

Landlord Registration (Private Housing) Bill 2020

Public Consultation

Summary of Responses Report

October 2020

1. Introduction

The public consultation on the draft Landlord Registration (Private Housing) Bill 2020 ran for six weeks from 15th June 2020 to 27th July 2020.

The survey followed the order of the draft Bill and comprised of both closed questions (requiring either a yes or no response) and free-form open ended text boxes to allow the respondents to provide more detailed feedback.

The eight parts being:

- The introductory section
- The register and registration
- The minimum standards
- Enforcement
- Appeals
- Occupancy Deposit Regulation and Protection
- Information
- General

The schedule was also considered and relates to the content of the register

Views were encouraged from everyone and in particular, relevant stakeholders including private rental sector landlords and charity/third sector organisations.

The survey was also issued directly to Tynwald Members, Local Authorities, Third Sector organisations and local estate and letting agents.

2. Responses to the Public Consultation

The consultation attracted 241 responses in total, with 194 respondents accessing the survey online via the Isle of Man Government's Consultation Hub; 47 individual responses were received by email or post.

Of the 194 online surveys completed, 38 respondents gave permission for their responses to be published in full, 115 gave permission for their responses to be published anonymously and 41 did not wish their responses to be published.

Responses received by email or post have been summarised at the end of this report. A small number were not directly related to the consultation exercise, however have in any case been noted for consideration by the Department.

3. Analysis of responses received via the Consultation Hub

Personal Information – Categories of Respondents

1) Organisations

Of the 194 online surveys completed, 25 responses were received from organisations, summarised by type as follows:

Table 1a - Summary of Organisations by Type

Local Authority (incl. Sheltered Board)	2	1%
Private Sector Letting Agent	7	3.6%
Private Sector Tenant Association Group	0	0%
3 rd Sector Housing Charity	4	2%
Other	12	6%
Total	25	12.6%

Of the organisations that responded, 9 gave permission for their responses to be published in full and are listed below:

Table 1b – Organisations who gave permission for responses to be published in full

Graih	3 rd Sector Housing Charity
Housing Matters	3 rd Sector Housing Charity
Port St Mary Commissioners	Local Authority
Southern Sheltered Housing Joint Board	Local Authority (Sheltered Board)
Plans Drawn	Other
Presswood Limited	Private Landlord
Property Mark	Other
Safe Deposits Scotland	Tenancy Deposit Scheme
The Dispute Service/Tenancy Deposit Scheme	Tenancy Deposit Scheme

2) Individuals

169 responses were received from respondents who described themselves as individuals and are categorised as follows:

Table 2 - Summary of Individuals by Category

Politician (national)	1	>1%
Politician (local)	0	0%
Private Landlord	80	41.2%
Homeowner	39	20%
Tenant (private sector)	31	16%
Tenant (public sector)	7	3.6%
Health or Welfare Professional	2	1%
Other	9	4.6%
Total	169	86.4%

Part 1 - Introductory section of the draft Bill

The Introductory section of the draft Bill sets out the general objectives of the Bill, such as the creation of a register of registered relevant landlords and enforcement of minimum landlord and property standards.

There was no specific question in respect of this part of the Bill however respondents were invited to make comments and a small but typical selection of this feedback is repeated below:

"I think a register and a set of minimum standards is an excellent idea"

"The addition of this level of bureaucracy which does not currently exist will not directly help tenants"

"This Bill has been a long time coming...this control is much needed within this sector"

"Why do you need a register of landlords?"

"I disagree with the need to impose registration upon landlords. It has not been established why this is required"

"It's really good that the government is working to establish some tenant's rights"

"It is encouraging to see this; I hope that the deposit part will be introduced with the rest of the Bill. This legislation is long, long overdue."

"Totally understand the need to regulate properties and "bad" landlords but there should be similar protection in place for landlords regarding "bad" tenants who think nothing of wrecking the property and moving on leaving debts and chaos behind"

"I am delighted that the Isle of Man Government is bringing forward this Bill. As we aspire to be an Island which protects the most vulnerable in our society, this is crucial. Safe living accommodation of a decent standard is foundational to physical, mental, emotional and social wellbeing. While some will see this as 'government overreach,' it is entirely reasonable that the Government's significant financial investment in tenancies leads to a good standard of housing."

"Enforcement of minimum standard should apply to all rented accommodation including the public sector housing"

"A Relevant Landlord...should not be one who rents out only one property. The Legislation imposes an unnecessary burden on people who are not operating a "business" and especially if the property is a former home"

"The principles behind the proposed legislation are much needed "

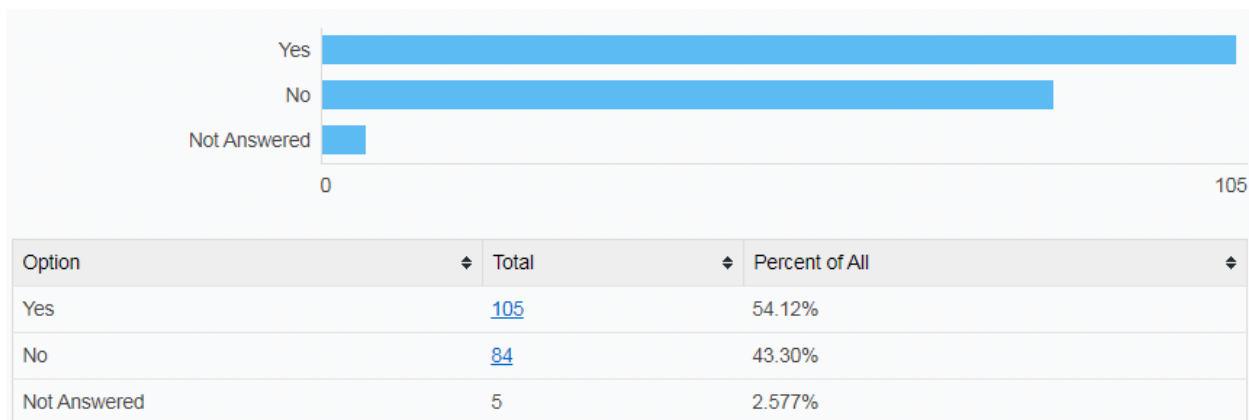
Part 2 – the Register and Registration

Part 2 of the draft Bill sets out the provisions for a register of relevant landlords and registration requirements, including:

- Definition of a relevant landlord
- Personal conduct requirements
- Registration requirements
- Landlord’s appointed representative
- The voluntary scheme
- Changes during registration
- Disclosure of registration

Respondents were asked two questions and were also given the opportunity to provide additional comments about this part of the draft Bill.

Q7. Are the personal conduct requirements reasonable?



54% of respondents agreed that the Personal Conduct Requirements for a relevant landlord are reasonable.

Examples of feedback provided by respondents who agreed the Personal Conduct Requirements were reasonable are:

“I agree personal standards are required but time frames should be applied for the crimes to be taken into consideration”

“These requirements seem reasonable, however the Island must consider that these measures may discourage inward investment into the island by landlords located overseas. After the full economic impact from the Covid19 pandemic is known, the island will need to be encourage new residents to move over to the Island who are willing to invest on island.”

“I have known cases where the Landlord resides off Island and habitually declined to respond to emails or telephone messages. Requiring an on-Island responsible agent is a very positive move”

“I am broadly in agreement with these requirements but do feel that 16(1)(f) is a little wide. “Any other matter the Department considers relevant in the circumstances” is open to interpretation

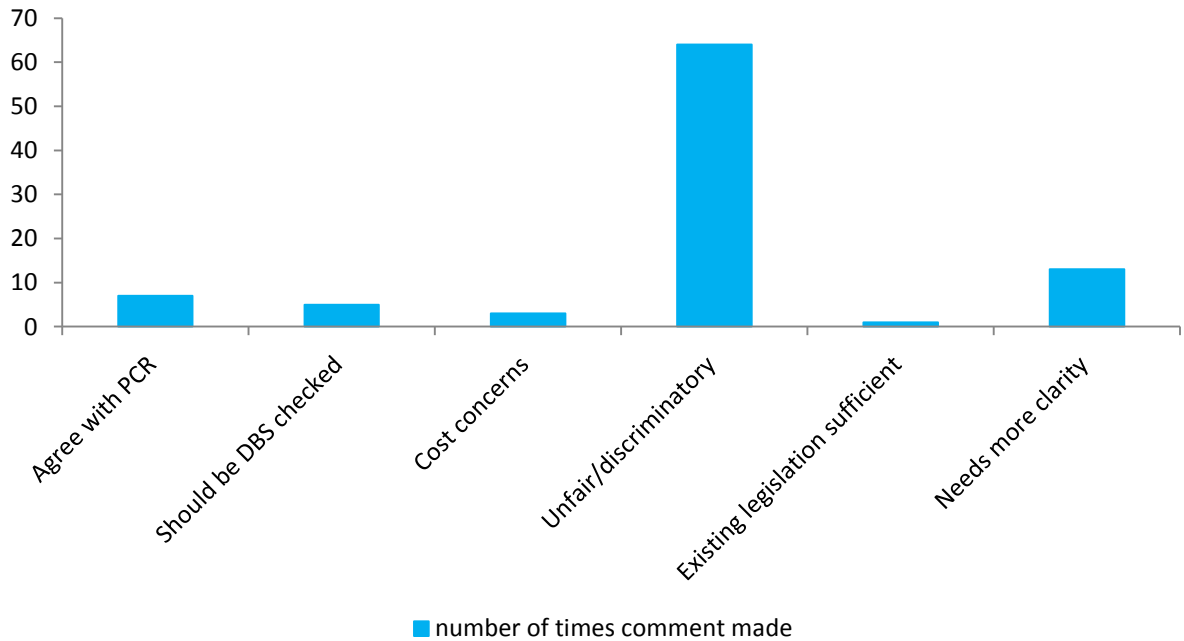
from one landlord to the other and I can see this could become the subject of dispute. Can this be tightened up in any way?

Comments from respondents who disagreed that the Personal Conduct Requirements were reasonable include:

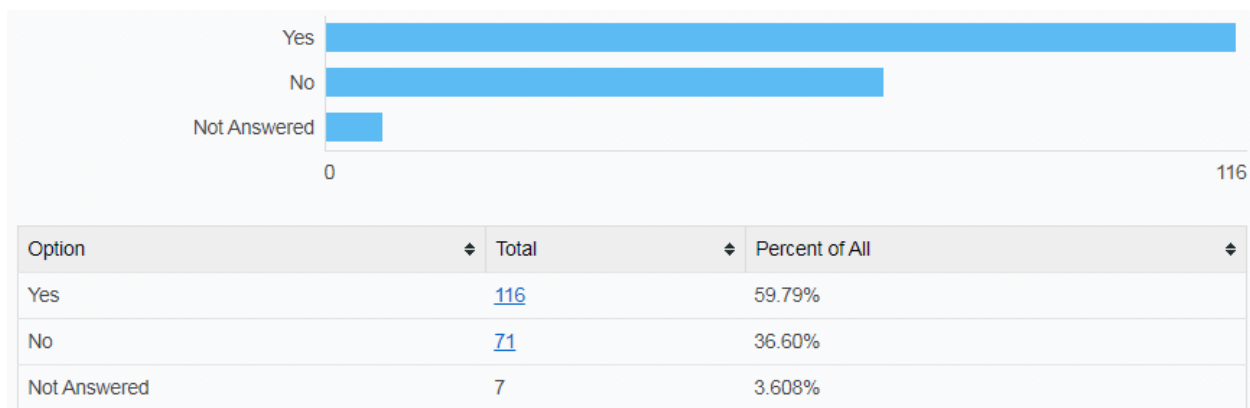
“These requirements again create a sledgehammer to attack a nut - why should landlords need to have a code of conduct over and above any other type of business owner?”
“Why do landlords need to reside on the island?”
“You are saying literally anything the Department considers can bar you from being registered.”
“3 years seems rather a short time for offences under housing related law”

In addition to answering the question, a total of **93** comments were made about the Personal Conduct Requirements.

