



## **Pest Control Policy**

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# Our Vision, Our Values, Our Strategic Objectives

## Our Vision

A vibrant neighbourhood where everyone can prosper.

## Our Values

Caring, Reliable, Fair, Open and Adaptable

## Our Strategic Objectives



## Equality and Diversity Statement

Elderpark Housing are committed to ensuring people or communities do not face discrimination or social exclusion due to any of the following protected characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex or sexual orientation.

This document complies with our Equality and Diversity Policy.

We will regularly review this Policy and consider any equalities implications taking the necessary action to address any inequalities (either directly or indirectly) that result from the implementation of this Policy.

## Executive Summary

### Policy Author

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| Director of Assets |
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### Purpose of the Policy

|                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
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| This policy sets out how Elderpark Housing Association deals with pests in and around the homes and buildings we own and manage. It explains what the Association will do, what we ask tenants to do, and where responsibility lies with others, including Glasgow City Council and owners in mixed-tenure closes. It replaces the Pest Control Policy approved in May 2017 and is supported by a process note and call guidance at Appendix 1. |
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### Aims and Objectives of the Policy

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| To protect the health, safety, and well-being of our tenants, our staff, and our contractors. To set out clearly where responsibility lies for dealing with pests in and around our properties. To act quickly and proportionately where there is a risk to health or to the building. To prevent infestations through proofing, drainage repair, waste management and estate inspection. To deal fairly with tenants, including those who are vulnerable. To protect the condition, lettable and long-term viability of our stock. To achieve value for money and to meet our legal and regulatory duties. |
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### Legislative and Regulatory Compliance

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| Housing (Scotland) Act 1987, the Tolerable Standard. Housing (Scotland) Act 2001 and the Scottish Secure Tenancy Agreement. The Scottish Social Housing Charter and the Scottish Housing Quality Standard. Tenement (Scotland) Act 2004 and the Tenement Management Scheme. Prevention of Damage by Pests Act 1949. Public Health etc. (Scotland) Act 2008 and Environmental Protection Act 1990, statutory nuisance and local authority enforcement. Wildlife and Countryside Act 1981 and NatureScot licensing. Health and Safety at Work etc. Act 1974, the Control of Substances Hazardous to Health Regulations and the code of best practice for the responsible use of rodenticides. Equality Act 2010. UK GDPR and the Data Protection Act 2018. The Repairing Standard, and the tribunal route that goes with it, applies to private rented housing and not to Scottish secure tenancies. The Housing Health and Safety Rating System is an English and Welsh tool. Neither is relied on in this policy. |
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## Equalities

This policy complies with our Equality and Diversity Policy. Pests affect households differently, and some tenants will be frightened, embarrassed, unwell or unable to act easily for themselves. We respond with support rather than judgement, take proper account of vulnerability when we decide how quickly to act, make reasonable adjustments where a tenant needs them, and make key guidance available in the main community languages and in alternative formats on request.

## Privacy

Reports, triage information and treatment records are held on Rubixx and processed under UK GDPR and the Data Protection Act 2018 for the purposes of managing the tenancy and the property. We do not disclose to any resident which household reported or is affected by an infestation. Where a whole close is treated, treatment is offered to all residents on a precautionary basis without identifying the source. Information is shared with our pest control contractor only to the extent needed to carry out the work.

## Related Policies

| Policy Title                  | Location                                                 |
|-------------------------------|----------------------------------------------------------|
| Reactive Repairs Policy       | <a href="#">Reactive Repairs</a>                         |
| Rechargeable Repairs Policy   | <a href="#">Rechargeable Repairs Policy</a>              |
| Estate Management Policy      | <a href="#">Estate Management Policy</a>                 |
| Factoring Policy              | <a href="#">Factoring Policy</a>                         |
| Equality and Diversity Policy | <a href="#">Equality, Diversity and Inclusion Policy</a> |

