

<b>Policy Name</b>	Income Management Policy		
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<b>Owner Name</b> <b>Job Title</b>	Rishi Spolia - Head of Locality		
<b>Approved by</b>			
<b>Linked Documents</b>	Rent Arrears procedure Allocation and Lettings policy and procedure Data Protection policy and procedure Eviction policy and procedure Service Charge policy Recharges policy and procedure Former Tenant Arrears Procedure The 1985 Housing Act (as amended) The 1988 Housing Act (as amended) The 1996 Housing Act (as amended) Commonhold and Leasehold Reform Act 2002 Homelessness Act 2002 UK GDPR and Data Protection Act 2018		
<b>Customer Information Leaflets (where applicable)</b>	To be developed by customer panels		
<b>Forms and Other Links (e.g. hyperlinks for intranet-based storage of forms and documents and / or legislation or other helpful information)</b>			
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## 1. Mission and Values

### Building better lives.

We exist to meet the greatest need in society through building better lives. We do this as both as an actively developing and tenant-focused landlord, and as a major provider of care, support and a range of local initiatives to address social injustice and inequality.

We empower people through tenant-led, co-operative and mutual housing – creating diverse neighbourhoods where each individual, family and community has the best opportunities to live independently. Through development we create quality new homes and sustainable communities where people can enjoy happiness, health and prosperity – the vital foundations for successful and fulfilling lives.

Where other services can no longer deliver, when opportunities dry up, when funding is unavailable, we remain the organisation that can and will help the people in the greatest need.

## 2. Overview

This policy applies to income management within Accord and Westlea Housing Association, (all trading as GreenSquareAccord). We aim to provide the highest quality of service to our residents. Non payment of rent or service charges affects our ability to provide high quality services and potentially has serious consequences for customers.

The business streams this Policy covers include:

- ◆ Affordable rent
- ◆ General needs
- ◆ General needs 55+
- ◆ Supported extra care housing
- ◆ Leaseholder
- ◆ Market rents
- ◆ Temporary housing
- ◆ Mortgage rescue
- ◆ Intermediate rents
- ◆ Shared owners
- ◆ Assured shorthold tenancies
- ◆ Right to Home Buy

## 3. Aims and Objectives

### 3.1 For our customer and future customers

- ◆ We aim to collect the maximum amount of rental income and other charges promptly and economically from our customers in order to protect the provision of services and maintain our financial stability.

- ◆ The aim of this Policy is to create an arrears prevention and payment culture and ensure that income is collected quickly and effectively, to support our customers with financial inclusion and the ability to manage their money. This Policy sets out our objectives around the collection of former tenant debts and how we will do this.
- ◆ We will work to support all customers according to their needs, making specific provision for customers with vulnerabilities

### 3.2 For our communities

- ◆ We understand how Welfare Reform, and the migration to universal credit (UC) has affected communities. We are committed to supporting our customers through these times, as well as building on a rental payment culture.
- ◆ We will provide tenancies and terms of occupation which are compatible with the purpose of our housing stock, the needs of the individual, the sustainability of the community and the efficient use of our homes

### 3.3 For our colleagues

- ◆ We will ensure our staff have the relevant training and support to manage income effectively as well as supporting customers in financial difficulties

### 3.4 For our stakeholders

- ◆ We will meet the requirements set out by our regulator.
- ◆ We will work with Local Authority and other partners to help support debt and money advice for customers
- ◆ We will participate in local agreements and initiatives to support economic resilience

## 4. Impact Assessments and Key Considerations

### 4.1 Customers

- ◆ This policy will be applied to our customers to ensure they have equal access to our services, information and that we respect their different needs. All customers will have access to this document upon request or from our website. This document and accompanying leaflet can be translated or provided in alternative formats (e.g. Braille, large print, audio) upon request.
- ◆ Across GreenSquareAccord, we work in partnership to maximise opportunities in order to achieve value for money and choice for customers. Customers' options are often limited by affordability so we are able to grant a range of homes to help us make most efficient use of our housing stock whilst giving customers options which suit their circumstances
- ◆ We will ensure that no person or group of persons will be treated less favourably than another person or group of persons on account of any diversity strand or protected characteristics.
- ◆ We will also ensure our customers have fair access to our services and will provide translation services when required.