The following graph illustrates the general themes that arose from this question.



Q8. The Bill states that a landlord's period of registration is 5 years, after which it must be renewed. Is this a reasonable time period?



59% of respondents agreed that 5 years was a reasonable time period for renewal of registration.

Examples of feedback provided by respondents who agreed with Q8 are:

“In Scotland, landlords renew after 3 years. 5 years is a reasonable time period for renewal, however information on the register becomes out of date very quickly, so regular contact with landlords on an annual basis prompting them to maintain up to date information may be beneficial.”

“The fee for registration should be nominal”

“...should be reviewed each time the landlord purchases a new property.”

“Five years does not seem unreasonable. However, it is very disappointing there has been no mention of the expected cost of registration to the scheme and subsequent renewal costs.”

Comments from respondents who disagreed with Q8 include:

“I think this is too long and should be a maximum of three years”

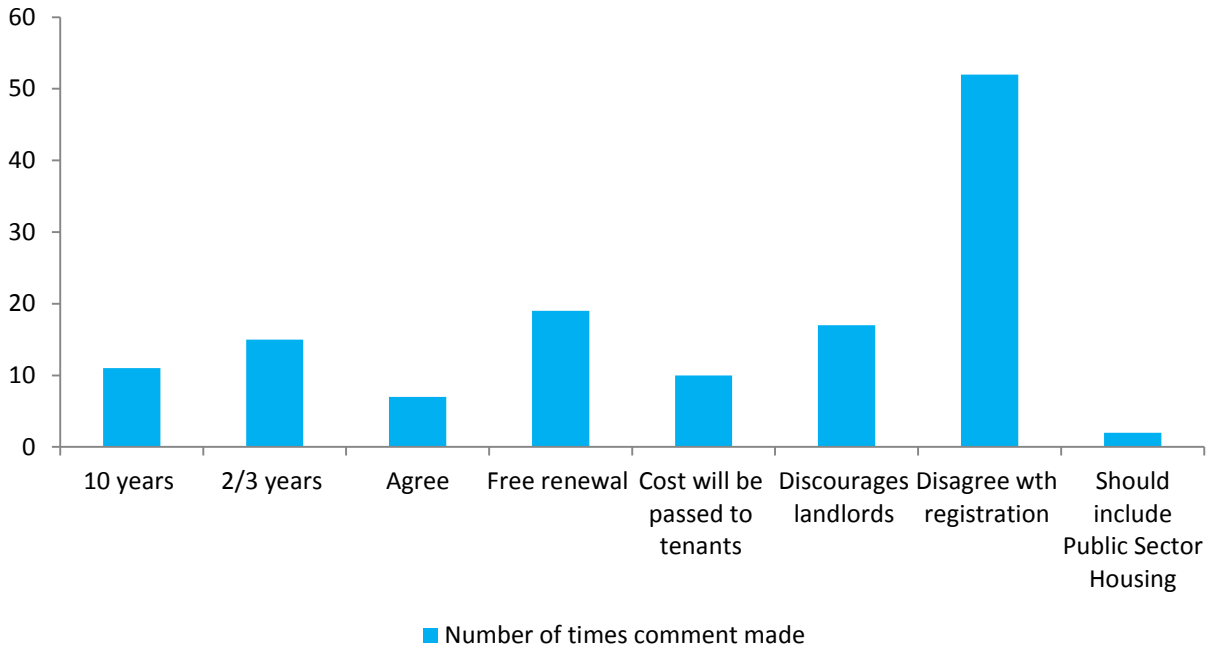
“There is no good reason why a registration would have an expiration date. An obligation on the part of a landlord to keep his/her registration up to date would be perfectly adequate”

“The registration scheme is excessive and will place to great a burden on the average landlord.”

“Why have a time frame - once registered leave registered until informed otherwise.”

Further comments

Respondents were given the opportunity to provide additional views about Part 2 of the draft Bill – the Register and Registration. A total of **82** respondents made additional comments and an overview of these is illustrated in the graph below.



Part 3 – Minimum Standards

The Minimum Standards are a supporting regulation of the Landlord Registration Bill which set out the requirements:

- a) of the landlord’s management and operational matters involved in being a relevant landlord, and
- b) in respect of the condition of the rented property.

There was no specific question in respect of this part of the Bill, however respondents were invited to make comments and a total of **116** comments were received, some of which are noted below:

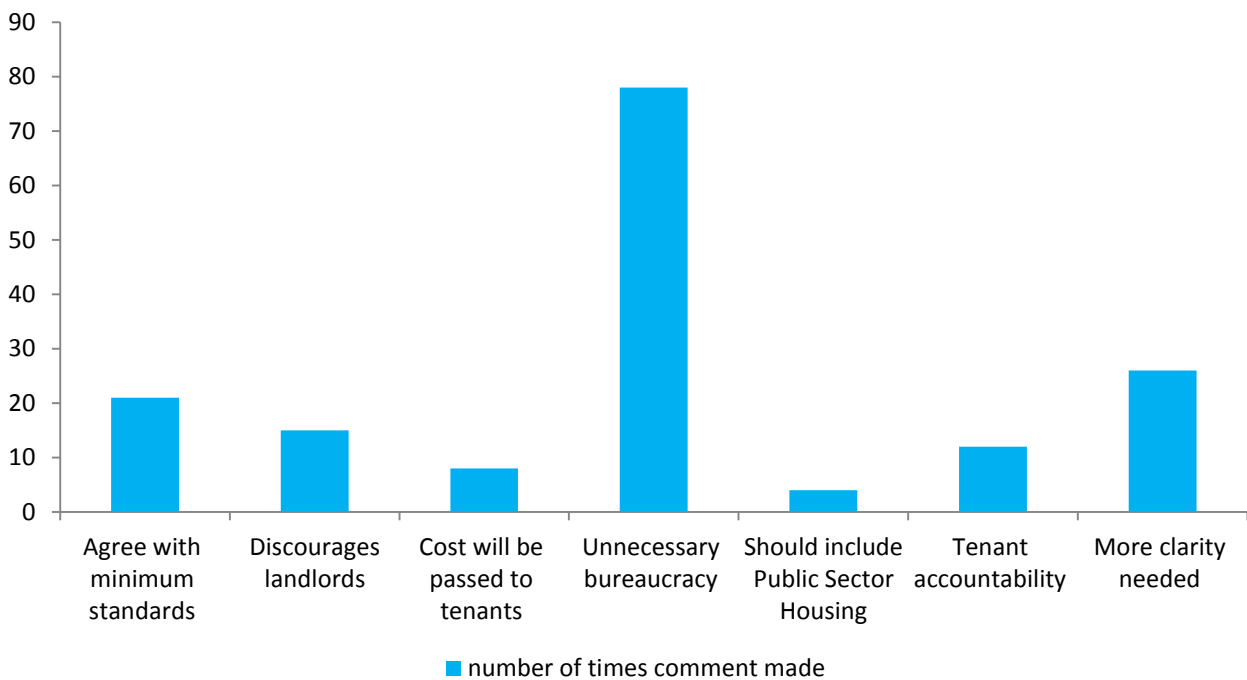
“A really good idea - safety first!”

“As long as the Min Standards are the same as Commissioners houses, so there isn't a mismatch of standards. There should be a reasonable time for compliance (unless it is safety standards)”

“Fantastic to see that damp and insulation being mentioned as minimum standards”

“This will cause some rental properties to be withdrawn from the market, therefore less rental properties on the market. Also, these costs will increase rental values.”

The comments were analysed in more detail and the graph below illustrates the general themes commented on around this part of the Bill.



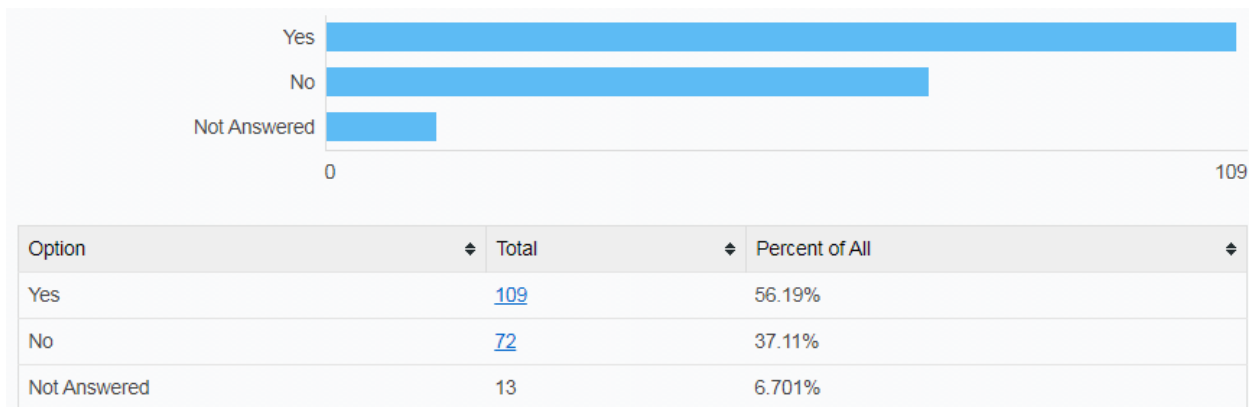
Part 4 – Enforcement

The Enforcement section of the Bill is set out into five divisions.

- Division 1 Registration
- Division 2 Minimum Standards
- Division 3 Breaches of Registration
- Division 4 Revocation of Registration
- Division 5 Other Enforcement Action

In this section, respondents were asked a number of questions and were given the opportunity to provide their feedback.

Q9. Division 1 relates to Registration. Do you think the provisions in this Division are fair and reasonable?



56% of respondents agreed that Division 1 of the Enforcement section of the draft Bill is fair and reasonable.

An example of feedback provided by respondents who agreed with this question include:

“If severe actions were taken against a landlord, what assistance would be given to the tenant; especially people who would not be a priority for government help with housing”

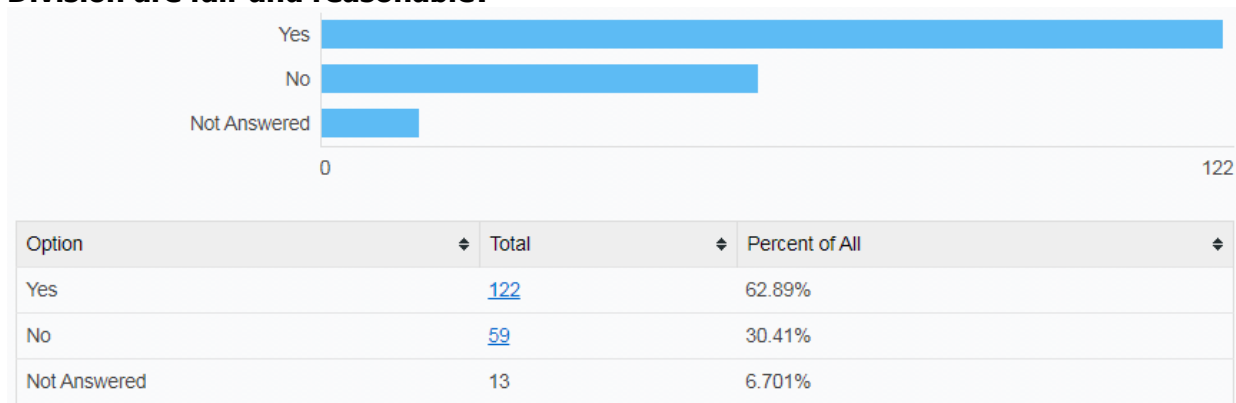
Comments from respondents who disagreed with this question include:

“Very one sided against the landlord and there should be consideration for bad tenants”

“Disqualifying a landlord who refuses to register is going to be as effective as expelling a child who refused to go to school.”

