

Clyde Valley Customer Panel

Rent Arrears

Scrutiny Report



November 2018

The Clyde Valley Customer Panel would like to thank Clyde Valley Housing Association staff and Tenants Information Service for their support in carrying out this scrutiny Project.

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1.0 Introduction

Welcome to the fifth report from the Clyde Valley Customer Panel (the Panel). We are delighted to present our finding of our independent review of the Arrears Policy and Procedures. This scrutiny task was carried out between January and November 2018 and the report details our findings and recommendations for consideration by the Leadership Team and Board.

We would like to thank the Panel members for their time and commitment in carrying out this scrutiny review and Sharon Donohoe, from the Tenants Information Service (TIS), who has supported us throughout this scrutiny project.

Clyde Valley staff have been very supportive and helpful throughout this process and we would like to thank them for meeting with us and providing the information required to carry out the various tasks we undertook during the project.

2.0 Background to the Panel

The Clyde Valley Customer Panel (the Panel) was established in 2013 and we are the first scrutiny group representing tenants and customers of Clyde Valley Housing Association (CVHA).

The Customer Panel is made of tenants and customers who responded to Clyde Valley recruitment drives with tenants and customers interested in participating in tenant scrutiny.

We have a team of **13** tenants and customers and members were delighted to welcome two new tenants to the Panel during our most recent scrutiny project.

Supported by Tenants Information Service (TIS), the Panel has participated in scrutiny awareness raising and training and developed a Panel Terms of Reference and Code of Conduct.

Our overall aim is to work with CVHA to make a difference to the services provided to tenants and customers across the communities served by the Association.

The remit of the Panel includes:

- ✚ To independently review and monitor Clyde Valley housing service delivery and performance
- ✚ To make recommendations and report on progress on scrutiny work to Clyde Valley's Leadership Team and Board

The main role of the Panel is to:

- ✚ Operate on behalf of tenants and service users to ensure that the landlord provides housing services that meet the needs of tenants and other customers and that are of the highest standard
- ✚ Independently review and monitor housing service delivery and performance
- ✚ Collect evidence to enable housing services to be monitored
- ✚ Make recommendations to senior managers, the Leadership Team and Board members on how housing services can be improved
- ✚ Work with the landlord organisation to provide a range of opportunities for customers to give their views
- ✚ Monitor and review agreed action plans
- ✚ Tell other customers what the panel is doing and encourage them to get involved

Our work is based on the following core standards:

- ✚ Being accountable to tenants and customers
- ✚ Being transparent
- ✚ Reflecting the needs and aspirations of tenants and service users
- ✚ Respecting the decision making role of the Board and Leadership Team
- ✚ Making recommendations based on evidence gathered

3.0 The Scrutiny Project

Along with CVHA staff and Board Members, we are all very aware that the payment of tenants' rent money is crucial to the operation of CVHA and the delivery of services to tenants and customers.

In addition our increased awareness of the challenges facing CVHA and tenants in our communities due to the introduction of Universal Credit provided an excellent opportunity for a Panel scrutiny project on the rent arrears policy and procedures.

Although we understand some tenants may face challenges with regard to paying rent, we consider it is vital that the rents of other tenants should not be increased to make up for any shortfall in income due to rent arrears.

The scope of our review included:

- ✚ To carry out an independent review of Clyde Valley's Arrears Policy and procedure
- ✚ To identify areas of good practice and recommend improvements identified

The Scrutiny Process

During this scrutiny project we carried out the following activities:

- ✚ A policy and procedural review
- ✚ Meetings with staff
- ✚ A review of information provided to tenants
 - New Tenants' Information Pack
 - Rent arrears letters
 - Website
- ✚ A review of performance

- Annual Return on the Charter
- SHR landlord reports
- Annual Report to Tenants

The Scrutiny Tasks

During this scrutiny project the Panel carried out the following activities:

- ✚ A review of the Clyde Valley Arrears Policy Number HM02
- ✚ A review of the CVHA arrears letters to tenants
- ✚ A review of the CVHA rent arrears Legal Action Procedure
- ✚ Consideration of information and presentations provided by CVHA staff
- ✚ Meetings with officers responsible for management of rent arrears
- ✚ Review of rent information on CVHA's web site
- ✚ Consideration of policies of other landlords, namely Glen Oaks Housing Association and East Ayrshire Council
- ✚ Review of Scottish Housing Regulator (SHR) Landlord reports for CVHA
- ✚ Comparison of SHR landlord report information for North and South Lanarkshire Councils and Glen Oaks and Thenuue Housing Associations

4.0 The Context

The Panel understands that the Scottish Housing Regulator, via the **Scottish Social Housing Charter Outcome 13: Value for Money** requires landlords to manage all aspects of their businesses so that tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.

This standard covers the efficient and effective management of services. It includes minimising the time houses are empty; **managing arrears and all resources effectively**; controlling costs; getting value out of contracts; giving better value for money by increasing the quality of services with minimum extra cost to tenants, owners and other customers; and involving tenants and other customers in monitoring and reviewing how landlords give value for money.

In carrying out our scrutiny project we reviewed CVHA rent arrears performance and compared this to the figures from the SHR landlord reports of North and South

Lanarkshire Councils, Glen Oaks and Thenue Housing Associations. We chose these landlords as:

- CVHA has housing stock in both North and South Lanarkshire Council areas
- Glen Oaks and Thenue Housing Associations are part of CVHA peer group: The G8 Group

5.0 Findings and Recommendations

Initial comments from the Housing Management Team are highlighted in yellow.

5.1 What we liked

- a) CVHA has an Arrears Policy which forms part of the Housing Policy Manual 2016. The policy provides details on how CVHA manages and deals with rent arrears. We consider the policy provides the key details required for staff in carrying out their duties and agree with its overall content.
- b) CVHA has a Rent Arrears – Legal Action Procedure which provides officers with a step by step guide on dealing with rent arrears.
- c) During a Panel work shadowing exercise of a tenancy sign up process, the Panel was pleased to see that staff led the new tenant through their roles and responsibilities, including paying rent and impact of rent arrears.
- d) CVHA staff want to work with tenants to prevent arrears in the first place and where unfortunately this is the case, to work with tenants to address the arrears as soon as possible.
- e) CVHA staff are working hard to deal with rent arrears on a day to day basis.
- f) CVHA has a series of “standard letters” that staff send to tenants at various stages of the rent arrears recovery process.
 - i. Generally we consider the letters are easy to understand for tenants who have good literacy skills and English as a first language.
 - ii. We are pleased that direct telephone numbers for officers sending the letters are provided along with email addresses.
- g) CVHA will endeavour not to initiate court proceedings with tenants who are unable or unwilling to pay rent arrears and we understand this can be due to:
 - The desire to assist people sustain tenancies
 - The cost of court action
 - The role and views of the Sheriff who may:
 - Insist on repayment plans, even when previous ones have not been kept
 - Request additional evidence

- Delay or rearrange hearings
- Just not be “keen on eviction”

A suggestion for different wording from the team is to say that our values are to sustain tenancies and prevent eviction wherever possible.

- h) Although there has been an increase in CVHA stock in recent years, the percentage rent arrears figures has remained relatively similar.
- i) CVHA rent arrears figures compare favourably with other landlords.
- j) CVHA has two Income Maximisation Officers who support tenants and customers’ access the benefits to which they are entitled.
- k) CVHA provides a New Tenant Information Pack which includes a “Paying Your Rent” section.
- l) CVHA has a paying rent section on the website.

NOTE

We understand that the introduction of Universal Credit (UC) could have a detrimental impact on CVHA’s rent arrears figures and that staff and tenants are dealing with difficult issues including:

- Housing Benefit being paid direct to tenants rather than landlords
- Benefit payment delays by the Department of works and Pensions (DWP)
- Tenants entitled to benefits potentially having no income for lengthy periods of time
- Potential fluctuations in payments received by tenants due to changes in circumstances et al

5.2 Our recommendations

We would like to recommend the following proposals for consideration by the CVHA Leadership Team and Board.

