Online ISSN: 2055-6586(online)

Website: https://www.eajournals.org/

Publication of the European Centre for Research Training and Development -UK

Investigating Tenant Selection Bias and Discrimination in the Enugu Metropolitan Residential Property Market, Nigeria

Celestine U. Ugonabo Fidelis I. Emoh

Department of Estate Management, Nnamdi Azikiwe University, Awka, Nigeria

doi: https://doi.org/10.37745/ijcecem.14/vol11n2102110

Published July 3 2023

Citation: Ugonabo C.U. and Emoh F.I. (2023) Investigating Tenant Selection Bias and Discrimination in the Enugu Metropolitan Residential Property Market, Nigeria, *International Journal of Civil Engineering, Construction and Estate Management*, 11(2), 102-110

ABSTRACT: The rapid rise in Nigeria's population has led to a corresponding increase in demand for rental housing prompting real estate investors to capitalize on the opportunity by providing private rental housing for the teeming population and offset government's inability to provide adequate accommodation. As the source of income of a rented house is the tenant, it is important for the landlord or his agent to select the best possible tenant. This paper investigates the tenant selection criteria adopted by registered Estate Surveying and Valuation firms in Enugu metropolis to identify the requirements for tenant selection and to examine the nature of bias and discrimination in their selection process with a view to determining the important criteria required of prospective tenants in securing a rental accommodation. The study adopts a survey research method. Structured questionnaires were administered to 44 registered real estate firms in Enugu metropolis. Data collected were analyzed using Relative Importance Index (RII) to rank tenant selection criteria. Findings revealed that though important tenant selection criteria such as *employment/occupation* (0.9758), *nature of employment* (0.9635), *and ability to pay rents* (0.9592) rank 1st, 2nd, and 3rd respectively, bias and discrimination factors such as ethnicity (0.8976), family size (0.8863), marital status (0.8757), and religion (0.8571) rank 4th, 5th, 6th and 7th respectively. Thus, there is a significant level of bias and discrimination in tenant selection in Enugu metropolis residential property market. The study recommends enactment of legislation that outlines the criteria to adopt when selecting tenants which is devoid of all forms of bias and discrimination, national re-orientation of citizens against ethnic bias which is the predominant form of bias in tenant selection, and enlightenment of landlords and property managers on the consequences of bias in tenant selection.

KEYWORDS: Tenant selection, criteria, bias, discrimination, rental housing, Enugu metropolis

INTRODUCTION

The growing rate of population and urbanisation has led to a corresponding increase in demand for rental housing in Nigeria. Moreover, government support to match the need for shelter and its availability has been burdened with the duo problem of overpopulation and substantial housing shortfall of over 600,000 units (Igbinoba, 2017). Residential rental property is an investment option with long-term value growth and returns. The characteristics of real estate as an inflation hedge makes it an attractive investment vehicle and the increasing demand for rental housing has led investors to capitalize on the opportunity of providing real estate for rent to a teeming population. However, considering the limited housing stock in Nigeria and the dominance of the private sector in the residential property market, there is a tendency for discrimination in access to private housing facilities. Secondly, like other types of investments, residential rental property investment has various risks. Among them is the risk of selecting bad tenants. There are many factors associated with the risk of bad tenant selection ranging from possibility of rent default (Dabara, Anthony, Olusegun, Eleojo, & Michael, 2017), race and ethnicity (Gbadegesin & Ojo, 2013; Akindele, Ogundile, & Oloke, 2021), age and gender (Ahmed & Hammarstedt, 2008), marital status (Agboola & Olukolajo, 2021), religion (Iruobe, Ugwuejim, Nworah, & Iruobe, 2020), and occupation (Nutsugbodo, Anaafo, Ankamah, & Bannor, 2022). These factors have become strategic tenancy selection criteria by landlords and property managers (Fonseca, Ferreira,

Online ISSN: 2055-6586(online)

