

Equality Impact Assessment

Greater Manchester Good Landlord Charter

Date: January 2024

Version 1

This document will be updated throughout Good Landlord Charter engagement and consultation process, as well as through the implementation of the Charter.

Additional mitigations will be put in place where any further potential equalities impacts are identified through this engagement.

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Introduction

The Greater Manchester Good Landlord Charter is intended to be the first of its kind: an ambitious new voluntary standard for all rented housing and landlord practice, no matter whether they are in the private or social sector, mainstream or specialist housing.

At the heart of the proposal is the principle that the charter would be open to every landlord in Greater Manchester to volunteer to work towards membership. The Charter is seeking to raise standards across the private and social rented sector beyond legal minimum requirements. Landlords would do this by voluntarily meeting specific member criteria that are set above legal minimums.

The proposal for the Greater Manchester Good Landlord Charter has been developed with a coordinating group including private and social tenants and landlords and other experts.

As part of the development process, an initial Equalities Assessment was undertaken in January 2023, to support a paper which was taken to the GMCA. This assessment was undertaken before detailed Census data and survey data were available, and before the detail of the Charter characteristics and member criteria had been produced.

This Equalities Impact Assessment utilises Census and survey data to consider the differential effect of the Good Landlord Charter on tenants and landlords in Greater Manchester.

Impact Assessment Form

	_
Name of policy / initiative / Service to	Greater Manchester Good Landlord
be impact assessed	Charter
Corporate objective being addressed	GM Strategy: A Fairer Greater
	Manchester
	GM Housing Strategy priority A2:
	Making a difference to the lives of
	private tenants
D	
Department / function carrying out	Planning and Housing Team, Place
the assessment	Directorate, GMCA
Who is responsible for the	Steve Fyfe, Head of Housing Strategy
implementation of the policy /	
initiative / service? (Function head	
/department manager)	
Who is involved in the impact	John Bibby- Principal, Housing Strategy
assessment?	(Private Rented Sector)
	Mary Gogarty- Principal, Housing
	Strategy
	GMCA Communications and
	Engagement team
Milest one the circulation of the circulation of the	
What are the aims / objectives of the	The Good Landlord Charter would work
policy / initiative / service?	with landlords to achieve higher
	standards. It would also provide a
	valuable resource for renters to identify
	a new landlord and to understand their
	rights and responsibilities as renters.
	Members of the charter will need to be
	able to demonstrate that they are
	compliant with existing legal minimum

	standards and the charter's member criteria, which are specific standards of letting practice, aiming to improve the renting experience for tenants across all		
Who is intended to benefit from the policy? What are the main outcomes of the	 types of rented accommodation. Tenants within Greater Manchester Landlords (private, social and specialist) within Greater Manchester 80% of social tenants in GM covered by the Charter 		
policy (this is key to being able to identify what monitoring is needed)?	 <8% of PRS landlords in GM covered by the Charter Improvements to the renting experience across the seven member criteria outlined in section 2 		
Is the policy for external or internal purposes?	External		
Are other organisations involved in the delivery? If yes, please state who:	Yes, external delivery agency- not yet procured Landlords, including GM Housing Provider Partnership members		
What information/ experience do we have i.e., a similar initiative and what did this information tell us? (info can be demographic data i.e., census findings, research findings, comparisons between similar	 Census 2021 data: statistics detailing the demographic make up of each tenure across Greater Manchester DJS Research: survey of private tenants and landlords to understand their experiences of 		

policies, survey data, equality	renting in Greater Manchester.
monitoring data, ad hoc data	The survey collected
gathering exercises)	demographic data on PRS
	tenants and landlords.
How will information be collected	Non-statutory consultation and
regarding the impact of the policy	engagement with the public prior to the
/initiative /service/ employment	Charter being agreed and implemented.
policy etc?	Monitoring and evaluation will be carried out during implementation.
Has a search of the internet revealed	Search of existing public sector
an impact assessment conducted by	commissioned/ managed landlord
other organisations of a similar	accreditation schemes has not revealed
policy/initiative?	any impact assessments.
If yes – is it possible to adapt /	
incorporate findings	
Date of Policy Review	N/A

Scope of this Equalities Impact Assessment

This assessment aims to understand the impact of the Good Landlord Charter on tenants and landlords, utilitising the following data sources:

- **Private tenants-** demographic data by tenure from the 2021 Census¹; demographic and experiential data from the 2023 DJS Survey of private tenants and landlords².
- Social tenants- demographic data by tenure from the 2021 Census; no experiential demographic data is currently available to understand the experiences of social tenants by demographic group.
- Private landlords- limited demographic and experiential data from the DJS
 Survey of private tenants and landlords conducted in 2023; demographic data
 from the 2021 Census is not available at the occupation level of landlord. As it
 is uncertain that the sample for the DJS Survey was representative of GM
 landlords, this is supported by evidence from the Department of Levelling Up,
 Housing and Communities (DLUHC) national landlord survey.³
- **Specialist housing tenants-** data from DLUHC on Temporary Accommodation by ethnicity⁴; GM Supported Housing Census data⁵.

Social landlords and letting and management agents are out of the scope of this assessment as they are assumed to be organisations rather than individuals. For the purpose of this assessment, it is assumed that specialist landlords are functionally either private or social landlords, and so will be treated accordingly.

¹ <u>Tenure of household variable: Census 2021 - Office for National Statistics (ons.gov.uk)</u>

² DJS Research, Good Landlord Research Study - report of findings, 2023.

³ English Private Landlord Survey 2021: main report, DLUHC, 2021

⁴ Department for Levelling Up, Housing and Communities: Statutory homelessness live tables, 2021-22, Table A8 - Ethnicity of main applicants assessed as owed a prevention or relief duty by local authority

⁵ Greater Manchester Supported Housing Census, 2017-18.

