



TAI CANOLBARTH CYMRU MID-WALES HOUSING

Yn barod **amdani** **Equal** to the challenge

Welfare Benefit Reform Strategy

Strategic Aim:	The Association will continue to place a high priority on income management, debt collection and managing welfare benefit reform.
Reference No:	
Date Of Issue:	From October 2019
Next Review Date:	September 2020
Departments Affected:	All Departments
Approved By/Date:	Board of Management
Lead Officer:	Jean O'Neill, Interim Director of Customer Services
Statutory Compliance:	The Westminster Government introduces elements of Welfare Benefit Reform through statute (Welfare Reform and Work Bill 2015) and regulation through the Department of Work and Pensions.

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WELFARE BENEFIT REFORM STRATEGY

1. Introduction

The Association has responded to the introduction of welfare benefit reform since its inception in 2013. Over that period of time new reforms have been introduced which were not included within the original scope of the policy. Further proposals have been introduced and some have introduced and then rescinded. It is highly likely that further subsequent amendments and reforms may be introduced.

2. Strategy

The Association's strategy in relation to welfare benefit reform is twofold.

- i) To protect the financial position and viability of the Association; and
- ii) To support and assist tenants and leaseholders concerning welfare benefit reform where it is proportionate and viable to do so.

3. Indicative principles of strategy implementation

- 3.1 The Association will continue to provide Welfare Benefit advice, through a combination of specialist Advisor post and wider general advice.
- 3.2 The Association will continue to seek rent payments when they are due; at the start of the tenancy, so tenants are aware of their responsibilities and the tenancy becomes something viewed as having 'value'.
- 3.3 The Association will continue to insist that new tenants have a bank account which is able to accept Universal Credit (UC) payments, and will encourage the use of direct debits over other forms of payment, at every available and appropriate opportunity.
- 3.4 The Association will continue to insist that for UC claimants who have UC paid directly to them, we set up a direct debit for their rent payment, on the UC payment date.
- 3.5 The Association continues to work with partners for the benefit of tenants and leaseholders, for example the Department for Work and Pensions (DWP), Community Housing Cymru (CHC) and local authorities.
- 3.6 The Association achieved "Trusted Partner Status" with the DWP on 2nd October 2018, and as such is able to access the "Landlords Portal". The Association will continue to work with CHC and other partners to develop the Landlords Portal, with the aim of there being a two way flow of information, rather than the current one way flow (from the Association to the DWP).
- 3.7 The Association will work with CHC and others to make the case for data sharing between the DWP and Associations, to ensure Associations are aware of the migration dates of vulnerable claimants, so support can be offered and rent arrears due to failure to claim UC, prevented.

- 3.8 The Association will use the UC “managed payments” and “alternative payment arrangements” where these are considered appropriate; generally for the most severe cases of inability to manage finances.
- 3.9 The Association will run ‘campaigns’ to explain the working of advance payments of UC, outlining any benefits and problems of taking advantage of such arrangements.
- 3.10 The Association will continue to develop more detailed arrears monitoring, in order to understand the effect on individual cases. The Association will also further develop the identification of trends.
- 3.11 When the Association makes allocations, it will take into account an applicant’s circumstances, and ensure in so far as is possible the tenancy can be sustained. This may mean that an applicant is “overlooked” until such time as the Association is assured the tenant can sustain that tenancy. Pre tenancy work takes place with prospective tenants from their very first contact with the Association, and continues through to viewing and sign-up. An income and expenditure proforma is completed by applicants and assessed by officers as to whether the tenancy can be afforded. The Welfare Benefit Advisor will support prospective tenants to apply for Universal Credit if support is needed.
- 3.12 It is a requirement for all prospective tenants to demonstrate an ability and willingness to pay rent and service charges before an offer of accommodation is made (to avoid offering tenancies that then cannot be afforded).
- 3.13 The Association will provide tenants and leaseholders with appropriate and timely advice about welfare benefit reform. The Association will work on the principal “we will assist applicants where appropriate”. This currently includes promoting tenants to have bank accounts, to pay the rent at the commencement of the tenancy and working towards a month’s credit on every rent account. The Welfare Benefits Advisor provides an information leaflet on UC and conversation at every opportunity, with any resident on a legacy benefit. The Association will consider sign-posting residents to other appropriate organisations. Where support is beyond the Association’s remit, we will sign post to other support organisations such as CAB, MIND, SSAFA etc.
- 3.14 The Association will ensure that appropriate staff are trained and skilled with regard to welfare benefit reform and UC issues which will affect its leaseholders and tenants.
- 3.15 The Association will mitigate the impact of the “under occupancy charge” by ensuring some priority is afforded to those tenants wishing to down size, on both the Powys and Ceredigion Common Housing Registers..