Website: https://www.eajournals.org/

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Fang, & Jalali, 2018). Tenant selection bias arises due to prejudice about some people who belong to a particular group or because of people who have certain behavioral characteristics or attributes. It is the result of not treating each person as an individual irrespective of their ethnicity, race, gender, etc. Rental housing discrimination during the process of tenant selection occurs when a prospective tenant receives an unfavourable treatment from a property owner/agent on account of his/her race, ethnicity, religion, disability, gender, and/or sexual orientation (Choi, Ondrich, & Yinger, 2005; Flage, 2018). Discrimination in the residential rental market can be direct or indirect. Direct discrimination is a situation whereby an individual/group of people is/are treated less favourably than another is/would have been treated in a similar setting. That is when a prospective tenant is discriminated against based on his/her background (gender, race, among others). On the other hand, indirect discrimination occurs when a criterion or practice would unintentionally put some persons at a disadvantage compared to others unless that criterion or practice can be objectively justified (Flage, 2018). This includes situations where a person was not intended to be discriminated against, but circumstances would cause s/he to be treated unfairly (e.g. disability). Housing market discrimination is related to housing supply, dwelling occupation, and the allocation of housing facilities (Nutsugbodo et al., 2022). When certain categories of people are excluded from occupying the available housing facilities since the facility's characteristics are unsuitable for them, it amounts to indirect discrimination. Hence, authorities are required to ensure that housing facilities are developed to meet the needs of every person, including persons with disabilities.

Given that the demand for rental housing in Nigeria exceeds the supply, the lucrativeness of investing in residential rental property in every city of Nigeria is justifiable. However, the success of investing in rental properties is determined partly by the tenants' attributes. Cases abound of indiscriminate destruction of properties, breach of covenants, and rent defaults in varied degrees and categories of lease. For instance, Gbadegesin and Ojo (2012) found the issue of recalcitrance common among tenants in metropolitan Ibadan, Nigeria. Among several prospective competitive tenants, it is important to select the appropriate tenant to occupy a vacancy without any element of bias. Choosing a tenant not at 'arm's length' transaction is tantamount to a wrong selection. Ethnic sentiment could also result to bias selection and consequently affect the aim of the investment which usually results in rent default (Gbadegesin & Ojo, 2013). Other consequences of rental housing discrimination which affects both the landlord and tenants include increase in housing void as the period required to let a residential property increases as a result of consideration of a discrimination criterion (Oladokun, 2011). Rental housing bias and discrimination also makes decent housing become inaccessible to the people and consequently leads to rent increase (Greif, 2018). The introduction of bias and discrimination factor(s) among tenant selection criteria affects the residential property market negatively by widening its imperfection (Gray, 2018).

This paper investigates the tenant selection criteria adopted by registered Estate Surveying and Valuation firms in Enugu metropolis to identify the requirements for tenant selection and to examine the nature of bias and discrimination in their selection process with a view to determining the important criteria required of prospective tenants in securing a rental accommodation in the residential property market of Enugu metropolis.

LITERATURE REVIEW

Tenant Selection Criteria in Nigeria Residential Rental Property

Tenant selection is a complex decision-making exercise that requires careful consideration of different factors (Fonseca *et al.*, 2018). Selecting a suitable tenant in a residential property is one of the most difficult aspects of property management (Agboola & Olukolajo, 2021). Given that the source of income of a rented house is the tenant, it is a major concern for the landlord or his agent to select the best possible available tenant (i.e., a tenant who pays the rent in full, on time, maintains a good relationship with the neighbours, and takes care of the property) from a large pool of applicants. Hence, the success or failure of the selection depends on the information available to the property owner or his agent (Olukolajo, Ogungbenro, & Adewusi, 2018). Nevertheless, determining *a priori* based on available information that someone will be a good tenant is not very reliable owing to the possibility of distorted information but generally, it is only after the tenant

Online ISSN: 2055-6586(online)

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Publication of the European Centre for Research Training and Development -UK lives in the property that it is possible to know whether s/he was a good choice (Fonseca *et al.*, 2018).