Building further evidence

Although this assessment has utilised a number of data sources, a full picture of the experiences of landlords and social tenants by demographic group is not currently available for this assessment. The following activity is suggested to ensure that we build further evidence to inform this assessment and the development of the Charter:

- Private landlords- The DJS private tenants and landlord survey collected demographic data on around 300 private landlords operating in Greater Manchester, however it is not possible to state with certainty that those landlords were representative of Greater Manchester private landlords. Therefore, although some demographic analysis of private landlords has been included in this assessment, this analysis is not representative of private landlords as a whole. To support further development of the charter, demographic information for landlords that become members of the Good Landlord Charter will be collected as part of the monitoring and evaluation.
- Social tenants- the DJS survey of private and social tenants was commissioned at the end of 2022, before the GM Housing Providers (GMHP) committed to work with the GMCA to expand the scope of the Charter to include social landlords. GMHP have undertaken a pilot of the new Tenant Satisfaction Measures (TSMs)⁶ to understand the experiences of their tenants, however the pilot did not have the coverage to be representative of the social housing tenant population. It is envisaged that as the TSMs are across housing providers, demographic information will be collected to support a differential analysis of the experiences of social tenants. GMCA are also working with GMHP and the GM Race Equality Panel to commission research to inform a strategic approach to correcting racial inequalities in the housing sector; and specifically, intersections which give rise to disproportionate homelessness among people from communities experiencing racial inequalities.

⁶ <u>Tenant Satisfaction Measures Standard - GOV.UK (www.gov.uk)</u>

• Focus groups- a key element of the consultation for the Good Landlord Charter will be undertaking focus groups with hard to reach communities and people that are less likely to complete the online survey, in order to understand their renting experiences. The results of this assessment will help to shape the focus groups to help us build evidence for those groups for which we have less information. This includes private landlords, who will be included in the plans for focus groups.

Positive and negative impacts of the Good Landlord Charter

The positive and negative effects of the Good Landlord Charter on tenants and landlords in GM are judged to be the same across all groups within the population, however the impact of those effects will be felt differently by different people. The assessment aims to articulate this differential impact upon people by protected characteristic, taking an intersectional view where possible.

The **envisaged positive impacts** of the Good Landlord Charter are:

- Providing reassurance for tenants in Greater Manchester that by renting from a Good Landlord Charter member they will have an improved experience.
- Providing support to landlords to go further than the legal minimum standards required of them, and enable them to provide a quality service to their tenants.
- Improving renting practice across the 7 Good Landlord Charter characteristics:
 - Affordable you should understand how your rent and other charges are set and should not be ripped-off
 - Inclusive you should not have a worse renting experience because of who you are
 - Private and secure you should be reasonably free to enjoy your home and make it your own
 - Responsive your landlord should respond satisfactorily to requests for repairs, correspondence and complaints
 - Safe and decent you should be able to live free from physical or psychological discomfort in your home
 - Supportive you should have essential information about renting your home and be helped to access extra support if you need it
 - Well managed your landlord should be competent or use a competent managing agent

The envisaged **possible negative impacts** of the Good Landlord Charter are:

- Affordability- there is a low risk that private landlords may feel the need to increase rents or service charges in order to fund aspects of Good Landlord Charter compliance. It is proposed that this impact could be felt disproportionately by people in lower socio-economic groups, and people from communities which experience racial disadvantage, where they are also in lower socio-economic groups. As social rents are based on a government formula, this shouldn't be an issue in social housing.
- Overcomplication- there is a medium to high risk that tenants may not be clear on the different role their landlord, letting agency and the Charter play in managing their tenancy, and are unsure of where to raise issues and how to navigate complaints procedures. Furthermore, in a changing regulatory environment some tenants may find it difficult to understand the different roles of the Charter, the Housing Ombudsman, social housing regulator and their local authority. It is proposed that this impact could be felt disproportionately by people for whom English is not their first language.
- Expectation management- there is a medium to high risk that tenants may enter
 into a tenancy with a Charter accredited landlord, and go on to have a bad
 experience if their landlord fails to meet the conditions of Charter membership.
 It is proposed that this impact would be felt across all population groups, but it
 could be disproportionately among those who have expressed that they can
 see the benefit of renting from an accredited landlord, including older renters.
- Specialist housing supply- there is a low to medium risk that by utilising the commissioning power of the public sector to require specialist housing providers to be Charter members, there may be a reduction in the supply of specialist accommodation due to commissioning arrangements breaking down. It is proposed that this would impact particularly on households who are more likely to live in supported accommodation, such as older and disabled households, and those in need of Temporary Accommodation, which disproportionately includes black and Asian households.

Mitigations

Similarly to the positive and negative impacts, it is proposed that the mitigations to the negative impacts are system wide and therefore will be the same across all groups within the population, however there may be extra mitigations put in place to support people with particular needs.

Suggested mitigations to the negative impacts outlined above include (but are not limited to):

- Affordability- indicators of rental affordability will be included in the monitoring and evaluation of the Good Landlord Charter, so that we are aware of any issues in the private rental market.
- Overcomplication- as the Charter is developed and implemented, the operating
 organisation will ensure that clear communication from all parties around roles,
 responsibilities and complaints procedures are put in place to try to avoid
 confusion for tenants and landlords.
- Expectation management- in order to avoid landlords becoming members of the Charter and failing to meet the expected standards, enforcement will be a key consideration during the development of the Charter.
- Specialist housing supply- GMCA and partners will take a considered approach
 to specialist housing commissioning, taking account of local markets and
 housing need in order to ensure that supply is not diminished.

Detailed assessment

	Impacts Identified
Age	Background
	The Census 2021 provides evidence on who rents in GM depending on their age. There is a strong relationship between age and the rate of renters, with higher rates of renting in the younger age groups and rates dropping after age 35. The rates of people renting for each age group are as follows:
	• 49% of people aged 15 and under (25% private renters, 24% social renters)
	• 53% of people aged 16-24 (31% private renters and 21% social renters)
	• 51% of people aged 25-34 (35% private renters and 17% social renters)
	• 40% of people aged 35-49 (22% private renters and 18% social renters)
	• 29% of people aged 50-64 (11% private renters, 18% social renters)
	• 23% of people aged 65+ (6% private renters, 17% social renters)
	The DJS research provides evidence on the role that age plays in private renting experience, with people in different age groups having worse outcomes in different areas of experience.
	The experience of problems in properties was generally similar for private renters in different age-groups. However, there were some limited differences, with 27% of 25-34 year-olds reporting having experienced broken / damaged white goods, compared to an average of 22%. More 35-49 year-olds reported a need for redecoration than average (34% compared to 28%) and more 18-24 year-olds reported problems with broadband / telephone supply (22% compared to 13%).
	Younger renters are also finding that it is getting harder to pay their rent than average and are moving more often. While 67%

of private renters overall say it has become more difficult to pay the rent in the last 12 months, this figure is 72% of 18-34 year olds. 19% of 18-24 year-olds said that they had moved four times or more in the previous five years, compared to 9% of all renters.

