



RENT SETTING POLICY & PROCEDURES

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1. INTRODUCTION

- 1.1 The Association's rent setting policy is crucial to ensure we can meet statutory obligations, demonstrate financial viability, plan for the future and ensure we have sufficient income to properly manage and maintain our properties to a high standard.
- 1.2 This policy details the principles on which rent setting for Scottish Secure Tenancies is based, the framework against which individual rents are set and factors that will be considered during the development, implementation and review, to encourage full consultation with tenants and determine annually whether and to what extent any increase should be applied.
- 1.3 The policy also outlines the principles applied in relation to Regulated Tenancies, i.e. tenancies created before 2 January 1989, which offer a protected Fair Rent, until the death of the tenant or eligible successor, so long as they remain in the same property.

2. AIMS

- 2.1 This policy recognises that the Association has a legacy of rents previously set by different policies, and/or inherited through stock transfer, and seeks to address equity and consistency issues which objectively reflect affordability and comparability across our varied housing stock.
- 2.2 The rent setting mechanism is based on a point system, reflecting property attributes including type and design and seeks to ensure transparency to tenants, stakeholders, including funders and the Scottish Housing Regulator.

3. OBJECTIVES

The objectives of the rent policy are:-

- 3.1 Affordability
To provide the best possible housing service at a rent which our present and future tenants on moderate incomes can reasonably afford, through prudent financial management and cost control mechanisms.
- 3.2 Viability
To ensure the level of rent charged covers the ongoing costs of managing and maintaining the Association's stock, including current and future loan charges, general overheads, financial commitments and contingencies.
- 3.3 Transparency and Fairness
To have a rent-setting mechanism that is both clear and fair and charges similar rents for similar properties, while also being easy to administer, understand and justify.
- 3.4 Comparability and Value for Money
To set rent levels that are consistent across Calvay's own stock, while also representing value for money by being broadly comparable with rents of other providers of similar housing in similar areas.

4. PRINCIPLES

4.1 The over-riding principle of Calvay Housing Association's Rent Setting Policy is to provide a clear and fair rationale for calculating rents which takes account of affordability and comparability, while also generating sufficient income to ensure viability in the long-term.

4.2 The Basis of the Rent-Setting System

The Association has traditionally used a points-based system which was established in the 1980s. The basis of the rent-setting formula is to use a flat with a single living space, separate kitchen and bathroom as the standard. Points are then added or deducted to this standard according to the specific facilities associated with each property, e.g. number of bedrooms, house type, garden, etc. and the higher the points, the higher the rent charged. The original point criterion was fairly complex and this review has sought to simplify the level of criterion and make it easier to understand. Over the years, the Association has completed a number of new build projects and a stock transfer from Glasgow Housing Association (GHA) for which we inherited the rents, all of which has created a number of anomalies between rent levels in similar properties, which the Association is keen to iron out to ensure our rents are fair for all of our tenants.

4.3 Consultation to Effect Change

The Association realised this would be a difficult exercise and require extensive consultation with tenants, committee and other housing providers, as well as substantial financial modelling, to ensure we got it right. We enlisted the help of an independent advisor, who assisted in compiling survey questions and also met separately with housing staff, tenants and committee to analyse and discuss all issues. We issued survey forms with our newsletter, at a Community Fun Day and also at the AGM and the general feelings from respondents were that rents should be affordable, similar to other local housing associations and based on property size and type. There were mixed views about whether private gardens and service charges like stair-cleaning should be taken into account and we therefore included these questions in an Independent Satisfaction Survey across 50% of our tenants, where a face-to-face approach was able to gather more views.

4.4 Affordability Considerations

To consider affordability at Calvay, this study used:-

- Glasgow City Council and Census economic data
- Housing Benefit information
- Knowledge of housing staff
- Statistics on the impacts of Welfare Reform
- Benefit calculations for particular household types on minimum wage

Calvay is one of the most deprived areas of Glasgow, with a high level of unemployment, long-term sickness and disability. There is a high benefit dependency level amongst Calvay's tenants, with approximately 65% being in receipt of either full or partial Housing Benefit. Many of those in employment also have their income supplemented by income related benefits such as Child and Working Tax Credits. The Association provides access to welfare benefits advice to assist tenants to maximise their income and apply for any benefits they may be entitled to, but the implications of welfare reform on tenants' ability to pay rent is a concern that must also be taken into account.