### 4.2 Communities

- ◆ Tenancy sustainment lies at the heart of our approach to income management, ensuring that eviction for debt is as a last resort
- ◆ We are committed to work with local community organisations and representatives to ensure that debt and money advice support services are managed in ways that meet the needs of the community and help sustain tenancies. Emphasis will be placed on working with applicants prior to becoming our customers in terms of tenancy sustainability, to ensure the right people are housed in the right properties

### 4.3 Planet

- ◆ To support our move to carbon neutrality and to be as responsive to customers' needs as possible we aim to collect email addresses and mobile phone numbers of our customers so we can communicate effectively and with reduced printed paperwork. Our commitment to locality working means we will seek to reduce travel wherever possible

### 4.4 Governance

- ◆ Board approval is required for this Income Management Policy

- ◆ We will review this Policy in line with any changes to the standards as published by the RSH and in line with prevailing good practice
- ◆ As part of our commitment to deliver an economical, efficient and effective service, we will use external benchmarking services and best practice groups to monitor our costs and service outcomes.
- ◆ We will ensure that in handling the personal data of our customers and applicants we will abide by the UK GDPR and Data Protection rules.
- ◆ We have the skills and expertise to conduct most legal work in-house. We will seek external legal support where this is required

#### 4.5 Partners

- ◆ Across GreenSquareAccord, we will work in partnership to maximise the opportunities for our customers to access income, money and debt advice. Where appropriate to do so we will participate in partners which support this agenda
- ◆ We may also make use of external agencies to provide information, advice and guidance to our customers
- ◆ We are committed to working to prevent debt and to proactively assist all those with money advice needs. In particular, we will work with representative organisations to assist them to meet the needs of the groups they represent.
- ◆ We will assist local authorities and other partners to prevent and reduce homelessness through debt

#### 4.6 People

- ◆ We will make sure our people are appropriately trained and understand how to implement this policy

### 5. Definitions

DWP	Department of Work and Pensions
NSP	Notice of Seeking Possession
ASB	Anti social behaviour.
CA	Citizens Advice
UC	Universal Credit
RSH	Regulator of Social Housing
DRO	Debt Relief Order

## 6. Our Policy

### 6.1 Policy Statement

We will ensure that pre-tenancy work is undertaken with applicants to ensure the property is affordable and that the customer understands the importance and responsibility of paying their rent;

We will let our customers know at the earliest opportunity they are in arrears;

We will offer customers support by providing benefit, money and debt advice and income maximisation before and during the period of a tenancy. This will include referrals to our internal tenancy sustainment officers and Financial Skills Coaches, as well as referrals to our external partners such as Citizens Advice;

### 6.2 Policy Outline

- ◆ To minimise arrears by focussing on preventative action and providing clear information;
- ◆ To offer a variety of payment methods to our customer for rent and charges;
- ◆ To encourage our customers to access their customer account or where applicable send a rent statement on request;
- ◆ To build relationships with the DWP, local authorities, the courts, credit unions and other local agencies which will help us achieve our aim to maximise income and minimise customer debt;
- ◆ To provide tailored and targeted advice to customers to explain how individual circumstances may be affected either directly or through our partners.
- ◆ To use eviction as a last resort

### 6.3 Policy Requirements

- ◆ To comply with all legislative and regulatory requirements;
- ◆ To meet the requirements of the Pre-Action Protocol for Possession Claims for social landlords;
- ◆ To fully consider an individual's circumstances and demonstrate our commitment to diversity and inclusion;
- ◆ To provide excellent customer service.

## 7. Scope of Policy

This policy applies to customers of Accord Housing Association Ltd and Westlea Housing Association (both trading as GreenSquareAccord) in all tenures subject to the terms of individual occupancy agreements and for all types of debt

Customers who have purchased a property on a long lease will pay ground rent and may pay a service charge. Customers who have purchased a property on a shared ownership basis will pay rent (dependent upon the percentage of the equity they own). They may also pay a service charge. Freeholders may also pay a service charge.

Some customers may not be tenants of the association but may receive care and/or support services from us for which there is a charge.

