Rental Income and Collection Policy

If you have difficulty with reading this policy, including any difficulties with sight or hearing, or if you require this document translated into another language, please contact us and we will be happy to provide this information in a format that suits your needs.

Last Review: January 2025 | Next Review: January 2029 | Policy Number: H4

(Some aspects of this policy were updated in August 2026 to reflect legislative changes on Domestic Abuse)

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

This Policy has been developed by the Housing Manager

Purpose of the Policy

The rental income and arrears policy provides guidance to applicants, tenants, former tenants and staff on how Elderpark Housing Association manages rental income and manages tenancy debt.

Aims and Objectives of the Policy

The Aims and Objectives of the Policy are

- Minimise tenancy related debt;
- Maximise timely payment of tenancy related debt; and
- Provide a proactive and reasonable approach to debt payment through a person centred approach which sustains tenancies
- To deliver an excellent customer experience
- To be efficient and effective whilst considering value for money

Legislative and Regulatory Compliance

EHA will manage rental income and arrears in line with all applicable legal and regulatory requirements. The main legal requirements relating to rental income and arrears are detailed below:

- The Housing (Scotland) Act 2001;
- The Housing (Scotland) Act 2010;
- The Housing (Scotland) Act 2014;
- The Housing (Amendment) (Scotland) Act 2018;
- The Scottish Secure Tenancies (Proceedings for Possession) Pre- Action Requirements Order 2012;
- The Equality Act 2010;
- Homelessness etc (Scotland) Act 2003;
- Debt Arrangement and Attachment (Scotland) Act 2002;
- The Bankruptcy and Diligence (Scotland) Act 2007;
- The Bankruptcy Act 2016;
- The Welfare Reform Act 2012;
- The Scottish Social Housing Charter; and
- General Data Protection Regulation

Scottish Social Housing Charter

Our policy also takes account of the Scottish Social Housing Charter. The SHR use the outcomes and standards in the Charter to assess the performance of social landlords.

The key outcomes that have been considered in the development of this policy are:

Outcome 1: Equalities
Every tenant and other customer has their individual needs recognised, is treated fairly and with respect, and receives fair access to housing and housing services.

Outcome 11 - Tenancy Sustainment
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.

Outcome 13 - Value for Money
Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

Equalities

We promote equal opportunities throughout all of our housing services; including our allocation policy and related procedures. We seek to ensure that priority for housing is based on housing need and that our policies are fair and accessible to everyone applying for a home or living within our communities.

Equality Impact Assessment (EIA)

An EIA is a tool to help identify whether or not policies, practices, procedures and services have an adverse impact on a particular community or group of people. We completed an EIA for this allocation policy to identify any barriers that could detrimentally affect under-represented communities or groups who may be disadvantaged by the way we carry out our business.

The EIA process focuses on the 'protected characteristics' as outlined in the Equality Act 2010.

These are:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- Religion or Belief
- Sex
- Sexual Orientation

As a result of the EIA, we have put some positive actions in place and will continue to review these:

- publishing the allocation policy in other formats and other languages, as required
- auditing the allocation policy against equality standards (plain language, accessible formats and so on)
- publicising the allocation policy widely to promote access to our housing list
- working with other organisations to promote equality objectives

Privacy

Any personal data collected will be in line with GDPR requirements and accessible only by those who require this information for specific purposes.

Related Policies

Policy Title	Location
GDPR – Data Protection Policy	Data Protection Policy
Allocation Policy	Allocations Policy
Tenancy Sustainability Policy	Tenancy Sustainment Policy
Equality, Diversity and Inclusion Policy	Equality, Diversity and Inclusion Policy

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Appendices

1 Introduction

1.1 Elderpark Housing was established in 1975 and currently owns approximately 1341 homes with the majority being in Central Govan although we also have a number of properties within the areas of Ibrox, Kinning Park and Cessnock.
Elderpark's approach to letting our properties aligns with our vision, to create vibrant neighbourhood where everyone can prosper.

2 Policy Statement

2.1 This policy sets out the legal framework and key principles used in maximising rental income and preventing and managing current and former tenancy arrears and credits.