In Nigeria, the nonexistence of any legal instrument that outlines the criteria to adopt when selecting tenants further adds to the difficulty in selecting suitable tenants (Gbadegesin & Oletubo, 2013). However, Nigerian scholars have identified various approaches and criteria that can be used to screen prospective tenants theoretically. Oni (2011) posits that adequate returns of investment in residential rental property can be achieved through the selection of suitable tenants by adopting some of the commonly considered tenant selection criteria of registered real estate firms (property managers) in Lagos metropolis which include income, employment/occupation status, job prospects, advance rent payment, marital status, tribe (ethnic group), physical appearance, religion, sex, and number of children (household size). In reality, job prospects and physical appearance are not applicable to most Nigerian property market as it is rare to grant an apartment to a prospective tenant based on job prospects without an initial inquiry of his/her occupation. Also, physical appearance is hardly applicable in tenant selection. Affordability is one of the major criteria for selecting tenants. Bello (2008) and the Joint Center for Housing Studies of Harvard University (JCHSHU) (2008) are of the view that rent affordability is a determinant factor of rental investment in most developing countries. Bello (2008) asserts that tenant's reputation is as important as affordability. This assertion is corroborated by Gbadegesin and Oletubo (2013) and Oni (2011) who posit that the possibility of rent default is avoided during the screening process by determining affordability through express demand for affordability evidence, criminality record, police report, and quality of reference or guarantorship. Affordability criteria can also be based on the circumstances of the prospective tenant. For example, single parent, either by circumstance of death, divorce or separation, or low-income status might be deemed unable to afford rents for adequate accommodation and lack the financial resources to overcome barriers to entry that may exist (such as bonds and rent in advance) (Carter, 1980). In order to select eligible tenants, residential property managers in Nigeria commonly require prospective tenants to fill out an application/acquaintance form where they provide information such as age, gender, marital status, ethnicity, education, employment, salary, annual income, tenancy history, number of dependents, size of household, religion, and guarantor among others (Olukolajo et al., 2018). Gbadegesin and Oletubo (2013) observed that property managers in Ibadan metropolis base prospective tenant selection for residential properties on four major criteria - tenant's personality report, tenant's impact record, tenancy report, and size of the current need. Other vital information that could be obtained by the landlord/property manager as a precaution against rent default include letter of recommendation from previous landlord, credit check and psychological profile of prospective tenants (Gbadegesin & Oletubo, 2013; Olukolajo et al., 2018; Oni, 2011; Yau & Davis, 1994). The main aim of adopting the various tenant selection criteria identified by different scholars is to protect the interest of the property investor and to safeguard the property against bad tenant. However, the use of all these selection criteria has not prevented the occurrence of problematic tenancies rather it has led to bias and discrimination in tenant selection.

Bias and Discrimination in Tenant Selection and the Consequences

The above subjective approaches and criteria for screening prospective tenants have unconsciously introduced some level of bias and discrimination in tenant selection (Gbadegesin & Oletubo, 2013; Reosti, 2018). Bias and discrimination in tenant selection come in different forms ranging from marital status, ethnicity, occupation, income, and gender to religion (Heylen & Van den Broeck, 2016). A plethora of studies have established evidence of bias and discrimination among landlords and property managers in tenant selection in both developed and developing countries along with the negative consequences for residential rental property investment (Adu-Gyamfi, Cobbinah, Gaisie, & Kpodo, 2020; Akindele *et al.*, 2021; Carpusor & Loges, 2006; Choi *et al.*, 2005; Flage, 2018; Gbadegesin & Ojo, 2013; Heylen & Van den Broeck, 2016; Iruobe *et al.*, 2020; Nutsugbodo *et al.*, 2022; Reosti, 2018). However, the requirements for tenant selection and the nature of bias and discrimination in the tenant selection process for residential rental properties in Enugu metropolis, Nigeria is yet to be studied.

Tenant selection bias occurs when discriminatory factors are introduced with the aim of denying some category of people access to accommodation when selecting tenants (Oyedeji, 2022). There are many bias and discrimination factors experienced in tenant selection such as ethnicity, income,

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Publication of the European Centre for Research Training and Development -UK marital status, family size, occupation, and religion among others which put some category of prospective tenants at a disadvantage when accessing accommodation (Heylen & Van den Broeck, 2016; Reosti, 2018). The proliferation of the bias and discrimination factors can be attributed to competition in the residential rental property market (Gbadegesin & Ojo, 2013).

Bias and discrimination in tenant selection is a social exclusion act which reduces housing accessibility to the citizens (Baldini & Federici, 2011) and widens the inequality gap in the society (Heylen & Van den Broeck, 2016). It inhibits housing accessibility among the people in a community. Oladokun (2011) posited that bias and discrimination in tenant selection in Lagos private residential property led to increase in rental housing void period. The denial of prospective tenants access to accommodation due to bias and discrimination factors often stigmatize the property resulting in elongated letting period (Oyedeji, 2022). Bias and discrimination in tenant selection makes decent housing inaccessible to the people and consequently lead to rent increase (Greif, 2018). The inclusion of bias and discrimination factors in tenant selection negatively affects the residential property market by widening its imperfection (Gray, 2018) and the imperfection of the residential property market can negatively affect smooth rental value determination which can lead to increase or decrease in rent (Oyedeji, 2020). It can also result in wrong tenant selection, for instance, according to Gbadegesin and Ojo (2013), there is high tendency of selecting a bad tenant when considering ethnicity as a tenant selection factor. Other major tenant selection bias factors include income, occupational status, marital status, age, gender, level of education, family size (household size), and religion (Agboola & Olukolajo, 2021; Akindele et al., 2021; Iruobe et al., 2020; Olukolajo et al., 2018; Oyedeji, 2022).

