

Greater Manchester Combined Authority

Date: 28th November 2025

Subject: Housing First: Strengthening Housing Standards: Property Check
Programme Progress and Enforcement Trainee Expansion

Report of: Deputy Mayor, Paul Dennett, Portfolio Lead for Housing First
James Binks, Chief Executive Portfolio Lead for Housing First

Purpose of Report

This report updates on the progress of Greater Manchester's Property Check Programme, which aims to ensure all renters can request a property check by 2030. It highlights recent actions to expand council capacity, the impact of new legislation making property checks easier, and ongoing efforts to improve standards in the private rented sector.

The report also seeks approval for a new round of the Housing Enforcement Trainee Programme, designed to train more enforcement officers and support councils in tackling unsafe rental housing. It outlines the programme's success so far, financial considerations, and next steps to further strengthen local authority enforcement capacity.

Recommendations:

The GMCA is requested to:

1. Approve the use of Retained Business Rates to deliver a new Housing Enforcement Trainee Programme cohort, in line with paragraph 2.7.
2. Note the update on the previous trainee programme.
3. Issue formal thanks to the Bishop of Manchester for his work to secure an amendment to the Renters' Rights Act to reduce the risk to tenants of asking for a property check, and make it easier for councils to carry them out.
4. Note the other actions taken as part of the Property Check Programme since June 2025.

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Equalities Impact, Carbon and Sustainability Assessment:

Recommendation - Key points for decision-makers		
Insert text		
Impacts Questionnaire		
Impact Indicator	Result	Justification/Mitigation
Equality and Inclusion	G	This proposal will primarily benefit residents living in poor conditions in private rented housing. The effect will only be limited due to the scale of the intervention. GMCA's full equalities impact assessment for the Good Landlord Charter shows a wide range of disproportionate affects of interventions in this kind of housing. These include a larger impact on younger people, as private tenants tend to be younger, and younger tenants are more likely to have experienced a problem in their home; on tenants with disabilities, who are more likely to be dissatisfied with the condition of their home; residents in the Black African, Arab, White and Black African and Other Mixed or Multiple Ethnic Groups who are more likely to be private tenants, etc. As above, the beneficiaries will disproportionately be socially or economically disadvantaged due to their status as tenants. The effect will only be limited due to the scale of the programme. A higher proportion of private renters are in receipt of Universal Credit (>35% of PRS households in GM) than the population at large (~11% of people nationally). The trainee programme is intended to support the growth in housing standards enforcement capacity, so that more renting residents across GM are able to access a property check from their council. N/A N/A
Health	G	The housing standards trainees, once trained, will work to identify and remedy housing hazards which pose a risk to residents' physical or mental health. The housing standards trainees, once trained, will work to identify and remedy housing hazards which pose a risk to residents' physical or mental health. N/A N/A N/A N/A
Resilience and Adaptation	G	Housing standards enforcement works on the basis of working to reduce health risks through the Housing Health and Safety Rating System, as part of the Housing Act 2004. Once trainees are sufficiently trained, they will work to reduce health risks in line with this. N/A Reducing housing hazards, such as dangerous damp and mould, excess cold, etc will reduce residents' vulnerability to a range of health risks. N/A N/A
Housing	G	Residents living in disrepair are at higher risk of homelessness. This is because households that are living with disrepair long-term (i.e. do not seek to move to housing in better condition, are unable to get improvements from their landlord) are more likely to have fewer housing options, and -- where poor conditions are at their most serious -- could be made homeless by their home being unfit for human habitation. N/A N/A N/A The housing standards trainees will identify poor housing and work with landlords to make improvements, ultimately taking enforcement action where landlords fail to comply voluntarily. The housing standards trainees will identify poor housing and work with landlords to make improvements, ultimately taking enforcement action where landlords fail to comply voluntarily.
Economy	G	Improved housing quality has an indirect beneficial impact on economic outcomes through improved health outcomes leading to a reduction in the number of lost work days, for example, through sickness absences The trainee programme is designed to support new entrants into the housing enforcement workforce, as part of the long-term increase in enforcement capacity. The trainee programme is designed to support new entrants into the housing enforcement workforce, and provide them with the skills needed for a long-term good job in enforcement. N/A N/A N/A The trainee programme includes a level 4 apprenticeship, level 5 diploma and a range of additional short courses. N/A
Mobility and Connectivity		
Carbon, Nature and Environment	G	N/A N/A N/A N/A N/A N/A N/A Housing standards enforcement officers are generally the responsible officers for enforcing Minimum Energy Efficiency Standards in domestic properties. Supporting a growing workforce will allow for further enforcement of these regulations
Consumption and Production		
Contribution to achieving the GM Carbon Neutral 2038 target		Housing standards enforcement officers are generally the responsible officers for enforcing Minimum Energy Efficiency Standards in domestic properties. Supporting a growing workforce will allow for further enforcement of these regulations. The contribution could be improved with additional resources, although to make this contribution to the target, this would need to be considered in local authorities with a
Further Assessment(s): Equalities Impact Assessment and Carbon Assessment		
G	Positive impacts overall, whether long or short term.	A Mix of positive and negative impacts. Trade-offs to consider. R Mostly negative, with at least one positive aspect. Trade-offs to consider. RR Negative impacts overall.