3 Aims, Objectives and Principles

3.1 **Aims**

The aims of this policy are to:

- Minimise tenancy related debt
- Maximise timely payment of tenancy related debt and;
- Provide a proactive and reasonable approach to debt payment through a person-centred approach which sustains tenancies

3.2 **Objectives**

The policy supports the delivery of the following strategic aims and outcomes:

Strategic Aim	**Outcomes**
To deliver excellent customer experience	Our customers are empowered and supported to as live independently as they choose. Our customers receive a consistent service that delivers high customer satisfaction
To be efficient and effective whilst considering value for money	We review our internal processes to ensure we are maximising our income. We continue to review our overall costs and consider how to reduce these to ensure our operating business is financially sustainable.

3.3 For the purposes of this policy "debt" relates to current and former tenancy arrears and legal expenses. This policy relates to arrears relating to Scottish Secure Tenancies, Loan stock, Garages and Leased Properties. We also have a Factoring Debt Recovery Protocol for the Shared Ownership and Factoring properties.

3.4 **Principles**

Our underpinning principles are to:

- Treat everyone as an individual;
- Treat people with dignity and respect at all times;
- Make personal contact at an early stage in the arrears process;
- Be firm, fair and consistent but be sensitive to the individuals' needs and circumstances; and
- Maintain confidentiality at all times

4 Legislation/Related Policies

4.1 The relevant legislation relating to tenancy related debts are:

- The Housing (Scotland) Act 2001;
- The Housing (Scotland) Act 2010;
- The Housing (Scotland) Act 2014;
- The Housing (Amendment) (Scotland) Act 2018;
- The Scottish Secure Tenancies (Proceedings for Possession) Pre- Action Requirements Order 2012;
- The Equality Act 2010;
- Homelessness etc (Scotland) Act 2003;
- Debt Arrangement and Attachment (Scotland) Act 2002;
- The Bankruptcy and Diligence (Scotland) Act 2007;
- The Bankruptcy Act 2016;
- The Welfare Reform Act 2012;
- The Scottish Social Housing Charter; and
- General Data Protection Regulation

4.2 **Social Housing Charter**

The Scottish Government, through the Scottish Housing Regulator, sets the outcomes it expects social landlords to achieve for its residents.

In terms of managing rental income, the relevant Social Housing Charter standards include:

Outcome 1: Equalities

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

Outcome 11 - Tenancy Sustainment

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.

Outcome 13 - Value for Money

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

4.3 **Annual Return on the Charter (ARC)**
Elderpark is required to submit an Annual Return on the Scottish Social Housing Charter each year in accordance with published guidance. The following ARC indicators are of particular relevance:

Indicator 26: Rent collected as a percentage of total rent
Indicator 27: Gross rent arrears (all tenants) as at 31 March each year as a percentage of rent due for the reporting year

4.4 **Good Practice**
In formulating this policy, we have taken account of the current best practice and guidance from Scottish Housing Regulator, Scottish Federation of Housing Associations and Chartered Institute of Housing.

5 Scope

5.1 This policy relates to arrears relating to Scottish Secure Tenancies, Garages and Leased Properties. For the purposes of this policy "debt" relates to current and former tenancy arrears and legal expenses.

6 Prevention of Arrears

6.1 It is recognised that arrears prevention is integral to having a successful arrears strategy. Prevention of rent arrears is beneficial to tenants as debt can have a significant negative impact on a tenant's wellbeing and their ability to sustain their tenancy. Tenants can pay by Direct Debit, Standing Order, AllPay, BACS or debit card on Elderpark's website. Cash or cheque payments can also be made at our head office or complexes with onsite staff. To ensure a successful early intervention approach, consent will be obtained from the tenant, if a discussion is required with a third-party agency.

Pre-Allocation to Allocation Stage

6.2 Measures for prevention can and should start prior to the allocation of a property. We also ascertain whether a prospective tenant is entitled to assistance with housing costs and provide details on the amount of rent and service charges that an individual can expect to pay. Council Tax banding and Energy Performance Certificate is also provided. This information can help an applicant determine if the property is affordable for them.

6.3 **Domestic Abuse Considerations**
The Association recognises that domestic abuse can have a direct impact on a tenant's ability to sustain rental payments due to financial abuse, coercive control, economic abuse or being forced to leave their home.

Where domestic abuse is known or suspected staff will:

- Consider the impact of abuse before progressing enforcement action.
- Discuss safe methods of communication.

- Consider referral to support services.
- Offer assistance with welfare benefits and financial support.
- Consider reasonable adjustments to repayment arrangements.