The Study Area

The name Enugu was derived from two Igbo words Enu and Ugwu which means 'top of the hill' or 'hilltop' denoting the city's hilly geography. It was named after Enugwu-Ngwo, the village under which coal was found. The city of Enugu is regarded as the oldest urban area in Southeast Nigeria, and it came into existence because of the presence of coal deposits in the area. Since the 17th century, the location of present-day Enugu has been occupied by the Enugwu-Ngwo and Nike subgroup of the Igbo people. Enugu, the capital city of Enugu State originated from the discovery of coal in 1909 by a team of British geologists led by Albert Kitson at Enugwu-Ngwo, a village located in the Udi Plateau. The discovery of coal by the colonialists brought about the emergence of a permanent cosmopolitan settlement in the area which influenced the construction of the Eastern Line railway to link the Enugu coalfields with the seaport in Port Harcourt to carry coal from the inland city of Enugu to the port of Port Harcourt (a city created for this purpose located 243 km south of what was called Enugu Coal Camp) for the export of the mineral (Nigeria Chief Secretary's Office, 1933). With the commencement of coal mining in Enugwu-Ngwo in 1915, people began to settle on the foot of the hills and on the wide plains that currently constitute Enugu metropolis (Iyi, 2007). In 1917, Enugu acquired township status as classified by the Township Ordinance No. 19 of 1917 (Nigerian Institute of Town Planners, 2011) and was called Enugwu-Ngwo, but because of the rapid expansion of the town towards areas owned by other indigenous communities, it grew into a city and was renamed Enugu in 1928. Enugu became strategic to British interests as foreign businesses began to move into the city, the most notable of which were John Holt, Kingsway Stores, British Bank of West Africa, and United Africa Company. From Enugu the British administration was able to spread its influence over the Southern Province of Nigeria. The colonial past of Enugu is today evidenced by the Georgian building types and meandering narrow roads within the residential area originally reserved for the whites, an area which is today called the Government Reserved Area (GRA). Since attaining city status in 1928, Enugu has being an administrative headquarters starting with becoming the capital of the Southern Provinces in 1929, the capital of East Provinces in 1939, the capital of Eastern Region in 1961, the capital of the defunct Republic of Biafra in 1967, the capital of East Central States in 1970, the capital of Old Anambra State in 1976, and the current capital of Enugu State since 1991 (Umar & Ugwu, 2015). Enugu has being a major and well known urban area and commercial center since 1915. It is referred to as the 'coal city' due to the significance of the coal industry to the city's foundation and development.

The city of Enugu is located in Enugu State in the southeast geopolitical zone of Nigeria and lies between latitude 06°27′10" North and longitude 07°30′40" East sitting at about 223 meters above

Online ISSN: 2055-6586(online)

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Publication of the European Centre for Research Training and Development -UK the sea level (Google Map, 2023). It has a total land area of about 556 square kilometers and is bounded by Igbo-Etiti and Isi-Uzo Local Government Areas in the North, Nkanu East Local Government Area in the East, Udi Local Government Area in the West, and Nkanu West Local Government Area in the South (Iyi, 2014; Umar, Onoh & Okereke, 2021). Enugu city has a total population of 846, 560 with a growth rate of 3.27% (World Population Review, 2023) and is divided into three local government areas namely Enugu East, Enugu North, and Enugu South. Enugu State which derives its name from the capital city is largely populated by members of the Igbo, an ethnic group in Nigeria. Enugu has a tropical savanna climate characterized by rainy season from March to November with average daily temperature of 24°C and dry season from December to February with average daily temperature of 30°C (Reifsnyder & Darnhofer, 1989). Between December and January, the city is affected by a dusty trade wind from the Sahara Desert known as harmattan which blows towards the western coast of Africa (Egboka, 1985).

In the early 20th century, the economy of Enugu was mostly dependent on coal mining in the Udi Plateau and this was the main force behind the city's rapid growth (Little, 2004). However, as of 2005, coal mining is no longer the mainstay of the economy and mines lay unused. Other minerals presently mined in Enugu include iron ore, limestone, fine clay, marble, and silica (Adepegba, 2010). The cultivation and trading of agricultural produce such as cassava, maize, yam, fruits and vegetables, palm oil, etc. as well as sale of manufactured goods are among the current economic activities of Enugu residents. There are three major markets within Enugu metropolis namely Ogbete Market, Awkunanaw Market, and New Market. A significant part of the population are employed as civil servants in various government establishments such as primary and secondary schools, tertiary institutions, hospitals, ministries and parastatals, while others are employed in private establishments.

