



Summary Report

Improving gas safety in the private rental sector: qualitative research amongst landlords

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1. Background and Method

1.1. Policy background

The size of the private rental sector has increased dramatically in recent years¹. The sector is largely non-professional, with the majority of landlords not part of a landlord association or even necessarily identifying with the descriptor 'landlord'. Since 1998, landlords who let properties in the private rental sector have had a duty to maintain gas fittings and conduct gas safety checks to prevent gas leaks, explosions and carbon monoxide poisoning, under the Gas Safety (Installation and Use) Regulations.

Landlord awareness of and compliance with Gas Safety regulations is thought to be high (approximately 87% according to research commissioned by MHCLG²). However, research suggests that knowledge and compliance could be lower among some specific groups, such as 'accidental' landlords³. HSE has conducted a review of existing research (carried out by Shelter, the Centre for Housing Policy and MHCLG) into landlord knowledge and behaviours related to Gas Safety regulations, which found that the current evidence base excludes individuals renting out rooms in a property and individuals who may not self-identify as a landlord. This suggests that the level of awareness and compliance (87%) with regulations may be lower than the headline figure previously identified, specifically amongst those who live with their tenant or have less formal letting agreements.

1.2. Aims and objectives

HSE are working to improve landlord compliance with Gas Safety regulations in the private rental sector. As part of this commitment, HSE commissioned Kantar to undertake qualitative research amongst landlords to understand the drivers and barriers to compliant behaviour.

Specifically, this research aimed to:

- Explore levels of awareness and understanding of Gas Safety regulations and guidance amongst landlords, including information sources used to inform understanding;
- Identify any factors beyond awareness enabling or acting as barriers to compliance;
- Map the journey of landlord engagement with HSE, Gas Safe Register and others when renting out a property, and fulfilling their responsibilities, and identifying potential touchpoints for more effective engagement;
- Collect views on existing communications regarding Gas Safety regulations from HSE and Gas Safe Register to identify what might be done to make guidance more effective;
- Develop a set of landlord typologies, based on the similarities and differences between levels of understanding and behaviour amongst compliant and non-compliant landlords.

¹ Rugg and Rhodes, The Evolving Private Rental Sector: Its contribution and Potential, 2018

² MHCLG, English Private Landlord Survey 2018 Main Report, Jan 2019

³ 'Accidental landlords' are those who have casual letting arrangements (e.g. letting spare room in property or letting property due to a change in circumstance) and for whom letting is unlikely to be their main source of income.

Ultimately, this research was aimed at enabling HSE to identify opportunities to drive compliance, via more effective communications or other interventions.

1.3. Research Design

We employed an iterative three-phase research design:

- **Phase 1 – Stakeholder:** 5 x 60-minute depth-interviews with stakeholders to provide context into landlord compliance with Gas Safety regulations.
- **Phase 2 – Feasibility stage:** 10 x 60 minute depth-interviews with landlords to trial recruitment methods to be used in Phase 3, explore drivers and barriers to compliance and identify intervention areas to be tested in the mainstage.
- **Phase 3 – Mainstage:** 20 x 60 minute in-depth interviews with landlords to deepen understandings of the drivers and barriers to compliance, explore responses to intervention areas, and inform a landlord typology.

The Feasibility Phase was included in recognition of the challenge of recruiting non-compliant landlords. During this Phase we trialled three recruitment approaches: Kantar Omnibus Survey⁴, Gumtree Advertising⁵ and free-find recruitment. Based on the results, Gumtree advertising and free-find recruitment were used in the Mainstage, alongside with a sample of landlords who had previously interacted with HSE regarding Gas Safety regulations (which was provided by HSE).

1.4. Definition of compliant behaviour

We defined compliance with Gas Safety regulations using the Gas Safe Register definition , meaning that landlords needed to have⁶:

- Completed a gas safety check with a Gas Safe registered engineer within the last 12 months;
- Ensured that checks covered all gas appliances in the property and the flue attached to the boiler;
- Received a Gas Safety certificate as proof that property is gas safe;
- Provided evidence that these checks had been carried out to their tenant.

