

# Demand Incentive Policy

Originator:	Policy & Strategy Policy
Approval Date:	November 2021
Review date:	November 2023

1	Introduction
1.1	One Vision Housing, (OVH) aims to provide homes that meet demand in safe and sustainable neighbourhoods and strives to provide excellent services to its customers. Part of this mission is the need to provide positive assistance to customers who are adversely effected by the Government’s Welfare Reform measures and to make best use of its resources to create sustainable and viable communities.
1.2	This Policy sets out the measures OVH will put in place to assist housing applicants and existing tenants who may be subject to under-occupation charges or are otherwise adversely affected by Welfare Reform measures.
1.3	<p>The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England introduced by the Homes and Communities Agency as outlined below:</p> <ul style="list-style-type: none"> <li>• Registered providers shall manage their resources effectively to ensure their viability is maintained</li> <li>• Registered providers shall let their homes in a fair, transparent and efficient way. They shall take into account the housing needs and aspirations of tenants and potential tenants. They shall demonstrate how their lettings: <ul style="list-style-type: none"> <li>○ make the best use of available housing</li> <li>○ are compatible with the purpose of the housing</li> <li>○ contribute to local authorities’ strategic housing function and sustainable communities</li> </ul> </li> <li>• Registered providers shall offer tenancies or terms of occupation which are compatible with the purpose of the accommodation, the needs of individual households, the sustainability of the community, and the efficient use of their housing stock</li> </ul>
1.4	<b>Access and Communication</b>
1.4.1	OVH is committed to ensuring that its services are accessible to everyone. OVH will seek alternative methods of access and service delivery where barriers, perceived or real may exist, that may make it difficult for people to work for OVH or use its services.

<p>1.5</p> <p>1.5.1</p> <p>1.5.2</p> <p>1.5.3</p> <p>1.6</p>	<p><b>Equality, Diversity and Human Rights</b></p> <p>OVH is committed to ensuring that no person or group of persons will be treated less favourably than another person or group of persons and will carry out our duty with positive regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity/Expression, Sexual Orientation, maternity, pregnancy, marital status, Marriage and Civil Partnership, Pregnancy and Maternity, Religion and/or Belief.</p> <p>OVH also recognise that some people experience disadvantage due to their socio-economic circumstances, employment status, class, appearance, responsibility for dependants, unrelated criminal activities, being HIV positive or with AIDS, or any other matter which causes a person to be treated with injustice.</p> <p>OVH will also ensure that all services and actions are delivered within the context of current Human Rights legislation. Staff and others with whom OVH works, will adhere to the central principles of the Human Rights Act (1998).</p> <p>This Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> <li>• OVH Complaints, Appeals and Feedback Policy</li> </ul>
<p><b>2</b></p>	<p><b>Statement of Intent</b></p>
<p>2.1</p> <p>2.2</p>	<p>OVH recognise that many of its customers experience financial hardship as a result of the introduction of Welfare Reform measures, in particular the under-occupation charge. In line with its 'anti-poverty' approach OVH will:</p> <ul style="list-style-type: none"> <li>• Take reasonable steps to alleviate financial hardship caused by Welfare Reform measures for its customers (within limited financial resources)</li> <li>• Assist customers to sustain tenancies</li> <li>• Promote financial inclusion</li> <li>• Encourage customers to gain skills required to secure employment and financial independence</li> </ul> <p>OVH also recognise the effects that Welfare Reform measures have had on the sustainability of neighbourhoods due to lack of demand and the shortage of available accommodation for single and smaller sized family units. To ensure OVH neighbourhoods remain viable and that it is in a position to continue providing excellent services to all of its customers, OVH will:</p> <ul style="list-style-type: none"> <li>• Use flexibilities available under nomination agreements with local authorities where it owns/manage properties to allocate properties in certain areas and where there is no obvious demand outside of the choice based lettings system</li> <li>• Prioritise neighbourhoods for intensive housing management and investment input</li> </ul>
<p><b>3</b></p>	<p><b>Policy</b></p>
<p>3.1.1</p>	<p>OVH will operate an alternative means of allocating properties outside of the sub regional choice based lettings process in areas that have been identified to require intensive housing management and investment input.</p>