Also towards the younger end of the age scale, renters aged 25-34 were more likely to say they had experienced problems with poor landlord communication or unfair deposit deductions. There were respectively 45% compared to an average of 37% for poor communication, and 19% compared to an average of 13% for unfair deposit deductions.

Renters in the middle age-groups were less likely to report worse outcomes. However, renters aged 35-49 are more likely to say that they are only private renting because they are unable to buy or access social housing than average (74% compared to 67%).

Older renters are more likely to have been private renting for longer and expect to stay private renting long-term. 72% of private renters over the age of 50 have lived in the PRS for more than six years, compared to an average of only 46%. In terms of future expectations, the proportion of the over 50s who see private renting as their long-term is more than double the average (56% compared to 24%).

Older private tenants (50+) were more likely than average to say that they were very dissatisfied with how any problems in their properties had been resolved (26% compared to 19%). They were also more likely to report problems related to landlord behaviour. 31% of tenants in the 65+ age-group said they had experienced rudeness or aggression, compared to an average of 18%. 42% had had unexpectedly high rent increases compared to an average of 20%. And 22% said they had had another concern about their landlords' behaviour compared to only 6% of all renters.

In line with this, older private renters are more likely to see the benefit of renting from an accredited landlord. 48% of private renters aged 50+ say that a landlord being accredited would make a big difference to their likelihood to rent from them. This compares to an average of 39% across all age groups.

Less evidence is available on the age distribution of landlords. Both the DJS Survey results and DLUHC's national landlord survey indicate that the proportion of landlords in the youngest age group is low, increases into middle age, but then falls in older age. However, there is some disagreement between the surveys about when the peak occurs and what proportion of younger adults are landlords (18-24 and 25-34), with the DJS Survey showing higher proportions of younger landlords and an earlier peak (45-54 in the DJS Survey, 55-64 in the national survey). This may reflect a genuine difference in the age of landlords in GM, or only differences in the sample for both surveys.

In 2017-18 a census of supported housing was undertaken in Greater Manchester. This found that over half of supported housing units in Greater Manchester were housing for older people or extra care housing.

Positive Impact:

The higher the rate of renting for younger people (below 35) means that they are more likely to be affected by the Good Landlord Charter, all other things being equal.

As the evidence suggests that older renters would be more likely to base decisions on some form of accreditation, it is possible that they will experience a larger benefit from the Good Landlord Charter individually. Furthermore, older renters have above average negative experiences of renting associated with elements of customer service, which is an area that a voluntary scheme like the Good Landlord Charter is more likely to be able to make a positive impact.

The apparent higher rate of people acting as landlords in middle age means that, all other things being equal, more people 45-64 are likely to benefit from the Charter as private landlords.

Negative Impact:

So far as there are any negative impacts from the charter, The higher the rate of renting for younger people (below 35) means that they are more likely to be affected.

Older renters who are more likely to choose an accredited landlord may be disproportionately affected by the low risk issues of overcomplication and expectation management if landlords fail to meet their obligation, however the mitigations outlined in the introduction should alleviate this risk.

The low risk to the affordability of private rented housing may have more of an adverse impact on renters and prospective renters who are aged under 35 as they report difficulties in affording rent, however the mitigations outlined in the introduction should alleviate this risk.

Disability

Types of impairment can be categorised as physical, sensory, psychosocial, and intellectual. There are several types of barriers that cause exclusion including.

- Physical
- Social/attitudinal
- Institutional
- Communication

Background

The Census 2021 shows that people who are disabled in GM are significantly more likely to socially rent than people who are not, although they are less likely to privately rent. In total, 49% of people who are disabled rent, compared to 38% of people who are not disabled. 32% of people who are disabled were social renters, compared to 17% of those who are not. 17% of people are disabled were private renters compared to 22% people who are not.

However, the DJS research found that disabled people who are privately renting have significantly worse outcomes across a very wide range of their renting experience than the average.

Rates of satisfaction with renting are lower for disabled tenants than the average. While 24% of private renters are dissatisfied with living in private renting overall, the proportion is 37% for private tenants with a disability. More private renters with a disability were dissatisfied with the condition of their home than the average (35% compared to 24%) and with their home's property management than average (37% comparted to 25%). And if they had experienced a problem in their home, more disabled private tenants (50%) were also dissatisfied with how it had been resolved than the average (41%). This is presumably responsible for more tenants with a disability (64%) taking action themselves to solve a problem in their property than the average (55%).

Despite these lower levels of satisfaction, disabled private tenants are more likely to feel like they have no option but to live in the private rented sector and will do so long-term. While 67% of private renters overall said that they were private renting only because they could not access social housing or home ownership, this was 79% for private tenants with a disability. Consequently, a higher proportion of tenants with a disability believe they will be private renting until they can access social housing than the average (17% compared to 10%) or that they will be private renting long-term (35% compared to 24%).

The rising cost of renting appears to be affecting disabled private renters more acutely. A higher proportion of private

renters with a disability (44%) or who were permanently sick/disabled (61%) said that they struggled to pay the rent than the average (33%). Higher proportions (76% and 89% respectively) also said that it has become more difficult to pay than the average (67%).

Finding suitable housing also appears to be a problem for a higher proportion of disabled tenants. Almost two thirds of private renters with a disability (64%) said that it was not easy to find somewhere to rent the last time they looked, compared with 52% for all private renters. In terms of the problems they experienced looking for a home, 18% of tenants with a disability reported having experienced discrimination due to disability. In addition to direct discrimination, 33% of private renters with a disability said that having features/adaptations for disability is an important factor when looking for a new home, which are not readily available.

Finally, in spite of these difficulties finding new rented housing, disabled private renters were also more likely to be frequent movers. While 9% of private renters overall said that they had moved four times or more over the previous five years, this was 17% for tenants with a disability.

Less evidence is available on the proportion of disabled people who are landlords. The DJS Survey included a question about disability and 14% of respondents replied that they had a disability. This is lower than the national average proportion of 18% of the English population being disabled under the Equality Act.