“I think the penalties are very harsh. I hope that if the bill goes through these will be a last resort.”

Q10. Division 2 relates to Minimum Standards. Do you think the provisions in this Division are fair and reasonable?



Almost **63%** of respondents agreed that Division 2 of the Enforcement section of the draft Bill is fair and reasonable.

Examples of feedback provided by respondents who agreed with this question include:

“Tenants should expect a minimum standards of accommodation with legislation to back this up”

“All work should be carried out by a qualified tradesman unless Landlord is qualified himself. Too many bodge up repairs fail later with no comeback for tenants.”

“The minimum requirements should be of a high and decent living condition. They should also relate to environmental standards to ensure all sectors of the IOM are maintained in line with the 2050 net zero emissions target. The government should have the powers to enforce this within the private sector.”

“For safety purposes, agreed, but the extra costs will be added to the cost of occupancy and therefore rents will be increased.”

Comments from respondents who disagreed with this question include:

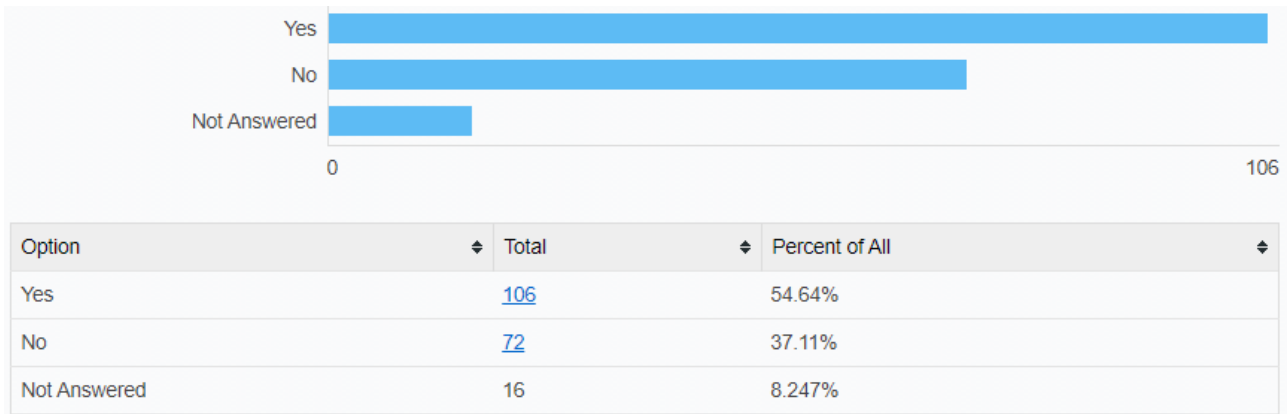
“More consideration for tenant responsibility and impact of costs needed.”

“The timeframes given are not sufficient for a response and the penalties are not reasonable and fair.”

“I think there needs to be further protection for the landlord as this weighted in favour of the tenant - what about unpaid rent?”

“Existing laws cover this.”

Q11. Division 3 relates to Breaches of Registration. Do you think the provisions in this Division are fair and reasonable?



54% of respondents agreed that Division 3 of the Enforcement section of the draft Bill is fair and reasonable.

Examples of feedback provided by respondents who agreed with this question include:

“Any action needs to be fair, reasonable and in proportion to the circumstances.”

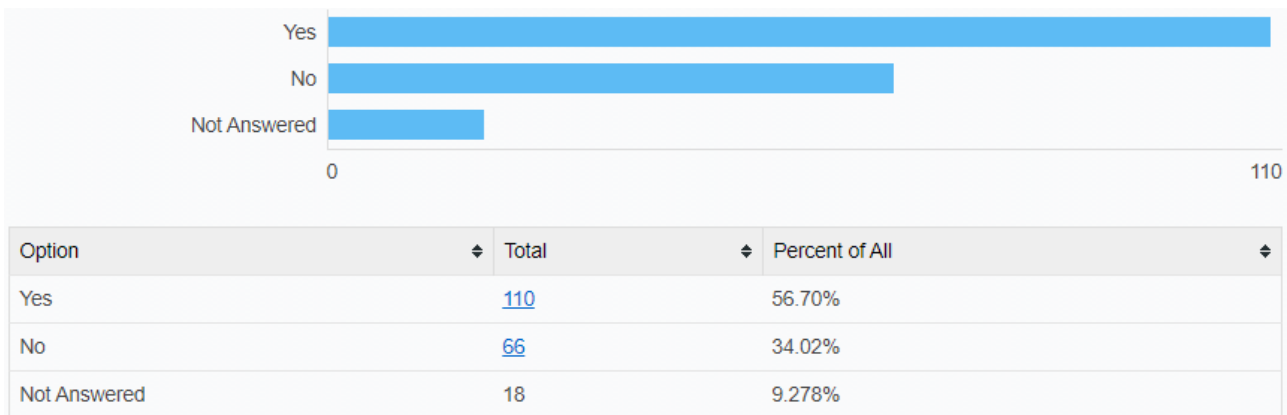
“I think the tenant must be made aware of any breaches made by the landlord.”

Comments from respondents who disagreed with this question include:

“The main sanction, which is no obligation to pay the rent, should be linked to non-compliance with the safety regulations and minimum standards, not to the fact of being registered or not.”

“Far too heavy handed...I have one property rented out at below market rental value - to not only enhance my meagre income as I am retired but to plan for my future.”

Q12. Division 4 relates to Revocation of Registration. Do you think the provisions in this Division are fair and reasonable?



56% of respondents agreed that Division 4 of the Enforcement section of the draft Bill is fair and reasonable.

Examples of feedback provided by respondents who agreed with this question include:

“Is there help to the tenant if the building is below standard? Or will they find themselves homeless because they complained?”

“On the whole but could there be some discretion built into 43 (3) to hear extenuating circumstances from a landlord to re-register within 12 months?”

“Any action needs to be fair, reasonable and in proportion to the circumstances BUT thought is required. If revocation takes place what happens to the tenant, must they be evicted without further delay?”

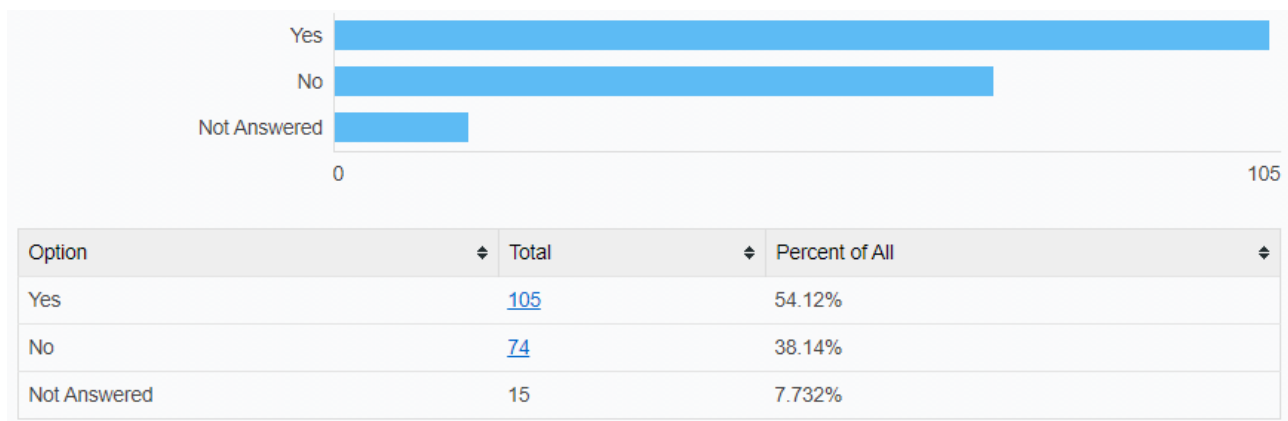
Comments from respondents who disagreed with this question include:

“If revocation of Registration is taken away, there could be a swath of properties on the market at the same time with people being homeless. A pragmatic approach should be used before revocation is used.”

“Revocation for 5 years and unable to re-register for 12 months will lead to empty declining properties blighting neighbourhoods.”

“No, a bad tenant can cause huge problems for a landlord and under these regulations the landlord can lose registration.”

Q13. Division 5 relates to other enforcement action. Do you think the provisions in this Division are fair and reasonable?



54% of respondents agreed that Division 5 of the Enforcement section of the draft Bill is fair and reasonable.

Examples of feedback provided by respondents who agreed with this question include:

"Enforcement needs to have teeth. Currently, properties are declared not fit for habitation by fire or environmental services, tenants are moved out and then the properties are leased all over again with no changes."

"How will vulnerable tenants be made aware of their rights? (Some will have problems with literacy and no computer access)"

"If the landlord has committed any acts that discriminate, injure or abuse their tenants, then the tenants should not be liable to pay rent."

Comments from respondents who disagreed with this question include:

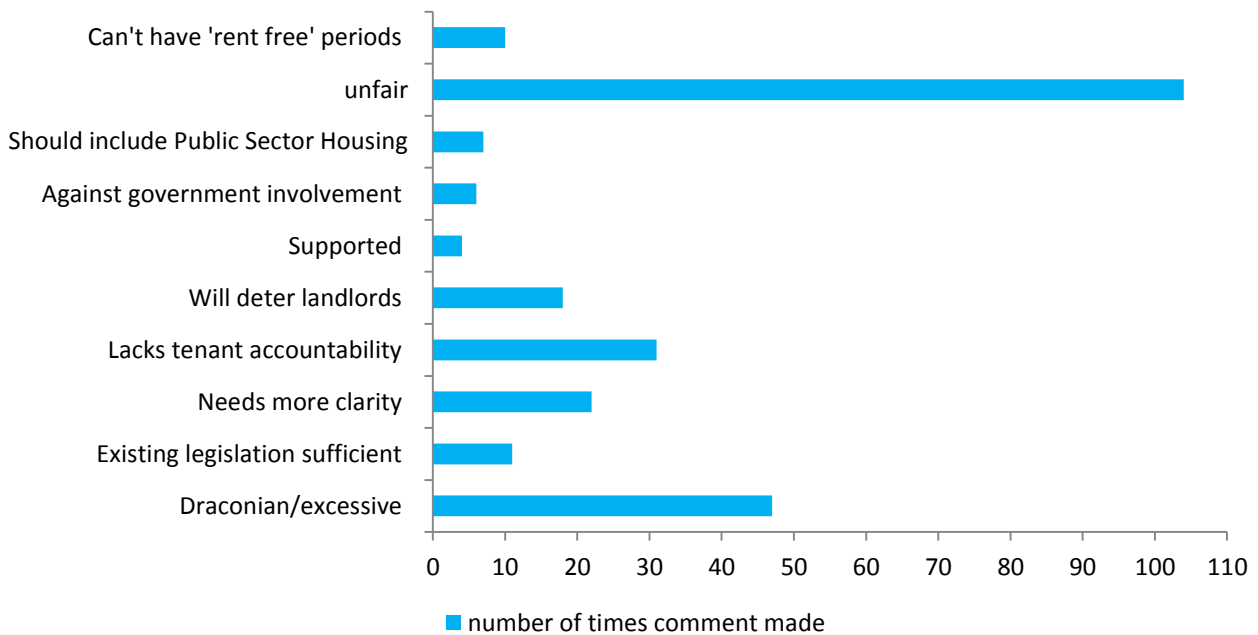
"This provision allows the tenant to stop paying rent if the landlord isn't registered. The tenant should have a responsibility to ensure they are renting from a registered landlord before they commence the tenancy."