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## 1 Introduction

- 1.1 Pests such as rats, mice, wasps, bedbugs, cockroaches, beetles, ants and fleas can spread disease, damage homes and belongings, sting or bite, and aggravate conditions such as asthma, eczema and other allergies.
- 1.2 Elderpark Housing Association is committed to providing attractive, sustainable homes in which tenants feel supported. Effective pest control protects our tenants' health and wellbeing, the condition, lettability and long-term viability of our homes, and the fabric of our predominantly pre-1919 tenement stock. This policy is about keeping homes habitable and tenants well supported, while spending deliberately and achieving value for money.
- 1.3 Treatment of most minor, common household pests is the responsibility of the tenant. However, the Association will act on the more serious pests, rats, mice, bedbugs and cockroaches, because they carry public health risks and can spread through the fabric of a building and become difficult and costly to eradicate. In certain cases the cost may be recharged, and Section 7 sets out when that applies.
- 1.4 This policy is supported by a process note and call guidance at Appendix 1. The policy sets the position; the process note sets out how Customer Services and the Asset Team deliver it, including the questions to ask on a call, how we distinguish between a one-off sighting and an infestation, the timescales we work to, and how each case is recorded. Training will be delivered on the process note before the policy goes live.

## 2 Aims

To set out clearly where responsibility lies for dealing with pests in and around our properties, to protect public health, tenants' wellbeing and the condition and Lettability of our homes, to act quickly where there is a risk to health or to the building, to prevent infestations through proofing and estate management, to treat tenants fairly, including those who are vulnerable, to achieve value for money, and to meet our legal and regulatory duties.

## 3 Legal and Regulatory Framework

- 3.1 The Association's duty arises principally from the Scottish Secure Tenancy Agreement, under which we must keep the house wind and watertight, habitable and in all respects reasonably fit for human habitation (clauses 5.1 and 5.3), taking into account sanitary defects (clause 5.7). A serious infestation can render a home not reasonably fit for habitation and so engage this duty.

- 3.2 Where works to common parts require the agreement of other owners, clause 5.5 requires us to do our best to obtain it, and we may be unable to carry out non-emergency works until we do.
- 3.3 The Association is not responsible for damage caused wilfully, accidentally or negligently by the tenant, their household or visitors (clause 5.10). The tenant's duty to keep the home in a reasonable state of cleanliness forms the basis for charging for tenant-caused infestations.
- 3.4 The policy also reflects the Scottish Social Housing Charter and the Scottish Housing Quality Standard, the Tolerable Standard under the Housing (Scotland) Act 1987, the Tenement (Scotland) Act 2004 and the Tenement Management Scheme (common parts and mixed tenure), the Prevention of Damage by Pests Act 1949 and the Public Health etc. (Scotland) Act 2008 (council powers and enforcement), the Wildlife and Countryside Act 1981 and NatureScot licensing (protected species), and the Equality Act 2010. Where the Association arranges treatment, we oversee our contractors' compliance with health and safety and substance controls, including the code of practice for the responsible use of rodenticides.

## **4 Links to Other Policies**

- 4.1 This policy links to our policies on Estate Management Strategy, Reactive Repairs, Rechargeable Repairs, Factoring, Allocations and and Equality and Diversity, Planned Maintenance and Void Management Policy.
- 4.2 The Rechargeable Repairs Policy is itself due for review during this financial year. The Association will make sure that the recharge provisions of this policy and of that policy are aligned when it is revised, so that there is a clear read across between the two.

## **5 Responsibilities**

- 5.1 The Association will arrange, and subject to the recharge provisions at Section 7 and the owner contribution provisions at clause 5.4 will meet the cost of:
- treatment of rats and mice in tenants' homes and in communal areas;
  - treatment of bedbugs and cockroaches in tenants' homes and communal areas (Section 8);
  - treatment of any other infestation in communal areas, or where the fabric of the building is or may be compromised;
  - blocking points of access once treatment is complete and addressing structural or drainage causes.
- 5.2 Glasgow City Council's Environmental Health service treats rats and mice in domestic properties free of charge, and tenants remain free to contact it. In practice, however, the service is thinly resourced and often slow to respond, and our experience is that it

cannot be relied on as the sole route for our stock. The Association will therefore signpost tenants to the council where that is appropriate, but the Association will not leave a tenant depending on it. The Association will arrange treatment of rats and mice in its tenanted homes where the council route has not resolved the problem within ten working days, or where the circumstances call for us to act directly (Section 6).