In 2017-18 a census of supported housing was undertaken in Greater Manchester. This found that 10% of supported housing units in Greater Manchester were housing for people with a learning disability and 3% were housing for people with a mental health need.

Positive Impact:

The higher the rate of renting for people who are disabled means that they are more likely to be affected by the Good Landlord Charter, all other things being equal. This is particularly the case because the rate of social renting for people who are disabled is high, and more social housing is expected to be covered by landlords participating in the charter than private rented housing.

The opportunity to have a positive impact on people who are disabled in the private rented is seen as particularly large because on average they are having very poor outcomes across a wide range of their renting experience. For example, supporting prospective tenants who are disabled to find suitable housing, and improving the accessibility of existing rental housing, is seen as a particular priority for the Good Landlord Charter and could help to address the above average levels of renters who are disabled who find looking for new private housing difficult.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people who are disabled means that they are more likely to be affected.

The low risk to the supply of specialist housing may have more of an adverse impact on disabled renters and prospective renters that need specialist accommodation, however the mitigations outlined in the introduction should alleviate this risk.

The low risk to the affordability of private rented housing may have more of an adverse impact on renters and prospective renters who are disabled as they report difficulties in affording rent, however the mitigations outlined in the introduction should alleviate this risk.

Sex

Identify any potential adverse impact to men or women.

Background

The Census 2021 shows marginal differences between the proportion of women and men in GM that live in the social and private rented sector. Overall, a slightly higher proportion of women rent than men (40.4% compared to 39.9%). Within renting, there is also a marginal difference in tenure split, with a higher proportion of women social renting than men (20.1% compared to 18.6%) and a lower proportion of women private renting than men (20.3% compared to 21.2%).

The DJS research findings show that women tend to have worse outcomes in private renting than men across a range of experiences.

Women are more likely to give a negative reason for living in the private rented sector than men. 74% of women said that they are private renting only because they cannot access social housing or home ownership, compared to 60% of men, who were more likely to state a more positive reason (such as enjoying the flexibility of renting).

Although there is no statistically significant difference with overall satisfaction with living in the private rented sector, women are more likely to be dissatisfied than men with how their private rented home is managed (26% dissatisfied compared to 21%) and the condition of their private rented home (24% dissatisfied compared to 19%).

This dissatisfaction with conditions appears to be reflected by a higher likelihood that women will have experienced a problem in their home in the last year. Women were more likely to say that they had experienced damp and mould (47% women, 37% men), need for redecoration (32% women, 23% men), broken windows or doors (21% women, 14% men), a leaking roof (23% women, 16% men) and problems with utilities supply (18% women, 12% men).

Finally, women appear to find it significantly more difficult to find a suitable new rented home than men. 56% of women said this was not easy the last time they looked compared to 44% of men.

There were no statistically significant differences in women and men's experience in the important areas of affordability or other aspects of poor landlord practice (such as harassment).

An area where, on the face of it, men experience worse outcomes is the number of times that they move in private renting. A small but significant number more men said that they had moved at least once in the past five years than women (75% compared to 69%).

Less evidence is available on the proportion of women and men who are landlords. The DJS Survey and DLUHC's national landlord survey both include some data on the sex of landlords, but the findings are contradictory. The DJS Survey found a slightly higher proportion of respondents were women than men (51% compared to 47%). However, the DLUHC survey found the reverse: 55% men and 44% women. This may reflect a genuine difference in GM simply a difference in the sample.

Positive Impact:

As the differences between the rates of renting for the sexes is marginal, it is not anticipated that there will be a significant difference between the total number of women and men who benefit.

However, the Good Landlord Charter may be able to support women in the private rented sector more than men as their satisfaction is generally lower, and they particularly appear to experience more problems with property conditions. The Good Landlord Charter will include requirements both for properties to meet the legal minimum conditions required and to go beyond these legal minimums in several ways.

Negative Impact:

The marginal difference in rates of renting between sexes means that there is unlikely to be any significant difference in negative effects by sex, so far as any negative affects occur. No additional negative effects are foreseen based on an understanding of renters by sex.

Race

Identify any adverse potential impact on different ethnic groups and identify which ethnic groups you may need to specifically consider.

Background

The Census 2021 provides evidence on who rents in GM depending on their race and ethnicity, showing some significant differences. The higher the rate of renting for any particular ethnic group, the more likely this Good Landlord Charter will affect people from that ethnic group, all other things being equal.

The census question on ethnicity asked individuals to choose from one of 19 ethnic groups, including a write-in option if their ethnic group was not listed. These 19 ethnic groups were spread across the five 'high level' ethnic groups of Asian, Asian British or Asian Welsh; Black, Black British, Black Welsh, Caribbean or African; Mixed or Multiple ethnic groups; White; or Other ethnic group.

Rates of renting in GM vary significantly both within and between these high level ethnic groups. Some are very significantly above the average for all GM households of 41% (21% for both private renting and social renting).

At the high level, the proportion of renters is by far the highest in the Black, Black British, Black Welsh, Caribbean or African ethnic group. Overall, 79% of people in this group were renters, with 31% privately renting and 48% social renters. Within this high level ethnic group, the renting breakdown for ethnic groups was:

- African: 80% renters (32% private, 48% social)
- Caribbean: 57% renters (18% private, 39% social)
- Other Black: 75% renters (21% private, 54% social)

At the high level, the rate of renting was second highest for the Other high level ethnic group, which includes Arab and the write-in option. 70% of households for this high level group rented (43% private renters, 27% social renters). Within this high level ethnic group, the renting breakdown for ethnic groups was:

- Arab: 73% renters (44% private, 30% social)
- Other: 58% renters (34% private, 24% social)

The rate of renting for Mixed or Multiple ethnic groups was third highest. 59% of households in this high level ethnic group rented (29% private renters, 30% social renters). Within this high level ethnic group, the renting breakdown for ethnic groups was:

- White and Asian: 43% renters (25% private, 18% social)
- White and Black African: 66% renters (29% private, 37% social)
- White and Black Caribbean: 61% renters (23% private, 38% social)
- Other Mixed or Multiple Ethnic Groups: 52% renters (29% private, 23% social)

The rate of renting for Asian, Asian British or Asian Welsh was fourth highest out of the five high level ethnic groups. 39% of households in this ethnic group rented, close to the average for all households, although weighted towards private renters (26% private renters, 13% social renters). Within this high level ethnic group, the renting breakdown for ethnic groups was:

- Bangladeshi: 42% renters (18% private, 24% social)
- Chinese: 26% renters (19% private, 7% social)
- Indian: 25% renters (20% private, 5% social)

- Pakistani: 36% renters (24% private, 12% social)
- Other Asian: 50% renters (28% private, 23% social)

The rate of renting was lowest for White households, and below the average for all households at 36% overall, 18% private renters and 18% social renters. This means that households in the White high level ethnic group are less likely to be affected by the Good Landlord Charter, although more people in the White high level ethnic group are likely to be affected by it overall, as it is by far the largest high level ethnic group.