- 3.16 The Association will seek to mitigate the impact of other changes by supporting tenant’s applications for extra payments such as Discretionary Housing Payments.
- 3.17 Develop a plan to identify and support prospective tenants who are the most likely to be in serious arrears upon the switch to Universal Credit.
- 3.18 That tenants on a starter tenancy should have a clear rent account or have a suitable arrangement in place to clear any arrears before such a tenancy converts to an assured tenancy.
- 3.19 The sustainable tenancy risk assessment process is carried out for all prospective tenants, and twice during the first year of tenancy.
- 3.20 The Association will continue to have ad hoc problem solving case reviews (both internal and/or with other agencies, as appropriate) for its most vulnerable and challenged tenants, as and when required.
- 3.21 The Association will encourage all tenants to be “digitally willing”.
- 3.22 The Association will encourage a shift in attitude of some tenants from "I don't pay rent" to "**I am responsible for ensuring my rent is paid**".
- 3.23 The Association will encourage and facilitate (were possible), access to the internet and the knowledge, skills and attitude needed to go online and possess and use an email account. The Association will continue to look to “recycle” redundant computers and mobile phones to those residents with the most need, and provide training in their use.
- 3.24 The Association will continue to develop and promote “My account” and any other emerging digital gateways to facilitate payment of rent and wider tenancy management .
- 3.20 The Association will consider any IT solutions that become available and carry out a cost benefit analysis.

Strategic Risk Factors	<ul style="list-style-type: none"> - MW19OE/001 - Income Collection - Status High Risk - Risk Score 12 - Internal Control Score 3/Fully Effective 	
Value for Money	<i>“Doing the right thing, in the best way for the best price”.</i>	It is appropriate for the organisation to seek to protect its financial position. It is also legitimate for the Association to seek to support tenants and leaseholders in relation to the reforms to welfare benefit

		and when they are adversely impacted by its effects. This needs to be undertaken in a manner which is timely and proportionate to the corresponding cost which will ensure <i>value for money</i> .
Equality Impact Audit	<i>How does/will this policy ensure needs are met fairly, particularly with regard to race, gender, disability etc.?</i>	The government policy impacts differently upon people dependent upon their age. The Association is unable to influence this. However, the Association may support tenants and leaseholders with the impact of the reform program if that support is proportionate and practical.
	<i>Is it felt that this Policy might affect different groups adversely? If so what is the justification for this, and is it legally permissible?</i>	The Welfare Benefit Reform programme affects different groups of people on the basis of their age and also household circumstances. In order to mitigate the impact where that is an appropriate and legitimate function of the Association, the Association will support tenants and leaseholders. The government's policy is legally justifiable because it has been introduced through statute. Challenges through the courts have been successful in a number of minor regards but these loopholes have been generally closed by the government through amendments to guidance and regulation.
	<i>Have any representative groups in the locality been asked for their opinion and if so what was the outcome?</i>	The Association has been working with both Ceredigion County Council and Powys County Council in regard to joint working to reduce the adverse impact of the reforms on the Associations customers. The Association has also worked with the Citizens Advice Bureau, credit unions, Community Housing Cymru and other representative groups. A

		practical example of an outcome is achieving Discretionary Housing Payments for tenants who are subject to the under occupancy charge.
Tenant Engagement	<i>How does/will this policy ensure the needs of tenants are met?</i>	The Association's initiatives in regard to Welfare Benefit Reform have been discussed at the Tenants and Residents Forum on a number of occasions and will be discussed again at the next available meeting.
	<i>How is it felt this Policy will impact on the rights and obligations of tenants?</i>	It is intended there should be no adverse impact on tenants. Leaseholders will have to be consulted on any amendments to service provision which impacts on service costs. However, the overall purpose of the strategy is to support tenants and leaseholders.
	<i>Have tenants been consulted and were the outcomes of that consultation taken into account when considering the introduction of this Policy?</i>	The Association has provided regular information updates to tenants and leaseholders. The lesson learnt through experience by the Association in regard to how to inform tenants: is that it is best to provide advice just before any changes occur in practise and not at the point of announcement which may be years in advance of the implementation of the changes. This strategy was considered at a meeting of the Tenants and Residents Forum (TaRF) held on 4 th October 2019. TaRF members requested that the sentence in 3.22 was amended from "I am responsible for paying my rent myself" to "I am responsible for ensuring my rent is paid" and that this sentence was emboldened.

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