Carbon Assessment		
Overall Score	#DIV/0!	
Buildings	Result	Justification/Mitigation
New Build residential	N/A	
Residential building(s) renovation/maintenance	#DIV/0!	
New build non-residential (including public) buildings	N/A	
Transport		
Active travel and public transport	N/A	
Roads, Parking and Vehicle Access	N/A	
Access to amenities	N/A	
Vehicle procurement	N/A	
Land Use		
Land use	N/A	
No associated carbon impacts expected.	High standard in terms of practice and awareness on carbon.	Mostly best practice with a good level of awareness on carbon.
		Partially meets best practice/ awareness, significant room to improve.
		Not best practice and/ or insufficient awareness of carbon impacts.

Risk Management

Risks associated with the Housing Enforcement Trainee Programme are being managed as part of the project, leaning on the experience of having run an equivalent programme in the past. Relevant risks have been identified and are being considered as the project progresses.

Legal Considerations

The funding arrangements set out in the report will be underpinned by appropriate grant agreements.

Financial Consequences – Revenue

Property Check 25/26 Approved Retained business rate ask was £1 million . It has been reprofiled to be spent in 25/26, 26/27 and 27/28. A proposed allocation for funding for ten new trainees for three years totals £600k, profiled as £145k in 25/26 £180k 26/27 and £275k in 27/28, the average cost of a trainee over the 3 year period is around £58k, any additional trainees over the 10 accounted for in the original bid will be funded from the local authorities.

Financial Consequences – Capital

N/A

Number of attachments to the report: 1

Good Landlord Scheme Trainee Programme: summative evaluation

Comments/recommendations from Overview & Scrutiny Committee

N/A

Background Papers

- Improving renting through higher standards and better enforcement, June 2025
- A New Deal for Renters, June 2023
- Action to Improve Greater Manchester's Rented Housing, January 2023

Tracking/ Process

Does this report relate to a major strategic decision, as set out in the GMCA Constitution

Yes

Exemption from call in

Are there any aspects in this report which means it should be considered to be exempt from call in by the relevant Scrutiny Committee on the grounds of urgency?

No

Bee Network Committee

No

Overview and Scrutiny Committee

N/A

1. Introduction/Background

- 1.1. GMCA has committed to a Housing First approach, and delivering healthy homes for all is at the centre of the Greater Manchester Strategy. This paper forms part of a programme of work by the Housing First Unit coming forward for approval in this meeting cycle, including Temporary Accommodation, and the Tripartite Agreement with Greater Manchester Housing Providers and NHS GM. This includes a pledge that by 2030 everyone living in rented accommodation across the conurbation will have the right to request a property check. A report to GMCA in June 2025 set out the three areas of action to deliver on this pledge. They are: expanding council capacity to do checks; working to develop central enforcement resources and expanding access to checks.
- 1.2. This report provides an update on action since then and asks for approval of a new round of the Housing Enforcement Trainee Programme to support increased council capacity to do checks. With GM councils also rising to meet the need for additional housing enforcement capacity, a new round of the trainee programme has the potential to deliver at least ten new enforcement trainees, in addition to the 13 trainees who completed the programme in its first cohort.
- 1.3. As part of the update, this report also recommends that GMCA issue formal thanks to the Bishop of Manchester for his work to secure a legal change as part of the Renters Rights Bill/Act that will make property checks easier to complete in the future.