"Any issues between the department and the landlord should remain private between them, allowing the landlord to rectify issues in private."

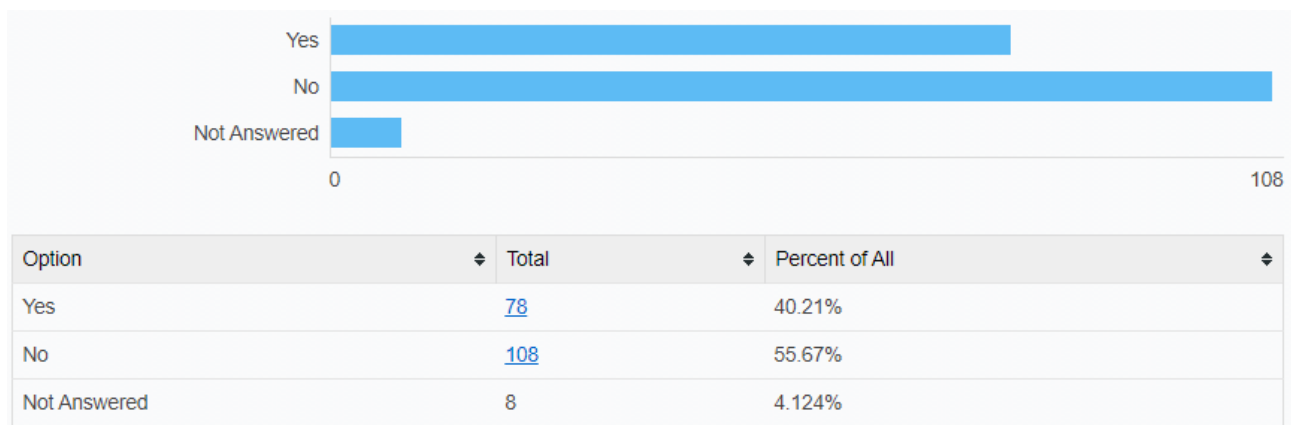
"Ensuring that any tenant is not left homeless because of the landlords action should also be considered."

"There is no provision for the landlord to reclaim lost rent if, following an alleged breach and revocation, the landlord is found to have acted within the conditions. Not so honest tenants (yes there are some) could make up false claims and live rent free for a few months while the Department deals with it. There is no legislation within the Act to protect the landlord's rights."

Feedback on all five Enforcement divisions was analysed in more detail and the graph below illustrates the general themes commented on around this part of the Bill.



Q14. One of the potential penalties is that a Landlord who fails to comply with an improvement notice, may be subject to legal action with the maximum penalty of 12 months' custody and a fine of up to £50,000. Do you think this is fair and reasonable?



55% of respondents disagreed that the maximum penalties for failure to comply with an improvement notice were fair and reasonable.

In addition to answering the question, a total of **98** comments were made about this question.

Comments from respondents who disagreed with this question include:

"Maybe appropriate for business landlords with multiple properties. Not for private person with one flat."

"That seems very strong. It may not be possible to make improvements on lots of properties all at once. This should be phased in over a period of years."

"Seems extremely harsh in comparison to other crimes."

"This is ridiculous and totally excessive, I'm sure there is already legislation to deal with any serious consequences of a landlord not complying with improvement notices."

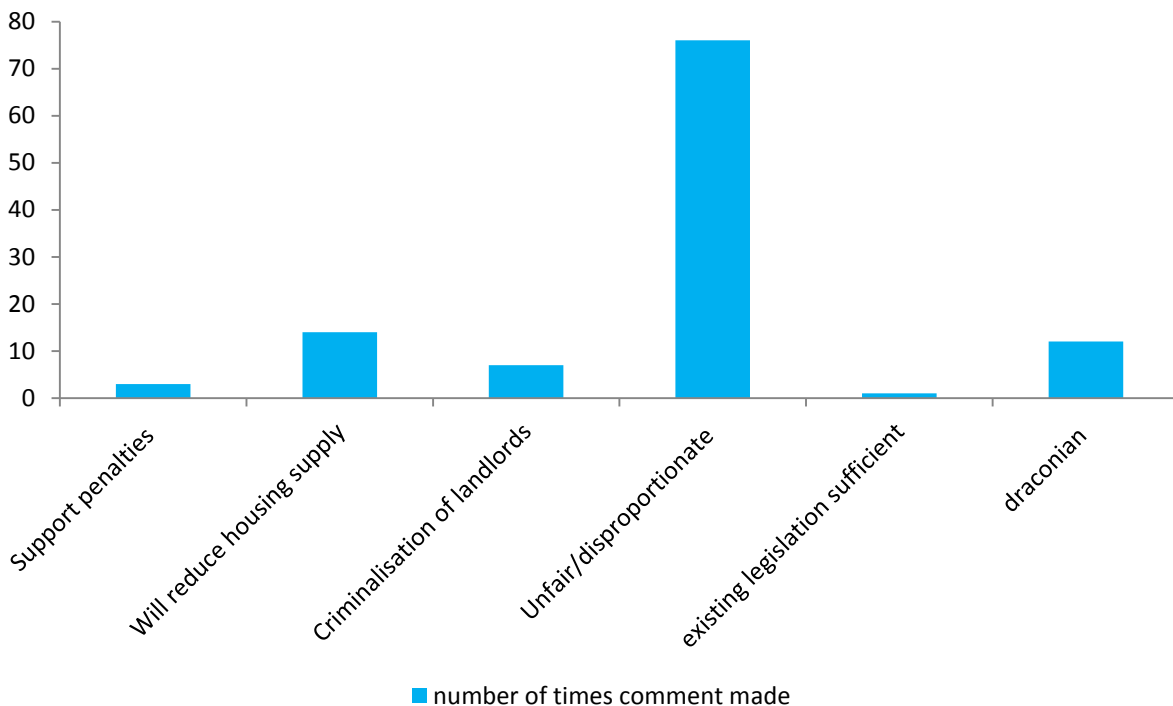
Examples of feedback provided by respondents who agreed with this question include:

"Without such penalties some landlords will not comply."

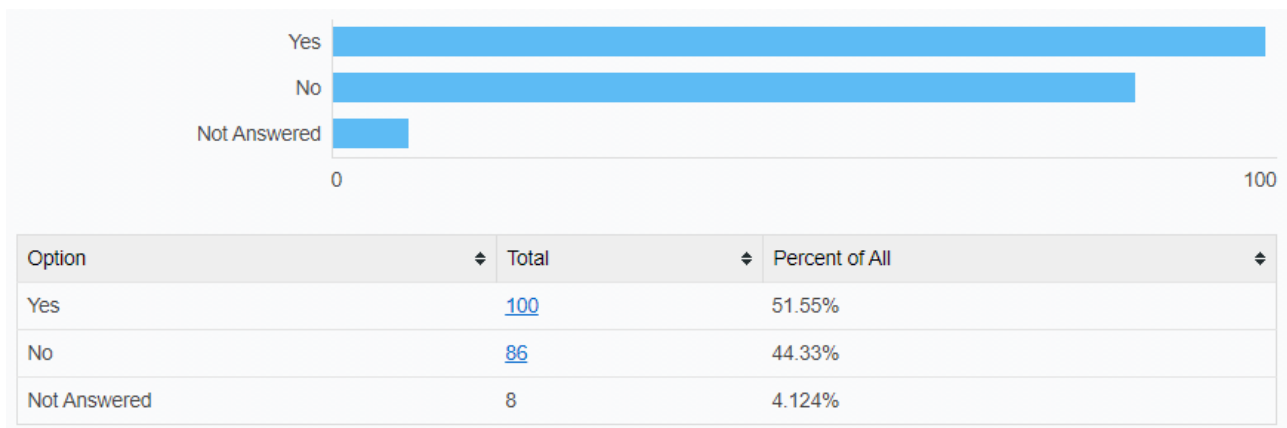
"As long as the maximums above are for very serious sub housing standard breaches."

"...For those landlords who are providing substandard accommodation and refusing to pay for maintenance, then they should be punished to protect tenants."

The following graph illustrates the general comment themes that arose from this question:



Q15. An option is that a Landlord who fails to comply with an improvement notice, may be subject to legal action with disqualification up to five years. Do you think this is fair and reasonable?



51% of respondents agreed that disqualification for up to five years for failure to comply with an improvement notice was fair and reasonable.

Examples of feedback provided by respondents who agreed with this question include:

“Repeated failures to comply should lead to permanent disqualification.”

“Yes....if it is applied in the right circumstances. For example the failure to comply is repetitive across a number of properties or timeframe. This would also serve as a deterrent.”

“Provided there is a suitable appeals process and not simply departmental decision.”

Comments from respondents who disagreed with this question include:

“A disqualification of 5 years for failing to comply with an improvement notice is too long and will discourage private investment, which will affect the value of properties on the island.”

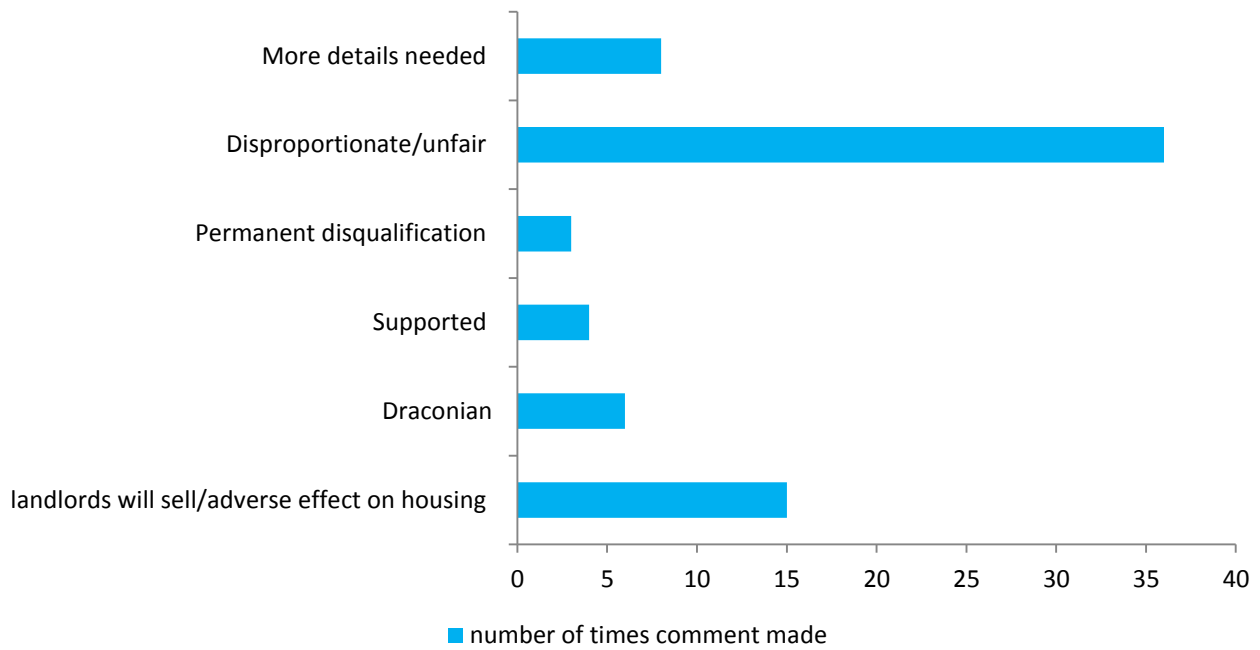
“An improvement notice will relate to a specific property, whereas, the landlord may have a number of other properties, possibly without issue. Disqualification should therefore be linked to the property, rather than the individual landlord. In other words, problems with one property, should not preclude the landlord from operating the rest of his business, although, warning flags may call for closer inspection of associated properties.”

