



<b>Housing Management</b>
<b>Rent Arrears Policy</b>
<b>Reviewed April 2025</b>
<b>Next Review Due April 2028</b>

<b>Policy on :</b>	<b>Rent Arrears</b>
<b>Compliant with Charter :</b>	<p><b>Charter Ref No. 1: Equalities</b> Social Landlords perform all aspects of their housing service so that:</p> <ul style="list-style-type: none"> <li>• Every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.</li> </ul> <p><b>Charter Ref No.2: Communication</b> Social landlords manage their businesses so that:</p> <ul style="list-style-type: none"> <li>• tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.</li> </ul> <p><b>Charter Ref No.3: Participation</b> Social Landlords manage their business so that:</p> <ul style="list-style-type: none"> <li>• Tenants &amp; other customers find it easy to participate in and influence landlords' decisions at a level they feel comfortable with.</li> </ul> <p><b>Charter Ref No.11:</b> Social Landlords make sure that:</p> <ul style="list-style-type: none"> <li>• Tenants get the information they need on how to obtain support to remain in their home and ensure suitable support is available, including services provided directly by the landlord and by other organisations</li> </ul> <p><b>Charter Ref No.13:</b> Social Landlords manage all aspects of their business so that: Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.</p>
<b>Compliant with New Regulatory Framework:</b>	<b>Regulatory Standards of Governance and Financial Management: Standard 2, 3, 4 and 5</b>

<b>Compliant with Community Engagement Strategy:</b>	<b>Yes</b>
<b>Compliant with Equal Opportunities : Equality Impact Assessment</b>	<b>Yes</b>
<b>Compliant with Business Plan:</b>	<b>Objective 2: Refine our Customer Service &amp; Support Model</b>  <b>Objective 4 Harness Digital Technologies</b>  <b>Objective 5: Invest in Partnership Working</b>
<b>Updated: Date for next Review :</b>	<b>April 2025 April 2028</b>
<b>Responsible Officer :</b>	<b>Director of Housing</b>

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## **1.0 Introduction**

Rent is the Association's main source of income.

The Association aims to maximise its rental income through the collection of rent & service charges and the recovery of rent & service charge arrears. We recognise the need to maximise our rental income to meet the Association's Business Objectives and meet our financial commitments.

## **2.0 Principles**

The following principles govern the operation of this policy:

- To provide a transparent service on managing rent arrears
- To promote a payment culture and make prospective tenants aware of the costs associated with maintaining a tenancy to prevent rent arrears occurring

This policy covers both arrears for current & former tenants and shared owners.

## **3.0 Aims & Objectives**

- To create a culture where tenants attach a high level of importance to ensuring their rent and tenancy charges are paid to avoid arrears from occurring in the first instance
- To ensure rent accounts are maintained with rental payments being paid one month in advance in accordance with our tenancy agreement
- To ensure advance payment of rent and service charges is a condition of being made an offer of housing
- To minimise arrears occurring and identify arrears problems at an early stage
- Provide staff with clear guidelines on dealing with rent arrears supported by internal procedures
- To provide services which support tenants experiencing financial difficulties
- To pursue current, former tenant and shared owner arrears by all viable means
- Enforce action where tenants fail to agree and maintain any repayment arrangement for arrears accrued including legal action for eviction where necessary

## **4.0 Legislative Framework**

This policy reflects "good practice" and complies with the following legislation:

- The Housing (Scotland) Act 1987, 2001, 2010 & 2014
- The Scottish Social Housing Charter
- The Data Protection Act 2018
- Freedom of Information Act (Scotland) 2002