However, there are also some very large differences within this high level ethnic group, with some very high rates of renting, including the highest overall rate for any of the lower level ethnic groups, for people identifying as Roma. The breakdown was:

- English, Welsh, Scottish, Northern Irish or British: 33% renters (15% private, 18% social)
- Irish: 31% renters (15% private, 17% social)
- Gypsy or Irish Traveller: 75% renters (41% private, 33% social)
- Roma: 82% renters (70% private, 12% social)
- Other White: 61% renters (46% private, 15% social)

The DJS research findings show some differences between the experiences of private renters based upon their race and ethnicity.

As the sample for the DJS research was much smaller than a full population survey like the census, the number of racial / ethnic groups used for the survey was necessarily smaller to achieve any sort of statistically significant sample. Research participants identified as being from one of fourteen lower level groups, with their responses aggregated together into four high level groups: Asian / Asian British, Black / Black British, Mixed and White.

Black or Black British private renters were the most likely to say that they had experienced discrimination due to race when looking for a new rented home, with 41% having said this. 11% of renters describing Mixed heritage said they experienced this

discrimination, 8% of Asian / Asian British and 3% of White private renters. As well as having experienced higher rates of discrimination due to race when looking for a home, both Black / Black British private renters and Asian / Asian British renters more likely to have moved more than average (both 84% compared to 73%).

Apart from this direct discrimination, there were large areas of experience where there were no statistically significant negative deviations from the average for the high level groups. This included measures of satisfaction, affordability or aspects of poor landlord practice such as harassment.

The experience of problems in properties was also largely statistically similar, in that for most problems no high level group experienced statistically significantly worse outcomes. The exception was for renters describing Mixed heritage who were more likely than average to have experienced a pest infestation (20% compared to 12%) or broken / damaged white goods (33% compared to 22%).

There was some evidence that people some racial / ethnic groups received worse information. Asian/Asian British were significantly less likely to have received a tenancy agreement than the average (73% compared to 87%). And Black / Black British were also significantly less likely than average to have received a gas safety certificate (38% compared to 55%).

Finally, mixed race renters were less likely than average to know who to complain to about their property (55% compared to 38%).

The DJS research also included a survey of landlords, which found higher proportions of landlords from some ethnic groups reporting negative experiences than average. A higher proportion of Asian / Asian British landlords said that they are finding it difficult to cover all the costs of letting properties than average (19% compared to 7%). The survey found dissatisfaction with being a landlord higher for Asian / Asian British landlords than average, although there was a low base for this result (9% compared to 3%).

Finally, the rate of those disagreeing that they fully understand their responsibilities as a landlord was higher for Asian / Black / Mixed landlords than average (18% compared to 7%).

Less evidence is available on the proportion of people from different ethnic group who are landlords. The DJS Survey and DLUHC's national landlord survey both include some data on the ethnicity of landlords, which were largely consistent, showing the ethnicity of landlords broadly reflects the population as a whole. The ethnicity of respondents to the DJS Survey broadly reflected the overall distribution of high level ethnic groups in GM according to the census:

- 13% Asian / Asian British respondents to the DJS Survey,
 14% people in the Asian, Asian British or Asian Welsh ethnic group in the census in GM
- 5% Black / Black British respondents to the DJS Survey,
 5% in the Black, Black British, Black Welsh, Caribbean or
 African high level ethnic group in the census in GM
- 6% Mixed respondents to the DJS Survey, 3% in the Mixed or Multiple ethnic groups in the census in GM
- 75% White respondents to the DJS Survey, 76% in the
 White high level ethnic group in the census in GM

Positive Impact:

As described above, the Good Landlord Charter is likely to have a greater impact on people from some ethnic groups than others, all other things being equal, as there are significant differences in the proportions who rent depending on ethnicity. This includes people from all the ethnic groups within the Black, Black British, Black Welsh, Caribbean or African high level ethnic group, all those in the Other high level ethnic group and the Mixed high level ethnic group, excluding social renters in the White and Asian lower level ethnic group. In the Asian higher level ethnic group, it includes Bangladeshi social renters, Pakistani private renters and Other Asian private and social renters. Finally, in the White high level ethnic group is includes Gypsy and Irish Traveller private and social renters, Roma private renters and Other White private renters.

Efforts through the Good Landlord Charter to ensure that renting is inclusive and non-discriminatory could have a greater impact on Black and Black British, Asian and Asian British and Mixed households that have detailed experiences of discrimination when privately renting.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people in several ethnic groups means that they are more likely to be affected.

Department of Levelling Up, Housing and Communities (DLUHC) data on Temporary Accommodation by ethnicity showed that in March 2022, Black households made up 10% of households in Temporary Accommodation, when they make up 5% of the Greater Manchester population. Therefore, the possible negative impact of reduced specialist accommodation supply would impact these households more acutely than others; however, the mitigations outlined in the introduction should alleviate this risk.

Religion and belief (including no belief)

Identify any
adverse potential
impact on
different religious
groups and
identify which
you may need to
specifically
consider.

Background

The Census 2021 provides evidence on who rents in GM depending on their religion and belief, showing some significant differences. The higher the rate of renting for any particular group, the more likely this Good Landlord Charter will affect people from that group, all other things being equal. The rates of renting are summarised below:

- Buddhist: 42% renters (27% private, 15% social)
- Christian: 33% renters (15% private, 18% social)
- Hindu: 29% renters (25% private, 4% social)
- Jewish: 28% renters (23% private, 5% social)
- Muslim: 49% renters (28% private, 21% social)
- No religion: 47% renters (25% private, 22% social)
- Sikh: 38% renters (26% private, 12% social)
- Other religion: 53% renters (29% private, 24% social)
- Not answered: 43% renters (23% private, 20% social)

The DJS research did not include questions that directly or indirectly allow for an analysis of the experience of different private renters based on religion or belief.