- 5.3 The tenant is responsible for reporting any infestation promptly and allowing access, preparing the home for treatment as advised, treating minor, common insect pests in their own home (for example ants, beetles and fleas) where these are not caused by disrepair and are not a communal or public health matter, and keeping the home in a reasonable state of cleanliness. Where responsibility for a minor insect pest sits with the tenant, the Association will give clear advice, including a short leaflet or email, so that tenants know what steps to take and expectations are managed.
- 5.4 A number of our closes are mixed tenure. Where treatment or proofing of common parts, or a whole close treatment, involves owner-occupied or privately let homes:
- owners are responsible for the cost of treatment within their own property, and for their apportioned share of common parts costs, for example proofing or blocking access in closes, back courts or roof spaces, under the title deeds and the Tenement Management Scheme. Owners are not charged for works to the Association's own property;
  - to ensure rapid eradication, the Association may arrange and fund the works in the first instance and recover owners' apportioned shares afterwards where the title deeds and the factoring agreement permit. The Association will confirm the recovery mechanism against the factoring agreement and take legal advice where needed, and align it with our Factoring and Rechargeable Repairs policies;
  - where the Association factors the block, we will co-ordinate the works, where we do not, we will seek owners' agreement (clause 5.5);
  - where owners refuse or fail to engage, we may ask the council to use its statutory powers (Section 14).
- 5.5 Where an infestation is caused by disrepair or a lack of action on the Association's part, we will take full responsibility for treatment and repair, regardless of the pest. Where an infestation, or consequent damage, is caused by the action or inaction of the tenant, their household or visitors, we may recharge the cost (Section 7). The Association is not responsible for damage caused by pests to tenants' belongings.

## **6 Rats and Mice**

- 6.1 On a report of rats or mice, we will log the report on Rubixx and act to make sure it is resolved. Tenants will not be charged for treatment of rats or mice in their home, subject to Section 7 where the infestation is tenant-caused. This aligns mice with rats and removes the previous charge to tenants for mice.

- 6.2 Where the case is serious, the Association will arrange treatment directly and immediately, without waiting on the council. A case is serious where any one of the following applies:
- a heavy or established infestation, for example multiple sightings, sightings over more than a few days, droppings in several rooms, gnawing damage, or rats rather than mice inside the home;
  - a vulnerable household or young children in the home;
  - evidence of a building or drainage cause, for example visible holes, a broken gully or drain, or activity around pipework;
  - signs of spread within the close, for example reports or sightings from more than one home, or activity in the common close, back court or bin store.
- 6.3 For a single-sighting case with none of the indicators in clause 6.2, we will signpost the tenant to the council's free service in the first instance, log the report, and diarise a follow-up. We will contact the tenant again on the tenth working day after the report. If the council has not attended, or the problem is not resolved, the Association will arrange treatment directly. Ten working days reflects the council's typical response times and gives the service a fair opportunity to attend without leaving the tenant waiting indefinitely. The tenant is never asked to chase the council; the follow-up is ours to make.
- 6.4 In every case, and whichever route is followed, no tenant will be left with an unresolved infestation because the council has not responded. The triage questions, the call script, the process map and the recording requirements that sit behind clauses 6.2 and 6.3 are set out at Appendix 1.
- 6.5 Following treatment, we will block points of access and address any structural or drainage cause. On council advice, access holes will not be sealed until treatment is complete, to avoid trapping rodents within the building.
- 6.6 Rats are commonly associated with the drainage system. Where there is a recurring problem, we will investigate the drains, including where appropriate a drainage camera or borescope survey, and carry out repair or proofing.
- 6.7 Owner-occupied and privately let homes are domestic properties, and their occupiers can use the council's free rodent service directly. Where rats or mice affect an owner's home, we will signpost the owner to the council and may also offer them the Association's treatment service at cost. Common parts and whole block rodent works are dealt with under clause 5.4.

## **7 Recharge**

- 7.1 Where an infestation, or consequent damage, is caused by the action or inaction of the tenant, their household or visitors, for example conditions arising from poor housekeeping, the Association may recharge the cost of treatment and repair in line with our Rechargeable Repairs Policy.