For tenants of fully mutual co-operatives, individual income management policies apply.

### 7.1 Over-riding approach

- (i) Rents and other charges are a major source of income. This income is critical in enabling GreenSquareAccord to achieve its strategic priorities of provision of excellent services and business growth. Our key policy principles are to:
  - ◆ adopt a “never in arrears” approach for income management and recovery of debt
  - ◆ ensure that customers pay rent in advance in accordance with their occupancy agreement
  - ◆ encourage a business culture where customers take responsibility for payment and understand the consequences of failing to do so
  - ◆ offer early appropriate professional support with personal budgeting to customers to maximise their household income and reduce arrears
  - ◆ ensure our actions are prompt, appropriate, consistent and fair
- (ii) We aim to maximise the recovery of all charges due from customers by establishing a dialogue between colleagues and customers, whilst developing and maintaining good working relationships with external agencies such as Housing Benefit Departments and the Department for Work and Pensions offices in our areas of operation.
- (iii) In recovering money owed, we will have regard to all relevant legislation, regulation and good practice. In particular, we will ensure we meet requirements of the Tenancy Standard of the RSH with “interventions to sustain tenancies and prevent unnecessary evictions.”
- (iv) Our aim is to be fast, firm and fair when collecting income from customers. We place particular emphasis on developing a positive payment culture and we equip colleagues to risk assess customers’ circumstances before a tenancy starts and at all appropriate points during their tenancy to ensure tenancies are successfully sustained
- (v) We focus on early intervention, maximisation of income and prevention of debt and our core housing service includes support to improve the financial capability of customers,

by offering money advice, and other interventions, to address income maximisation including household outgoings reduction, assistance with benefit claims and advice on getting into work

We are aware that any of our customers may, at various points on their housing journey, be vulnerable and need additional support, especially those on limited incomes and with changing circumstances. Our colleagues will be sensitive to the needs of any individual whilst ensuring that they understand their payment obligations

- (vi) We attempt to reach a balance between empathy and firmness with customers who fall into debt, ensuring they are fully aware of their responsibility to pay and we will ensure that our escalation procedures and agreed practices for income recovery are applied uniformly across the business and that colleagues are provided with training to enable them to provide an effective service
- (vii) For those customers who live in supported housing, the emphasis for income recovery is on key working and the relationship that each key worker has with their service user. This will also be reflected in personal and/or support and care plans, which will be subject to review in the context of the service user's wider needs and abilities.
- (viii) We will utilise Customer Insight data to target appropriate advice and services and to review trends of non-payment by different segments of customers
- (ix) We recognise the business case for avoiding eviction and consider eviction as a last resort. Effective income recovery is more likely if a customer stays in their home. We will be clear when eviction is the appropriate outcome and achieve that as quickly as possible, including the use of the mandatory grounds
- (x) Details of the steps that we take before resorting to legal enforcement action, including possession, are detailed in our procedures. These actions may vary according to the terms of the occupancy agreement or contract

## 7.2 Enforcement Action

GreenSquareAccord will attempt to reach agreements with individual customers to repay arrears and other debts, which are both manageable for the customer and acceptable to us.

If arrears persist or a customer is unwilling to make and stick to an agreement and all other solutions fail we will take legal action to repossess a property, usually by using the statutory grounds for possession of schedule 2 of the Housing Act 1988, including use of Ground 8.

### (i) Use of Ground 8

Where tenancy agreements permit, we have the ability to use mandatory grounds (Ground 8) to seek possession on serious rent arrears cases. Before we use this we will

try to work with the customer and make referrals to tenancy sustainment or to debt, advice or support agencies for assistance.

Ground 8 is available where a customer has arrears of more than eight weeks' or two months' rent when the Notice of Seeking Possession is served and at the date of the hearing. As it is a mandatory ground of possession, the judge must make an order for possession if the ground is established. The decision to use Ground 8 in court will be authorised by Locality Manager or equivalent or above.