Neither the DJS Survey or DLUHC's national landlord survey included a question about the religion of landlords.

Positive Impact:

The higher the rate of renting for people who are Buddhist, Muslim, of no religion or other religion means that they are more likely to be affected by the Good Landlord Charter, all other things being equal.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people who are Buddhist, Muslim, of no religion or other religion means that they are more likely to be affected. No specific additional disbenefits are foreseen based on an understanding of renters by this protected characteristic.

Sexual Orientation

Identify any
adverse potential
impact on
different sexual
orientations and
identify which
sexual
orientations you
may need to
specifically
consider.

Background

The Census 2021 shows that significantly higher proportions of people who are gay and lesbian, bisexual or other sexuality in GM rent than straight or heterosexual people. However, this was largely accounted for by higher rates of private renting, rather than social renting.

- The highest proportion of renters by sexuality were bisexual people, with 64% renting (47% private renters, 19% social renting)
- The proportion of renters for all other sexual orientations was also 64% (46% private renters, 20% social renters)
- The proportion of gay and lesbian people who rent was
 51% (34% private renters, 17% social renters)
- Straight or heterosexual people had the lowest rate of renting, with 36% renting in total (19% private renters, 18% social renters)
- Rates of renting for those who did not answer the question were 45% (24% private renters, 21% social renters)

In addition to rates of renting being higher for lesbian, gay and bisexual (LGB) people, the DJS research shows that private renters have significantly worse outcomes than average across several aspects of their private renting experience.

Rates of satisfaction with renting are lower for LGB tenants than the average. While 24% of private renters are dissatisfied with living in private renting overall, the proportion is 40% for bisexual private tenants, and 36% for lesbian and gay private tenants. More bisexual private renters are dissatisfied with their home's property management than average (38% comparted to 25%). If they had experienced a problem in their home, more lesbian or gay private tenants (53%) were dissatisfied with how it had been resolved than the average (41%). More bisexual private tenants (65%) have taken action to solve a problem in their property than the average (55%).

Despite being less satisfied with their experience private renting, bisexual tenants are particularly more likely to feel like they have no option but to live in the private rented sector. 81% of bisexual tenants said that they are private renting only because they cannot access social housing or home ownership, compared to 67% for all renters.

Bisexual private tenants are also more likely to struggle to find private rented housing, with 64% saying that did not find it easy to find a rented home the last time they looked compared to 52% overall. Despite this, bisexual private renters are also more likely to be frequent movers, with 22% of bisexual private tenants having move four or more times in the last five years, compared to 9% overall. Both lesbian or gay and bisexual private renters say that they have experienced discrimination due to their sexuality when looking for a new rented home (28% for lesbian or gay private tenants and 17% for bisexual).

Finally, although neither lesbian or gay or bisexual private renters were in the groups struggling most to pay rent, a higher proportion of lesbian and gay private tenants said they were finding it more difficult to pay than average (81% compared to an average of 67%).

Less evidence is available on the proportion of people with different sexual orientations who are landlords. The DJS Survey included a question on sexual orientation who rent, while DLUHC's national landlord survey did not. The DJS research suggests that the proportion of respondents who are

LGB was slightly higher than the average for the national population. 9% of respondents chose either bisexual or gay or lesbian, compared to 3.2% in the census. However, a larger proportion chose not to answer the question in the census.

Positive Impact:

The higher the rate of renting for people who are LGB means that they are more likely to be affected by the Good Landlord Charter, all other things being equal.

The opportunity to have a positive impact on people who are LGB in the private rented sector is seen as larger because on average they are having poor outcomes across a range of their renting experience.

The higher proportion of LGB landlords who responded to the DJS Survey may indicate that LGB people are more likely to be affected by the Charter as landlords, all other things being equal.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people who are LGB means that they are more likely to be affected. No specific additional disbenefits are foreseen based on an understanding of renters by this protected characteristic.

Gender Reassignment

Identify any adverse potential impact on transgender or non-binary people.

Background

The Census 2021 included a question about gender identity for the first time. Census respondents were asked to say whether their gender identity was the same as the sex they were registered at birth or not, and if not how they describe their gender identity.

Overall, in GM people whose gender identity was different from the sex they were registered at birth were much more likely to be renters (72% renters; 39% private and 32% social) than people whose gender identity was the same (37% renters; 19% private and 18% social). Within the group of those whose gender identity was different from the sex they were registered at birth, the rates of renting were broadly similar:

- Trans women: 66% renters (36% private, 30% social)
- Trans men: 69% renters (37% private, 30% social)

All other gender identities: 66% renters (49% private, 17% social)

The DJS survey provides some information about the experience of non-binary and trans people and people who chose other as a gender. The sample size for this group is not large enough to be statistically significant, so the results can only be trusted to reflect the opinions and experience of the research participants and not a larger group. However, those participants reported significantly worse experiences than the average across a wide range of aspects of renting. This includes:

- Those saying they were only renting because they could not buy or access social housing rather than for a positive reason (85% compared to an average of 67%)
- Those saying they had moved at least four times in the last five years (40% compared to an average of 9%)
- Dissatisfaction with relationship with property manager (45% compared to 19%), overall management (57% compared to 25%), speed of response to enquiries (46% compared to 25%), living in the private rented sector (64% compared to 24%),
- Those saying it was not easy to find a property the last time they looked (83% compared to 51%)
- Recent experience of broken white goods (50% compared to 22%), damp/mould (68% compared to 43%), pest infestation (35% compared to 12%), broken electrics (49% compared to 20%), need for redecoration (45% compared to 28%), broken windows or doors (35% compared to 18%), problems with utility supply (38% compared to 16%) and problems with broadband / telephone (59% compared to 13%)
- Dissatisfaction with how the above problems were resolved (70% compared to 40%)

- Experience of the following problems with a landlord / letting agent: poor / slow communication (71% compared to 37%), rudeness or aggression (47% compared to 18%), unfair deposit deductions (48% compared to 13%), entering property without notice (40% compared to 14%), any other concern (14% compared to 6%)
- Those saying they would not know who to complain to if they had a problem in their property (57% compared to 38%)
- Those who agree that it has become more difficult to pay the rent in the last 12 months (87% compared to 66%)

No evidence is available from the DJS Survey or DLUHC national landlord survey on the proportion of Trans or other gender identities who are landlords.