Cases will be managed in accordance with the Domestic Abuse Policy.

6.4 When the property is viewed, a more detailed discussion regarding the applicant's income and the costs associated with the property is held. This discussion assists in determining any potential issues that may arise in relation to the financial aspect of having a tenancy, moving to a new house and running a home. The Officer will determine if the applicant will be applying for benefit, if they require assistance with completing the form, if they require assistance with moving costs and if a benefit check is required. The 'Your Rent and Service Charge Account Leaflet' is provided as part of the viewing pack and contains information relating to rent payment and benefits/welfare advice.

Tenancy Sign-Up

6.5 At the sign up, the importance of making regular payments and keeping a clear rent account will be discussed, with further information provided in the form of:

- The Tenancy Agreement; and
- The Tenants Handbook

6.6 At the sign up the method of payment and frequency of payment will be agreed. The Association offer a variety of methods, with our recommended method being Direct Debit. It is discussed that rent should be paid in advance (i.e. at the start of the month) however should a tenant require to pay on a different date an alternative payment method can be agreed.

6.7 Where the tenant is applying for benefits to pay for housing costs, help will be offered to complete the applications. Tenants are encouraged to sign an authorisation mandate, which allows staff to liaise with benefit staff to ensure the smooth processing of the claim. Tenants may be entitled to housing benefit or universal credit and a discretionary housing payment.

6.8 It is made clear that regardless of the method of payment, it remains the tenant's responsibility to ensure that their rent and service charges are paid regularly and on time.

Post Allocation

6.9 Post Allocation visits are carried out 6-8 weeks after the start of all new tenancies and any issues regarding rent will be discussed at this stage. Regardless of any arrears new tenants will be reminded of our Welfare Rights Service.

7 Arrears Recovery

7.1 Detailed procedures exist which complement this policy. They give guidance to staff and incorporate guidance on the use of the IT system in relation to Arrears Recovery.

7.2 There are essentially 3 stages of Arrears Recovery, with a fourth and final stage being where all interventions have failed, and a Decree for Payment and/or Eviction is granted.

- Stage 1: Early-stage low arrears to Pre-Notice of Proceedings
- Stage 2: Notice of Proceedings to Court Action
- Stage 3: Court Action
- Stage 4: Eviction

Throughout these stages the Association provides multiple opportunities and support to tenants to resolve their arrears in a sensible and realistic way. ELDERPARK provides information and advice and makes appropriate referrals for specialist help or signposts to specialist agencies, where the tenant can self-refer.

Stage1: Early-stage low arrears to Pre-Notice of Proceedings

7.3 During the first stage of the recovery process we will contact the tenant at the earliest opportunity after the account falls into arrear to discuss the reasons for the arrears and determine if the arrears can be cleared in full. Where they cannot we will, with the agreement of the tenant where appropriate, assess the income and outgoings of the tenant to make a manageable repayment agreement. This discussion and financial review can highlight where there are multiple debts, fuel poverty, unclaimed benefits, health problems and unmet support needs that may be worsening in the tenant’s financial situation.

Before progressing enforcement or legal action, staff will consider whether domestic abuse has contributed to the arrears. Consideration will be given to financial abuse, economic control, restrictions on access to income, forced absence from the property, or other abuse-related circumstances which may have affected the tenant's ability to maintain rental payments.

7.4 Appointments will be offered to the tenant to discuss their arrears in confidence. These will be carried out either face to face in the tenant’s home or at an office, by telephone or by video conferencing if the tenants has appropriate compatible software, whichever is most suitable.

7.5 Referrals to the Welfare Rights Officer and external money and debt advice agencies will be made where a tenant requires additional specialist advice.

7.6 Clear audit trails within the QL system are essential in relation to both good practice and in demonstrating that the Pre-Action Requirements have been met.

Stage 2: Notice of Proceedings to Court Action

7.7 Prior to issuing a Notice of Proceedings, the Association will ensure that any known domestic abuse circumstances have been fully considered and that all available support, advice and assistance have been offered to the tenant.

We will issue a Notice of Proceedings for Recovery of Possession (NOP), only when all other interventions have failed.

Service of Notices

Any Notice of Proceedings, legal correspondence or other statutory notice issued by the Association in connection with arrears recovery will be served in accordance with Section 40 of the Housing (Scotland) Act 2001, as amended by Section 50 of the Housing (Scotland) Act 2025. Where permitted by legislation and where the tenant has agreed to receive communications electronically, notices may be delivered by electronic means. The Association will ensure that all notices are served using a method permitted by the relevant legislation in force at the time the notice is issued.