4.5 Comparability with Other Landlords

With reference to the Scottish Housing Regulator's (SHR) annual rent tables for housing associations across Scotland and additional surveys of local landlords carried out by the Association, we knew our rents were generally below the Scottish average and also in line with rents for neighbouring associations. However we also knew that some of our small flats have very low rents, while some of our 5apt houses have higher rents than average, particularly the ex-GHA properties. We were also aware that some of the stock we bought over from GHA previously had their rent frozen because the properties needed major external upgrade, but as these improvement works have recently been carried out, these rents should be brought into line with other rents for similar properties.

4.6 Interim Rent Review

While the ultimate goal was to harmonise all rents, the Association realised this couldn't be easily achieved in one go. The Association therefore proposed that the rent review in March 2017 should aim to tackle the most obvious anomalies, with further changes, following full review and harmonisation of the rent points, being introduced in March 2018. The 2016/2017 rent review therefore brought the following interim changes:-

- rents for ex-GHA 5apt houses were frozen to bring them closer to Calvay rents,
- the ex-GHA tenements where rents had previously been frozen but upgrades had since been done, were increased by RPI+1% (to bring them closer to rents charged for similar flats and to honour the promise at SST that rents would not increase by more than RPI + 1%)
- and all other rents (except registered rents) were increased by CPI + 1%, but on a flat rate basis, to help narrow the margin between smaller and larger properties

4.7 Rent Review Going Forward

One year on and this policy review therefore seeks to amend our rent setting mechanism to achieve harmonisation of all rents across our stock and ensure similar rents for similar property types, sizes and amenities. We realise it will take a few years for all rents to be fully integrated and the Association has therefore agreed on a phased harmonisation of rents over a maximum period of 10 years, to minimise the impact on individual tenants. The Association will continue to consult with tenants at every stage and will honour our commitment on rents to tenants who transferred from GHA, which was:-

'to guarantee rent increases of no more than inflation (RPI) plus 1% each year until 31st March 2016 (which we have done) and then to plan but not guarantee, rent increases at no more than inflation (RPI) plus 1% each year for the remainder of the 30-year Business Plan.'

4.8 The Rent-Setting Criteria

Full details of the Association's rent-setting criteria (points system) are given at Appendix 1. A points total is calculated for each property based on the various property attributes and the rent then calculated by applying a monetary multiplier to the point's total. The value of this monetary multiplier will be set each year by the Association's Committee, as part of the annual

rent review process, e.g. dividing the total rental income required for the year by the total points for all stock, where an across the board increase is applied.

4.9 New Build Housing and Stock Transfer

The previous points criterion added points for 'new build housing' regardless of age, whereas the reviewed criterion awards points on a sliding scale by age of development, or stock transfer. This will allow for any new housing developed through the Affordable Housing Supply Programme (AHSP), to be incorporated accordingly and for the Association to take account of the Scottish Government's standard benchmark rents as part of the development viability considerations. Accordingly, the Association may allocate additional rent points to properties in any future developments, or utilise the benchmark rent where this is required to ensure the financial viability of the scheme.

5. **SCOPE OF THE POLICY**

5.1 Scottish Secure Tenancies (SSTs)

This policy relates to the majority of the Association's tenancies, which are SSTs or Short SSTs that came into effect from 28th September 2002, in accordance with the Housing (Scotland) Act 2001. Rents for these tenancies are set by the Association as per this policy and reviewed annually.

5.2 Regulated Tenancies

We also have some tenancies where rents are not set annually by the Association, but every 3 years by the Rent Registration Officer. These relate to tenants who previously held a Secure Tenancy created prior to 1989 and who retain the right to have their rent set in this way, for as long as the original secure tenant remains in that property. However, if the tenant transfers to another property, assigns their tenancy, or dies and another succeeds to the tenancy, the right to have the rent set by the Rent Registration Officer is lost and the rent would be set by the Association from that point onwards. When applying for a rent registration, the Association will request that the Fair Rent be set at the same level that would be set by the Association's policy, with an allowance to reflect up to 18 months inflationary increase, to compensate for the rent not being reviewed again for 3 years.