Positive Impact:

The higher the rate of renting for people who have a different gender identity from the sex they were registered at birth means that they are more likely to be affected by the Good Landlord Charter, all other things being equal.

The significantly worse outcomes suggested by the DJS research suggests that trans and non-binary people could stand to gain more than other tenants from improvements in renting (albeit that these data cannot be used to make generalisations about experiences as they are based on a small sample size).

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people who have a different gender identity from their sex registered at birth means that they are more likely to be affected. No specific additional disbenefits are foreseen based on an understanding of renters by this protected characteristic.

Pregnancy and Maternity

Background

The Census 2021 does not include any specific question on maternity. However, age can be used to identify babies under one year old, which is the best available proxy for expectant Identify any adverse potential impact because of pregnancy, maternity, or paternity.

Pregnancy is the condition of being pregnant or expecting a baby.

Maternity refers
to the period
after the birth,
protection
against maternity
discrimination is
for 26 weeks
after giving birth,
and this includes
treating a
woman
unfavourably
because she is

and new mothers. Of these 51% in GM lived in a rented home, 30% private rented and 21% social rented.

The DJS research also did not include a direct question about pregnancy and maternity. The short length of time that this protected characteristic lasts for can make it challenging to achieve a statistically significant sample size. However, the research considered the issues affecting parents and families with children, which are likely to be similar and are considered in the 'other' section below.

No evidence is available from the DJS Survey or DLUHC national landlord survey on the proportion of people who are expectant or new mothers who are landlords.

Positive Impact:

The higher the rate of renting for people with babies under one means that expectant and new mothers more likely to be affected by the Good Landlord Charter, all other things being equal. Other benefits are discussed in the section below on parents and families with children.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for expectant and new mothers means they are more likely to be affected. No specific additional disbenefits are foreseen based on an understanding of renters by this protected characteristic.

Marriage & Civil

breastfeeding.

Partnership

Identify any adverse potential impact because of marriage and

Background

The Census 2021 provides a breakdown of the proportion of people in GM who rent by marital status, showing people who are separated but still married or in a civil partnership to be the most likely to rent, and those who are married to be the least likely to rent. The full breakdown is as follows:

Separated but still legally married / in a civil partnership:
 59% renters (29% private renters, 30% social renters)

civil partnership means someone who is legally married or in a civil partnership. Marriage and civil partnership can either be between a man and a woman, or between partners of the same sex.

- Never married / never in a civil partnership: 51% renters
 (28% private renters, 23% social renters)
- Does not apply: 49% renters (25% private renters, 24% social renters)
- Divorced / dissolved civil partnership: 45% renters (18% private renters, 27% social renters)
- Widowed / surviving partner from civil partnership: 28% renters (7% private renters, 22% social renters)
- Married or in a registered civil partnership: 23% renters (13% private renters, 10% social renters)

The DJS research did not include questions that directly or indirectly allow for an analysis of the experience of different private renters or landlords based on marriage or civil partnership.

Positive Impact:

The higher the rate of renting for people who are separated, never married or divorced means that they are more likely to be affected by the Good Landlord Charter, all other things being equal.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for separated, never married or divorced people means they are more likely to be affected. No specific additional disbenefits are foreseen based on an understanding of renters by this protected characteristic.

Social economic disadvantage

Identify any adverse potential impact because

Background

As socio-economic disadvantage is multi-faceted it is not possible to distil it into a single question for the Census 2021 or a survey. Furthermore, the census does not include a question about household income, which would give the clearest indication of financial hardship.

For the purpose of housing, receipt of Housing Benefit or the housing element of Universal Credit is a useful indicator of the risk of socio-economic disadvantage. These housing benefits

of financial hardship.

support people who are on low incomes with the cost of paying for housing. Benefit support with housing costs is typically only available to renters, with support with the cost of a mortgage very restricted and in the form of a loan only. In GM, approximately the following proportions of renting households are in receipt of Housing Benefit or the housing element of Universal Credit:

- 78% social renters
- 40% private renters⁷

For the purpose of the DJS research, several different questions asked in the research give a picture of the significant and multiple challenges that private renters in or at risk of socio-economic disadvantage face in their renting experience.

There is strong evidence that private renters at risk of socio-economic disadvantage are particularly likely to struggle to pay their rent. Overall, 33% of private renters are struggling to pay their rent. However, 39% of private tenants living in the most deprived areas are struggling (i.e. an area in the most deprived quintile according to the Indices of Multiple Deprivation). This rises to almost half (47%) of those who receive Housing Benefit or the housing element of Universal Credit (collectively referred to as 'housing benefits' in this note). 47% of private tenants in part-time employment also struggle to pay, and 48% of those who are unemployed or not working. Private tenants on housing benefits were also more likely to say that has become more difficult to pay rent than the overall average (74% compared to 67%), which is in line with the current freeze on Local Housing Allowance.

This higher likelihood to struggle with affording rent appears to also translate into putting up with poorer quality housing. A higher proportion of private tenants who are struggling to pay their rent (30%) or who are on housing benefits (28%) say that they are dissatisfied with the condition of their rented home than the average (22%).

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⁷ GMCA calculation based on data from Stat-Xplore, DWP, and the Census 2021, ONS. The calculation compared August 2023 Housing Benefit and Universal Credit housing element caseloads with households in the census. Although benefits data for March 2021 are available, caseloads were elevated due to the coronavirus pandemic. The most recent data are therefore considered to be a more accurate reflection of current caseloads

Private tenants on housing benefits are much more likely to feel like they have no option but to live in the PRS and to feel pessimistic about getting out of it. While 67% of private renters overall say they are private renting only because they cannot access social housing or home ownership, this is 75% for private tenants on housing benefits. 36% of tenants on housing benefits also say they think they will be living in the PRS long-term, compared to 24% overall. And while overall only 10% of tenants think the only way they will leave the PRS is by moving into social housing, this rises to 22% of those on housing benefits. For those who are constantly struggling to pay their rent, it rises to 27%.