Examples of when it will be appropriate to rely on Ground 8 in court include circumstances where the customer fulfils the arrears criteria for ground 8 and:

- ◆ Has not resolved Housing Benefit or Universal Credit issues despite repeated opportunities or
- ◆ Has made a fraudulent claim for Housing Benefit, Universal Credit or other benefits or
- ◆ Is not living at the property or
- ◆ Is continuously and persistently in arrears and fails to engage with us or
- ◆ Is not deemed to be a "protected party" under the Civil Procedure Rules due to lack of capacity or is known to be vulnerable or
- ◆ Is in serious breach of other tenancy conditions, for example, serious nuisance, harassment and anti-social behaviour; a perpetrator of domestic abuse or violence
- ◆ Has refused to engage with us

(This list is illustrative only of the issues to be considered and is not exhaustive.)

A head of service will review and approve any cases with an eviction request.

- (ii) A Section 21 Notice may be issued where a customer has an assured shorthold tenancy. This includes customers on a Starter tenancy.
- (iv) Where a customer has a fixed term assured shorthold tenancy, we may where appropriate use a NSP relying upon Ground 8 rather than a Section 21 Notice.
- (v) **Monetary judgements**

When seeking a possession order against a customer, we will also seek a monetary judgement for the arrears, plus our legal costs of taking possession action. Where a customer owes us money for charges due other than rent or service charges, we may obtain a monetary judgment against that person for the sums owed. We will take all appropriate steps to enforce any monetary judgements that are not paid, for example, by obtaining Attachment of Earnings Orders

#### (vi) **Insolvency, bankruptcy and Debt Relief Orders**

Insolvency happens when an individual does not have enough assets to pay all of their debts. They enter into an agreement facilitated by an independent broker who

divides up the repayment agreement to the creditors on the individual's behalf. This is a voluntary agreement.

If this is not financially affordable for the individual, bankruptcy is the next stage, which can only be imposed by a court order. We often get involved at the insolvency stage so that we can get our debt removed from the insolvency agreement. This allows us to recover the debt through possession proceedings on breach of tenancy grounds. If a bankruptcy order is made, we can still take action on breach of tenancy using ground 11 (persistent delay in payment).

DROs are a form of bankruptcy to deal with debts if a person owes less than £20,000, does not own things of value, or has savings over £1,000 and £50 or less spare each month after paying household bills. Customers with arrears may seek to have the arrears included within a DRO. This could mean that such arrears become uncollectable.

In all of the above scenarios, we will make use of ground 12 on irrefutable breach of tenancy conditions, where we feel a possession claim would have a very strong chance of success. Decision on actions in each case will be made on a case-by-case basis and a final decision as to whether to pursue possession action or write off the debt, having taken legal advice, will be taken by the relevant Head of Service or Locality or equivalent.

#### **(vii) Belongings left in properties**

Where belongings have been left in properties, we may take legal action to sell the goods for the payment of or towards any debt. This can be done as part of possession proceedings or as part of any monetary judgement awarded. Where goods of value (over £250) are left in properties in other circumstances, such as death or abandonment, the sale of goods can only take place if the correct legal procedures are followed. These are detailed in our guidance for colleagues.

#### **(viii) Provision of Rent Account Statements**

We are actively increasing the number of customers who can access their rent statement on-line. We promote the customer account to enable them to access their rent statement at any time. When they fall into arrears, we send a letter advising them of this. For this reason, and to save costs associated with postage and officer time, we have decided not to send rent statements to all customers on a quarterly basis.

To meet the requirements of the Pre-action Protocol for Possession claims, all customers who fall into arrears and have been served a statutory notice will receive a rent statement from us, generally by email, as part of the recovery process. If a customer specifically requests that they wish to receive a statement by e-mail or other method, this will be accommodated wherever possible; however, access via the customer account will be the default option.

For accessibility purposes, we will generally promote being able to request a hardcopy statement on demand for only those customers that do not have access to a computer or require their statement in an alternative printed format.

For co-operatives, where we are paid to provide the income management service, we will agree with each co-op if they wish to continue to send out statements, even to those customers who are not in arrears.