5.3 Shared Ownership

The Association has a small number of shared ownership properties, for which the rent will be set in accordance with the principles of this policy, for the proportion of the property to be rented by the sharing owner. Deductions will be applied for repair responsibilities in line with nationally set allowance guidelines. See Appendix 2 for more details.

5.4 Leased Properties

The Association leases a number of properties to various agencies, for the purpose of providing temporary homeless accommodation, or supported accommodation for people with learning difficulties or mental health issues, e.g. GCC Temporary Furnished Lets Team, Asylum Team, Serco, Quarriers and Turning Point Scotland. The rents for these properties are also set in accordance with this Policy.

5.5 Costs Covered by Rental Income

As rent is our main source of income, the Association must ensure the rent levied each year is sufficient to cover all costs associated with managing and

maintaining our stock. The annual review will therefore be carried out in conjunction with the Association's budget setting process. This will ensure a detailed assessment of all relevant costs is made and the resulting rents set at a level necessary to sustain our current level of spending and continue an investment programme that will enable us to secure the future of the Association and its properties for the benefit of current and future tenants. Costs to be considered within this exercise would include the following:-

- Management of housing stock, including staff & office overheads
- Maintenance of housing stock (reactive, cyclical and services)
- Voids and bad debt allowances
- Loan charges and repayments, insurances and other legal costs
- Future major repairs, component renewals and associated costs
- Provision for any contingencies
- Inflation levels, interest rates and general construction industry costs are also taken into account, as these all affect our financial projections.

5.6 As well as carrying out maintenance, repairs and improvements, the Association also provides additional services, for which the costs are covered by rental income, e.g. stair-cleaning, bulk uplift, bin store maintenance, grass-cutting, litter-picking and general landscaping of common areas. The Association has always included for the cost of services as part of the overall budget to be covered by rental income, without separate charges being added to individual rents for specific properties. We do however charge factored owners for these services at cost, as this is an area covered by their title deeds and fully explained in the Code of Conduct and Written Statement.

5.7 The Association reviewed and consulted on service charging as part of the recent rent-setting review, and it was agreed not to add the cost of services to individual rents as this may skew the point system criterion and also result in some rents e.g. to small flats within tenement blocks, being overly burdened by additional costs. It was also recognised that many services, e.g. landscaping of common areas, litter picking, etc. enhance the look of the area in general and therefore benefit all residents within the Association's locale.

5.8 Wider role services are also provided from the Calvay Centre, in which our offices are situated. These are enabled by the Association's Community Development staff and volunteers, and include free internet access and IT training, youth groups, bingo, pre-school activities, dance classes, boxing lessons, beauty salon, book exchange, community church and Job Club. The Association is extremely grateful to our community volunteers as these activities help reduce youth disorder and encourage community involvement.

6. LEGAL AND GOOD PRACTICE STANDARDS

6.1 The Association fully complies with Section 25 of the Housing (Scotland) Act 2001, which allows landlords to increase rent (or any other charge payable) under an SST, so long as they give tenants at least four weeks' notice of the increased rent due to be paid. Before issuing this notice, the Association is also aware of the legal requirement to consult with tenants affected by the proposal and have regard to their views. We will seek to go beyond this requirement and encourage tenants to engage with staff and become more fully involved in the annual review process, wherever possible.

6.2 We will also seek to comply with good practice and performance standards. While the Scottish Social Housing Charter does not prescribe how landlords should consult tenants about proposed rents, it does set the standards and outcomes that all social landlords should aim to achieve when performing their housing activities. The outcomes relating to rent-setting include:-

- 13: - *'Tenants, owners and other customers receive services that provide continually improving value for the rent and other charges they pay.'*
- 14: - *'Social landlords set rent and service charges in consultation with their tenants and other customers so that a balance is struck between the level of services provided, the cost of the services, and how far current and prospective tenants and service users can afford them.'*
- 15: - *'Tenants get clear information on how rent and other money is spent, including details of any individual items of expenditure above thresholds agreed between landlords and tenants.'*

6.3 In reviewing this policy, the Association has also taken account of:-

- the SHR's Thematic Enquiry and good practice examples of how social landlords consult tenants about rent increases (November 2016), and
- the SFHA's Guide to Rent Setting and Affordability Tool (June 2017)

6.4 Consultation and Review

Calvay Housing Association has carried out extensive consultation with tenants in the development of this policy review and will continue to do so year on year. All rent levels and other charges will be reviewed annually, from September to February, with any increases agreed being notified to tenants in February and applied from the first of April each year. The Association has asked tenants how they prefer to be consulted and the overriding preference is via the Association's newsletter, but we will also use other methods that may encourage tenant involvement in the consultation e.g.