The residential houses in Enugu metropolis are mostly block of flats, bungalow, duplex, and tenements. The predominant housing type depends on the residential area. For instance, block of flats is mainly found in the medium density residential areas of Achara Layout and New Haven Layout for medium income earners, bungalow and duplex are common in the low density residential areas of GRA and Independence Layout for high income earners, while tenements are the major housing type in the high density residential areas of Abakpa Nike, Ogui New Layout, and Coal Camp for low income earners.

RESEARCH METHOD

The study adopted a survey research method using questionnaire. A structured non-disguised questionnaire was targeted to registered Estate Surveying and Valuation firms in Enugu metropolis. According to the Firms Directory of the Nigerian Institution of Estate Surveyors and Valuers (NIESV), there are 44 registered real estate firms in Enugu metropolis (NIESV, 2023). Questionnaire was administered to each of the registered real estate firms. It was self-administered to either the branch manager or senior estate officer in the surveyed firms. Estate Surveyors and Valuers work as agents and property managers to the landlords, hence their role include among others screening prospective tenants before selecting them for tenancies and managing them throughout their tenancy period (Ige & Audu, 2017). The questionnaire sought to obtain data on tenant selection criteria of real estate firms for residential properties in Enugu metropolis over a period of five years (2018-2022). It was divided into two sections - A and B. Section A provided the demographic data of the respondent Estate Surveyor and Valuer and the firm, while section B identified the requirements for tenant selection by the firm. A 5-level Likert scale was designed in section B to measure the level of agreement to predetermined tenant selection criteria.

Level 1 - 5 was represented as follows:

- 1 Strongly Disagree
- 2 Disagree
- 3 Undecided
- 4 Agree
- 5 Strongly Agree

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The questionnaire contained only close-ended questions to enable coding and quantification of the response for analysis. Descriptive statistics such as frequency and percentage were used to analyze the demographic data, whereas inferential statistics such as Relative Importance Index (RII) was used to analyze the requirements for tenant selection and the nature of bias and discrimination in the selection process. Out of the 44 questionnaires administered, 40 representing 91% were returned valid for analysis.

DATA ANALYSIS, RESULTS AND DISCUSSION

To identify the requirements for tenant selection and to examine the nature of bias and discrimination in the selection process, several factors which the respondents indicated that they consider in tenant selection for residential tenancies as indicated in section B of the questionnaire were analyzed using Relative Importance Index (RII). According to Ige and Audu (2017), RII helps in determining a variable's contribution to the prediction of a criterion (dependent) variable, both independently and in conjunction with other predictor (independent) variables. Relative Importance Index (RII) was calculated using the formula:

 $RII = n_5 + n_4 + n_3 + n_2 + n_1$

A*N

Where:

 n_5 = total number of responses for 'strongly agree'

 n_4 = total number of responses for 'agree'

 n_3 = total number of responses for 'undecided'

 n_2 = total number of responses for 'disagree'

 n_1 = total number of responses for 'strongly disagree'

A = highest response level (i.e. 5)

N = total number of respondents

The RII was used to rank the selection criteria for prospective tenants. The higher the RII value, the more important is the selection criteria.

Relative Importance Index of Tenant Selection Criteria in Enugu Metropolis

Table 1 shows the RII values and rankings of the tenant selection criteria of Estate Surveyors and Valuers in Enugu metropolis. The rankings were based on the results of analysis of data from response to predetermined tenant selection criteria obtained from the questionnaire administered on registered Estate Surveying and Valuation firms in Enugu metropolis.

Table 1: Relative Importance Index of Tenants Selection Criteria of Estate Surveyors and Valuers in Enugu metropolis

Selection Criterion	RII Value	Ranking
Employment/Occupation	0.9758	1
Nature of employment	0.9635	2
Ability to pay rents	0.9592	3
Ethnicity	0.8976	4
Family size	0.8863	5
Marital status	0.8757	6
Religion	0.8571	7
History of previous tenancy	0.8445	8
Credit history	0.8373	9
Ability and willingness to maintain the tenancy agreement	0.8254	10
Provision of suitable referee/Guarantor	0.8187	11
Criminality record	0.7944	12
Age	0.7878	13
Gender	0.7773	14
Disability	0.7592	15

Source: Field Survey (2023)

Employment/occupation (0.9758), nature of employment (0.9635), and ability to pay rents (0.9592) ranked 1st, 2nd and 3rd respectively. These economic indicators are major criteria for determining the suitability of prospective tenants. Therefore, Estate Surveyors and Valuers in Enugu metropolis place high importance on these factors to guarantee the financial commitment

Online ISSN: 2055-6586(online)

Website: https://www.eajournals.org/

Publication of the European Centre for Research Training and Development -UK of prospective tenants. This finding corroborates Agboola and Olukolajo (2021) and Oyedeji (2022).