“Where a landlord has more than one rental property, a blanket disqualification should only apply if there are multiple offences relating to multiple properties.”

“I would think 2 years would be sufficient to teach them a lesson.”

“Revocation for 5 years and unable to re-register for 12 months will lead to empty declining properties blighting neighbourhoods.”

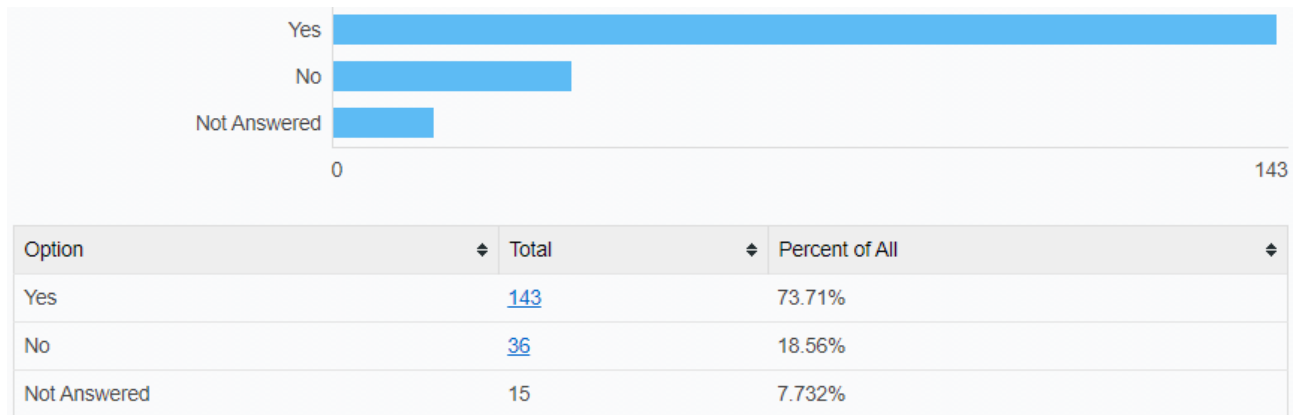
In addition to answering the question, a total of **85** comments were made about this question and the following graph illustrates the general themes that arose.



Part 5 – Appeals

The Appeals section of the Bill sets out the process by which a relevant Landlord may appeal against a decision made against them.

Q16. Do you agree with what is on the list of decisions that are subject to appeal?



73% of respondents agreed with the list of decisions that are subject to appeal.

Examples of feedback provided by respondents who agreed with this question include:

“Rating Appeal Commissioners must be knowledgeable in this process.”

“Rather than 21 days suggest 28 days.”

“Do we have the resources and staff for independent investigation of appeals however? And again people with real building, surveying, and damp proofing knowledge would be needed to fully assess a situation before an improvement notice is served.”

Comments from respondents who disagreed with this question include:

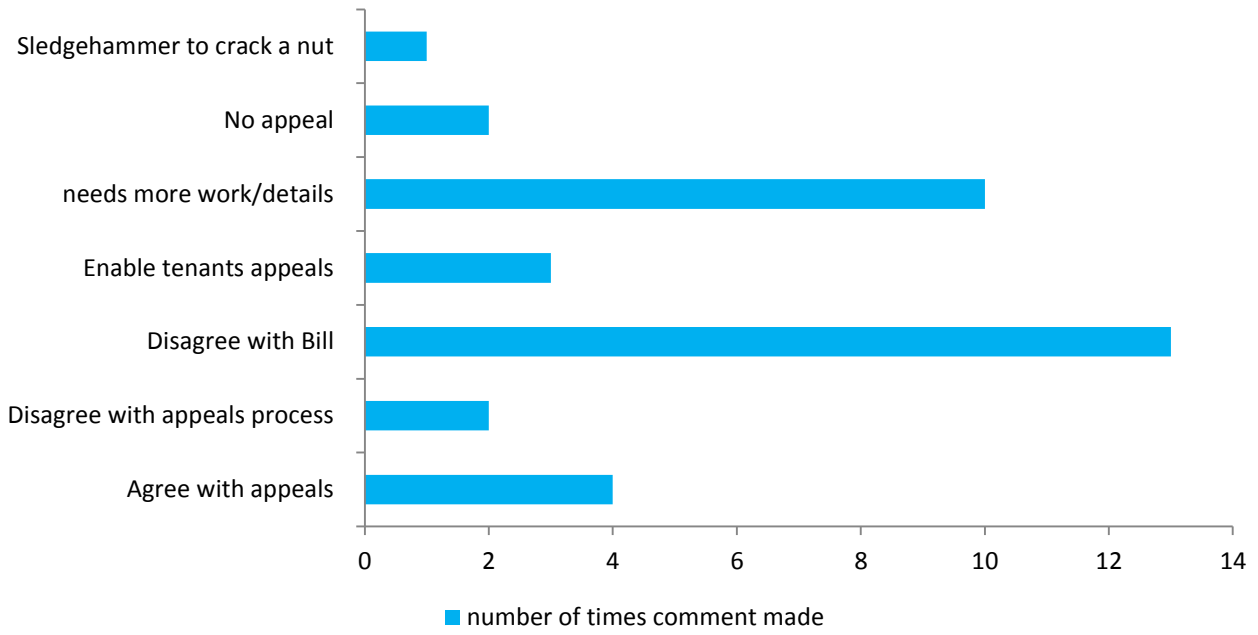
“...I currently can't kick out a tenant causing damage to my property, causing nuisance to the neighbours and not paying rent without going through court costing money, time and tears. What chance does a landlord have of appealing against the Government?”

“Too restrictive. Needs to be property specific not landlord specific.”

“In all circumstances the Landlord should be able to appeal to a court.”

Further Comments

Respondents were given the opportunity to provide additional views about Part 5 of the draft Bill – Appeals. A total of **41** respondents made additional comments and an overview of the themes that arose from this question is illustrated in the graph below.

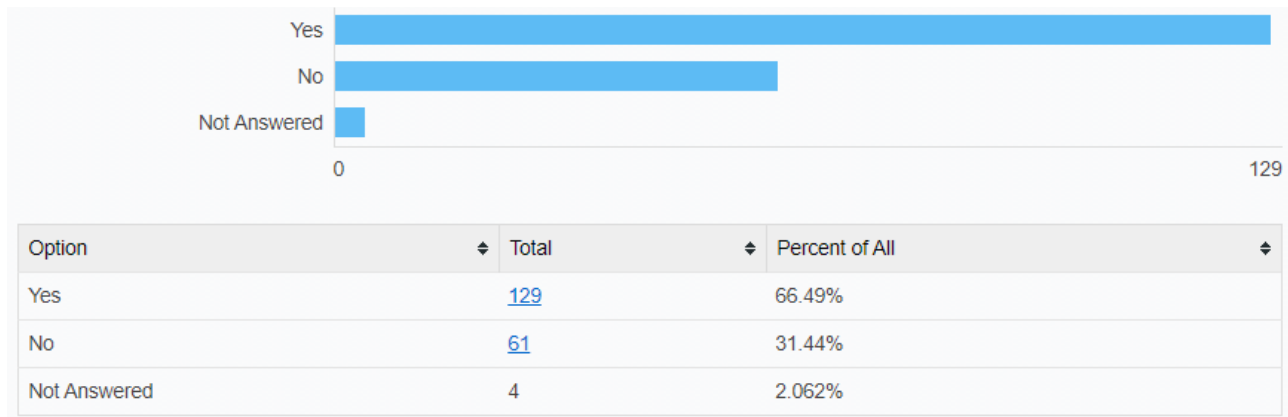


Part 6 – Occupancy Deposit Regulation and Protection

It is the intention of the Department that a Deposit Protection Scheme should be established in the Isle of Man should the Landlord Registration Bill receive Tynwald approval.

Respondents were asked to provide their views on whether such a scheme was supported and if so, which organisation should operate the scheme.

Q17. Do you support the principle of a Rent Deposit Protection Scheme on the Isle of Man?



66% of respondents agreed with the principle of a Rent Deposit Protection Scheme on the Isle of Man.

Examples of feedback provided by respondents who agreed with this question include:

"This is long overdue and should be introduced to ensure unscrupulous landlords are never in a position to unreasonably withhold a tenants deposit again."

"...an aspect of tenancy where tenants are too often treated unfairly (although clearly not by all landlords) so this is a welcome move."

"This is a much-needed improvement to the current lottery for tenants, where it very much depends on a landlord's whim or good graces whether a deposit is returned or not."

"...I fully support the creation of a simple & inexpensive 'Deposit Protection Scheme' that is fair to both parties."

Comments from respondents who disagreed with this question include:

"Rental deposits are part of the negotiation process at the inception of the tenancy. A good landlord and tenant relationship should not require regulatory interference."

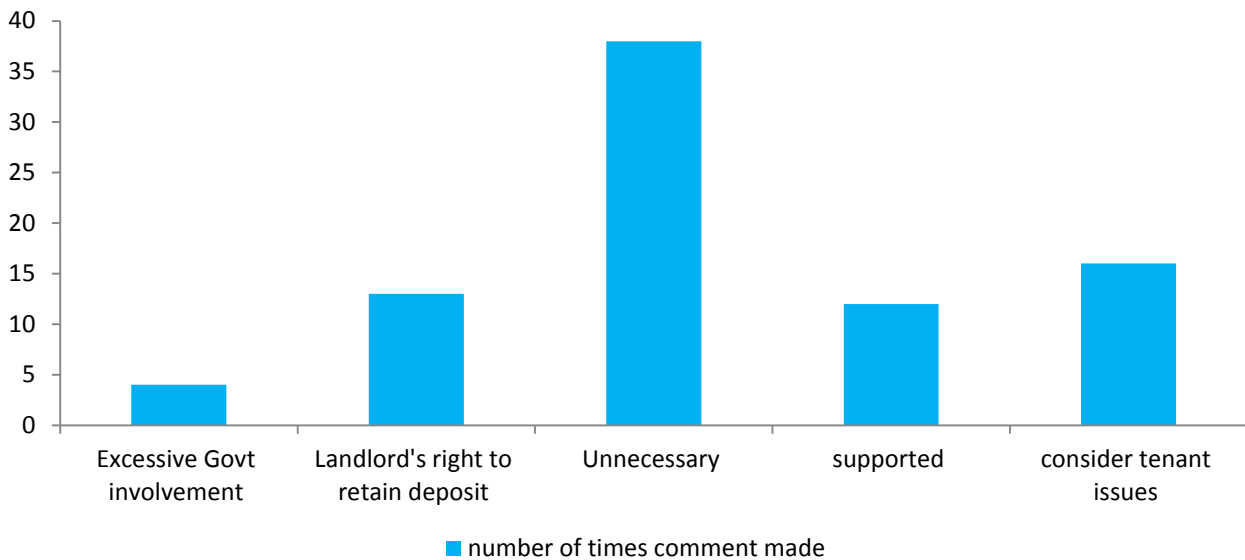
"...There is no need for the scheme. It is likely to result in litigation between landlord and tenant. It is also difficult to see how this would operate. It's costs are likely to outweigh its benefit."

