

Subject:	Minimising risk of evictions arising from welfare reforms		
Date of Meeting:	15 November 2017		
Report of:	Executive Director Neighbourhoods, Communities & Housing		
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Ward(s) affected:	All		

FOR GENERAL RELEASE

1. PURPOSE OF REPORT AND POLICY CONTEXT

- 1.1 Government changes to welfare benefits over the past few years have culminated in the recent roll-out of Universal Credit in the BN3 postcode area, with further roll-out to the BN2 postcode area at the end of November, and to BN1 and BN41 postcode areas in mid-January. Universal Credit has signalled the most significant change to welfare benefits since the inception of the welfare state, however there are also other changes impacting benefit claimants.
- 1.2 A notice of motion presented to Council on 6 April 2017, requested this committee call for a report outlining how the risk of evictions arising from, for example, Housing Benefit changes and the Benefit Cap could be minimised. The notice of motion specifically requested that council officers use all means other than evictions and bailiffs to recover arrears debt to the Council which was solely due to Benefit Cap or removal of entitlement to Housing Benefit. In addition, that the Council works with partners to, where possible, prevent eviction and homelessness of local residents affected by the benefit changes. Specific reference was made in the notice of motion to a disproportionate number of lesbian, gay, bi-sexual or transgender (LGBT) young people being at risk of homelessness, and therefore potentially adversely impacted by the changes. However, this potential impact on young LGBT people is not borne out locally from known equalities data of people seeking support from council services.
- 1.3 This report looks at the actions being taken by the Council to minimise the risk of eviction of local residents as a result of impact of welfare reforms.
- 1.4 Particular attention is given in this report to groups most likely to be impacted by the changes, these include young single people and large families; and the benefits changes causing this impact, namely Universal Credit and the Benefit Cap.

2. RECOMMENDATIONS:

- 2.1 That Housing & New Homes Committee note the contents of this report.
- 2.2 That Housing & New Homes Committee endorse the actions being taken to support residents and foster a culture of responsibility, thereby minimising the risk of eviction arising from welfare reforms.

3. CONTEXT/ BACKGROUND INFORMATION

3.1 Universal Credit

The number of residents currently on Universal Credit is relatively low, while the roll out gets underway, spreads geographically, and expands to other claimant groups. Given that the Council's Revenues and Benefits team does not administer Universal Credit (although it still retains responsibility for administering Housing Benefit in the interim), we cannot be clear of the exact number of people in the city currently claiming Universal Credit. However, at the end of September, there were 82 council tenants and 28 temporary accommodation residents receiving this welfare benefit.

- 3.2 The ambitions of Universal Credit are to make the transition to work easier, to make every hour of work pay, and to simplify the benefits system in part by combining the following six existing benefits into one:-

- Housing Benefit
- Working Tax Credit
- Child Tax Credit
- Jobseeker's Allowance
- Employment and Support Allowance
- Income Support

- 3.3 Other significant changes that Universal Credit introduces are:-

- Most claims will be made, and importantly maintained, online
- The amount paid for rent will normally be paid directly to the tenant not the landlord
- Payments will normally be paid once a month to one person in the household
- The first payment will normally take at least six weeks, and payments will be made monthly in arrears
- In most cases there will be no benefit payable for the first seven days
- From 1 April 2017, [18-21 year olds](#) making **new** Universal Credit claims in full digital service areas will not be entitled to help with housing costs unless they fall into one of the following exempt groups:
 - ✓ have dependent children
 - ✓ in late pregnancy
 - ✓ carry out a caring role
 - ✓ exempt from the Shared Accommodation rate of Local Housing Allowance

- ✓ inappropriate to live with parents
- ✓ working 16 hours per week for the previous 6 months
- ✓ vulnerable
- ✓ apprentice
- ✓ existing claimant.

This is a small group housed by the Council, and in order to be housed they would need to be vulnerable in some way and be in priority need. There are currently 40 council tenants under 21 and although tenant profiling data is incomplete, it is considered that the vast majority would fall into the exempt groups. If a young tenant was not exempt, a full package of tenancy sustainment support is provided.