Recommendations - the Policy

a.	<p>Within section of the policy, 1.2 Compliance with Regulatory Standards, we recommend that:</p> <ul style="list-style-type: none"> a) CVHA adds the Scottish Social Housing Charter Outcome numbers to the policy such as: <ul style="list-style-type: none"> ○ Housing Options: Outcome, 7,8,9 ○ Tenancy Sustainment: Outcome 11 ○ Value for Money: Outcome 13
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	<p>b) CVHA adds a link to the Charter, along with details on how to access a hard copy of the Charter for people with no or limited access to the internet</p> <p>NOTE: As CVHA is required to provide a copy of policies on request, the Panel considers that adding the Charter Outcome numbers as well as a link to the Charter would be beneficial to people who request a copy of this policy.</p>
	Will add this to the Policy
b.	Within section of the policy, 1.5.3 Confidentiality, we recommend that CVHA updates the policy in line with the new GDPR requirements.
	Agree with this recommendation
c.	Within section of the policy, 2.4 Welfare Benefits, we recommend that CVHA updates this section to reflect how CVHA will deal with potential increases in rent arrears due to payment delays to tenants by the Department of Works and Pensions (DWP)
	CVHA charge rent in advance, UC is paid in arrears. We would be unable to change this cycle. We do take in to account the fact that the tenant is not paid UC for 5/6 weeks and would be unable to pay rent for this period.
d.	We recommend that CVHA adds a section within the Policy regarding when it will be reviewed and how tenants will be consulted.
	Policy already states when it will be reviewed. Will add a section on how tenants will be consulted.
e.	We understand the Legal Action procedure is for staff, however consider that a summary of the document would be useful for tenants. The Panel therefore recommends CVHA develops an “A Step by Step Guide to Rent Arrears for Tenants” that includes a summary of the Policy and Legal Procedures. Think this is a good idea
	Agree that a summary documents be produced showing the escalation stages and outcomes.

Recommendations - the Process

a.	<p>We understand that the current computer system does not check rent accounts on a daily basis and that much of the checking is carried out manually, therefore staff are not always able to do this on a weekly basis.</p> <p>We therefore recommend CVHA continues with the introduction of improvements to the system to include:</p> <p>a) Immediate notice of when a rent payment has been missed</p> <p>b) A reduction in staff time manually checking accounts</p>
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	<p>c) Inclusion of a “red flag” on tenants’ accounts and tenancy details when accounts are in arrears that prompts staff to address this with the tenant</p> <p>d) Inclusion of a section that shows arrears via UC payment delays and allows CVHA to deal with these people in a slightly different way, so that CVHA is not continually contacting people to pay the arrears when they have no means of doing so.</p> <p>NOTE – we consider CVHA should continue to pursue the arrears caused by UC delays, but are concerned that when people have received no money, rigorous pursuit of the arrears may be detrimental to their health and wellbeing.</p> <p>If tenant works with us and we are aware of their payment dates- we work with them to agree re-payment arrangements, or if no engagement, we ask for direct payments.</p>
b.	CVHA continues to work with the 493 tenants in the below £349.99 arrears brackets immediately to assist these tenants make some payment towards the arrears thus preventing their arrears escalating to levels that will become increasingly difficult to manage.
	CVHA actively pursue all arrears including the under £350 .
c.	CVHA continues to actively work with the 337 tenants with arrears of over £350 to reduce the arrears levels to sustain tenancies and prevent CVHA having to pursue court actions or evictions to increase payments to the Association.
	As above
d.	CVHA continues to pursue former tenant arrears.
	CVHA pursue former tenant arrears in all cases. If no forwarding address we pass to our Debt Collection Agency for tracing and collecting.
e.	<p>CVHA continues to take arrears into account when considering making offers of housing</p> <p>a) Former tenant arrears when people reapply to CVHA for housing</p> <p>b) Current tenant arrears when people apply to move to another CVHA property</p> <p>NOTE: where a current tenant is looking to move to a lower rent property, this should be considered as it may assist people to repay arrears owed.</p>