"As the landlord is running a business the level and nature of the deposit is a commercial decision

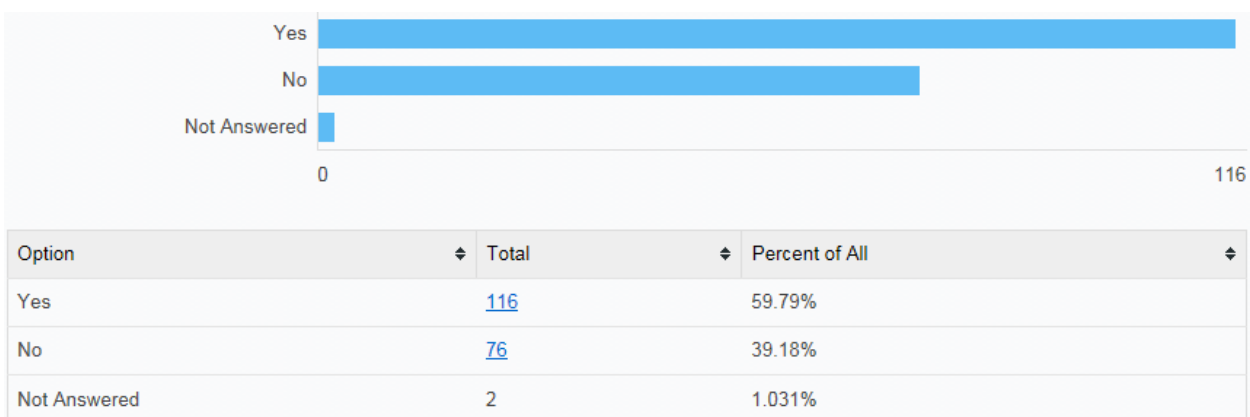
and subject to the usual accounting provision to show the deposit held on the business financial statement.”

“A landlord should be responsible for setting the amount of the deposit and rent for their property and should be allowed to keep this until such times as it is returned to the tenant at the end of their occupancy either in full or with deductions if necessary. This should be outlined in the lease.”

In addition to answering the question, a total of **101** comments were made about this question and the following graph illustrates the general themes that arose.



Q18. Should there be a maximum amount that a landlord is able to charge tenants as a deposit?



Just under **60%** of respondents agreed there should be a maximum amount that a landlord is able to charge a tenant as deposit.

Examples of feedback provided by respondents to this question include:

"As much as it normally is, the same price as a month's rent."

"I have answered yes but I do have a related point. Whatever the maximum is, should be further increased (say by 50%) where a landlord agrees to pets. I require a one month deposit, but if the tenant has pets I want a 2 month deposit, as I've had too much damage done by pets over the years."

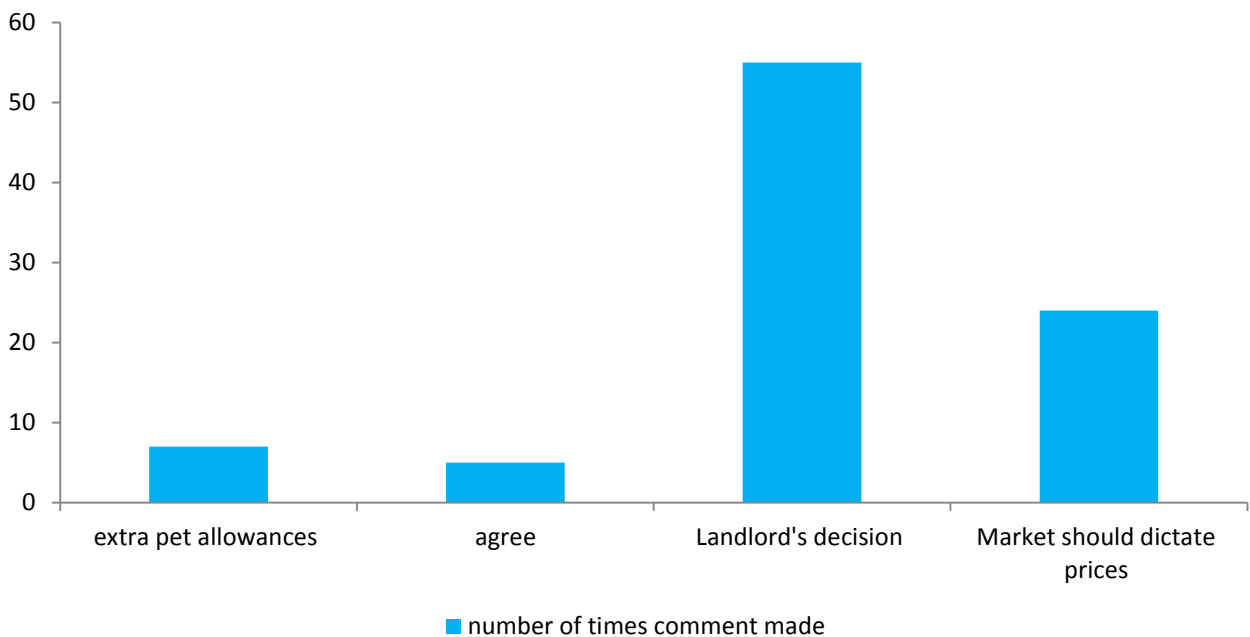
"This should be up to a maximum determined by the value of the property and/or monthly rent amount."

"It depends on the value of the property and the tenant."

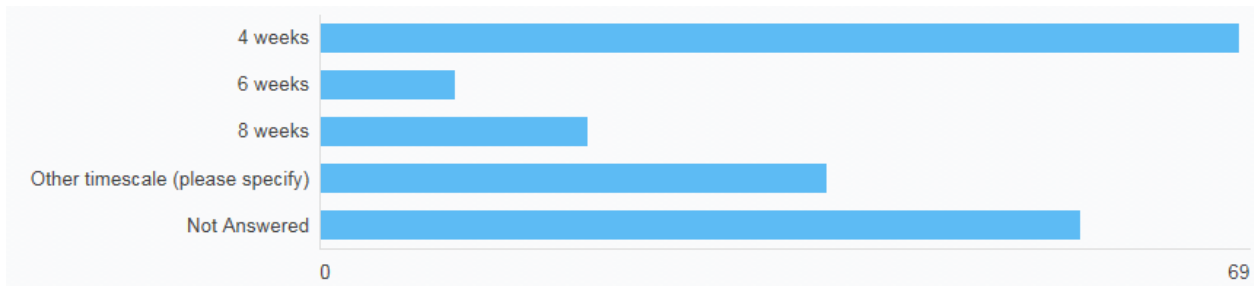
"The deposit depends on the value of the property - which is not always reflected in the rent for market reasons."

"Let the market dictate."

In addition to answering the question, a total of **80** comments were made about this question and the following graph illustrates the general themes that arose.



Q19 Please select an option for what you think the maximum weeks' rent is suitable to charge as a deposit

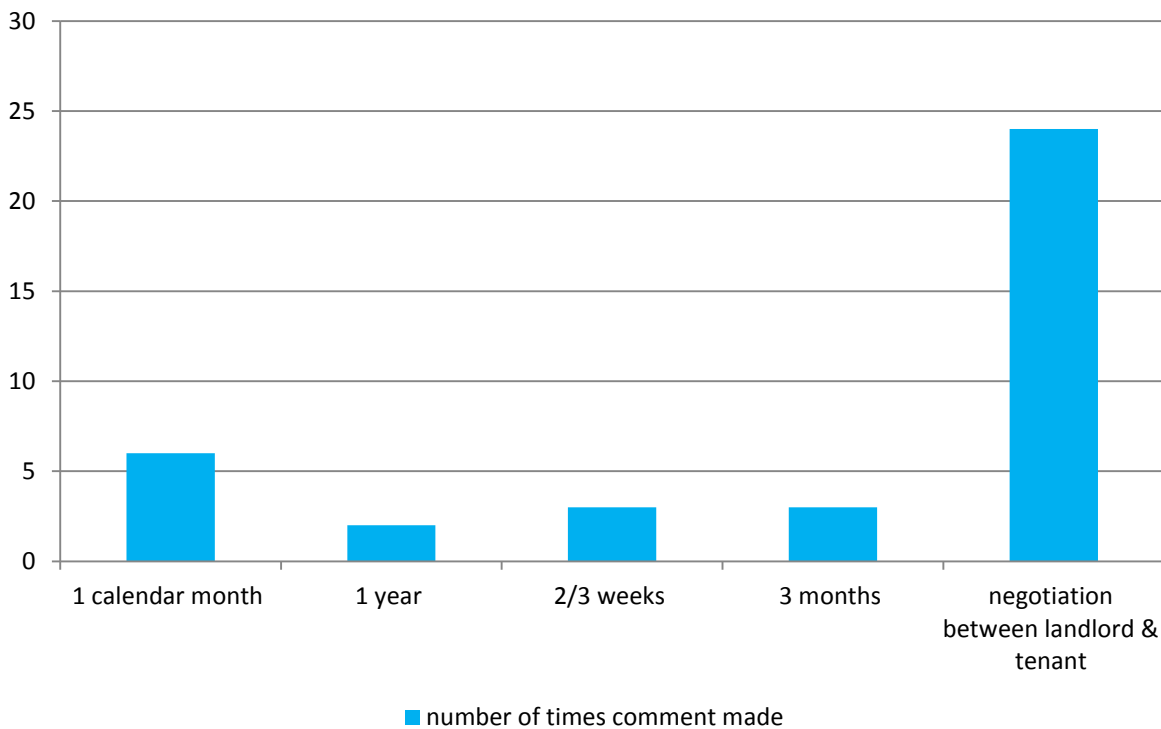


Option	Total	Percent of All
4 weeks	69	35.57%
6 weeks	10	5.155%
8 weeks	20	10.31%
Other timescale (please specify)	38	19.59%
Not Answered	57	29.38%