- 7.2 The Association will only recharge where the cause is clearly established in writing. The cause is normally established by the report from our pest control contractor. Where the position is straightforward and does not need specialist judgement, cause may instead be established by a written inspection report from an Asset Officer or Estate Officer who has visited the property. Cause is never decided over the telephone, and a tenant is never told they may be at fault before an inspection or a contractor's report is available.
- 7.3 The Association recognises that rodent infestations in particular usually have a structural, drainage or environmental cause rather than a tenant-related one, so a recharge for rats or mice will be rare.
- 7.4 Where a recharge applies, we will act reasonably in recovering the cost, offer reasonable payment arrangements, and signpost money and welfare advice. Recharges are applied in line with our Rechargeable Repairs Policy and our Equality and Diversity Policy.

## **8 Bedbugs and Cockroaches**

- 8.1 The council does not provide a treatment service for bedbugs, which is the guidance the Association received directly from the council during the cases we dealt with last year, and cockroaches have never formed part of the council's pest control offer. There is therefore no council route for these pests and no free alternative for tenants.
- 8.2 Because they spread quickly between flats in a close and threaten tenants' wellbeing and the Lett ability of our homes, the Association treats confirmed bedbug and cockroach infestations as a priority, delivers treatment itself from the outset, and acts quickly to contain and eradicate them. Tenants should report these pests to the Association as soon as possible, and by telephone rather than by calling at the office and should not contact the council.
- 8.3 Because the source usually cannot be established, a bedbug infestation may originate in the reporting home or have spread to it from elsewhere, the Association will treat on a whole close basis rather than treating flats in isolation. All homes in the affected close are offered treatment as a precaution, and adjacent closes are monitored and treated where evidence of spread is found.
- 8.4 The Association arranges and meets the cost of treatment in the first instance, including any owner-occupied or privately let homes in the close, so that the whole block is cleared without delay. Eradication takes priority over cost recovery. We will then recover owners' apportioned shares as a rule, under clause 5.4. Where time allows, we will seek the owner's written agreement to the charge before work begins. The Director of Assets, the Chief Executive or the Asset Manager may waive or reduce an owner charge in an acute public health case where seeking recovery first would delay eradication or risk wider spread.

- 8.5 To meet our data protection obligations, we will not disclose which home reported or is affected by an infestation. Whole-house treatment is offered to all residents on a precautionary basis without identifying the source.
- 8.6 Tenants must follow the preparation and treatment instructions given. More than one treatment may be needed, and residents may have to leave the home during treatment; we will advise at the time. Where an infestation is shown to be tenant-caused, Section 7 applies.
- 8.7 All reports and treatments are recorded on Rubixx to monitor trends, identify hotspots and target prevention.

## **9 Wasps**

- 9.1 On a report of a wasp's nest, tenants should not disturb the nest. The Association's position is that we will signpost to the council's seasonal service, chargeable at approximately £116.50 including VAT and available June to September, with the tenant meeting the cost.
- 9.2 The Association will use discretion to arrange treatment at the Association's cost where there is a genuine health and safety risk, for example a known serious allergy in the household or a nest in a busy communal area, and we will provide tenants with clear advice, including a short leaflet, so that expectations are managed.

## **10 Birds, Pigeons and Wildlife**

- 10.1 Bees are a protected species. We will advise tenants whom to contact for removal, but the Association will not treat bees or remove their nests. Birds, including pigeons in many circumstances, bats and some other species are also protected under the Wildlife and Countryside Act 1981. Control is restricted by law, and we will not destroy wild birds or their nests while those nests are in use.
- 10.2 Where birds or other wildlife gain access to roof spaces or the building through a defect in the fabric, repairing and proofing that defect is the Association's responsibility.
- 10.3 Where a single bird is trapped in a loft or communal space, we will arrange for it to be removed and released humanely, and proof the access point.
- 10.4 We will not remove or destroy an active nest, as all wild birds, their nests in use and their young are protected by law. We will make the area safe, wait until the young have fledged and the nest is no longer in use, then remove the nest and proof the access point, timing proofing works outside the nesting season wherever possible.