7.8 A NOP will be issued to the Tenant, Joint Tenant (s) and any Qualifying Occupier known to be living at that address.

7.9 Once the NOP has been served, we will make continue to make contact with the tenant, with a view to making an agreement for repayment. However, if the tenant fails to make contact by the effective date, or the agreement that was made is broken, then the case will be referred to court to seek a Decree for Eviction.

7.10 The Housing Team Leader will approve the progression to court. This approval acts as a final check to ensure that the officer has carried out all the necessary work and met all of the pre-action requirements.

Stage 3: Court Action

7.11 When a case is called at court there are several options available as to what action to take. The case can be:

- Continued: this is where a repayment agreement has been made and the Association wish to monitor the agreement for a set period of time (for example 8 weeks). After this time the case will be reheard at court and depending on whether the agreement has been maintained the case may be sisted, or if the agreement has been broken either a further continuation or decree for ejection can be requested.

- Sisted: this is where the case remains in the legal system but is essentially suspended. This allows the association to monitor payment over a longer period of time. The legal case remains active as long as the rent arrears remain. If the account is cleared the case should be dismissed. Sisted cases will be regularly reviewed and recalled within a maximum of 12 months.
- Decree for Eviction: Once a decree has been granted it should be enforced to end the tenancy. If the tenant did not represent themselves in court and seeks legal representation after the outcome, a Minute of Recall may be used to recall the case to court.

7.12 Legal action will be taken as a conjoined action, which means that the Association will seek to recover the property and the debt. Legal expenses awarded by the Court will be recovered from the tenant.

Stage 4: Eviction

7.13 Evictions will only be authorised with the approval of the Director of Housing.

7.14 Prior to any eviction taking place, we will ensure the Local Authority Homelessness Section and where appropriate, Social Work Department (for example if there are children in the household or the tenant is vulnerable), are notified.

7.15 Storage of any tenant belongings which are left in a property following an eviction may be authorised by the Housing Team Leader where appropriate, and where authorised, such items shall only be stored for a maximum of 28 days after the eviction. Storage costs will be recharged to the former tenant.

8 Former Tenant Arrears

8.1 Detailed procedures have been developed to assist the officers in dealing with former tenant arrears and write-off requests.

8.2 Former tenant arrears will be pursued as efficiently and cost effectively as possible.

8.3 All outgoing tenants will be advised of their rent account balance in writing and encouraged to make a repayment agreement or review the agreement that may be in place. A further discussion will be held at the pre-termination inspection.

8.4 Where possible a forwarding address for outgoing tenants will be collected. Consideration will be given to using a tracing agent on a case-by-case basis, where the current whereabouts are not known.

8.5 When a tenant passes away, details of the executor will be collected. This may be a solicitor, a family member or person nominated by the tenant. The matter will be dealt with professionally and sensitively.

9 Sequestrations, Trust Deeds and Exceptional Circumstances

9.1 Where proof is received that a tenant has been sequestrated, any arrears of rent and service charges outstanding up to the date of sequestration will be included in a committee report with a recommendation for write-off.

9.2 No legal action can be commenced in respect of pursuing any debt accrued prior to the date of sequestration but Elderpark will follow normal arrears procedures for any debt accruing thereafter.

9.3 Where a tenant is sequestrated during the course of a repossession action, the Housing Team Leader will use their discretion as to whether or not to continue to pursue the order for repossession, taking into account the circumstances of the case, or whether to dismiss the action.

10 Write-Offs

10.1 We recognise that there are a number of situations when a debt may be written off. In the majority of cases this will relate to former tenancy arrears, but in exceptional circumstances is may also relate to current tenancy arrears.

10.2 Debts will be considered for write off where:

- The amount of the individual debt is so low that it is not cost effective to seek repayment;
- There has been an unsuccessful trace and the current whereabouts are not known;
    - The former tenant has died and there is no estate;
    - It has not been possible to confirm if there was an estate;
    - The debt is 3 years or older; and
    - The tenant has been sequestrated.

10.3 In exceptional circumstances consideration will be given to writing off current tenant debts. These will be dealt with on a case-by-case basis in agreement with the Director of Housing and Committee approval may be required.