2. Housing First

- 2.1. The Greater Manchester Strategy sets out the vision to deliver a healthy home for all across the conurbation, so that everyone can live in a good, warm, safe place they can call home. Driving up the standards of existing homes is one of the three pillars of the Housing First approach that is being taken to deliver this, alongside delivering new supply, and housing support.
- 2.2. Improving standards for private renting in particular is central to the work that needs to be done to deliver on this vision, as private renting is the housing tenure with the worst conditions. Government statistics suggest that 28,739 (12%) of GM's private rented homes had serious, category one hazards in 2020 and 58,564 fell

below the current Decent Homes Standard.¹ Work to improve private renting standards is being led by the groundbreaking Good Landlord Charter, which is encouraging all landlords to raise standards voluntarily and was launched in June 2025, and the Property Check Programme, which is supporting increased enforcement against non-compliant landlords.

3. The Housing Enforcement Trainee Programme

- 3.1. GMCA's Housing Enforcement Trainee Programme was developed with GM councils in 2022 to help address the shortage of qualified and experienced housing enforcement officers. These officers are at the frontline of tackling dangerous rented housing, completing property checks for housing hazards and using councils' significant enforcement powers to remedy housing disrepair and penalize criminal landlords. In addition to resource constraints brought on by years of government austerity after 2010, the skills shortage has been a significant impediment to increasing councils' capacity to do more property checks.
- 3.2. The first trainees to complete the training programme began in 2023 and the first programme is due to formally end in March 2026. The programme is designed to take entirely new entrants up to a level of qualification recognised by the relevant professional body, the Chartered Institute of Environmental Health. It includes both an apprenticeship and a diploma. The costs of employing and training new enforcement trainees through the programme are split between councils and the GMCA. The GMCA contributes half the employment costs of ten trainees for three years, with councils able to add additional trainees to the cohort where they can fully meet their employment costs. All training costs are also met by the GMCA, save for the cost of each trainee's apprenticeship, which is covered from their respective council's Apprenticeship Levy.
- 3.3. The programme has been a significant success, and an evaluation of the first cohort is included as an appendix to this report. Considerations from the evaluation have been included in the development of the new programme. All 13 trainees who joined the programme in 2023 have now finished their training. All continue to be employed by the councils that they were originally recruited to, making a positive contribution to tackling bad housing and criminal landlords (a case study is included below). Eight of the 13 trainees have so far secured contract extensions in

¹ English Housing Survey: local authority housing stock condition modelling, 2023, MHCLG

their enforcement teams beyond the March 2026 end of the programme, or are in permanent posts. Decisions on some remaining trainee posts will be made as part of councils' 2026/27 budget processes, and in other cases trainees will be supported to apply for enforcement vacancies.

- 3.4. **Case study** – Adam joined as Wigan Council's housing enforcement trainee in the 2023 cohort. Having completed his level 4 Regulatory Compliance Officer Apprenticeship, Adam began to take on his own casework. He subsequently led an investigation against a landlord for failing to comply with an improvement notice, under the Housing Act 2004, after the landlord did not remedy serious excess cold, electrical and fall hazards, despite the council's instructions to do so. Adam then processed the council's first ever civil penalty against a landlord for this offence, which led to the landlord receiving a £27,500 fine, the proceeds of which will be reinvested into housing enforcement. With the support of the team, he also issued a £2,000 financial penalty for failing to comply with Minimum Energy Efficiency Standards, and ensured the energy efficiency of the home was increased to a legal standard. He has recently secured a permanent enforcement position at the council.
- 3.5. Following a process over the summer, it has been established that there is significant appetite to run the Housing Enforcement Trainee Programme for a second time on the same model 2026-2029. Most GM councils have committed to participating in the programme by match-funding the employment costs of a trainee and covering apprenticeship training costs through their Apprenticeship Levies, on condition of funding from the GMCA being approved.
- 3.6. Several councils have gone even further by committing to fully fund additional housing enforcement trainees as part of the cohort, on top of the ten match-funded by GMCA. These include Bolton, Bury, Manchester and Salford. Through a combination of these match-funded and fully council-funded trainees, the Housing Enforcement Trainee Programme therefore has the potential to train in excess of ten housing enforcement officers 2026-2029.
- 3.7. GMCA officers therefore recommend approving the use of funding already allocated to the Property Check Programme as part of the Retained Business Rates 2025/26 allocation for this purpose. Funding will be used to match-fund the employment costs of ten new trainees across the conurbation for three years, and fully funding the training costs of all trainees in the cohort, excepting the apprenticeship training costs to be covered by councils levies. In line with good

grant practice, funding will be spread across the three financial years 2025/26, 2026/27 and 2027/28, with a total cost to GMCA of up to £600,000.