- The Equalities Act 2010
- Human Rights Act 1998
- The Homelessness etc (Scotland) Act 2003
- Bankruptcy & Dilligence (Scotland) Act 2007
- Debtor's (Scotland) Act 1987
- Statutory Instrument 2012 No 127 Pre-Action Requirements Order 2012.
- Welfare Reform Act 2012
- The Children (Scotland) Act 1985
- Scottish Secure Tenancy Agreement, Short Scottish Secure Tenancy Agreement and Occupancy Agreement – Paisley HA Tenancy and Occupancy Agreements contain specific conditions in relation to the payment of rent and other tenancy related charges. Non-payment of these charges represents a breach of the tenancy or occupancy conditions

## **5.0 Scottish Housing Charter**

The Association in preparing this policy and the related procedures has given consideration to and sought compliance with The Scottish Social Housing Charter in respect to;

### **Charter Ref No. 1: Equalities**

Social Landlords perform all aspects of their housing service so that:

- Every tenant and other customer have their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

### **Charter Ref No.2: Communication**

Social landlords manage their businesses so that:

- tenants and other customers find it easy to communicate with their landlord and get the information they need about their landlord, how and why it makes decisions and the services it provides.

### **Charter Ref No.3: Participation**

Social Landlords manage their business so that:

- Tenants & other customers find it easy to participate in and influence landlords' decisions at a level they feel comfortable with.

### **Charter Ref No.11:**

Social Landlords make sure that:

- Tenants get the information they need on how to obtain support to remain in their home and ensure suitable support is available, including services provided directly by the landlord and by other organisations

**Charter Ref No.13:**

Social Landlords manage all aspects of their business so that:

Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

The Association reports annually to the Scottish Housing Regulator (SHR) on its performance in respect to rent collection.

**6.0 Equality & Diversity**

We are committed to preventing discrimination and providing equal opportunities for everyone. In applying this policy, we will not discriminate against any individual, household or group on grounds of race, gender, sex, marital status/civil partnership, gender reassignment, sexual orientation, pregnancy or maternity, religion or belief, language, social origin, disability, age or any other personal attribute.

We will make this policy available in alternative formats such as large print or Braille on request. Translation services for other languages can also be made available and where practical we will arrange for an interpreter if you speak a language other than English.

An EIA was considered by Alan Graham in April 2025. We were satisfied that this policy does not have any obvious negative impact on protected groups but this will be reviewed in April 2028.

**7.0 Wider Framework**

We recognise that the delivery of other policies and services provided by us can have a positive impact on managing rent arrears. These are;

**7.1 Rent Setting Policy**

Our rents are based on properties of the same size and type having the same rent. Our rents reflect the costs required to cover loan charges, voids, management & maintenance costs, including amounts set aside for future expenditure.

We carry out an annual rent affordability assessment to ensure that our rents remain affordable to tenants and represent value for money.

We consult with our tenants on any proposed increase to both rent & service charges and give our tenants a minimum of 4 weeks' notice of increase.

## **7.2 Common Allocations Policy**

We include within our policy the requirements of the Housing (Scotland) Act 2001 to disregard:

- Any former tenant rent arrears or other tenancy debt older than 3 years
- Any debt owing to the Association (rent arrears and recharges) less than 1/12<sup>th</sup> of the current annual rent.
- Where a tenant with rent arrears has maintained a suitable arrangement for at least three months and is continuing to make such payments.
- Any outstanding debts, including missed Council Tax payments, which do not relate to the tenancy of a house.

Our Allocations Policy applies to both existing tenants seeking a transfer and applications to us for housing.

### 7.3 Short Scottish Secure Tenancy Policy

### 7.4 Recharge Policy

### 7.5 Domestic Abuse Policy

## **7.6 Community Engagement Strategy**

We consult with our tenants on our proposed rent & service changes and have regard to the views given before implementing any change.

## **7.7 Advice Service**

We promote our Advice Service, which includes Welfare Benefits, Money and Energy Advice, to both new & existing tenants. We aim to ensure they receive the benefits they are entitled to, maximise their income and minimise their expenditure by making best use of their money and minimising expenditure on Energy. We recognise that the Advice Service is both a preventative measure and a reactionary service assisting tenants in sustaining their tenancies.