### (ix) Former Tenant Debts

- ◆ We aim to prevent or minimise arrears from accruing, we recognise this will not happen in all cases. We will aim to maximise the recovery of arrears outstanding when a tenancy is terminated.
- ◆ This applies to any debts owed to us, including recharges and court costs.
- ◆ We will encourage a customer to clear any arrears or debts prior to a tenancy ending; and will seek to obtain a forwarding address.
- ◆ Where we do not hold a forwarding address, we may refer the case to a tracing agent to obtain this.
- ◆ We will write-off where a customer has deceased with no estate or where we are legally required to do so, for example bankruptcy, where there is a DRO or the debt becomes statute- barred
- ◆ All cases will be considered on a case-by-case basis. This will include how cost effective it is to recover the debt and likelihood of recovery.
- ◆ We may refer the recovery of debts to our appointed debt recovery service. We will do this if the total of debt/s is greater than £50.00
- ◆ Debts of less than £50.00 in total will not be outsourced.
- ◆ Debts under £5 will be written off as these are not economical to pursue.
- ◆ Where a debt/s is older than two years old, we may accept a lump sum payment on a sliding scale of up to 50% as full and final settlement, with the remainder being written off.
- ◆ Any write off's will be approved in accordance with the current Decision and Delegation Schedule. When it is established that the debt is irrecoverable or uneconomic to pursue further, the debt will be recommended for write-off. This will only occur once all attempts to recover have been exhausted and generally not before statute of limitations has expired

- ◆ Where the debts have been written-off as irrecoverable, we will reinstate these and attempt to collect them if new information becomes available. For example if we obtain a current address for a debtor whose whereabouts were previously unknown.

## 8. Roles, Responsibilities and Duties

### 8.1 Executive

The Executive Director (Communities) is responsible for:

- ◆ the regular review, implementation and monitoring of this policy and for reporting to boards and committees as required.
- ◆ negotiating strategic partnerships with local authorities and other partners
- ◆ oversight on internal and external audit reports and for providing board assurance in relation to regulatory compliance
- ◆ Approving write-off reports

### 8.2 Head of Service

Heads of Service are responsible for:

- ◆ liaison with local authority, the DWP and others in relation to strategic Welfare Reform and benefit issues
- ◆ review and approve eviction cases
- ◆ Approving write-off reports
- ◆ participating in external benchmarking
- ◆ providing local reporting -eg to co-op partnership boards
- ◆ ensuring that team responsibilities are reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies.

### 8.3 Departmental Managers

Departmental Managers are responsible for:

- ◆ approving the use of Ground 8
- ◆ Approving write-off reports
- ◆ approving legal costs
- ◆ preparing information for reporting and monitoring purposes
- ◆ monitoring that standards are complied with
- ◆ take action where data standards fall below those expected

### 8.4 Operational Staff

Operational staff are responsible for:

- ◆ Liaising with local authority and DWP regarding benefit applications
- ◆ Supporting tenants with debt and money advice or signposting
- ◆ Monitoring and managing arrears and agreeing repayment plans
- ◆ Preparing legal paperwork as necessary and attending court
- ◆ Undertaking tenancy checks and housing options interviews with customers
- ◆ Investigating instances of tenancy fraud
- ◆ Supporting customers and / or signposting in relation to tenancy sustainment

### 8.5 Working Groups

Working Groups will be set up as and when to consider improvements and changes to this policy and other associated policies and procedures

### 8.6 All Staff

Every member of staff is responsible for:

- ◆ delivering a customer-led service and for suggesting ways to improve and enhance the customer experience;
- ◆ preventing and / or responding effectively to complaints and concerns
- ◆ Recording information in a timely and accurate way having regard to UK GDPR, Data Protection rules and the Data Quality policy
- ◆ Staff must ensure that they comply with the requirements of this and other policies and procedures relating to their role

## 9. Monitoring and Reporting

The management of debt needs to be closely monitored. This is achieved in a number of ways, which are aimed at providing managers with information on arrears trends, good practice and customer aspirations of the income management function

### 9.1 Data Recording

The fundamental principle of data quality and recording is that data should be right first time, which means that the responsibility is held at the point at which it is collected and recorded, whether the person recording the information is clinical, technical or clerical.

All staff are responsible and accountable for the quality of data they collate and record.