4. Property Check Programme Update

- 4.1. Multiple additional steps have been taken to support delivery of the property check pledge since the areas for action were outlined in June.
- 4.2. Working with Salford City Council, the Greater Manchester Fire and Rescue Service started to pilot a new 'tier one' property check in September, focused in the Eccles area. Tier One Property Checks are being developed to support a wide range of public services to identify dangerous rented housing and escalate disrepair to local authority enforcement teams for further investigation and possible enforcement action. Thousands of public servants across Greater Manchester make home visits every year, and these represent a key opportunity to spot dangerous rented homes and expand access to property checks. The findings of the pilot are expected in early 2026/27 and the next steps in rolling it out will be identified subject to future budget availability.
- 4.3. Several other actions taken since June 2025 relate to the forthcoming implementation of the Renters' Rights Act. GMCA officers worked with the Bishop of Manchester over the summer to achieve an amendment to the act itself to make it easier for councils to carry out property checks. This amendment, which received government backing in the final stage in the Lords, altered councils' power of entry under the Housing Act 2004 by removing the requirement to give landlords 24 hours' notice of a formal inspection of a rented home, while retaining tenants' rights to notice. The old requirement to give the landlord notice had given criminal landlords an opportunity to pressure their tenants to withdraw complaints about bad housing, made it more difficult to take action in emergency situations and increased the red tape around property checks. Removing the requirement should allow more tenants to come forward and make the process of council property checks more efficient.
- 4.4. Officers recommend that the GMCA issues its formal thanks to the Bishop of Manchester for his work in the House of Lords and with the minister, to secure this change, which will make a genuine difference to renters seeking property checks across the conurbation.
- 4.5. Beyond this amendment, the act is a transformational piece of legislation for private renting and will significantly extend councils' powers and duties to address bad

landlord practice. This will put Greater Manchester in a stronger position to deliver on the property check pledge, but may also create new pressures on council enforcement capacity in the short term. In particular, the abolition of 'Section 21 no-fault evictions' will put private tenants at significantly lower risk of being evicted in retaliation for asking their local council for a property check, removing a major current barrier to the right to request a check. Ensuring councils are prepared to implement this legislative change is therefore intimately related to the successful delivery of the property check pledge.

4.6. GMCA has acted to support councils to prepare for implementation of the act and retain capacity to conduct property checks while the new powers and duties come in by:

- organising training on the bill for relevant council teams – including enforcement, homelessness, trading standards, legal and finance – across all Greater Manchester local authorities.
- participation in MHCLG's pilot of the national private rented sector database. Trafford, Salford, Wigan local authorities and the GMCA are participating in the pilot jointly, and will use the pilot to influence the shape of the database and understand opportunities for city region cooperation on database enforcement.
- extending funding for officers recruited through the Private Rented Sector Enforcement Pathfinder Project. MHCLG funding for these enforcement officer posts began to come to an end at the beginning of 2024/25. GMCA funding from the 2025/26 property check allocation has supported councils to retain these 16 posts across the conurbation by gap funding ahead of new burdens for the act becoming clear.

5. Conclusion

5.1. Improving standards in the private rented sector is central to delivering on the Greater Manchester Strategy of a healthy home for all. As part of the strategy pledged to deliver a right to request a property check for everyone living in rented accommodation. Significant progress has been made since June 2025 when the GMCA considered a report setting out the three areas for action to deliver the right to request a property check. This includes a vital change to primary legislation, as well as a number of other changes.

5.2. Expanding council capacity is one of the three areas for action, and to achieve this the pool of qualified and experienced enforcement officers will need to grow.

GMCA's Housing Enforcement Trainee Programme offers a proven model to achieving this and re-running it from 2026 could deliver up to 19 new trained enforcement officers, putting Greater Manchester in a strong position to deliver on the property check pledge and improved standards for private renters.