	CVHA always check arrears from previous tenancies and ensure, as per Allocation Policy, that arrangements have been in place and adhered to for 3 months. Where current tenants apply for a transfer to another CVHA property, it will only be authorised if rent account is clear.
f.	CVHA introduces a “text or email alert” system to tenants (where mobile numbers and email addresses are available) to advise tenants that a rent payment has been missed, similar to those used by banks to alert people that they are close to using their overdraft.
	Agree this is something we are working towards with our IT Department
g.	CVHA considers adding a “footer” to all tenant correspondence stating: “It is your responsibility to keep up with your rent payments. Non - payment of rent may affect your tenancy. If you are having difficulty paying your rent, please contact XXX IMMEDIATELY ”
	This information is contained within all our arrears letters
h.	CVHA recommends that people tick the Direct Payment to Landlord box when filling in benefit forms.
	Not always the preferred option- yes for HB but not for UC due to administrative issues. If tenant on UC, we work with them to agree payments from tenant, avoids DWP delays.
i.	CVHA encourages rent payments via Direct Debit (DD) where possible. NOTE: a) As people who pay by Standing Order (SO) have to change the amount when rents increase themselves, some people could get into arrears if they do not update the SO immediately. b) We understand that for some people DD may not be an option as funds need to be in accounts to ensure payments can be taken and for some this may not always be viable.
	CVHA looking at Direct Debit Portal option which would make administration quicker and easier.
j.	For people who have SO's and do not want to change to a DD, CVHA introduces automated text alerts in addition to the current letters to advise of when rent level will change and remind them to change the SO amount.
	Agree. Working towards this facility

k.	When CVHA staff are assessing people for a tenancy, they continue to ensure that people understand their responsibility to pay the rent and advise CVHA of potential change of circumstances or issues that may affect their ability to pay when making an offer of housing.
	CVHA continue to carry out lots of pre tenancy work to ensure affordability
l.	CVHA provides tenants with a list of potential changes in circumstances that could arise of which CVHA needs to be informed. These could include: <ul style="list-style-type: none"> ○ Change in working hours ○ Family member moving out of or into the property ○ Children leaving school and therefore eligible to pay towards rent ○ Unemployment ○ Illness ○ Benefit changes ○ Et al
	Could tie this into the Tenant Version of the arrears procedure mentioned previously- add new section to website.
m.	We understand that five Housing Officers are responsible for managing around 830 arrears cases with the support and guidance of the Senior Housing Officer. We therefore recommend CVHA reviews the workloads of the Housing Officers dealing with arrears to: <ul style="list-style-type: none"> ○ Ensure equity of cases officers work on ○ Identify if there is a need for additional officers to deal with arrears
	We will continue to look at Improvements in IT systems and Text alerts, better efficiencies balanced against staff numbers ratios. Managers will also continue to look at resources within their Teams.
n.	CVHA considers a review of staff available to work on arrears recovery.
	As above
o.	CVHA investigates the potential to employ a further person with responsibility for Income Maximisation work, with significant experience and knowledge of UC and possible debt advice.
	As above
p.	CVHA investigates the potential to employ a debt advisor, who can continually work with tenants and staff to keep everyone up to date on changes and issues as they arise.

	<p>NOTE</p> <p>We understand there will be a cost implication to include this type of service with CVHA, and consider this is something CVHA could possibly consider in partnership with another landlord or organisation.</p>
	<p>Could look at some external funding in partnership with other RSLs</p>
q.	<p>CVHA continues to work with other landlords and Scottish Government to find out why there are such long delays in UC payments being received and to try to have this reduced.</p>
	<p>We are attending the SLC/DWP liaison meetings, working with Partnership Managers etc- however, the administration of UC is a nationwide/political issue. I feel we are likely to see improvements, as migration continues; there will be more political pressure to increase money going into the system, and make incremental changes.</p>