- 3.4 However, the Council is very much aware of the implications on claimants. Sources of information include other council areas where Universal Credit was either trialled or has since been implemented, feedback disseminated by the Chartered Institute of Housing, and importantly from research conducted by Citizens Advice. Nationally, Citizens Advice supported over 30,000 people with Universal Credit issues during 2016. The matters Citizens Advice has documented in its research report published in July this year, 'Delivering on Universal Credit', provides insight that reinforces the need for the actions that the Council has already introduced to help minimise arrears and therefore minimises the risk of eviction. For example:-
- 3.4.1 One third of Citizens Advice clients claiming Universal Credit had to make more than 10 calls to the UC helpline to sort out their claim. The housing service has introduced an early appointment system so that colleagues can support residents and provide early information, for example evidence of their rent charge, to the Department for Work and Pensions (DWP).
- 3.4.2 The level of disruption to financial stability caused by a wait of seven weeks, and up to 12 weeks in some cases, for Universal Credit to be paid. The Council has attempted to communicate this to tenants, so they are aware in advance and can consider how they will manage in the intervening time. While the Council is not able to recommend that tenants apply for a Credit Union or other type of financial service, there have been regular items in Homing In informing people of the existence of the East Sussex Credit Union, and the assistance it can provide. Similarly, staff have updated information on local food banks and the various access or referral requirements for each one. Local processes around court action have also been reconsidered, meaning that rather than increase the debt burden on claimants at an early stage through court costs, the Council will do even more work with residents to emphasise the importance of reducing their debts immediately they receive their backdated lump sum payment of living allowance and housing allowance. We have also instigated a dialogue with the Court utilising the working practices established with other Courts in other areas, where Universal Credit has been a relevant factor.
- 3.4.3 Few residents were aware that if they were in hardship they could apply to the DWP for an 'Advance Payment', whereby they could receive up to 50% (up to half) of their estimated claim amount while it was being processed. The money would then be deducted from future benefit payments, and repaid within 6

months. This is an example that has informed the type of information officers are giving to residents seeking advice and support. Furthermore, discussions with colleagues within the council has highlighted the need for joined-up thinking in the advice or guidance offered, because depending on individual circumstances, the type of tenancy, or the level of any pre-existing arrears, it might be possible that other sources of hardship support could be more suitable for the individual.

- 3.4.4 Alternative Payment Arrangements that include an element deducted for rent arrears could mean that residents would be left with very little to live on. This has informed our actions around applying for the rent element only in some cases, and working with the household to ensure affordable amounts towards arrears are paid to gradually reduce debt.
- 3.4.5 High call charges to contact the DWP and long waiting times to talk with someone there is addressed by the Council ensuring Freephone telephone access from housing offices (although we note that the government has ended the high-cost telephone service) This, linked with the DWP change requiring claimant consent each and every time an organisation is contacting them on behalf of the claimant, is also an important reason why revised processes include early face-to-face contact with Universal Credit claimants.
- 3.4.6 The Citizens Advice research also highlighted the issues around the DWP requiring claimants to be digitally up-to-date with their claim. This links the Council-wide work promoting support from Digital Brighton & Hove to get people online. This is in the knowledge that all residents will not only benefit from being able to make their claim online, but also benefit from the plethora of advantages of being online (eg work search and money saving issues). However, the added significance of on-line confidence is that failure to respond to digital updates required by the DWP can result in sanctions – ie claimants’ payments being reduced or suspended. This could be, for example, for failing to book online for the initial compulsory Jobcentre appointment for residents to meet their work coach. The Citizens Advice research showed that there was an over-representation of people who are disabled or on low incomes among those without internet access at home or on the move, and/or without basic digital skills. We are also concerned about those with literacy problems.
- 3.5 The above examples demonstrate the Council’s awareness of the issues residents face in respect of the welfare reforms. This awareness means that eviction action will remain a last resort as it always has been – with a range of support coming first. However, it also shows that a policy of doing nothing or having no sanction against people who do not cooperate with requests from agencies/organisations to address their financial affairs, whether in respect of Universal Credit or other welfare reforms, will not be in the best interest of our customers in the longer term. The issue of digital support is absolutely key here, because while some people will be exempt and will be allowed to claim in an analogue way, the majority of people will need some way of supporting their own access to their claim and updating DWP requests. Research company Ipsos MORI estimated in 2015 that 20% (or 1 in 5) of the adult population lack digital skills (‘Go on UK’), yet among those seeking support from Citizens Advice, the figure was 45% (or almost half). Neither the Council, nor local voluntary agencies will be able to sustain the high level of interaction individuals will need to support them in the longer term. This therefore signals a need for council

awareness that, alone, it is not able to ameliorate the negative impacts of welfare reform without individuals playing their own very important role where they can.