- Informal coffee and a sandwich mornings to chat with staff
- Short questionnaires circulated at Open days and Family Fun days
- Presentations at AGM and other public meetings
- Small group discussions with invited tenants and staff, and/or committee
- Newsletter articles including information and questionnaires
- Independent Tenant Satisfaction Surveys with face-to-face contact
- Information / response via the Association's website and Facebook page

6.5 The Association will ensure all information provided to tenants on the annual budget and proposed rent review is provided in a clear format that is easy to understand and covers the following areas:-

- How the rent-setting policy works and examples of points criteria set
- What rental income pays for and what tenants get for their money
- Details of major works/services done in current year / proposed next year
- How Calvay rents and general performance compares with other HAs
- Suggested reviews to policy and proposals for rent increase by £ and %
- Invitation to comment and/or to attend informal group discussions
- Feedback on discussions and comments from the review

- 6.6 The main focus of the Association's consultation is that tenants are made fully aware of the rent-setting and review process, have the opportunity to comment on proposals, participate in discussion, receive meaningful feedback and effectively influence the overall process.
- 6.7 The decision as to the level of any increase to be applied will be made by the Operations Sub-Committee, following at least two separate reports. Firstly to agree on the proposals to be circulated to tenants and subsequently to consider any representations received from tenants and any implications this might have on the final outcome of the review and resultant increase applied.
- 6.8 When calculating rent increases in its annual budget setting process, the Association will generally use November's Consumer Price Index (CPI) figure rather than the Retail Price Index (RPI), as this is also used to calculate EVH salary increases and uprating of state benefits. Reports to committee and tenants will demonstrate the effect on individual rents of increases at various levels and how these increases and rents compare with other landlords.
- 6.9 The Association will seek to limit rent increases wherever possible, while also being mindful of the level of rental income required to maintain financial viability. Regard will also be taken of any emerging trends in CPI and RPI inflation rates and interest rates, and their potential effect on key expenditure issues such as maintenance costs, loan repayments and staffing costs. Should CPI or RPI be a negative figure, the Association will consider, as a minimum, freezing rents for the following year.
- 6.10 Business Planning & Risk Management
In reporting to committee on the rent setting and annual review, consideration will also be given to:-
- Any links with the Association's strategic priorities and action plans
 - Consideration of any financial risk or budget implications
 - Impact on tenants and compliance with the Social Housing Charter
 - Emerging risks from any current and proposed welfare reforms

7. AFFORDABILITY MEASURES

- 7.1 A number of tests of affordability have been suggested over the years based on the consideration of various different factors, e.g.
- % of net income that should be spent on rent,
 - % of residual income that should be left after paying rent,
 - that someone working 16 hours or more should only exceptionally be dependent on housing benefit in order to pay their rent, or
 - using the number of adults and children in a household to determine typical 'moderate' income and the proportion that should be spent on rent

While each of these tests have their merit, it is unlikely that any one test could accurately reflect the varying experiences of all different household types within different areas.