Recommendations - Information to tenants	
a.	<p>CVHA updates the new tenant information pack to have sections re:</p> <ul style="list-style-type: none"> ○ Paying your rent, which focuses on the rent payments, how rent can be paid etc. ○ Rent arrears, which advises of: <ul style="list-style-type: none"> ○ who to contact when a payment is missed ○ arrears recovery process ○ advises of risk to tenancy ○ support available such as Citizens Advice Bureau, Income Maximisation Officers et al
	<p>CVHA will review all the arrears letters in January/ February 2019</p>
b.	<p>CVHA updates the arrears recovery letters to tenants as detailed in Appendix 1.</p>
	<p>As above</p>
c.	<p>CVHA reviews and updates the website to Change the Pay Your Rent button to Rent</p> <ul style="list-style-type: none"> ○ When clicking on rent button, the next buttons to be: <ul style="list-style-type: none"> ○ Payment methods / how to pay ○ Rent arrears ○ Help and assistance available <ul style="list-style-type: none"> ▪ CVHA income maximisation officers, CAB, Councils, DWP and relevant others ○ Changing Circumstances – Please get in touch as this may affect the amount of rent you need to pay, with a list of potential circumstances that may change
	<p>Agree lots of work to be done in improving the website and providing more information, also encouraging people to use the App.</p>

d.	<p>CVHA reviews and updates the “Rent Arrears Questions Answered” on website information sheet to:</p> <ul style="list-style-type: none"> ○ One page document only ○ Included details regarding UC and Housing Benefit ○ Advise people they can request a direct payment to CVHA if on UC <p>NOTE: We recommend this is included in the new Rent Section of website (if previous recommendation accepted) as when looking at the website, we consider this was not easy to find.</p>
	<p>Agree will be carried out in February/March 2019</p>
e.	<p>CVHA develops an information sheet for tenants regarding support available and how to access it such as:</p> <ul style="list-style-type: none"> ○ Scottish Welfare Fund ○ Council payments for people who have received no UC money ○ Referrals and links to food banks ○ Organisations that can provide support or referrals to grant funding, food banks etc. <p>Agree- this is a good idea and something we should implement. Fact sheet and information on our website would be beneficial to our tenants.</p>
f.	<p>CVHA develops an up to date Universal Credit Fact Sheet for the website.</p>
	<p>Agree. Will implement January/February 2019</p>

6.0 The Clyde Valley Customer Panel Members

-  Alex Greenhorn
-  Charles Reid
-  Diana Forder
-  Helen Leyden
-  James McLean
-  Les Peck

- ✚ Margaret Parton
- ✚ Maureen Buick
- ✚ Sharon Allardice
- ✚ Sharon Kerrigan
- ✚ Sheena McVicar
- ✚ Tom Campbell
- ✚ Val Shield



**Appendix 1
Letters to tenants**

Recommendations	
	Letter TA1
a.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Missed Rent Payment and Amount to be shown in red in the subject line ○ If you are now claiming or have applied for Universal Credit, please contact (relevant person) ○ Add - Did you know Box to highlight - If you are now claiming Universal Credit, you are responsible for paying your rent directly to CVHA ○ Add - Did you know Box to highlight – CVHA has an income maximisation service, to make an appointment please call xxx

	Letter TA2
b.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Rent Arrears – Urgent Action Required and Amount to be shown in red in subject line ○ Add – Did you know boxes as above
	Letter TA3
c.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Subject and arrears amount in red and bold ○ Paragraph 3 – amend to say “you MUST contact me immediately if the time is not suitable” ○ Paragraph 5 – consider amending to say “Failure to do so will result in legal action being pursued which could result in your tenancy being terminated and you losing your home”
	Letter TA4A
d.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Subject and arrears amount in red and bold ○ Add “Urgent Action Required”
	Letter TA5B
e.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Subject and arrears amount in red and bold ○ Add “Urgent Action Required” ○ Add “You are at risk of losing your home, please get in touch immediately”
	Letter TC1
f.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Subject and arrears amount in red and bold ○ Add “You are at risk of losing your home, please get in touch immediately”
	Letter TC2
g.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ Subject and arrears amount in red and bold ○ Add “You are at risk of losing your home, please get in touch immediately” ○ At paragraph 3 – add ...Repossession Decree, which could legally end your tenancy and evict you from your home.
	Letter TAM
h.	CVHA updates the letter as follows: <ul style="list-style-type: none"> ○ To make reference to Universal Credit ○ Add - Did you know Box to highlight – CVHA has an income maximisation service, to make an appointment please call xxx
	Letter TAB
i.	CVHA updates the letter as follows:

	o Paragraph 1 – add, which may result in you losing your home.
	Letter NOP
j.	We consider that although lengthy, this letter covers all that is required in a succinct manner