3.6 **Benefit Cap**

3.6.1 Extensive support, including Discretionary Housing Payments, has been provided for residents affected by both the introduction of the Benefit Cap and the changes made to it last year. The number of households in Brighton and Hove affected by the cap in benefit levels received has reduced from 415 in February, to 340 in May, to 309 in September this year. The largest proportion were in the private rented sector (59% or 156 households); 22% (67 households) were in temporary accommodation; 15% (47 households) were council tenants; and 13% (39 households) were housing association tenants. Of the 309 households, 80% (247) are single parents, and just 4% (12 of the 309) were single person households.

3.6.2 From September 2016 to March 2017 the Housing Income Management Team visited 54 council tenants subject to the Benefit Cap of £20k. In the majority of cases the households were assessed as being able to afford their cap and were offered money advice to assist with budgeting and debts. The majority of tenants subject to the Benefit Cap had more income than households working in low paid jobs or on zero hour contracts.

3.6.3 Exemptions to the Benefit Cap are:

- Claimant, partner or dependent child claim a disability benefit
- Claimant able to claim Working Tax Credit by starting work:
 - 16 hours per week for a single parent
 - 24 hours per week between partners
 - 30 hours per week if single and over 25 years old.

3.6.4 If a rent is evaluated as unaffordable, the Council is duty bound to put a support package in place to assist the tenant. Tenants in temporary accommodation are expected to pay a minimum of £20 per week towards their living costs. Discretionary Housing Payments are awarded for fixed periods and have tailored conditions attached to them. The aim of these conditions is to enable the tenant to engage with positive support which is focused on gaining exemptions eg more working hours, disability benefits, volunteering etc.

3.7 As well as the risk of eviction for residents, there are risks to the Council arising from welfare reforms.. These are:-

- Increased rent arrears – it is estimated that almost 5,000 council tenants will be on UC when it is fully implemented, potentially being responsible for paying around £20m which is currently paid directly to the Council from Housing Benefit
- Increased resources needed to recover debt arising from general needs housing and temporary accommodation
- Higher housing management costs as a result of above
- Reduced income impacting on the Councils ability to provide services to existing tenants, maintain homes, and to resource the provision of increased council housing supply

- Funded voluntary sector organisations finding it difficult to cope with the increased demand for their services (eg Money Advice Plus)
- Additional work required to sustain people in council, temporary accommodation or private sector tenancies, limit their debt by limiting court action, and keep evictions to the minimum levels they are today.

3.8 Actions being taken, in addition to those outlined in paragraph 3.4 include:-

- Homeless Prevention Trailblazer project - early intervention models
- Working with landlords to understand UC issues and apply to the DWP for Alternative Payment Arrangements as an alternative to eviction
- Pre-tenancy work which enables prospective tenants to have information about becoming a tenant and prepare in advance for this – for example, by having a bank account, accessing support for getting online, and considering how they will fund furniture, kitchen items etc
- Increased communications to ensure tenants are aware of the local support available to them, their claimant responsibilities, and their rent payment responsibilities
- One-to-one support and tailored communications – eg to people under 22 affected by the ‘no housing costs’ rule, and those under 35 affected by the ‘shared room rate’ rule
- Equipping visiting staff with internet enabled tablets, which although not connected to the Council’s data systems enables officers to show residents a range of useful sources for them on the internet
- Seeking to enter into a dialogue with the Court to explain the foreseeable problems emerging from the move to Universal Credit. Officers have contacted other local authorities to investigate the protocols being utilised in dealing with the Court. For instance one of the issues envisaged is the lack of information regarding people’s benefit claims. Officers from housing are able to get quick information from colleagues in the housing benefit team and can fully appraise the Court in respect of Housing Benefit claimants. This is not the case with Universal Credit claimants. With the very limited access to DWP officers, and the difficulty (because of no contact) in obtaining the required explicit authorisation from a claimant each time their claim is discussed with the DWP, it is extremely difficult to get a sense of the tenants income/welfare benefit position before going to court.