Tenants may access our Advice Service by:

- making a self referral,
- through being referred to the service by an officer of the Association
- through a third party, where written consent is provided

We will seek consent from the tenant prior to making a referral for the service and will seek to refer all tenants who have rent arrears in excess of £750.

We will also offer a financial health check to all new tenants at sign up, if the tenant wishes to accept this offer a referral will be made to our Advice Service.

## **7.8 Tenancy Support Service**

Our Tenancy Support Service aims to provide vulnerable tenants with the best start in their property and work with tenants at risk of homelessness to deal with any issues that may be contributing to this risk.

All lets via Section 5 homeless referrals have a Support Assessment completed at the beginning of their tenancy by our Tenancy Support Officer and the tenancy is reviewed as a minimum quarterly throughout their first year of tenancy to minimise the risk of repeat homelessness.

For current tenants where a vulnerability is established that is putting the tenancy at risk, a referral system is in operation for referrals to be made to the Tenancy Support Officer.

## **8.0 Multi Agency Working**

The Association recognises the importance of working with others to benefit our tenants and assist towards us achieving our aims. We work in partnerships with the following:

### **8.1 Renfrewshire Council**

#### **8.11 Housing Benefit**

Renfrewshire Council is responsible for the processing and award of housing benefit on behalf of the Department of Works and Pensions. Eligibility for Housing Benefit is now limited to:

- Tenants who are above State Pension age, where this tenant is a member of a couple both members of the couple must be over State Pension age
- Supported Exempt Accommodation
- Existing Housing Benefit claimants under State Pension age, who have not migrated to Universal Credit

Where this applies, we will assist in the provision of information to Renfrewshire Council that will aid in the processing of Housing Benefit. This compliments:

- Our aim to prevent arrears arising by offering assistance to new tenants applying for HB entitlement and controlling the process of submitting applications.
- Our aim to manage the recovery of arrears in an efficient & effective way by offering assistance to existing tenants who, due to changing circumstances, are required to make a new application for HB.

Where we receive HB payments on behalf of the tenant and we become aware of a change in their circumstances which would affect their entitlement we will notify the Council.

### **8.12 Renfrewshire Council – Discretionary Housing Payments for Under Occupation**

Where the Association has identified that a tenant will be affected by under occupation at either the 14% or 25% rate we will advise the tenant accordingly of their rental liability and will offer assistance to make a claim for Discretionary Housing Payment (DHP). Where DHP has been awarded Renfrewshire Council will make payments to the Association. While waiting the processing of DHP tenants rent arrears will increase. These arrears will be classed as technical arrears and recovery action will be suspended unless there is/has been a change in circumstances which would affect the tenant's entitlement to the payment.

### **8.13 Renfrewshire Council Housing Advice**

We will notify the Council's Housing Advice Section where the Association is pursuing legal action following the issue of an NOP and when enforcing a decree.

### **8.14 Renfrewshire Council Social Work**

We will notify the Social Work Department where court action is due to be raised where children are part of the household.

We will also notify the Social Work Department where a decree has been awarded & there are children and/or vulnerable adults are part of the household.

## **8.2 Department of Work & Pensions (DWP)**

### **8.21 Universal Credit**

The Association liaises with DWP in respect to the management of Universal Credit (UC) to assist tenants in the making and management of their UC claims and for alternative payment arrangements.

### **8.22 Arrears Direct**

The Association will seek to actively engage with tenants in relation to any arrears balance for their rent. Where this engagement fails, we will seek to recover an arrears balance through 3<sup>rd</sup> party deductions from eligible benefits. A 3<sup>rd</sup> party deduction will be considered where:

- there are outstanding arrears of at least 4 full weeks' rent accrued over a period of 8 weeks or more, and;

- there is no repayment arrangement in place, despite all reasonable efforts, or a tenant has defaulted on a repayment arrangement

3<sup>rd</sup> party deductions may be requested from Universal Credit, Income Related Employment Support Allowance, Income based Jobseekers Allowance, Income Support and Pension Credit.