The most prevalent form of bias in tenant selection in Enugu metropolis irrespective of prospective tenants' suitability for the property indicated by the top 3 criteria is ethnicity (0.8976) which ranked 4th. This finding supports Oladokun (2011) and Oyedeji (2022) in studies conducted in Lagos, and Heylen and Van den Broeck (2016) in a study conducted in Belgium to establish ethnicity as the most predominant form of bias in tenant selection in private residential properties. Similarly, Carpusor and Loges (2006) found rental housing discrimination based on ethnicity in names in the advertisement of apartment vacancies in Los Angeles. In addition, Gbadegesin and Ojo (2013) found the dominance of ethnic bias in tenant selection in residential properties in Ibadan, Nigeria.

Other discriminatory factors such as family size (0.8863), marital status (0.8757), religion (0.8571), age (0.7878), gender (0.7773), and disability (0.7592) ranked 5th, 6th, 7th, 13th, 14th and 15th respectively. Family size determines how pressure will be exerted on existing facilities. For example, with a large family size, more people will want to use water which increases the rate at which the pumping machine provided by the landlord is used. When the pumping machine breaks down, it will cost the property managers to repair it. Hence, to reduce, the cost of maintaining available facilities, attention is paid to the family size of prospective tenants. This finding agrees with Agboola and Olukolajo (2021) which ranked family size as the highest discriminatory factor in tenant selection in Akure after ethnicity.

History of previous tenancy (0.8445), credit history (0.8373), ability and willingness to maintain the tenancy agreement (0.8254), provision of suitable referee/guarantor (0.8187), and criminality record (0.7944) ranked 8th, 9th, 10th, 11th and 12th respectively.

CONCLUSION

From the results of the study, it is evident that a significant level of bias and discrimination exists in tenant selection in Enugu metropolis residential property market. It is noteworthy that bias in tenant selection is not peculiar to developing countries but is a global phenomenon as evidenced by several prior studies by Carpusor and Loges (2006) in Los Angeles, Heylen and Van den Broeck (2016) in Belgium, Oladokun (2011) and Oyedeji (2022) in Lagos, and Gbadegesin and Ojo (2013) in Ibadan. Ethnicity is the most dominant form of bias in tenant selection. Other major forms of bias and discrimination in tenant selection include family size, marital status and religion. Bias and discrimination factors in tenant selection are introduced by landlords and property managers due to bad experience from previous tenants. However, these have reduced objectivity in tenant selection and resulted in letting residential properties to unworthy tenants. Bias and discrimination in tenant selection have negative impact on residential property investment, therefore it essential for residential real estate investors to avoid them in all forms to ensure high returns.

RECOMMENDATIONS

Housing accessibility is vital in a developing economy with high housing deficit like Nigeria. To achieve this, the following measures are recommended:

- 1. Enactment of legislation that outlines the criteria to adopt when selecting tenants which is devoid of all forms of bias and discrimination. An enforcement agency should also be set up by government to enforce this law. This will discourage landlords and property managers from bias and discrimination in tenant selection.
- 2. The important criteria for selecting tenants should be based on prospective tenant's financial security and commitment, ability to pay rents as and when due, and ability and willingness to maintain the terms of the tenancy agreement.
- 3. Ethic bias which is the most prevalent form of bias in selecting tenants should be avoided through national re-orientation of the citizens against it. Co-integration among the ethnic groups should be encouraged, and landlords and property managers should be enlightened on the consequences of bias in tenant selection such as increase in housing void and risk of selecting bad tenants.

Online ISSN: 2055-6586(online)

Website: https://www.eajournals.org/

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4. Property management tasks including tenant selection should be limited to only certified Estate Surveyors and Valuers registered with NIESV. The avoidance of quacks will regulate the activities of tenant selection and reduce bias and discrimination.

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Online ISSN: 2055-6586(online)

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