To ensure that we covered a variety of behaviours, landlords were further categorised as either 'hard' or 'soft' non-compliant. For the purposes of this study, hard non-compliance was defined as landlords who had not completed any of the steps above and/or those for whom it had been over 12 months since their last Gas Safety check. Soft non-compliance was defined as landlords who had had the checks completed but had failed to provide evidence of this to their tenants. We also included compliant landlords to provide insight into drivers that encouraged compliant behaviour. A full breakdown of interviews achieved and further details on the sample is shown below in Figure 1.

⁴ An Omnibus survey is a method of data collection whereby data on a variety of topics is collected within the same interview. We used the survey to screen on behaviour and to collect contact details for re-contacting, if they wished to participate in the research.

⁵ Gumtree Advertising is an online classified advertisement and community website.

⁶ Gas Safe Register, Information for Landlords, 30 March 2020, <https://www.gassaferegister.co.uk/help-and-advice/renting-a-property/information-for-landlords/>, last accessed 17 September 2020

We further excluded landlords that were part of a landlord association as we suspected them to be professional landlords and therefore, likely to be compliant. Instead we focused on 'accidental' landlords who, from the background reading and stakeholder phase, seemed more likely to be non-compliant.

Figure 1. Summary of method and sample

Phase 1

5 x 60 minute telephone depth interviews with stakeholders

Collect expert input on relevant landlord characteristics and potential recruitment methods

Phase 2

10 x 60 minute telephone depth interviews with landlords comprising:

= 5 Compliant

= 5 Non-compliant (3 Hard non-compliant & 2 Soft non-compliant)

Trial recruitment methods and research approach to be used at the Mainstage. Pull out emerging typologies relating to landlord compliance, and to select intervention areas to test at Mainstage

Phase 3

20 x 60 minute telephone depth interviews with landlords, comprising:

= 5 Compliant

= 15 Non-compliant (12 Hard non-compliant & 3 Soft non-compliant)

Deepen understanding of barriers and drivers to compliance and further establish landlord typologies to inform effective interventions

2. Main Findings

2.1. Understanding the experience of being a landlord

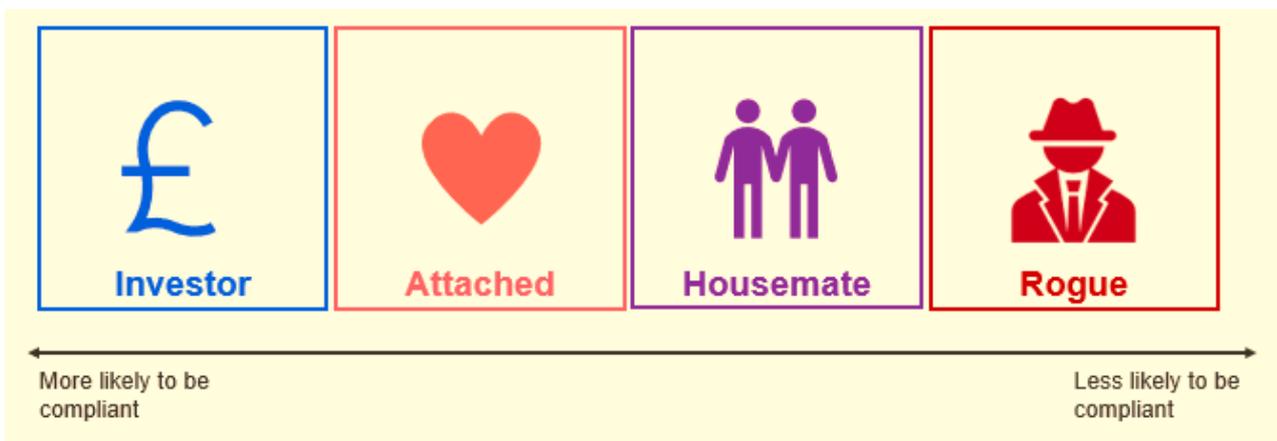
Both compliant and non-compliant landlords shared a common journey regarding letting and maintaining their properties, consisting of the following stages:

1. Acquiring / deciding to let the property
2. Researching to let
3. Renovating the property or room in preparation to let
4. Finding tenants
5. Completing property maintenance and other landlord responsibilities

By examining the different actions and approaches taken at each of these common stages, four distinct landlord typologies emerged. These typologies had discrete experiences that influenced whether they were compliant with the Gas Safety regulations (as shown in figure 2). The four typologies identified were:

- **Investor:** Professional landlords who take pride in their lettings and expect a financial return
- **Attached:** Landlords who became landlords due to an emotional attachment to property or tenant
- **Housemate:** Live in landlords who prioritise household harmony and do not see themselves as a landlord
- **Rogue:** Landlords with limited regard for regulations and their tenants, aiming to maximise profit

Figure 2. Landlord typologies on compliance spectrum



Understanding how each landlord typology behaved at each stage of their landlord journey identified the risks that may lead them to becoming non-compliant, as well as the potential touchpoints where interventions could help to drive compliance.

2.2. Risk factors for non-compliance by landlord type

All landlords were at risk of becoming non-compliant with Gas Safety regulations. Risk factors varied by landlord typology (typologies shown in figure 2). Risks included:

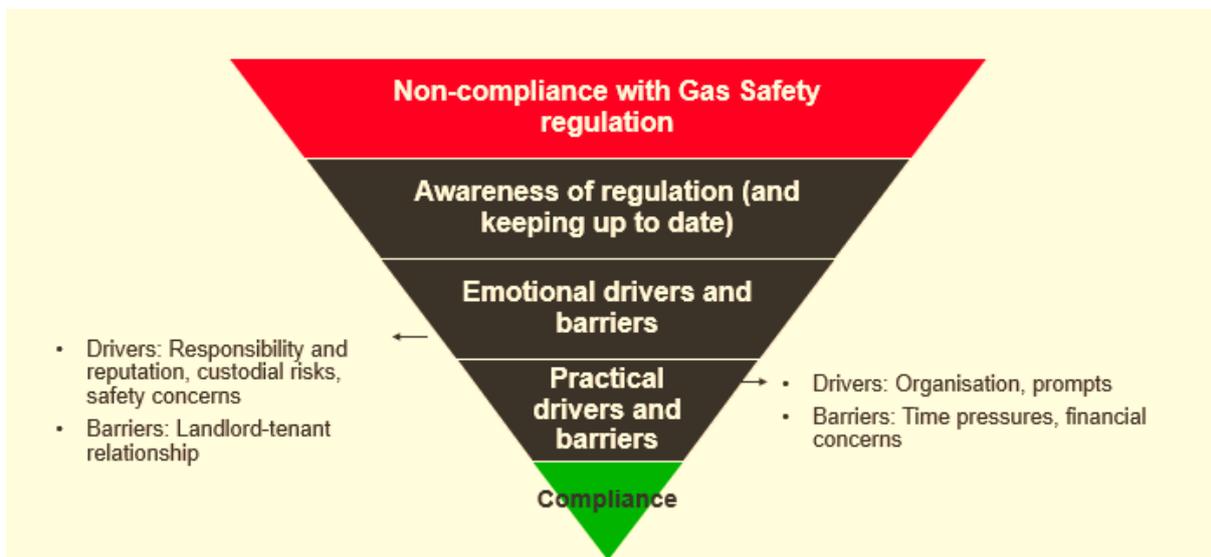
- **Investor**
 - Breakdown in tenant-landlord relationship leading to tenant denying access to property;
 - Knowledge of regulations becoming out of date due to lack of proactive engagement with responsibilities and potential changes.
- **Attached**
 - Knowledge of regulations becoming out of date due to longer term tenants and low tenant turnover;
 - Time pressure and lack of time to prioritise landlord responsibilities.