### 9.2 KPIs

In addition to standard KPI's for arrears, rent collection, evictions, former tenant debt and write-offs, we will:

- ◆ Monitor performance indicators and targets at association, locality and officer level, including qualitative measurements
- ◆ Have timely provision of management information, making effective use of IT
- ◆ Use customer/business intelligence to target advice, support and services to those most at risk

### 9.3 Monitoring Effectiveness

Regular reviews will be undertaken to assess the use and implementation of this policy and that it is meeting business plan and organisational objectives

We will regularly monitor the effectiveness of money advice, legal partnerships and debt collection arrangements

### 9.4 Reporting Fora and Frequency

**(i) Internally**

- ◆ Monthly performance reports at individual and team level
- ◆ Quarterly Executive team reports at Directorate level
- ◆ Quarterly Committee reports at Directorate level
- ◆ Board reports at Directorate level (frequency to be determined)
- ◆ Reports for Customer Panels (frequency to be determined)

**(ii) Externally**

- ◆ Benchmarking with other registered providers and within our localities
- ◆ Data submission to HouseMark or equivalent
- ◆ NROSH+ annually
- ◆ National Tenancy Fraud returns annually

**10. Quality Assurance****10.1 Internal Audit**

Adherence to this policy will be routinely assessed – on a risk-based basis - by the internal audit function.

Compliance audits against external requirements, such as the court Pre-Action Protocols undertaken by the Internal Audit and Business Intelligence functions

In addition, line managers should ensure that regular spot checks are carried out to identify and remedy any issues

**10.2 External Audit / Validation**

Adherence to this policy may be audited / validated by the following:

- ◆ External legal reviews
- ◆ RSH via In-Depth Assessment

**10.3 Service Standards**

Customers will be involved in developing service standards and in monitoring and scrutinising performance

**11. Communication, Training and Implementation**

Line managers will ensure that this policy and any team responsibilities are communicated as appropriate and reflected in meetings and performance reviews, and appropriately covered within departmental business plans, standard operating procedures, contingency plans and strategies. Staff may be asked to confirm they have received and understood the details of this policy

Where policy reviews, audits or performance indicate the need for whole-scale change, then a fit-for-purpose implementation project plan will be produced and delivered.

All staff will receive adequate training in the use of policies, documentation, systems and records required as part of their role. Induction, supervision and appraisal processes will be used to monitor staff's understanding and compliance with expectations.

Where anomalies indicate changes are needed to training programmes, changes will be made to reduce the risk of recurrence and ensure expected standards are clear.

## 12. Legal and regulatory framework

Registered providers are expected to comply with the Pre-action protocol

<https://www.justice.gov.uk/courts/procedure-rules/civil/protocol/pre-action-protocol-for-possession-claims-by-social-landlords>

In addition we are guided by the specifics of housing law, including, but not limited to:

- ◆ Housing Act 1988
- ◆ Housing Act 1996
- ◆ Localism Act 2011
- ◆ Homelessness Act 2002
- ◆ Equality Act 2010
- ◆ UK Data Protection Act 2018
- ◆ Human Rights Act 1998
- ◆ The Localism Act 2011
- ◆ The Welfare Reform Act 2012

## 13. Information Sharing and Confidentiality

**13.1** Management information produced from tenant/ customer data is essential for the efficient running of GreenSquareAccord and to maximise utilisation of resources for the benefit of tenants, customers and staff. It supports making effective decisions about the deployment of resources, and also in demonstrating the value of the services provided

**13.2** In addition to its housing services, GreenSquareAccord operates a significant number of care and support services which require high levels of personal and sensitive data being appropriately recorded and managed. High quality information means better care, support and customer safety, and there could be potentially serious consequences if

information is not correct and up to date, both for customers and for the organisation as a whole.

- 13.3 GreenSquareAccord is committed to protecting the Confidentiality, Integrity and Availability of all Personal Data that it holds and to complying with all of the necessary Data Protection Laws in line with the highest standards of ethical conduct.
- 13.4 Data must be stored securely and processed in line relevant legislation and Accord procedures in relation to confidentiality. All staff must pay due regard to where they record information, what they record, how they store it and how they share information ensuring that they comply with national and local requirements, policies and procedures.
- 13.5 We will only allow the transfer of Personal Data from, or allow access to, Third Parties when it is assured that the information will be processed legitimately and protected appropriately by the Third Party