- 10.5 Where a nest is being built but no eggs have been laid, the access point may be proofed and the partly built nest removed, and we will arrange this promptly rather than wait, as the position changes as soon as the first egg is laid.
- 10.6 We will only act sooner than clause 10.4 allows where the law permits, that is where the species is covered by a NatureScot general licence, and there is a genuine public health or safety risk, or under an individual licence from NatureScot. In practice, the species most likely to be relevant to our stock is the feral pigeons. The species covered by general licences, and the conditions attached to them, are set by NatureScot and change from time to time, so we will check the current position before any action is taken. Any such work will be carried out by a competent contractor working to the terms of the licence, and the work will be recorded.
- 10.7 Bats are strictly protected. We will not disturb bats or their roosts, and we will seek a NatureScot licence and specialist ecological advice before any work that may affect them.
- 10.8 Tenants are asked not to feed birds in communal areas or back courts, as this attracts rats.

## **11 Prevention and Estate Management**

- 11.1 The Association sees prevention as the main way we will reduce both infestations and recurring costs over time. We will assess and proof properties at void stage and during major works, investigate and repair drainage defects, including a drainage camera or borescope survey where there is a recurring rat problem, use rodent proofing measures such as mesh, hard mortar and, where appropriate, drainage non-return valves, manage bin stores and waste to remove food sources, and carry out routine estate inspections to identify risks early.
- 11.2 We will provide clear advice to tenants on preventing pests and will make key guidance available in the main community languages. Our approach to rodents favours proofing and targeted treatment over routine or permanent baiting. Where baiting is used, it will be carried out by qualified contractors, sited and controlled to protect children, pets and wildlife, and in line with the code of practice for the responsible use of rodenticides. We do not operate standing bait across estates as a matter of course.

## **12 Advice to Tenants**

- 12.1 On receiving a report, we will tell the tenant whether the Association or the tenant is responsible for arranging inspection or treatment. Where responsibility lies with the tenant, we will give initial advice and may provide contact details for pest control companies while making clear that we cannot vouch for any particular company.
- 12.2 We will set out our approach to pest control to tenants at least once a year through our customer experience communications and CX Feedback, covering what we treat

and what we do not, who to contact and how, why bedbugs and cockroaches are treated a close at a time, and how owners in mixed tenure blocks may be charged for common works. This is intended to manage expectations before a problem arises rather than at the point a tenant reports one.

- 12.3 Any contractor the Association instructs will be suitably qualified, for example membership of the **British Pest Control Association or the National Pest Technicians Association**, or certification to BS EN 16636. We will procure our pest control service on a fixed-term contract rather than continuing to appoint on an ad hoc basis, so that response times, rates, and quality can be specified and monitored.

## 13 Recording and Monitoring

- 13.1 The Association will ensure that all reports of pests and all treatments are recorded on Rubixx so that we can monitor trends and problem areas, target prevention and proofing, and report on performance.
- 13.2 Pest reports are logged and managed separately from reactive repairs and are not counted within our reactive repairs' performance. Pest control is a distinct service with its own triage, timescales and contractor arrangements, and treating it as a repair would distort both sets of figures.

## 14 Enforcement Notices

- 14.1 The council, not the Association, enforces the law on pests. In cases of serious infestation by rats or mice, the Association, as the owner, may itself be served with a notice under the Prevention of Damage by Pests Act 1949, requiring it to remove the infestation and repair any damage. This clause records our exposure to that enforcement; it does not give the Association an enforcement role.
- 14.2 Under Part 5 of the Public Health etc. (Scotland) Act 2008, the council may serve notice on the owner or occupier of premises that are in a filthy or verminous condition, specifying the works required. We will liaise with and assist the council and may seek the use of these powers where an owner in a mixed tenure close refuses or fails to engage (clause 5.4).

## 15 Complaints

- 15.1 Tenants who are dissatisfied with how we have handled a pest or vermin issue will be advised of the Association's complaints procedure.

## **16 Policy Review**

16.1 This policy will be reviewed every three years, unless an earlier change is required by legislation, by the outcome of monitoring, or by a change in the services available from the council.