3.1.2	<p>This is in line with the terms of the transfer agreement with Sefton Metropolitan Borough Council that OVH is allowed to allocate 25% of its properties outside of the Property Pool Plus (PPP), within the Borough of Sefton. Where OVH has stock in other local authority areas it is allowed to allocate its properties outside the choice based lettings scheme of that sub-region as per the nomination agreements and in line with any Section 106 agreements (mechanism used to make a development acceptable in planning terms).</p>
3.1.3	<p>Where OVH grant tenancies in the priority neighbourhoods to those that receive welfare assistance to pay their rent, OVH will consider covering the cost of the 'under-occupation charge' where this would apply via a 'Demand Incentive Payment'. This would be subject to criteria as outlined below:</p> <ul style="list-style-type: none"> <li>• Priority will be given to applicants likely to suffer the greatest levels of financial hardship if they had to pay under-occupation charges or they are subject to benefit cap and Universal Credit (UC) Full migration and this impacts on ability to pay rent (based on an assessment of income and outgoings)</li> <li>• OVH will cover under-occupation charge for a limited period of up to 12 months and this may be extended depending on availability of funding and subject to review of circumstances. No cash payments will be made directly to tenants, the shortfall of under-occupation charge being covered by OVH</li> <li>• OVH will withdraw the payment if an individual's circumstances change e.g. their household composition has changed and under-occupation charges or benefit cap no longer apply or if they were to gain employment that means they are no longer eligible for welfare benefits</li> <li>• OVH will require those in receipt of this assistance who are of working age to engage with the local employment and skills Services if they are able to work</li> <li>• Assistance of this kind may be offered to those who are unable to work due to disability, sickness or any other legitimate reason without them having to prove they are seeking employment and / or engage with the local employment and skills services. This will normally be where no conditionality is attached to benefits being claimed i.e. those in receipt of Disability Living Allowance, Employment Support Allowance or Personal Independence Payments</li> <li>• OVH would cease to cover under-occupation/benefit cap charge or UC Full migration based on any revision of the Government Policy where the charge is no longer levied</li> </ul>
3.2	<p><b>Home Starter Fund</b></p>
3.2.1	<p>In addition to the above measures OVH operates a support scheme for existing customers and new housing applicants to help them sustain their tenancies via the 'Home Starter Fund'. The 'Home Starter Fund' involves OVH gifting customers bespoke packages of essential household items that they would struggle to finance through their own resources, provided they meet the required criteria.</p>
3.2.2	<p>OVH will give an opportunity to access Home Starter Fund to existing customers and those who have signed a tenancy agreement to move into OVH property. Neighbourhood Services staff will decide the eligibility of customers.</p>
3.2.3	<p><b>Eligibility</b></p>
3.2.3.1	<p>All customers must meet the following criteria to be eligible for funding:</p>

- Be a OVH customer (new and existing)
- Be living in an OVH property
- Be moving into OVH properties and have signed the Tenancy Agreement for that property
- Be at least 18 years old or 16 years old if leaving care

3.2.3.2 Priority will be given, but will not be restricted to, those that meet one or more of the following criteria:

- Those claiming Income Support
- Those claiming Income related Employment and Support Allowance
- Those claiming Income based Jobseeker's Allowance
- Those who receive Universal Credit
- Those claiming Pension Credit
- Those who have limited household income
- Those with a family experiencing exceptional pressure
- Those who are vulnerable older persons
- Those who are fleeing domestic violence or have been referred by MARAC
- Those who are young persons leaving care
- Those moving out of institutional or residential care e.g. hospital, care home hostel
- Those who are ex-offenders leaving prison or detention centre
- Those who are chronically or terminally ill
- Those who have disability

3.2.3.3 OVH's decision to allocate Home Starter Fund will also be determined by the availability of the Home Starter Fund. If no funding is available or the customer does not meet the criteria outlined above, the Neighbourhood Services Team will advise the customer about and/or signpost them to other alternative services.

3.2.3.4 Each person is restricted to a one-off application to access Home Starter Fund and the amount is limited to £450 per household. The decision to award the maximum amount of a Home Starter Fund will be at the discretion of the Neighbourhood Services staff. OVH will have an approved supplier which customers will be able to choose items from.

3.2.3.5 Any items provided under a Home Starter Fund will be gifted to the customer and OVH will not be responsible for the items. Therefore, OVH will not insure, repair or carry out Portable Appliance Testing (PAT) on any items provided.

3.2.3.6 OVH will ensure that all items in the Home Starter Fund are provided with a manufacturer's warranty. OVH will advise customers to register the warranty and contact the manufacturers should they experience problems with any items provided under the Home Starter Fund.

### 3.3 **Assistance for Existing Tenants**

3.3.1 To assist existing tenants who may be under-occupying their property and are subject to under-occupation charges or benefit cap, OVH will work to rehouse tenants through CBL scheme or the free to use, web based, national home swapping service which is utilised by the Neighbourhood Services Team.