Where a 3<sup>rd</sup> party deduction is approved by DWP, we will not seek to remove this until the arrears balance is cleared in full.

### **8.3 External Agencies**

We identify vulnerability of both new & existing tenants and signpost to external agencies for support.

We also work in conjunction with other agencies to provide a holistic approach to effective rent collection, ensuring that our tenants have the support they need where appropriate.

### **9.0 Preventative Action**

A proactive approach to preventing rent arrears is adopted by the Association's staff at all times.

#### **9.1 Website**

Our website will have clear information to prospective and existing tenants including;

- All methods available to make rent payments
- Our staff contact information for advice and support
- Any consultations carried out including the annual review of rent and service charges
- Our Annual Report on our Performance against the Charter
- This policy along with other Association policies for reference
- Tenant Handbook

#### **9.2 Pre Tenancy Advice**

Staff carry out a wide range of methods to ensure that prospective tenants receive the appropriate advice pre-tenancy advice to enable them to sustain their tenancies.

This is done in a variety of ways -

### **9.21 Housing Options**

As part of our Housing Options process, Applicants applying to join our housing list will be advised of;

- The requirement for one month's rent & service charges to be paid in advance upon the acceptance of an offer for housing
- The requirement for rent & service charges to be paid one month in advance on 28<sup>th</sup> of each month during the course of any tenancy with us
- Applicants will be provided with an information sheet giving some useful information on the basic costs of running a home so that they can be informed and prepared prior to obtaining a tenancy with the Association
- Average weekly rents of the property suitable for their needs
- Basic information on benefit entitlement and information on where to apply for benefits
- Information on other housing options which may be more suited to their current income/household circumstances

### **9.22 Offer of Housing**

We will ensure that when issuing an offer of housing, the prospective tenant is advised;

- Of the rent and service charges for the property
- Of the requirement to pay one month's rent & service charges when signing for the property, with the exception of;
  - a) HB claimants who will be required to pay 1 week's rent & service charges as HB is paid weekly in arrears
  - b) Section 5 applicants who are identified as needing to move for safety reasons and do not have sufficient funds to pay the advance payment of 1 month's rent & service charges, we will accept an arrangement
  - c) Domestic abuse applicants needing to move for safety reasons and do not have sufficient funds to pay the advance payment of 1 month's rent & service charges, we will accept an arrangement
- Of the requirement to pay rent & service charges monthly in advance on 28<sup>th</sup> of each month during the course of the tenancy
- Offered an affordability assessment/HB/UC check to assist them in making an informed decision on being able to manage a tenancy. This will be done through making a referral to our Advice Team

### **9.23 Viewings for Offers of Housing**

We will carry out accompanied viewings for all properties.

At the accompanied viewing, staff will remind all prospective tenants of the information given at offer stage and advise prospective tenants of their rental liability from date of entry to the property.

If any pre-tenancy vulnerabilities are established, staff will make a referral to the appropriate agency and/or Tenancy Support Worker.

### **9.24 Signing for the Tenancy**

When signing for a tenancy, the new tenant will be;

- Advised of their obligations in respect to their tenancy including rent payments and the potential consequences of failing to pay rent that is lawfully due, including the potential loss of tenancy
- Provided with a Tenant Handbook along with their tenancy agreement
- Given details of payment methods available to pay their rent & service charges and advised of our preference for charges to be paid via direct debit
- Given assistance to set up their preferred method of payment
- Given assistance to apply for HB/UC/DHP as required, including a benefit check if not taken up at selection stage.
- Offered financial health check with our Advice team

At this stage any support issues identified as being required to sustain the tenancy will be brought to the attention of the Housing Officer/Tenancy Support Officer.

### **9.3 Allocation of Payments to Account**

Payments made by tenants will be applied to their accounts on the basis of service charges first and then to rent.