- 7.2 Affordability is a major factor in the rent-setting process, particularly in an area like Calvay where unemployment, long-term sickness and benefit dependency is high. We know that approximately 68% of our tenants receive some element of housing benefit, but the recent rent review and Tenants' Satisfaction Survey also showed that only 30% of tenants work full or part-time, while the other 70% are either unemployed, retired, disabled or long-term sick. The effect of further welfare reform is therefore likely to have a huge impact on these households and their ability to pay their rent.
- 7.3 Operating in an area of high benefit dependency also brings challenges to the Association in terms of collecting rent from tenants who may be struggling with other debts and general budgeting. We recognise that rent controls may not assist these tenants, but help with accessing benefits, energy advice, tackling multiple debts and seeking employment or training opportunities will. The Association will therefore seek to enable access to these wider role services, either directly, or indirectly through liaison with or sign-posting to other specialist services, to assist tenants in this position.
- 7.4 The Association therefore favours a 'moderate incomes' approach to testing affordability, which recognises that landlords are not able to set rents that are affordable for every single tenant, regardless of how low their income is, but that moderate incomes just above housing benefit eligibility levels, may provide a more useful and realistic comparison.
- 7.5. The Association will therefore aim to set rents that are affordable to those on moderate incomes and achieve the best balance between rental income generated, quality service provision and organisational sustainability.
- 7.6 To ensure our rents are fair and represent value for money, we compare them with rents for similar property sizes and types owned by other landlords:-
- within EHRA (Easterhouse Housing Regeneration Alliance)
 - across Scotland, via Scottish Housing Network (SHN) benchmarking
 - via the ARC indicators published by the SHR
 - and we also compare proposed rent increases to be applied each year via EHRA and Glasgow, via GWSF (Glasgow and West of Scotland Forum)
- 7.7 In this way, the Association can ensure our rents are reasonably affordable and on a par with other landlords providing similar stock in similar areas. An Independent Tenants Satisfaction Survey of 50% of our tenants in 2017 showed that 94% considered the rent charged to represent value for money.
- 7.8 In terms of re-let times, void loss and tenancy sustainment as measured by the ARC, Calvay has outperformed the Scottish average across all areas and there is no evidence to suggest that current rent levels are encouraging high turnover or discouraging the take up of offers of housing.

8. RENT COLLECTION METHODS

- 8.1 Rent for all of the Association's properties is due monthly in advance and various methods of payment are available to suit individual preferences. Allpay payment cards are issued to all and can be used to pay by:-

- Cash - over the counter at any Post Office or Paypoint outlet
- Debit card - by phoning allpay.net or the Calvay office
- Debit card at Calvay office (or credit card in certain circumstances)
- Using a Smartphone - by downloading the allpay APP
- Online via allpay.net - from home, or in the office if no internet access
- Direct Debit via a bank account, or
- Cheque to the office

8.2 Rent payment methods will be reviewed regularly to ensure that the most convenient options are always made available to tenants.

9. MONITORING

9.1 Operation of the Rent Policy will be monitored by the Property Services Manager (PSM) and the Senior Property Services Officer (SPSO) on a monthly basis, to ensure all rents are charged appropriately, any anomalies or errors are identified and rectified without delay, and rents for any Regulated Tenancies that are terminated, are converted to an SST rent in accordance with this policy, from the next monthly debit or re-let, whichever is the case.

9.2 The policy itself will also be reviewed on an annual basis in conjunction with the annual review of rent charges and a report will be presented to the Operations Sub-Committee highlighting the following:-

- the effectiveness of the policy and any implementation issues
- any recommended changes to the policy
- comparative rents and affordability measures
- details of current income and expenditure and projected spend over the next financial year
- proposed recommendations in regard to the annual rent increase, showing the effect of implementation of different levels of increase on SST rents
- details of tenant consultation and involvement and respective feedback

9.3 All tenants will be consulted as noted above and duly given four week's written notice of the new or revised rent for their property and the due date.

9.4 Role of the Committee

The Committee's role in regard to the Rent-Setting Policy will be to:

- Review the rent and service charge policy and monitor its outcomes
- Consider the rent structure and the effect of any variances applied
- Ensure tenants are fully consulted on any proposed changes
- Ensure legislation, and good practice is followed
- Be aware of other social and economic factors affecting the policy
- Consider and approve any rent increase in line with the policy
- Monitor complaints in accordance with the Complaints Policy

10. EQUALITY AND DIVERSITY

- 10.1 Calvay Housing Association is committed to providing fair and equal treatment for all its stakeholders and will not discriminate against anyone on the grounds of age, disability, gender reassignment, marriage, and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation or any other grounds.
- 10.2 The Association will comply with Outcome 1 of the Scottish Social Housing Charter: *Social landlords perform all aspects of their housing services so that:-*
- *‘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’.*
- 10.3 The Association will therefore seek to ensure that its employment and service delivery practices are not in themselves either directly or indirectly discriminatory, and as an organisation it will seek to actively promote equal opportunities and endeavour to achieve fair outcomes for all.
- 10.4 Our Equal Opportunities Policy sets out the principles that Calvay will apply, to help ensure that discrimination does not occur. We will ensure that:-
- the highest level of sensitivity and responsive service can be provided to meet the needs of the different communities within our area.
 - We consult and involve under-represented groups, where appropriate, in our decision-making process.
 - Equality Impact Assessments are carried out as part of the introduction of any new policy document, review of existing policies, major change in service delivery, office premises or office access arrangements.
 - all venues used for the Association’s meetings and events are suitable for access for wheelchair users where available locally, and that, where appropriate, translation or other services (e.g. hearing loops) are provided.
- 10.5 All information provided will be clear, simple and consistent and all information given in relation to this policy will be treated as strictly confidential and will not be discussed with external parties without their permission. The Association will comply with the requirements of the Access to Personal Files Act 1987 and the Data Protection Act 1998 (and as amended legislation) in this regard.