16.2 This policy was approved in August 2026. The next review is due in August 2029.

## Appendix 2

### Equality Impact Assessment

|                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------------------------|
| <b>Name of Policy to be assessed</b>                                                                                                                                                                                                                                                              | Pest Control Policy (M10)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | <b>New policy or revision of existing?</b> | Revision of an existing policy. It replaces the Pest Control Policy approved in May 2017. |
| <b>Person(s) responsible for assessment</b>                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Director of Assets                         |                                                                                           |
| <b>1. Briefly describe the aims, objectives and purpose of the policy.</b>                                                                                                                                                                                                                        | The policy sets out how the Association identifies and treats pests in and around our homes and buildings that we own and manage, and where responsibility sits between the Association, the tenant, Glasgow City Council, and owners in mixed-tenure closes. Its purpose is to keep homes habitable and safe, to protect tenants' health, safety and wellbeing and the condition and lettability of our stock, to respond quickly and proportionately to risk, to prevent infestations through proofing and estate management, and to treat tenants fairly, including those who are vulnerable. |                                            |                                                                                           |
| <b>2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)</b>                                                                                                                                                                                               | Tenants and their households are the main beneficiaries, in particular vulnerable tenants for whom a pest problem carries the greatest health and wellbeing risk. Staff and contractors benefit from a clear and consistent process, and neighbouring residents and owners benefit from prompt, block-based treatment that prevents spread.                                                                                                                                                                                                                                                      |                                            |                                                                                           |
| <b>3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)</b>                                                                                                                                                                         | That our homes are kept habitable and free of infestation and that serious cases are dealt with quickly, and no tenant is left without help because the council has not responded. Vulnerable tenants are supported rather than penalised, recurring infestations and costs are reduced through prevention and proofing, and the Association meets our legal, regulatory and equality duties. Outcomes are monitored through the pest reports and treatment records held on Rubixx.                                                                                                              |                                            |                                                                                           |
| <b>4. Which groups could be affected by the policy? (note all that apply)</b>                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |
| <b>Age</b>                                                                                                                                                                                                                                                                                        | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Disability</b>                          | Yes                                                                                       |
| <b>Gender reassignment</b>                                                                                                                                                                                                                                                                        | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Marriage and Civil Partnership</b>      | No                                                                                        |
| <b>Pregnancy and Maternity</b>                                                                                                                                                                                                                                                                    | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Race</b>                                | Yes                                                                                       |
| <b>Religion or Belief</b>                                                                                                                                                                                                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <b>Sex</b>                                 | No                                                                                        |
| <b>Sexual Orientation</b>                                                                                                                                                                                                                                                                         | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |                                            |                                                                                           |
| <b>5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</b>                                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |
| The policy is relevant to the equality groups noted above, so the assessment continues and is not screened out at this stage.                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |
| <b>6. Have those affected by the policy / decision been involved?</b>                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |
| The policy draws directly on the Association's recent operational experience, including the bedbug cases at Langlands Road, and on benchmarking against neighbouring Glasgow associations. Whilst tenants have not been consulted individually on the policy itself, we commit to setting out our |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                                            |                                                                                           |

approach to tenants at least once a year and to gathering views through our customer experience communications and CX Feedback, which will inform future reviews.

|                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</b></p>                                                                                                                              | <p><b>Positive Impact(s)</b></p> <p>The policy takes account of vulnerability. Serious cases, including those involving young children or older or unwell tenants, are treated directly and immediately. Recharge is applied only where the cause is clearly established in writing and is expected to be rare for rodents, with reasonable payment arrangements and money and welfare advice where it does apply. Key guidance is made available in the main community languages and in alternative formats on request, and staff are trained to respond with support rather than judgement.</p> | <p><b>Negative Impact(s)</b></p> <p>A recharge for a tenant-caused infestation could bear more heavily on tenants with lower incomes, who may be disproportionately older, disabled or from some minority groups. This is mitigated by applying recharge only on a clearly established cause, by acting reasonably in recovery, by offering payment arrangements, and by aligning this policy with our Rechargeable Repairs and Equality and Diversity policies. No other negative differential impact has been identified for the remaining protected characteristics.</p> |
| <p><b>8. What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b></p> | <p>Make tenant-facing guidance available in the main community languages and in alternative formats on request. Deliver staff training on the process note, including vulnerability and the data protection rule, before the policy goes live. Record pest reports and outcomes on Rubixx and monitor for any disproportionate effect of recharges. Align the recharge provisions with the Rechargeable Repairs Policy when it is revised this year, and review this assessment at the next policy review in August 2029, or sooner if monitoring indicates a need.</p>                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

|         |                             |
|---------|-----------------------------|
| Signed: | <i>Duncan Smith</i>         |
| Dated:  | 5 <sup>th</sup> August 2026 |