- **Housemate**
 - No awareness of landlord responsibilities due to lack of identification as landlord and no proactive engagement with information;
 - Not accessing channels where landlord responsibilities are likely to be advertised (e.g. not a member of Landlord Association or using a letting agent to find tenants or lodgers).
- **Rogue**
 - Not actively seeking information around landlord responsibilities;
 - Only motivated to carry out landlord tasks when prompted by an authority (e.g. LA, HSE) and even then likely to lapse into non-compliant behaviour in future;
 - Poor tenant-landlord relationship leading to tenant denying them access to property;
 - Landlord unresponsive to tenant requests.

2.3. Drivers and barriers to landlord compliance with gas safety regulations

Moving from non-compliance to compliance with gas safety regulations requires an awareness of the regulations and for positive motivation from emotional drivers to outweigh potential barriers to compliance. Figure 3 below demonstrates how landlords can transition from non-compliance to compliance.

Figure 3. Image showing the transition from non-complaint to compliant behaviour



2.3.1. Awareness

The most significant factor determining compliance was awareness of the Gas Safety regulations. In our sample, landlords typically chose to have the checks completed once they

knew it was a requirement. Landlords became aware of the regulations typically when researching to let, renovating the property or room in preparation to let, when finding tenants and when completing property maintenance and other landlord responsibilities.

The most common cited sources included:

- Independent proactive research e.g. *Googling 'landlord responsibilities'*
- Interactions with gas professionals such as gas engineers or gas supplier
- Interactions with their letting agent
- Information from local authorities who register landlords or provide checklists to prepare properties for rentals
- Informal sources, such as friends who are landlords or work in property

Landlords who were not aware of Gas Safety regulation reported their lack of awareness as being driven by inconsistencies across regulations for homeowners compared to landlords. This was especially prevalent amongst **Housemate** landlords, who felt that they were maintaining the property, in which they also lived, to a standard above that of a typical rental property, and assumed that this meant any provisions they might be expected to make as a landlord were being met.

Additionally, both compliant and non-compliant landlords referenced the absence of one reputable source for all landlord duties. They felt this made becoming aware and staying up to date with landlord responsibilities challenging, with a reliance on multiple sources for information leading to patchy knowledge.

2.3.2. Emotional Drivers and Barriers

Emotional Drivers

Although compliant landlords were not always aware of the specific penalties for non-compliance, the general fear of **penalties** was a sufficient deterrent for the majority of those who were aware of regulations.

Compliant landlords also felt a **moral** duty to have the checks completed and keep their tenants **safe**, due to their understanding of the potential for harm through gas leaks and carbon monoxide poisoning. In addition, some described how they felt that they were being paid to complete certain responsibilities and wanted to offer a good service to their tenants, of which getting the Gas Safety checks completed was a part. Related to these factors, compliant landlords also generally perceived gas safety regulations to be **fair**.

Emotional Barriers

A tense landlord-tenant relationship often created poor communication between the two parties, which could result in landlords having difficulty accessing the property and arranging a time for the gas engineer to visit. Although this made checks more burdensome, it typically did not prevent them from being completed unless the relationship had completely broken down. Landlords that had been brought to the attention of HSE (e.g. for investigation) often exhibited this extreme breakdown in landlord-tenant relationship.

2.3.3. Practical Drivers and Barriers

Practical Drivers

Good **organisation** helped landlords to keep track of when they need to get their Gas Safety checks completed. **Investor** and **Attached** landlords were typically better organised, with systems, such as mobile calendar reminders for key dates, in place.

Landlord behaviour could also be shaped by their social network. The completion of Gas Safety checks could be **prompted by peers** who were also landlords, who could act as a source of information or reinforce compliance as a **norm** through their own behaviour.

Practical Barriers

Landlords also mentioned a range of practical challenges encountered that could make undertaking checks more burdensome, although these were not insurmountable, and they could typically be overcome. This included **financial constraints**, with the accumulative cost of all landlord responsibilities making it expensive and causing some to feel financially precarious. **Rogue** landlords also begrudged paying to ensure their property met the required standard, even if they had the money.

Time pressures could also make arranging an appointment challenging, especially for landlords working to external set timelines (e.g. moving to a new house due to job change). This led to some landlords prioritising getting a tenant into the property over researching and completing their landlord responsibilities.