The exception to this is any payment from Housing Benefit which is paid exclusively for rent .i.e. no payment included within the HB or UC payment for service charges.

Any payments the Association is due to make to a tenant e.g. decoration allowance payments will be allocated to any service charge arrears, followed by rent arrears followed by recharges outstanding before any payment will be issued to a tenant.

### **9.4 Information & Advice**

- Offer tenants as wide a choice of payment methods as possible
- Provide 4-weeks notification of any change in rent or service charges
- Maintain an efficient rent accounting system which provides accurate information on tenants rent & services accounts
- Provide annual rent statements in addition to on request

- Identify any prospective, existing tenants who are vulnerable and record any additional contact details/action needed to support them in the management of their tenancy
- Promote our Advice and Tenancy Support Services
- Provide information on external services which may assist our tenants manage their rent accounts
- Work with our partners to provide the information required to assist our tenants in the uptake of benefits
- Profile tenants in arrears to target resources
- Assist with online claims for UC
- Provide tenants with Tenant Handbook
- Provide information to prospective and existing tenants, individually and via our website on the rent & service charges which apply to our properties
- Offer the services of our Advice Team to tenants in completing their HB/ UC claim during tenancy
- Offer the services of our Advice Team for advice on benefits and on maximising tenants incomes during tenancy.
- Signpost/make referrals for new & existing tenants to other agencies for support & debt advice as appropriate
- Carry out new tenant visits/ contact within 6 weeks of the new tenant signing up for the property.
- Encourage early contact by tenants for changes of circumstances or where tenants experience difficulty in making payment of rent & service charges.
- Offer our Energy Advice Service to assist tenants make energy efficiency savings

## **10.0 Managing the Recovery of Arrears**

Our Tenancy Agreement sets out the responsibilities for the payment of rent & service charges. Where a tenant fails to make payment either in full or part the Association will seek to recover the debt through our arrears procedures. To be effective in our recovery of arrears we will:

- Ensure staff are fully trained in our arrears policy & procedures and apply them consistently
- Focus on early personal contact with tenants who fall into arrears and maintain regular contact throughout the recovery of the arrear
- Carry out regular home visits as required, some of which may be out with office hours
- Staff will carry out risk assessments in relation to home visits
- Use remote access to our housing system and the internet when carrying out visits to tenants
- Encourage tenants to carry out an income/ expenditure assessment and agree realistic voluntary arrangements for the repayment of arrears based on individual circumstances

- Operate an effective computerised rent accounting system that clearly records all actions taken for the recovery of arrears and provides all the necessary reports to identify and manage arrears recovery
- Operate effective financial management of accounts to ensure that tenants accounts are accurate
- Work closely with RC to ensure tenants HB claims are processed as quickly and accurately as possible.
- Work closely with DWP to ensure Universal Credit claims are being processed correctly
- Comply with legislation in respect to tenants who have arrears and have been sequestrated or have Trust Deeds in place.
- Progress to legal action where the tenant;
  - Fails to agree an arrangement to repay their arrears
  - Repeatedly breaks their arrangement and their arrears are not decreasing
  - For any such period as our Homeless Prevention Service is available, tenants who have requested the 1-month moratorium on any legal action to allow engagement with that service but have not adhered to the requirements of the moratorium

## **11.0 Joint Tenants Liability**

Joint tenants are jointly and severally liable for any debts that accrue during their tenancy i.e., rent arrears or recharges. In the event that a joint tenant ends their interest in the tenancy or is sequestrated/enters into a trust deed the Association will pursue the remaining/other joint tenant for the full debt owing.