4. ANALYSIS & CONSIDERATION OF ANY OPTIONS

4.1 The Council agreed a no eviction policy when the ‘Social Sector Size Criteria’ was implemented in April 2013. This resulted in confusion, with some tenants affected by the policy interpreting it as the landlord being unable to take action to recover rent arrears. This was also evidenced in a number of tenants seemingly purposely building up rent arrears, with little regard for it being a priority debt. Anecdotally, this also had a negative impact in that some tenants chose not to engage with the Money Advice Plus service which is specifically commissioned as an independent source of support to residents facing financial hardship. This

particular welfare benefit change did considerably increase council housing arrears amongst the residents affected by the welfare reform from £84,000 prior to its introduction, to £142,000 at its peak 4 months later. The table below gives some more detailed information regarding the levels of arrears in relation to the 'Social Sector Size Criteria'. However, the numbers affected were considerably less than those who will be affected by the full roll out of Universal Credit; and those affected were in the main impacted by 13% of their Housing Benefit (some lost 25% or one quarter of their Housing Benefit), whereas with Universal Credit the amount at stake in terms of levels of debt build up is 100% of the rent. Lastly, for people impacted by that welfare reform, there were actions that could be taken to reduce the impact – ie tenants could move to the 'right sized' accommodation to avoid being impacted, whereas it is not possible to avoid Universal Credit in this way.

Arrears information of under occupiers

	Base Apr 2013	Peak Aug 2103	Back to base Jan 2016	Current Sept 2017
Level of arrears of impacted group	£84k	£142k	£85K	£49k
Number of tenants	949	862	725	631
Number (%) in arrears	277 (26%)	565 (65%)	313 (44%)	283 (45%)
Average arrears per impacted households in arrears (rounded)	£300	£250	£255	£175

As at the end of September, the average arrear amongst people in arrears and on Universal Credit is £500, compared to the average for under occupying tenants at £175, Benefit Cap tenants at just over £300, and all tenant in arrears at £250. Comparable early 2017 Universal Credit claimant arrears data submitted to the Government's Work and Pensions Select Committee from organisations that went live to the full service between November 2015 and July 2016 includes:-

- Hounslow Borough Council - £870
- Croydon Council - £685
- Halton Housing Trust - £602
- Lancaster City Council - £560
- Southwark Council - 5% of tenants on Universal Credit owe almost 20% of arrears debt.

4.2 Tenants have a contractual obligation to pay their rent and it could be interpreted as inconsistent if council policy contradicts the obligations set out in tenancy agreements. Judges have commended the Council on its approach to

presenting arrears cases in court, and any latitude required in respect of people facing hardships arising from welfare reform can already be fully accommodated in existing policies and procedures. From previous experience, a blanket no eviction policy would give the wrong message to tenants and to important partners such as the judiciary.

- 4.3 In Brighton and Hove the eviction rate for council tenants has remained extremely low, placing the Council in the top quartile, while the rent collection rate has continued to increase. Of the 105 local authorities owning at least 5,000 properties, Brighton and Hove has the lowest rate of rent arrears evictions, when expressed as number of evictions as a percentage of the total stock (6 divided by 11,563 = 0.05%). The eviction rate for temporary accommodation tenants has also remained low, with there being no evictions in 2016/17 arising from rent arrears. The ability to maintain rent collection without resorting to eviction is due to the wide range of support both the Housing Income Management and Credit Control teams provide in order to help tenants sustain their tenancies and reduce the need for expensive, statutory services. As well as close liaison with other housing professionals, both teams work closely with Social Services, Family Coaches, Learning Disability Teams, Money Advice, Housing Advice Centres, Employment Support Services, Benefits Services and numerous other agencies to support tenants and provide holistic, tailored support to achieve income maximisation, tackle long term financial exclusion and change behaviour so tenants are able to pay their rent.
- 4.4 There is a Court imposed process prior to any arrears proceedings being issued. In addition to our own attempts to contact the tenants, there is a 'pre-action protocol' which requires any public sector landlord to have undertaken a number of steps. This means that at least three attempts would have been made to engage the tenant in addressing the issue. The Council's practice is far more than this, and normally dozens of approaches are made. Even at Court there is the opportunity to come to an accommodation and for an agreement to be reached. Finally, even after the Court has made a possession order (normally the case where the tenant fails to attend) then there is still the possibility to apply for a stay of the order on terms. If eviction takes place it is normally due to a failure by the tenant to engage or to provide any meaningful offers to resolve the situation.
- 4.5 It is well documented that evictions lead to high individual, organisational and societal costs – often with limited success in recouping rent arrears debt. There is no desire from the Council to contribute to this. However, the potentially serious welfare reform impacts on households means that individuals do have to take greater levels of responsibility in managing their affairs. With the range of support the Council, and local organisations offer to residents, it is concerning that some residents still do not engage with services – some saying that they didn't think the Council would do anything. Enforcement action against tenants who are in arrears is not taken lightly, and officers put a great deal of work into every individual household's case in order to avoid eviction. Proportionality is a major element when considering whether enforcement is reasonable and officers are required to demonstrate that the decision to take enforcement action is justifiable and proportionate, does not interfere with a tenant's right to respect for their home under the Human Rights Act, and protects those covered by the Equality Act.