11. COMPLAINTS

- 11.1 Calvay Housing Association operates a complaints Policy that is open and transparent, should any customer or service user feel the need to make a complaint against an individual, the organisation or any service provided.
- 11.2 Any tenant or customer who is dissatisfied with the operation of the Rent Policy may make a formal complaint to the Association via the Complaints Policy, copies of which are available from the Association’s offices or to view or download from our website.

12. REVIEW

- 12.1 In addition to the operational review of the policy for monitoring purposes as noted at 9.2 above, the full policy and related procedures will be reviewed three years from the date of approval, or earlier should the need arise to reflect changing circumstances or changes in legislation or good practice standards.

13. Cross References with Other Policies

Rent Arrears Policy
Shared Ownership Policy
Factoring Policy
Code of Conduct & Written Statement for Factored Owners
Standing Orders
Equal Opportunities Policy
Complaints Policy

RENT SETTING CRITERIA (POINTS SYSTEM)

RENT SETTING			
		CURRENT VALUES	REVISED TOTAL 13 09 17
HOUSE TYPE:-			
	bungalow	10	15
	semi	7.50	12
	4 in a block	7.5	7
	2 in a block	7.5	7
	end terrace	5	10
	mid terrace	3	8
	Maisonette		
	Main Door Flat		
	2 storey	5	1
	3 storey	3	
	Sheltered		15
PROPERTY AGE:-			
	Pre 2000 New Build		10
	Post 2000 New Build		20
	SST Element		3
NB 1 - 3	1994 - 1999		
	2000 - 2004		
NB 4 & 5	2005 - 2009		
NB 5 - Manse Site	2010 - 2014		
BEDROOM:-			
	single	15	12
	double	25	15
	Additional bedrooms:- single ()		12
	double ()		15
	Bedroom Recess		-10
GARDEN			
	private back & front	15	15
	private front only	12.5	10
	private back only	10	10
OTHER AMENITIES			
	Shower Room Only	-10	-5
	Additional Shower	5 each = 10	3
	Additional WC	5	2
	Additional Wet Room	10	6
	Dining Area	7.5	6
	Parking	3	3
	Separate Utility Room	3, 5, 10	2

SHARED OWNERSHIP RENT ELEMENT

1. The Association is required to set a rent for the share of the property to be rented by the sharing owner. This rent element is called the Specified Rent and will comprise of the following:-
 - Rents will be set in accordance with the policy for Scottish Secure Tenants less an allowance of 15%, to account for the fact that the sharing owner is responsible for meeting the cost of all repairs and maintenance of the property.
2. Separate additional fees will also be charged via the Factoring Service:-
 - Management Fee for provision of a Factoring Service
 - Common Buildings Insurance fee, as per the Occupancy Agreement
 - Service charges for any services provided, e.g. stair-cleaning, bulk uplift, bin store maintenance, grass-cutting, litter-picking and general landscaping of common areas
 - Charges for common reactive repairs undertaken by the Association
3. All charges will be made in advance, except reactive repairs which will be charged in arrears, once the Association has received the invoice.
4. The occupancy agreement will provide that rents will be reviewed on an annual basis.
5. The sharing owners' rent will be recalculated in the event that a further share of the property is bought, i.e. further tranche/staircasing.
6. If the date of the staircasing transaction coincides with the rent review date, the rent must be re-assessed and the new rent apportioned to reflect reduction in the specified rental share.
7. The sharing owners' specified rents will rise at 1 April each year, with 28 days' notice being given to the sharing owners of the specified rent rise.