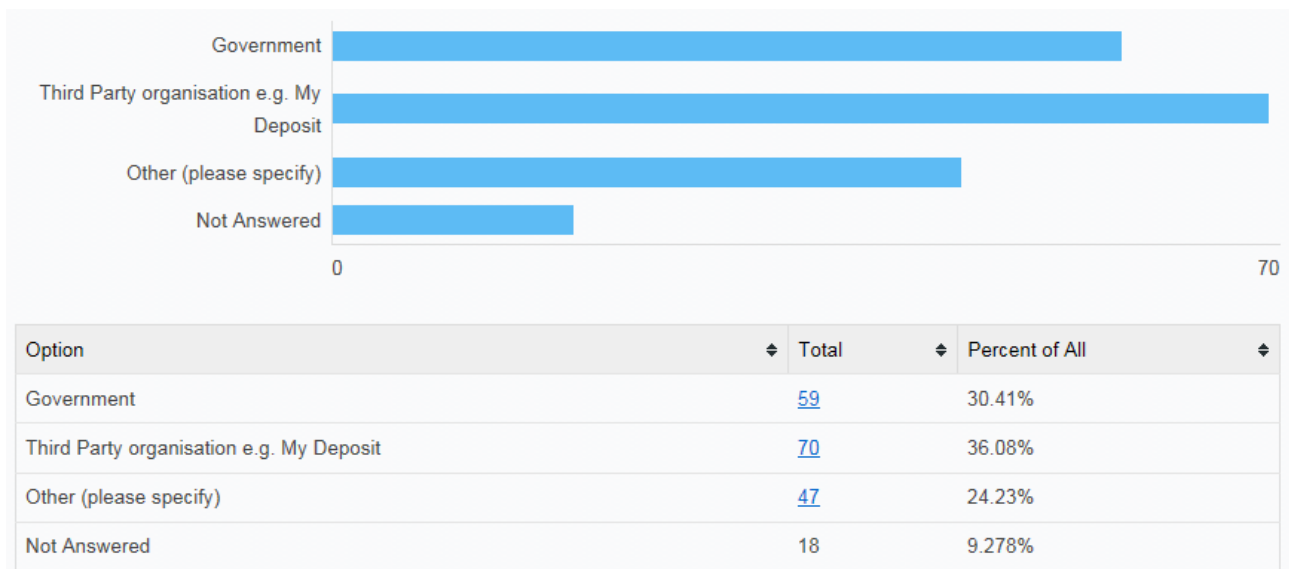
Views varied across this question. Examples of suggestions made under the 'other timescale' option include:

- "13 weeks / 3 months"
- "8-12 weeks plus any pet deposit"
- "For a long-term resident of the IOM. Just a week or 2 rent in advance."
- "Should be based on risk of tenant such as if smokers or if pets or if first timers or if short let. This should be agreed between landlord and tenant."
- "It varies on every property"
- "Case by case basis"
- "4 weeks or 6 weeks if you have pets"

In addition to answering the question, a total of **47** comments were made about this question and the following graph illustrates the general themes that arose.



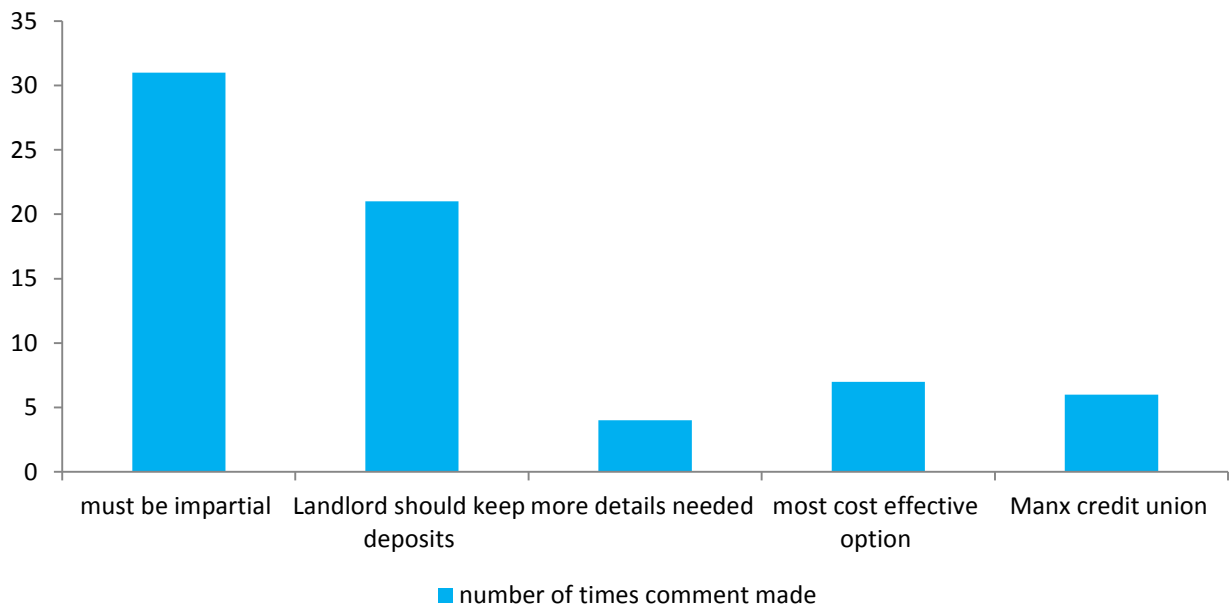
Q20. The Rent Deposit Protection Scheme should be operated by:



Examples of suggestions made under the 'other' option include:

- the Landlord
- Local banks
- Credit union
- Licenced property managers/agents

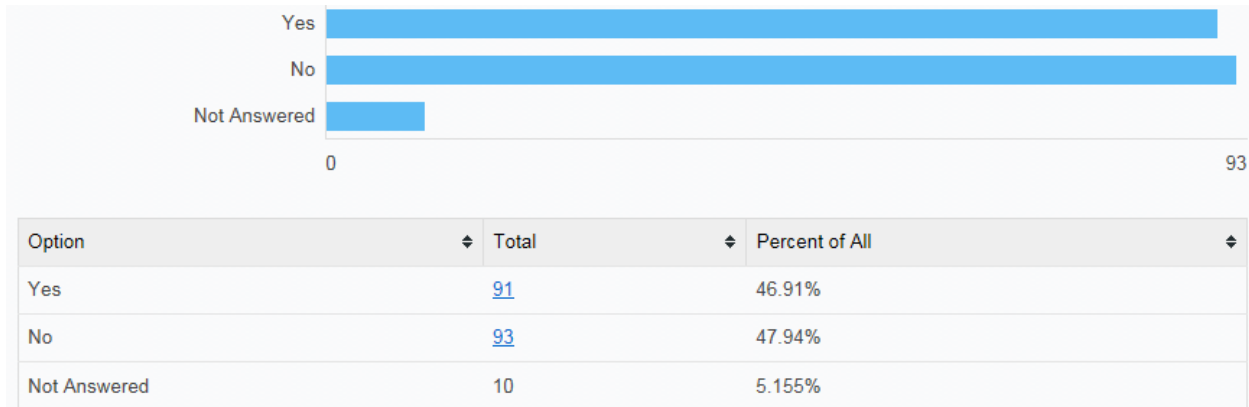
In addition to answering the question, a total of **109** comments were made about this question and the following graph illustrates the general themes that arose.



Part 7 – Information

This part of the Bill outlines the powers the Department has in respect of obtaining the necessary documentation from relevant landlords, their nominated representatives or other persons noted as having a relevant interest in a rented dwelling.

Q21. Failure to comply and to provide relevant documentation will result in a maximum penalty of £5000 as ordered by the Courts. Do you think this is fair?



There was an almost even response to this question with just under **48%** of respondents disagreeing that the maximum penalty of £5000 for failure to provide relevant documentation as ordered by the Courts was fair, whilst **47%** agreed it was fair (5% did not answer this question).

Comments from respondents who disagreed with this question include:

"The maximum fine is too high - not all landlords are wealthy."

"We could be off island for 3 months holiday, what happens if we are not here?"

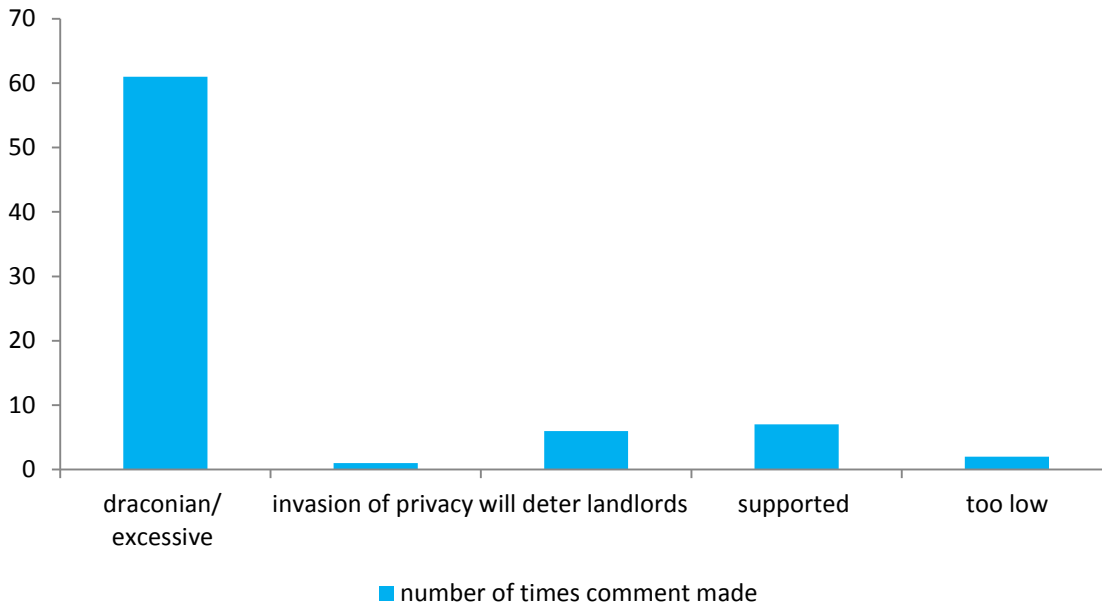
"No idea upon what this amount is based."

"Excessive and disproportionate"

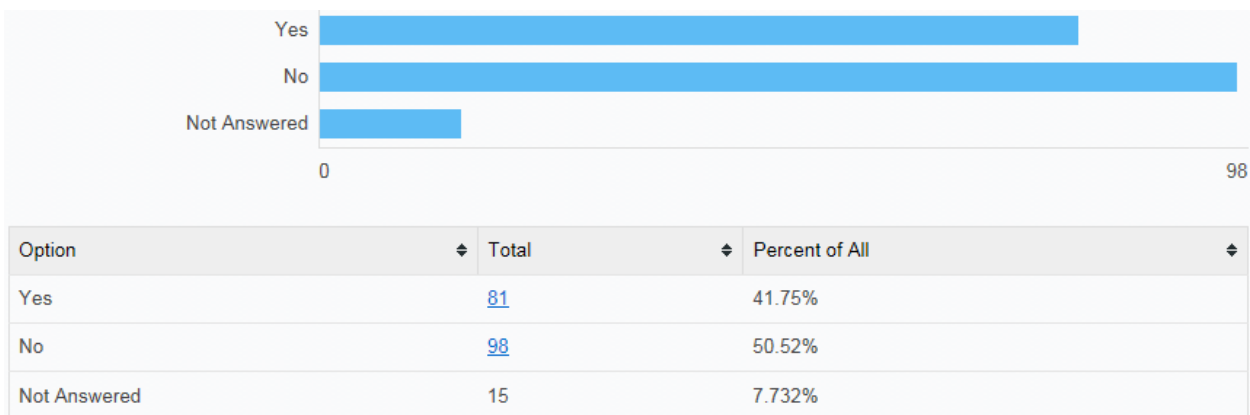
There was just the one additional comment from respondents who agreed with this question:

"it depends on the circumstances"

In addition to answering the question, a total of **82** comments were made about this question and the following graph illustrates the general themes that arose.



Q22. The £5000 penalty is applicable to a landlord or their representative, and any other person who has an estate or interest in a rented dwelling. Is it fair that this penalty should apply to any person who has an estate or interest in a rented dwelling?



Views were fairly even in response to this question with **50%** of respondents disagreeing that a penalty of £5000 is applicable to any person who has an estate or interest in a rented dwelling, whilst just under **42%** agreed it was fair (7% did not answer this question).

Comments from respondents who disagreed with this question include:

“Penalties should only be imposed on parties directly responsible for negligence.”