- 4.6 In September this year, Citizens Advice produced a follow up report to that mentioned in paragraph 3.4 above, called 'Universal Credit and Debt'. The report outlines research between August 2016 and May 2017 from almost 800 respondents in 18 Universal Credit areas, as well as their analysis of over 50,000 complex debt cases they helped with between October 2016 and June 2017. On the indicator of having priority debts that could lead to the loss of goods, the loss of one's home or even imprisonment, their research found that 79% of people on Universal Credit were in this category, compared to 69% of people who were on former benefits. Citizens Advice also highlight the negative consequences of problem debt on financial stability, relationships, physical health and mental health. Rather than exacerbate these consequences by turning away from the need to address debt arising from rent arrears, the Council wants to work with residents as early as possible. It has not been uncommon to hear residents talk about using the opportunity of receiving a lump sum Universal Credit payment of several hundreds of pounds to pay for a long overdue holiday, or to resolve existing household financial pressures, for example, to help with travelling to work costs or to replace essential white goods etc. A no eviction policy could encourage this thinking, but would not be helpful for the household in the longer-term, as they would be burdened with additional debt.
- 4.7 It may be considered sympathetic in many respects to have a no eviction policy for certain people in certain circumstances, but it might not be viewed upon favourably by the courts who may determine that a generous approach could have contributed to tenants not dealing with their affairs appropriately and being 'allowed' to rack up escalating debt. The Courts express displeasure when there has been no action on a debt, or where they note that we have created a situation where the resident will never be able to meet their debts. Housing rent is very likely to be the biggest single payment made by Universal Credit recipients, therefore any avoidance of payment will lead to uncontrollable debt within a matter of only a few months.
- 4.8 There is an absolute desire for as many people as possible to be encouraged to pay their rent on time, and as soon as they can. This is in preference to them working on the premise that the Council, either as their landlord will not take action against them, or as their support provider will help them remain in their private rented accommodation, if their debt arises from Universal Credit or Benefit Cap. This is especially important when we consider the time involved in the Council or local organisations supporting people in times of crisis and with high support needs - and the paucity of this level of resource in the city. Curo Housing Association calculated the average times they spent supporting tenants with their Universal Credit claims. Distributed within these three groups the durations were as follows:-
- 20% of tenants with low support needs – 10 minutes
 - 40% of tenants with medium support needs – 1.8 hours
 - 20% of tenants with high support needs – up to 7 hours

Repeated contacts with people who might be able, but less inclined, to treat their rent payments with the priority they need to in order to sustain their tenancies, will detract from the time local agencies and council staff are able to devote to residents with high support needs.

- 4.9 The Council's Allocations Policy was potentially unlawful due to the 'Working and Positively Contributing' classification which has now been removed. Therefore, the Council is minded to be wary when considering positive discrimination to mitigate the impacts of the Government's welfare reforms. The Council's eviction policy, which supports income collection which pays for housing services, remains overarching and above all fair to everyone. With major reductions in public spending, difficult decisions are being made, and financial decisions which are likely to have a positive or negative impact on groups of people within the protected characteristics are subject to an equalities impact assessment. The Council pays attention to equalities implications of its actions, and to the fair treatment of all residents – including those impacted by other welfare reforms, and those who are on low incomes but not claiming benefit, or not impacted by the specified reforms.
- 4.10 Significant loss of income also risks service provision to some very vulnerable individuals. It also reduces the income for major projects such as sprinklers or bringing properties up to decent home standards. So while a few may be 'protected' the impact on other residents is potentially significant leading to reduced service provision.
- 4.11 It is likely to be deemed more equitable for the Council to continue the current policy of doing everything possible to prevent evictions for arrears for all tenants, licensees and residents. This includes continuing to work closely with local organisations and community groups in responding to welfare reforms, and giving supportive yet clear and assertive messages to residents.