10.4 A report on write-offs will be put to the Committee on a quarterly basis.

11 Current and Former Tenant Credits

11.1 The Association should not hold large amounts of credits on rent accounts and tenants are discouraged from creating large credits on their rent account.

11.2 The Association will refund credits ensuring that the balance refunded would not put the rent account into debt, for example the balance refunded could be that showing on the last date of the previous month after all transactions had been processed. The Officer will confirm that there are no other debts outstanding to the Association or that no Overpayments of Benefit expected prior to any refund being issued.

11.3 All credits will be authorised by the Housing Team Leader prior to passing to the finance team for processing.

12 Confidentiality

12.1 All information received in relation to rent arrears is confidential to Elderpark. This means that information will only be shared with other individuals or agencies with the prior written consent of the person providing the information. The exceptions which apply to this are:-

- Where legislation states information is to be given, for example, the Department of Work and Pensions (DWP) Fraud Investigations etc.;
- Where a decree for repossession is being sought. This information will be shared with Local Authority Homeless & Social Work departments as well as the Associations Solicitor; and
- In some circumstances staff may believe it necessary to break confidentiality in relation to a tenant's rent account in order to protect a tenant. For example, where it is thought that the tenant is at risk or vulnerable. In these situations staff will not require the tenant's approval to discuss their case with appropriate external agencies providing these agencies for example Social Work.

13 Roles and Responsibilities

13.1 **Management Committee**

The role of Elderpark's Management Committee is to ensure that this policy, as well as any associated policies, are regularly reviewed as required, or in accordance with the usual cycle of policy review.

13.2 **Executive and Leadership Team**

The role of the Executive and Leadership Team is responsibility for ensuring that this policy, and any associated policies, procedures and documentation which support it, are implemented within Elderpark.

13.3 **Staff**

Housing Manager (within the guidelines and procedures which support this policy) and Housing Officers have delegated authority to take necessary action to control arrears in full consideration of the individual circumstances of each case

14 Compliance and Support

14.1 It is the responsibility of all staff to familiarise themselves with the content of this policy and to ensure that they comply with the policy and associated procedures.

14.2 If advice or support is required, this is available through the Housing Manager in the first instance, or the Director of Housing.

15 Equality Impact Assessment (EIA)

15.1 Elderpark will treat all customers with fairness and respect in line with its Diversity Strategy. Elderpark recognises that we have an ethical and a legal duty to advance equality of opportunity and prevent discrimination on the grounds of age, sex and sexual orientation disability, race, religion or belief, gender reassignment, pregnancy and maternity, marriage and civil partnership.

15.2 Where any group has difficulty in understanding this process staff will assist to ensure that the policy is available in other formats, if required, and that groups are supported through the process. This policy is available in other formats, including large print, if required. An EIA has also been carried out.

16 Privacy Impact Assessment

16.1 The initial screening questions of the Privacy Impact Assessment have beencompleted and as a result of the assessment no new potential information risk has been identified.

17 Monitoring and Evaluation

17.1 The implementation of this policy and associated procedures will enable us to strive to achieve the Housing Charter Outcomes and the SHR's Charter Indicators relating to arrears management. Our monthly Key Performance Indicators (KPI's) on arrears form part of our performance assessment process and these are reported to Board on a quarterly basis.

17.2 Elderpark will undertake effective monitoring of our arrears performance via the procedures supporting this policy to:

- Provide day-to-day control over the arrears function and ensure that procedures are followed by staff and cases being dealt with appropriately through regular audits;
- Monitor our overall performance in relation to arrears over each financial year;
- Provide good quality information about its arrears performance against its stated objectives for our committee and to inform service review;
- Benchmark against other social landlords to review and improve performance; and
- Performance information will inform continuous improvement which will be detailed within the People & Place departmental plan

17.3 Elderpark will set annual targets for income loss as a percentage of the annual rent; these targets will be agreed as part of the annual budget planning process.

17.4 Benchmarking or comparing performance across organisations is good practice and is a useful tool in improving performance. Elderpark will use relevant information available from a range of sources.

17.5 Elderpark will maximise use of its IT system to ensure good monitoring of arrears, as well as aid good communication between departments and to provide analyses of arrears for reporting purposes. Systems will also enable Annual Charter Report validation and Inspection visits by SHR.