“It is not clear what this means.”

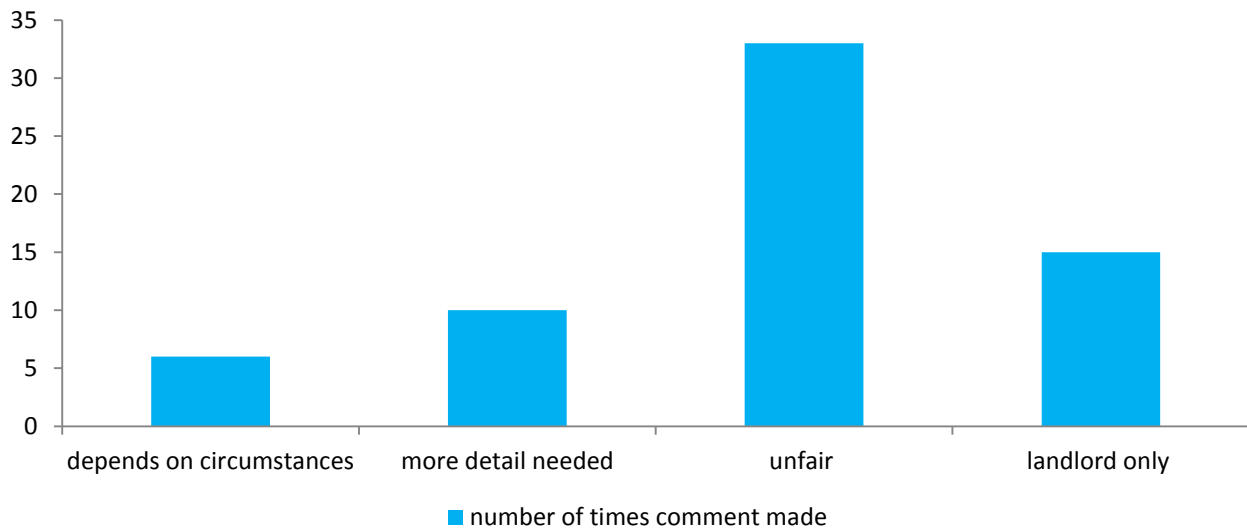
“The person with an interest may have no involvement in day to day Management.”

“It may not be transparent of who has an interest in the property.”

There was just the one additional comment from respondents who agreed with this question:

“...fines should be based on a proportion of the rent.”

In addition to answering the question, a total of **84** comments were made about this question and the following graph illustrates the general themes that arose.



Part 8 – General

This section covers the general powers and supporting law or regulation within which the Landlord Registration Bill will operate.

There was no specific question in respect of this part of the Bill however respondents were invited to make comments and a total of **51** comments were received, some of which are noted below:

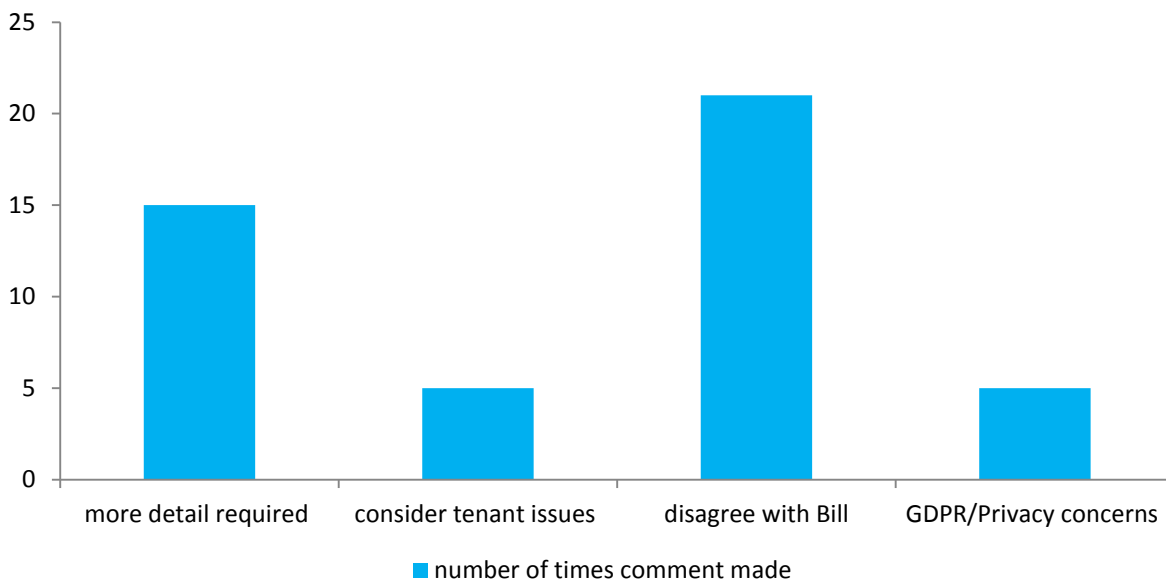
“Entering by consent is acceptable. Being authorised to copy, film, photograph, and remove documents having entered smacks of a Police State not the Island?”

“How many civil servants will this scheme take to run and what will be the cost?”

“I don’t want this scheme and not many landlords do, you will end up with landlords selling up and not being landlords.”

“Massive over-reach into the private affairs of the public.”

The comments were analysed in more detail and the graph below illustrates the general themes commented on around this part of the Bill.



Schedule – Content of the Register

The Schedule at the end of the Bill informs what content must be held on the Register about the landlord, their representative if applicable and each rented dwelling which is registered as part of the landlord’s registration.

There was no specific question in respect of this part of the Bill however respondents were invited to make comments and a total of **46** comments were received, some of which are noted below:

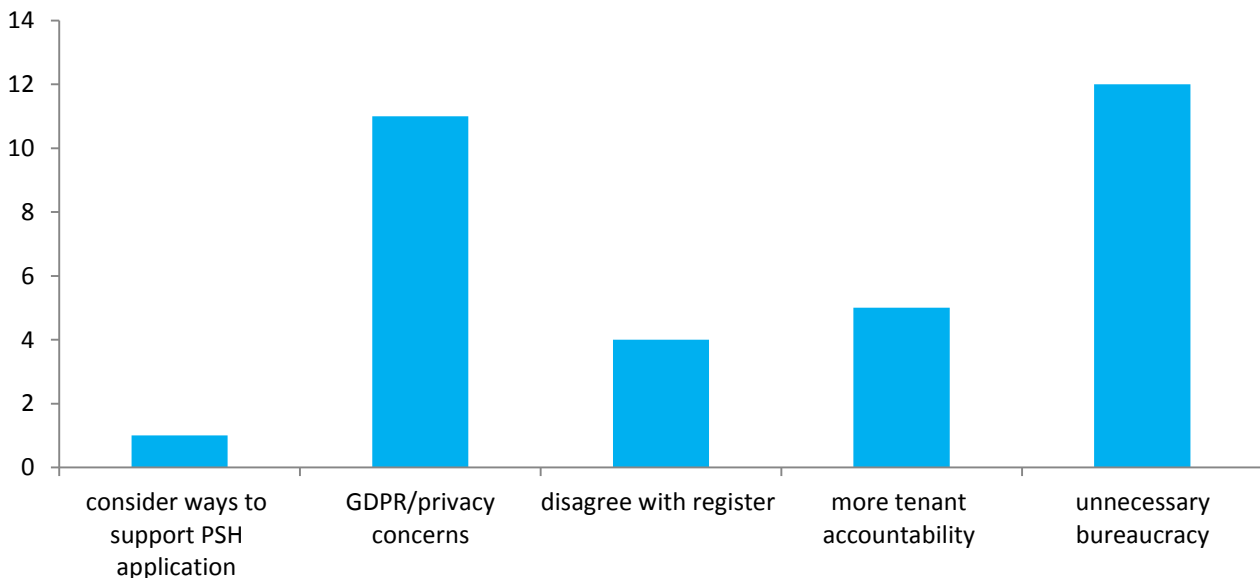
“How accessible would the Register be to the public, tenants or third-sector bodies? While landlords should have a right to privacy when appropriate it would seem sensible that tenants and those supporting them (housing charities, for example) could check that either specific landlords or specific properties were registered...”

“Is this register available to the public...who will have access, will it be tenants/potential tenants? I do not want them knowing my full name, gender etc. That is personal and privileged information which could if available to anyone who sought it potentially be used for malicious reasons/ purposes. I would not be happy providing it until I had assurances that there was no compromise...”

“The register is only as good as the data it holds. It exposes the IOM Government to data protection and loss risk.”

“It is not clear why residential addresses need to be included.”

The comments were analysed in more detail and the graph below illustrates the general themes commented on around this part of the Bill.

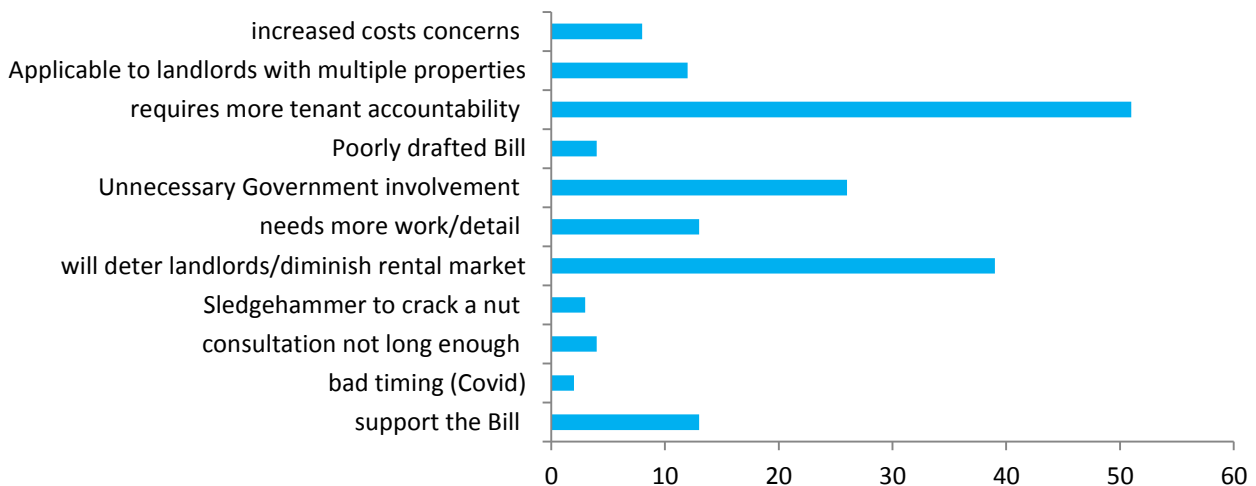


Any further comments

All respondents who completed the survey were invited to add any further comments about the draft Landlord Registration (Private Housing) Bill 2020.

A total of **112** respondents used this opportunity to provide their final thoughts about the proposed Bill.

The most popular themes are shown in the graph below:



4. Responses received by email/letter

43 respondents provided their thoughts, comments or recommendations about the proposed Bill via email and **4** by letter.

The five most common themes are as follows:

- Insufficient consultation with Landlords
- Will deter landlords
- Unfair/unnecessary bureaucracy
- Will increase rents
- Excessive penalties

There were many other thoughts and considerations made about the proposed amendments including:

- In support of the Bill
- Unnecessary Government involvement
- More details needed
- Should also apply to Public Sector Housing landlords

5. Conclusion

The Department thanks all respondents for taking the time to complete the survey. All responses have been considered and are assisting the Department to further develop the legislation and operational policy before making its recommendations to the House of Keys.