As well as feeling pessimistic about their future route out of the PRS, some private tenants at risk of socio-economic disadvantage are more likely to have already lived in it for a long time. 54% of those not in work or training said they have been in the PRS for more than six years. This compares to an average of 46%.

Private tenants who are not working or unemployed are also more likely to have moved more often. The proportion of not working or unemployed renters who have moved at least four times in the last five years (21%) is more than double the overall figure (9%). Despite these frequent moves, not working or unemployed renters were also much more likely to say that finding a new property was not easy the last time they looked than the average (64% compared to 52%).

In terms of looking for property, renters on housing benefits are also very likely to report experience of discrimination due to being in receipt of benefits. Well over half these renters (58%) said that they had experienced housing benefit discrimination when they looked for a property. These reflects the attitudes of private landlords, with 52% of them saying that not claiming benefits is an important factor when they are looking for a new tenant.

Positive Impact:

The higher the rate of renting for people who are in receipt or housing support from the benefits system means that they are more likely to be affected by the Good Landlord Charter, all other things being equal. This is particularly the case for social renters, given the high rates of social renters who receive housing benefit or housing element of Universal Credit.

Negative Impact:

In so far as there are negative impacts from the charter, the higher the rate of renting for people in receipt of housing benefits means they are more likely to be affected.

The low risk to the affordability of private rented housing may have more of an adverse impact on renters and prospective renters experiencing socio-economic disadvantage, however the mitigations outlined in the introduction should alleviate this risk.

Other

Families with children

Background

Parents and families with children are considered to be an important group for the Good Landlord Charter and renting policy. They are considered below.

The Census 2021 provided a breakdown of tenure by household type. The Census shows that 46% of single family households with dependent children live in rented accommodation (24% private rented, 22% social rented). This contrasts with 30% of single family households with no children living in the rented sector (22% private rented, 8% social rented), and 29% of single family households with non-dependent children (9% private rented, 20% social rented).

The data also shows that 31% of households living in the private rented sector have dependent children, as well as 30% of households in the social rented sector.

The DJS research found that parents and families with children appear to have worse outcomes in some areas of their renting experience. Some of this is due to direct discrimination. The research asked landlords about the factors that they consider important when they let property and who they normally rent properties to. 29% of landlords said that not having children is an important factor for them when they are looking for new tenants, and 34% said that they typically let to adults with no children. However, it is important to note that 46% of landlords said they typically let to families with children, suggesting some landlords prefer to rent to parents.

The research also asked tenants for details of household composition, which allows for analysis of how parents or adults living with children are differently affected by their renting experience. These households are finding it more difficult to afford their rent. While overall 33% of tenants are struggling to

pay their rent, this rises to 42% of private renting households with children and 43% for single parents / guardians.

In line with this, single parents are much more likely to say that they feel forced to live in the private rented sector. 82% of private renting single parents / guardians said that they are private renting only because they cannot access social housing or home ownership, compared to 67% for all renters.

Finally, families with children were also more likely to take action themselves to remedy an issue with their renting experience. 62% of families with children had done this, compared to 55% of private tenants overall.

In other aspects of private renting, such as experience of problems in their property, satisfaction etc., renting parents and families experience was on average no worse than the rest of the renting population.

Positive Impact:

The higher the rate of renting for families with dependent children means that they are more likely to be affected by the Good Landlord Charter, all other things being equal. This is particularly the case because the rate of social renting for families with dependent children is high, and more social housing is expected to be covered by landlords participating in the charter than private rented housing.

The opportunity to have a positive impact on families with dependent children in the private rented sector is seen as large because on average they are having poor outcomes in some areas of their renting experience.

Negative Impact:

So far as there are any negative impacts from the charter, The higher the rate of renting for families with dependent children means that they are more likely to be affected.

The low risk to the affordability of private rented housing may have more of an adverse impact on families with dependent children as they report difficulties in affording rent, however the mitigations outlined in the introduction should alleviate this risk.

Action Plan

Any actions identified as an outcome of the EIA should be mapped against the headings within the Action Plan.

Title: Good Landlord Charter Equality Impact Assessment Report – November 2023

Action/ Activity	Owner and Interested Stakeholders	Dependencies/ Risk/Constraints	Completion Date	Progress Update
This should be a list of recommendations identified in the EIA report. A short description of the issue being taken forward.	Team/Department/Service Internal and external stakeholders How will you ensure your stakeholders continue to be involved/engaged in shaping the development/delivery of this policy?	There may be other projects /initiatives that will deliver the action, so refer to these.	The date by which the action is to be completed.	Progress to date. Any barriers. New stakeholders, etc. Give RAG (red/amber/green) rating if appropriate. Details of monitoring and review methods
Share the findings of the EIA with networks to provide additional scrutiny and feedback on proposals.	GMCA Housing Team Good Landlord Charter Coordinating Group GMCA Communications and Engagement Team		December 2023	Shared with Good Landlord Charter Coordinating Group, 30 th November Feedback from stakeholders received, amendments made and further analysis to be considered

Use findings from EIA to plan Good Landlord Charter Consultation focus groups	GMCA Housing Team GMCA Research Team Good Landlord Charter Coordinating Group	Limited number of focus groups- prioritisation of groups to include	December 2023	Discussion with Coordinating Group 30 th November Discussion with stakeholders through December 2023 to prioritise focus groups and understand different engagement methods where appropriate Focus groups to be commissioned early 2024
Produce alternative format materials for Good Landlord Charter Consultation	GMCA Housing Team GMCA Research Team GMCA Communications and Engagement Team	Limited project budget and tight timescales for production of additional materials	January 2023	Easy Read document produced Animation produced Language Line service agreed
Monitoring and evaluation of the Charter to factor in demographic data collection, particularly of private landlords	GMCA Housing Team GMCA Research Team	Operation of the Charter will be considered as part of the consultation and as such has not yet been agreed, scope for monitoring/ evaluation not yet known	Ongoing	
Work with GM Housing Providers to support representative demographic data collection through TSMs implementation	GMCA Housing Team GM Housing Providers GMCA Research Team		Ongoing	

Incorporate findings from racial	GMCA Housing Team	Research yet to be	Ongoing	
inequalities in housing and	GM Housing Providers	commissioned		
homelessness study into	GMCA Research Team			
Charter design	GM Race Equality Panel			