## Appendix 3

### GDPR Impact Assessment

|                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------|------------------------------------------------------------------|
| <b>Name of Policy to be assessed</b>                                                                                                                                                                                                                                                                   | Pest Control Policy (M10)                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | <b>New policy or revision of existing?</b> | Revision of an existing policy. It replaces the May 2017 policy. |
| <b>Person(s) responsible for assessment</b>                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Duncan Smith, Director of Assets           |                                                                  |
| <b>Briefly describe the aims, objectives and purpose of the policy.</b>                                                                                                                                                                                                                                | The policy sets out how the Association identifies, reports, assesses and treats pests in and around our homes, and where responsibility sits between the Association, the tenant, the council and owners. Delivering it requires the Association to record and manage information about pest reports, the properties affected and the households involved.                                                                                                                                     |                                            |                                                                  |
| <b>Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)</b>                                                                                                                                                                                | Personal data about tenants and other residents, including name, address, contact details, the nature and location of the infestation, and case handling records held on Rubixx. Some information may be special category or otherwise sensitive, for example where a household's vulnerability, age, health or the presence of young children affects how quickly we respond. Limited information is shared with our pest control contractor only to the extent needed to carry out treatment. |                                            |                                                                  |
| <b>What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)</b>                                                                                                                                                                                                           | To manage pest cases, the tenancy and the property lawfully and effectively, to meet our repairing, habitability and public health duties, and to monitor trends and target prevention, while processing only the information needed for those purposes and protecting residents' privacy. Processing is carried out under UK GDPR and the Data Protection Act 2018 for the management of the tenancy and the property.                                                                         |                                            |                                                                  |
| <b>Which groups could be affected by the policy? (note all that apply)</b>                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |
| <b>Tenants</b>                                                                                                                                                                                                                                                                                         | Yes                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Committee</b>                           | No                                                               |
| <b>Employees</b>                                                                                                                                                                                                                                                                                       | No                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | <b>Contractors</b>                         | Yes                                                              |
| <b>If the policy is not relevant to any of the data groups listed above, state why and end the process here.</b>                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |
| The policy is relevant, as delivering it involves processing personal data about tenants and residents, so the assessment continues.                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |
| <b>Have those affected by the policy / decision been involved?</b>                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |
| The policy reflects the Association's operational experience of managing pest cases. Residents are told how their information is used through our tenancy documentation and privacy notice, and the policy itself commits to not disclosing which household reported or is affected by an infestation. |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                            |                                                                  |

| Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.                                                                                                                                     | Positive Impact(s)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Negative Impact(s)                                                                                                                                                                                                                                                                                                                                                                                                                                |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                                                                                                                   | Information is recorded consistently on Rubixx, held and processed under UK GDPR and the Data Protection Act 2018 for managing the tenancy and property, and shared with the contractor only to the extent needed. Where a whole close is treated, treatment is offered to all residents on a precautionary basis without identifying the household that reported or is affected, which protects the privacy of the reporting tenant.                                                                                                              | Handling reports about pests, vulnerability and households creates a data protection risk if information is over-collected, kept too long, or wrongly disclosed, for example revealing which flat reported an infestation. This is mitigated by data minimisation, the standing rule against disclosing the affected household, restricted sharing with the contractor, and retention and access controls under our data protection arrangements. |
| <b>What actions are required to address the impacts arising from this assessment? (This might include: additional data, putting monitoring in place, making adjustments, taking specific action to mitigate any potentially negative impacts)</b> | Process only the information needed for each case and hold it on Rubixx under UK GDPR and the Data Protection Act 2018. Maintain the rule that we do not disclose which household reported or is affected by an infestation. Share information with the contractor only to the extent needed to carry out treatment. Make sure retention, access and our privacy notice cover pest case records, and cover the data protection rule in the process note training. Review at the next policy review, or sooner if data protection guidance changes. |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Signed:                                                                                                                                                                                                                                           | Duncan Smith                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Dated:                                                                                                                                                                                                                                            | 5 <sup>th</sup> August 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                                                                                   |