## **12.0 Enforcing Action for the Recovery of Arrears**

The Association will:

- Follow the pre- action requirements as set out within the Housing (Scotland) Act 2010
- Notify Renfrewshire Council's Housing Advice Section where the Association is pursuing legal action following the issue of an NOP and when enforcing a decree.
- Notify the Social Work Department where court action is due to be raised where children are part of the household.
- Notify the Social Work Department where a decree has been awarded & there are children and/or vulnerable adults are part of the household
- For common heating service charge arrears & pursue fuel direct payment as appropriate to the tenant's circumstances
- Seek court expenses for all actions raised and pursue the recovery of these through recharges to the tenant or former tenant
- Enforce any eviction decree for arrears as permitted by the Sheriff Court, ending the tenancy on the date the property is repossessed

### **13.0 Housing Benefit Overpayments**

The Association receives direct payment of HB from Renfrewshire Council for some of its tenants & notifications of changes to housing benefit entitlements. Where the Council makes a request for the repayment of an overpayment, the Association will only make payment where we were aware of the tenant's change of circumstances and the Council had not been notified.

Any overpayment recovered from Renfrewshire Council will be recovered from the tenant's rent account & any rent arrears balance caused will be recovered from the tenant or former tenant in line with this policy.

Where the Council takes ongoing deductions from direct payments, we will assist tenants to get these reduced to a minimum so they can afford to pay the remaining charge.

### **14.0 Universal Credit Overpayments**

All overpayments of Universal Credit are recoverable, however, they may only be recovered from a landlord where:

- The overpayment has resulted from a change of address
- The overpayment has resulted as the Landlord has misrepresented a material fact
- The Universal Credit has been calculated in error based on a Housing Cost figure that is greater than the rent due

In all these cases the Association will make payments due to DWP and any rent arrears balance caused will be recovered from the tenant or former tenant in line with this policy.

If the circumstances that resulted in the overpayment fall outwith these prescribed criteria, the Association will challenge the recovery of the overpayment from the landlord and advise the DWP to recover from the tenant or former tenant.

If a Universal Credit overpayment is recovered from the tenant, the Association will promote the use of our Advice Services to reduce any recovery to an affordable amount.

### **15.0 Requests for Refunds from Accounts**

Rents & service charges are due for payment 1 month in advance on the 28<sup>th</sup> of each month. Where a tenant seeks the repayment of a credit on their account the Association will only refund any money greater than 1 month's full rent and service charges.

The Association will however consider requests individually where the tenant is in crisis and on Full HB.

Prior to any refund the Association will also check for any overpayment of HB due to be recovered by Renfrewshire Council from the Association and any other debts owed to the Association e.g., rechargeable repairs, court expenses, recovered UC overpayment.

## **16.0 Former Tenants**

The Association aims to minimise former tenant debts through the management of current tenant rent accounts and by applying our End of Tenancy procedures.

In the recovery of former tenant arrears, we will:

- Ensure vacating tenants are advised of their final balance before their tenancy ends
- In the instance that a final balance cannot be paid in full, staff will enter into an affordable payment arrangement with former tenants
- Provide former tenants with clear information about the balance on their account
- Offer a range of payment methods
- Have a separate procedure for the recovery of former tenant arrears
- Use the services of a qualified and experience debt recovery agency as required
- Report to the Board performance against KPIs for the creation of new former tenant arrears
- Write off debts when it is clear they can no longer be pursued

## **17.0 Shared Ownership Arrears**

The Association will monitor Shared Ownership Accounts and will follow the arrears recovery procedure for any arrears up to 2 months charges. For arrears over 2 months charges the Association will notify the lender and request, in accordance with the appropriate Occupancy Agreement, that the lender initiates legal steps for the recovery of the property, or the recovery of monies owed. Where the Sharing Owner has no loan outstanding the Association will pursue a small claims action for the outstanding debt.

## **18.0 Write offs**

The Association will write off:

- Any arrears on a current/former tenant's rent account in the event of their death and where there is no estate to recover the debt from
- Any debt specified through a tenant/ former tenant's sequestration/ bankruptcy/ Trust Deed
- Any former tenant debt identified through our debt collection agency as being untraceable or uncollectable

- Any former tenant arrear that is uneconomical to recover i.e., below £25.00

## **19.0 Targets/Monitoring/ Performance Reporting**

The Association will annually review its Business Objectives and identify any specific actions required to maximise rental income. The Association's Key Performance Indicator for arrears is set against Total Rent Arrears (current & former before write offs) as a % of Gross Rental Income

Performance against KPIs is reported to the Board on a quarterly basis

The Association's performance for arrears is reported annually to the Scottish housing regulator through its Annual Return on the Charter.