3.3.2	Where this is not possible or practical, OVH will offer assistance to any of its existing tenants that are financially disadvantaged due to Welfare Reform measures, to make applications for Discretionary Housing Payments (DHP's) or Exceptional Hardship Fund Payments (EHFP's).
3.3.3	DHP's, and EHFP's administered by local authorities, are intended as short term awards to assist where there is a shortfall between Housing Benefit and rent or where individuals are struggling with Council Tax payments respectively.
3.3.4	Where tenants have made unsuccessful applications for DHP and or EHFP and are subject to under-occupation charges, OVH may consider on a case-by-case basis utilising its 'Welfare Reform Hardship Fund'.
3.3.5	<p>This will operate in the same way as the Demand Incentive Payments and no cash payments will be made but OVH will cover the under-occupation shortfall for a limited period of time (depending on individual circumstances and subject to periodic review). Priority will be given to the following groups:</p> <ul style="list-style-type: none"> <li>• Where there is exceptional financial hardship due to Welfare Reform measures</li> <li>• Where individual circumstances are due to change within a 12 month period removing the tenant from the under-occupation change e.g. children reach an age where separate bedrooms are required</li> <li>• Single parents with access to children overnight</li> <li>• Households who need an extra room due to a recognised medical condition</li> <li>• Where there are diagnosed mental health issues where support measures are in place</li> <li>• Tenants receiving support through the Independent Living Team</li> </ul>
3.3.5	As with allocation of Demand Incentive Payments OVH will require tenants of working age and who are capable of work to engage with the local employment and skills services or show other means of actively seeking work or training to access Welfare Reform Hardship funding (unless they are in receipt of 'no conditionality benefits as outlined above in 3.1.1).
3.4	<b>Appeals and Complaints</b>
3.4.1	Although, OVH aims to provide advice and assistance to as many of its customers that are affected by Welfare Reform issues, it may not be possible due to budget restrictions to help each and every customer with direct financial assistance.
3.4.2	OVH will endeavour to ensure that financial and staff resources that are made available to assist with financial hardship caused by Welfare Reform measures are distributed in the most equitable manner and to those in greatest need.
3.4.3	OVH's decision in regard to the allocation of funding or resources to assist customers affected by Welfare Reform is final and there is no right of appeal
3.4.4	Where customers believe there is an element of service failure in OVH's handling of Welfare Reform assistance they may submit a complaint via OVH's complaints process (see OVH Complaints and Feedback Policy for further details).

<b>4</b>	<b>Implementation</b>	
4.1	All OVH staff need to be aware of the Demand Incentive Policy to be able to signpost any customer queries that arise.	
4.2	OVH's Neighbourhood Services Team will have responsibility for the administration of OVH's annual budget for Demand Incentive Fund and Welfare Reform Hardship Fund.	
4.3	OVH's Neighbourhood Services Team will have responsibility for the administration of OVH's Home Starter Fund.	
<b>5</b>	<b>Performance</b>	
5.1	Regular reports will be provided to OVH's Welfare Reform Steering Group on the effectiveness of all measures designed to alleviate the impacts of Welfare Reform on OVH customers, where requested.	
<b>6</b>	<b>Consultation</b>	
6.1	All OVH staff have been consulted about the development of this Policy.	
6.2	OVH customer representatives have been consulted in the development of this Policy via the Tenant Policy Review Group meeting held on 15 <sup>th</sup> October 2021.	
<b>7</b>	<b>Review</b>	
7.1	This Policy will be reviewed every two years (from the date it is approved) by the Executive Management Team to ensure its continuing suitability, adequacy and effectiveness. The Policy may also be reviewed as required by the introduction of new legislation or regulation that impacts on Welfare Reform and its effects on OVH customers.	
<b>8</b>	<b>Equality Impact Assessment</b>	
8.1	<b>Was a full Equality Impact Assessment (EIA) required?</b>	No
8.2	<b>When was EIA conducted and by who?</b>	EIA completed in October 2021 by the Policy Officer and Policy and Strategy Manager is still valid for this Policy review
8.3	<b>Results of EIA</b>	The EIA Relevance Test indicated there are no adverse or differential impacts for any groups with protected characteristics as a result of the operation of this Policy. The aim of the Policy is to provide services and support to the most vulnerable and in need customers without prejudice or preferential treatment for any protected characteristics they may have.

9			Scheme of Delegation		
9.1	Responsible committee for approving and monitoring implementation of the policy and any amendments to it		Executive Management Team		
9.2	Responsible officer for formulating policy and reporting to committee on its effective implementation		Operations Director- Housing Services		
9.3	Responsible officer for formulating, reviewing and monitoring implementation of procedures		Operations Director- Housing Services		

10			Amendment Log		
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Date of revision:	Reason for revision:	Consultation record:	Record of amendments:
05/11/2019	Reviewed in line with OVH's business practices.	See Section 6	<ul style="list-style-type: none"> <li>Change at section 3.2-Eligibility for Home Starter Fund has been extended to existing customers</li> </ul>
16 <sup>th</sup> November 2021	Reviewed in line with OVH's business practices.	See Section 6	<ul style="list-style-type: none"> <li>A change at 3.2.2- Customer eligibility will now be determined by Neighbourhood Services Staff</li> <li>A change at 3.2.4.3- a decision to award the maximum incentive will now be at the discretion of Neighbourhood Services staff.</li> </ul>