Appendix 2 The Figures

Findings																					
a.	<p>We understand that CVHA has seen slight percentage increase in rent arrears since 2015 / 16.</p> <p>There hasn't been an increase in current arrears since 14/15- this is the global figure, which includes lots of historic FT arrears. However, think it is important to say that the trend since 14/15 is downwards. At the end of 17/18 our current rent arrears figure was under 2%. Slight increase this year due to introduction and roll out of full service of UC. Arrears less than predicted and below target for 18/19</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Number of cases</th> <th>%age</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>2018 / 19</td> <td>1053</td> <td>3.6%</td> <td>£600,074.32</td> </tr> <tr> <td>2017 / 18</td> <td>840</td> <td>3.6%</td> <td>£462,085.33</td> </tr> <tr> <td>2016 / 17</td> <td>1113</td> <td>3.2%</td> <td>£478,990.00</td> </tr> <tr> <td>2015 / 16</td> <td>1021</td> <td>3.2%</td> <td>£386,974.43</td> </tr> </tbody> </table> <p>NOTE Although we understand that this represents a small percentage increase, with Universal Credit being a challenge to some people in our communities we are concerned that this may increase in future.</p>	Year	Number of cases	%age	Value	2018 / 19	1053	3.6%	£600,074.32	2017 / 18	840	3.6%	£462,085.33	2016 / 17	1113	3.2%	£478,990.00	2015 / 16	1021	3.2%	£386,974.43
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b.	<p>We consider that recent performance compares favourably with the 2017 / 18 quarterly figures.</p> <table border="1"> <thead> <tr> <th colspan="2">2018 / 19</th> <th colspan="2">2017 / 18</th> </tr> </thead> <tbody> <tr> <td>Quarter 1</td> <td>2.97%</td> <td>Quarter 1</td> <td>3.32%</td> </tr> <tr> <td>Quarter 2</td> <td>3.37%</td> <td>Quarter 2</td> <td>3.13%</td> </tr> <tr> <td></td> <td></td> <td>Quarter 3</td> <td>3.04%</td> </tr> </tbody> </table>	2018 / 19		2017 / 18		Quarter 1	2.97%	Quarter 1	3.32%	Quarter 2	3.37%	Quarter 2	3.13%			Quarter 3	3.04%				
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				Quarter 4	2.95%																								
c.	Based on the G8 performance report 30 th September 2018, we understand CVHA has collected 99% of rent due this year. This compares favourably with the G8 peers we looked at:																												
	<ul style="list-style-type: none"> - Glen Oaks Housing Association: 98.78% - Thenue Housing Association: 100.40% 																												
d.	Based on SHR Landlord Reports we understand the percentage of rent collected for the landlords we compared with are:																												
	<table border="1"> <thead> <tr> <th>YEAR</th> <th>CVHA</th> <th>NLC</th> <th>SLC</th> <th>GOHA</th> <th>THA</th> </tr> </thead> <tbody> <tr> <td>2017 / 18</td> <td>99.2%</td> <td>98.8%</td> <td>99.5%</td> <td>99.3%</td> <td>100.3%</td> </tr> <tr> <td>2016 / 17</td> <td>99.4%</td> <td>99.6%</td> <td>100%</td> <td>100.1%</td> <td>100%</td> </tr> <tr> <td>2015 / 16</td> <td>100.2%</td> <td>99.55</td> <td>99.9%</td> <td>101.3%</td> <td>99.3%</td> </tr> </tbody> </table>					YEAR	CVHA	NLC	SLC	GOHA	THA	2017 / 18	99.2%	98.8%	99.5%	99.3%	100.3%	2016 / 17	99.4%	99.6%	100%	100.1%	100%	2015 / 16	100.2%	99.55	99.9%	101.3%	99.3%
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	This demonstrates to us that CVHA compares favourably with other landlords. We also understand that where 100% or more rent is collected that this could refer to outstanding arrears payments or former tenant arrears payments, rather than landlords collecting all rent money due in a specific financial year.																												