The Association will monitor the impact of UC through recording the following:

- % of arrears created by UC
- % of UC tenants in arrears

The Association also monitors the level of new former tenant arrears and evictions against budget assumptions.

## **20.0 Accountability/ Audit /Risk Management**

The Association will ensure any training required by staff is identified and that these needs are met to provide an efficient and effective service for the prevention and the recovery of arrears. In addition to training which can be delivered internally or through an external agency the Association will also participate in joint training on HB through our Service Level Agreement with Renfrewshire Council. DWP for UC

The Association will undertake both internal and external audit of the rent accounting and arrears recovery functions as required and will take account of any recommendations contained therein.

## **21.0 Responsibility**

The Board is responsible for approving this Policy.

The Board has delegated authority to the Housing Manager for;

- Approving any enforcement based on a full evaluation of the case following decree being granted

The Director of Housing is responsible for;

- Development and review of this policy

- Reporting to the Board on performance against our KPIs
- Identifying any risk presented by arrears to the Association and formulating an Action Plan to address any risk
- Authorising the write off of arrears of both current & former tenant arrears

The Housing Manager is responsible for;

- Developing & monitoring delivery of Internal procedures to support this policy
- Ensuring procedures are being followed and identifying any performance issues
- Ensuring HM staff are trained to delivery this policy/internal procedures
- Authorising court actions
- Approving the enforcement of decrees
- Checking any write offs to be put forward to the Director of Housing to ensure write off is appropriate and all arrears recovery actions have been taken in accordance with this policy/internal procedures
- Presenting an annual report to the Board for write offs

The Advice & Projects manager is responsible for:

- Developing and monitoring delivery of internal procedures relating to the delivery of our Advice Services provision in relation to this policy
- Implementing and monitoring procedures for our Advice Services which remain responsive to the delivery of the overall aims of this policy
- Maintaining accessibility to Advice Services to ensure maximisation of opportunities for uptake of service in relation to this policy
- Presenting an annual report to our Board on uptake of Advice Services including engagement and outcomes

The HM staff are responsible for:

- Applying this policy & internal procedures
- Providing advice and information about payment methods & rent account information
- Using early intervention to avoid arrears escalating
- Providing assistance with making claims for Housing Benefit/ Universal Credit
- Signposting/referring to other agencies which can assist tenants with support & issues of multiple debt Liaise effectively with Renfrewshire Council's Housing Benefit department in relation to Housing Benefit and Discretionary Housing Payment.
- Effective liaison with DWP in relation to Universal Credit, including management of the UC Landlord Portal top verify rent charges, apply for managed payments and Arrears direct.
- Monitoring payments due from other agencies such as DWP and Renfrewshire Council
- Ensuring that tenants are using the best payment methods suitable to their circumstances.

## **22.0 Data Protection/GDPR**

When implementing the policies and procedures of Paisley Housing Association all staff and Board members must adhere to and be aware of the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (EU) 2016/679 (“the GDPR”).

In situations where there may be any doubt about the requirements of the above, the Association may seek the views of its legal advisors.

## **23.0 Complaints**

The Association aims to ensure that the service provided to residents is of the highest quality. If this is not the case, a Complaints Policy and Procedure is in place to allow all residents or affected parties to state their grievance. The Scottish Public Services Ombudsman is the final stage of this process.

## **24.0\_Review**

This policy will be reviewed in full by the Association every 3 years. Amendments to the policy will be made in the interim to respond to any changes in legislation and to reflect any changes in any of the Association’s related strategies, policies and procedures.