17.6 Tenants views will be sought through:

- Monitoring comments and complaints from tenants and using this to improve service delivery
- Tenant consultation – through our Tenant Participation Strategy

Appendix 1 - Equality Impact Assessment

<table>
<tr><td>Name of Policy to be assessed</td><td>Rental Income and Arrears Policy</td><td>New policy or revision of existing?</td><td>New</td></tr>
<tr><td colspan="2">Person(s) responsible for assessment</td><td colspan="2">Housing Manager</td></tr>
<tr><td>1. Briefly describe the aims, objectives and purpose of the policy.</td><td colspan="3">This policy sets out the legal framework and key principles used in maximising rental income and preventing and managing current and former tenancy arrears and credits.

The aims of this policy are to:
Minimise tenancy related debt
Maximise timely payment of tenancy related debt and;
Provide a proactive and reasonable approach to debt payment through a person-centred approach which sustains tenancies</td></tr>
<tr><td>2. Who is intended to benefit from the policy? (e.g applicants, tenants, staff, contractors)</td><td colspan="3">Tenants/former tenants/applicants</td></tr>
<tr><td>3. What outcomes are wanted from this policy? (e.g the measurable changes or benefits to members/ tenants / staff)</td><td colspan="3">To maximise rental income and reduce tenancy debt.</td></tr>
<tr><td colspan="4">4. Which groups could be affected by the policy? (note all that apply)</td></tr>
<tr><td>Age</td><td>x</td><td>Disability</td><td>x</td></tr>
<tr><td>Gender reassignment</td><td>x</td><td>Marriage and Civil Partnership</td><td>x</td></tr>
<tr><td>Pregnancy and Maternity</td><td>x</td><td>Race</td><td>x</td></tr>
<tr><td>Religion or Belief</td><td>x</td><td>Sex</td><td></td></tr>
<tr><td>Sexual Orientation</td><td>x</td><td></td><td></td></tr>
<tr><td colspan="4">5. If the policy is not relevant to any of the equality groups listed above, state why and end the process here.</td></tr>
<tr><td colspan="4"></td></tr>
<tr><td colspan="4">6. Have those affected by the policy / decision been involved?</td></tr>
<tr><td colspan="4">Tenants current and former will be may be affected by this policy a consultation was carried out by electronic survey to all tenants and former tenants in arrears to consult on the changes to the policy.</td></tr>
<tr><td colspan="2" rowspan="2">7. Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.</td><td>Positive Impact(s)</td><td>Negative Impact(s)</td></tr>
<tr><td>x</td><td></td></tr>
</table>

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)	Monitoring will be done by assessing monthly KPIs and service level complaints.

Signed:	Rachel Cooper
Dated:	6th February 2025

Appendix 2 - GDPR Impact Assessment

Name of Policy to be assessed	Rental Income and Arrears Policy	**New policy or revision of existing?**	New
Person(s) responsible for assessment		Housing Manager	
Briefly describe the aims, objectives and purpose of the policy.	This policy sets out the legal framework and key principles used in maximising rental income and preventing and managing current and former tenancy arrears and credits. The aims of this policy are to: • Minimise tenancy related debt • Maximise timely payment of tenancy related debt and; • Provide a proactive and reasonable approach to debt payment through a person-centred approach which sustains tenancies		
Which type of data will be used by implementation of this policy? (e.g. personal, sensitive or special category)	Personal and potentially sensitive information will be used by implantation of this policy.		
What outcomes are wanted from this policy? (e.g. necessary to meet legal obligations)	To maximise rental income and reduce tenancy debt. The main legal requirements relating to rental income and arrears are set out in the Housing (Scotland) Act 1987, as amended by the Housing (Scotland) Act 2001 and the Housing (Scotland) Act 2014.		
Which groups could be affected by the policy? (note all that apply)			
Tenants	X	**Committee**	
Employees	X	**Contractors**	
If the policy is not relevant to any of the data groups listed above, state why and end the process here.			
Have those affected by the policy / decision been involved?			
Yes all tenants and former tenants in arrears have been consulted on the proposed changes to the policy.			
Describe the likely positive or negative impact(s) that the policy could have on the groups identified above.		**Positive Impact(s)**	**Negative Impact(s)**
		X	
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)		Monitoring will be done by assessing monthly KPIs and service level complaints.	
Signed:		Rachel Cooper	
Dated:		6th February 2025	