5. COMMUNITY ENGAGEMENT & CONSULTATION

- 5.1 Resident feedback from various sources has informed actions taken to date to increase support to residents. An example of this is the tenant focus group looking at the introduction of Universal Credit, carried out in 2015 as part of a Masters degree. As part of that work, stakeholder engagement in the form of an Appreciative Inquiry exercise was undertaken with staff groups. Other feedback has been gleaned from residents on a one-to-one basis from individual contacts made with people impacted by the two waves of Benefit Caps, the reduction in Housing Benefit arising from having a spare room, changes to disability benefits, and more recently the introduction of Universal Credit.

6. CONCLUSION

- 6.1 The Council will continue to work closely with partner agencies, support groups, and tenants to provide good up-to-date information that enables them to take the actions they need to maximise their incomes, maintain their rent responsibilities and therefore reduce the risk of eviction.

7. FINANCIAL & OTHER IMPLICATIONS:

7.1 Financial Implications:

The actions being taken by the Council to minimise the risk of eviction of local residents as a result of the impact of welfare reform are outlined in this report and are funded from current Housing Revenue Account (HRA) and general fund budgets. Increased funding for the on-going changes to welfare benefits is currently being considered as part of the budget setting process for both the HRA (for council tenants) and the general fund (for those in temporary accommodation). Any new funding agreed will aim to support those affected by the benefit changes to adapt and continue to pay their rent. This will be reported as part of the HRA budget report to Housing and New Homes Committee in January and part of the Council's revenue budget report to Policy Resources & Growth Committee in February.

- 7.2 It is crucial that the council continues to have an eviction policy. As outlined in the report, the council uses this as a last resort where tenants continue to fail to engage and take responsibility for their obligations set out in the tenancy agreement. Eviction levels continue to be one of the lowest in the country. The costs of having a no evictions policy cannot be quantified but there is a high risk that arrears for both the general fund and the HRA could escalate. The risks are considered to be of corporate significance and therefore this change to the policy would require approval by Policy, Resources and Growth Committee.

Finance Officer Consulted: Monica Brooks

Date: 06/11/17

7.3 Legal Implications:

Part II of the Housing Act 1985 enables local authorities to make reasonable charges for the tenancy. Part IV of the Local Government and Housing Act 1989 places a duty on local authorities to keep a balanced HRA, while being reasonable and proportionate in relation to how tenants with rent arrears are dealt with. All of these aims are reflected in the report set out above. There are no legislative requirements for exempting tenants from their responsibility to pay rent. The legislation and guidance is about assisting tenants to manage their finances to either avoid debt being incurred or managing any debt so incurred in an appropriate way.

What is proposed (non-eviction of tenants) has not been put to the Courts for consideration. Those not impacted by Universal Credit could seek a judicial review of such a policy as it places them at a disadvantage in comparison to those who are. It might be argued that it was 'unreasonable' that the whole tenancy body should have less service provision in order that others should be protected. The reducing rents under government policy means less available income to counterbalance shortfalls in other areas.

Lawyer Consulted: Simon Court

Date: 23/10/17

7.4 Equalities Implications:

An Equality Impact Assessment carried out by the Department for Work and Pensions reveals that those most likely to be impacted and face a threat of eviction as a result of the welfare reforms are young single people, single parents, families with more than 2 children, and residents living in accommodation where the rent is far in excess of the Local Housing Allowance. This has been borne out locally.

Section 4 of this report has outlined the Council's responsibilities toward all tenants, and the risks of selective exemptions to debt prevention and debt collection actions.

7.5 Sustainability Implications:
None arising directly from this report.

Any Other Significant Implications:

7.6 Public Health Implications:
None arising directly from this report.

7.7 Crime & Disorder Implications:
None arising directly from this report.

7.8 Risk and Opportunity Management Implications:
The welfare reforms pose a significant change for benefit claimants, and Universal Credit in particular presents a substantial risk to Housing income – in the form of council rents and temporary accommodation rents. This is because tenants will be paid the money directly, and then need to make payments to their landlord. The main mitigating factors being taken have been addressed in the body of this report, but include increasing personal contacts made with and support provided to residents, and making use of DWP Alternative Payment Arrangements where the criteria for doing so is met.

7.9 Corporate / Citywide Implications:
None arising directly from this report.

SUPPORTING DOCUMENTATION

Appendices	None
Documents in Members' Rooms	None
Background Documents	Neighbourhoods, Inclusion, Communities & Equalities Committee report of 9 October 'Readiness for Universal Credit implementation'