

Financial Hardship Policy

Originator:	Policy and Strategy Team
Approval Date:	20th September 2022
Review date:	September 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.
1.2	As part of this service provision, OVH will aim to provide positive assistance to customers who may experience financial hardship and who would otherwise struggle to maintain their tenancies.
1.3	This Policy sets out the measures OVH will put in place to assist housing applicants and existing tenants who may experience financial hardship through a variety of reasons e.g. as a result of Welfare Reform measures and / or cost of living rises.
1.4	Whilst OVH will endeavour to support as many customers as is possible who experience financial hardship, it will not be possible to offer direct assistance in all circumstances. For this reason, each case will be reviewed on its merits and eligibility criteria will apply to make the best use of available resources.
1.5	<p>The application of this Policy ensures compliance with the outcomes of the Regulatory Framework for Social Housing in England, adopted by the Regulator of Social Housing as outlined below:</p> <ul style="list-style-type: none"> Registered providers shall manage their resources effectively to ensure their viability is maintained 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
1.6	Access and Communication
1.6.1	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.
1.7	Equality, Diversity and Human Rights
1.7.1	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 its duty with positive

	<p>regard for the following core strands of equality; Age, Disability, Gender, Race, Gender Identity / Gender Expression, Sexual Orientation, maternity, pregnancy, marital status, Marriage and Civil Partnership, Pregnancy and Maternity, Religion and / or Belief.</p>
1.7.2	<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>
1.7.3	<p>OVH will ensure that all services and actions are delivered within the context of current Human Rights legislation. OVH will endeavour to ensure its staff and others with whom it works, will adhere to the central principles of the Human Rights Act (1998).</p>
1.8	<p>This Policy should be read in conjunction with:</p> <ul style="list-style-type: none"> • OVH Complaints, Appeals and Feedback Policy
2	Statement of Intent
2.1	<p>OVH aims to promote tenancy sustainability as part of its drive to create stable and thriving communities in all areas where it owns and manages properties.</p>
2.2	<p>OVH recognise that due a combination of factors that include but are not exclusive of Welfare Reform measures and cost of living rises, many customers experience financial hardship which may threaten their ability to sustain a tenancy.</p>
2.3	<p>Where OVH becomes aware that its customers (both existing and those who may be new housing applicants) are experiencing financial hardship, it will endeavour to offer assistance and advice to promote tenancy sustainability.</p>
2.4	<p>In order to make the best use of limited financial resources and to operate in a fair and transparent manner, OVH will apply criteria to the discretionary application of its direct financial support measures and will ensure that these are consistently followed.</p>
2.5	<p>To offer a comprehensive financial assistance and advice services, OVH will maintain close working relationships with a number of external support and advocacy groups.</p>
2.6	<p>OVH will keep the support measures it operates under review to ensure they are effective, offer value for money and are reaching those most in need.</p>
3	Policy
3.1.1	<p>OVH have developed an annual 'financial hardship' budget provision to assist customers who may experience financial hardship (for a variety of reasons) which would endanger their ability to sustain a tenancy with OVH.</p>
3.1.2	<p>OVH offers financial assistance from this budget in a number of ways and may choose to offer one or a combination of different forms of assistance depending on budget availability and individual circumstances.</p>

3.1.3	The budget for financial hardship is finite and is subject to availability. If the annual budget allocation is used up entirely, OVH will not be a position to offer further direct forms of financial assistance until the budget is replenished in the following financial year.
3.1.4	In all cases where OVH becomes aware of its customers experiencing financial hardship, it will offer advice and may, with the customers permission, make referrals to partner agencies for additional support. This will apply even when they are deemed to be ineligible for direct assistance from OVH.
3.1.5	This will include assisting with applications for Discretionary Housing Payments (DHP's) or Exceptional Hardship Fund Payments (EHFP's) administered by local authorities and available to customers who may be claiming benefits.
3.2	Assistance with Under Occupation Charge (Bedroom Tax)
3.2.1	Where new housing applicants or existing customers that have a change in circumstances are subject to the 'Under Occupation Charge' (Bedroom Tax), OVH will consider covering the shortfall in rent on a case-by-case and discretionary basis, (for 14% of rent or the equivalent of the Under Occupation Charge that would apply to 1 additional bedroom).
3.2.2	<p>In these circumstances the following criteria will apply when assessing eligibility and providing this type of assistance:</p> <ul style="list-style-type: none"> • For all applicants or referrals for this type of assistance, OVH will conduct an income and expenditure check to assess the household's financial position • Priority will be given to applicants, or existing customers that are likely to suffer the greatest levels of financial hardship. This can include if they are subject to the 'Benefit Cap' and in receipt of Universal Credit (UC) and this impacts on ability to pay rent (based on an assessment of income and outgoings) or are otherwise in a position of financial hardship e.g. have greater household expenditure than income • Priority will be given to customers who have made applications for DHP's and EHFP's and these have either been refused or have been in place and have elapsed • Priority will also be given where OVH have been unable to let a property on the first round of bidding within sub-regional 'Choice-Based Lettings' – (CBL) schemes it participates in (and where the property is let by alternative means e.g. as 'available now', via direct or management lets or where it is advertised outside of CBL schemes) • OVH will cover under-occupation charge for a limited period, up to the end of the financial year (from the point when it is first agreed) or 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 • 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 and / or have sufficient household income • 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 • For all recipients of this type of assistance OVH will make referrals to its Financial Inclusion Team and may make welfare benefit referrals where appropriate • 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

	<p>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</p> <ul style="list-style-type: none"> • OVH would cease to cover under-occupation charge based on any revision of the Government Policy where the charge is no longer levied
3.2.3	To assist existing tenants who may be under-occupying their property and are subject to under-occupation charges or benefit cap, OVH will assist them to make applications for transfer (to accommodation of the appropriate size for the family unit) via the various CBL schemes it is party to or via the free to use, web based, national home swapping service.
3.3	Home Starter Assistance
3.3.1	Home starter assistance involves OVH gifting customers (either new customers that have signed a tenancy agreement or existing tenants) bespoke packages of essential household items that they would struggle to finance through their own resources, provided they meet the required criteria.
3.3.2	<p>Priority will be given, but will not be restricted to, those that meet one or more of the following criteria:</p> <ul style="list-style-type: none"> • 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 financial pressures • 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 • Single parents with access to children overnight • Households who need an extra room due to a recognised medical condition • Where there are diagnosed mental health issues where support measures are in place • Tenants receiving support through the Independent Living Team
3.3.3	Subject to budget availability and the above priorities being met each household is restricted to a one-off application and the maximum amount available will be £450.
3.3.4	The decision to award the maximum amount of home starter assistance will be at the discretion of the Neighbourhood Services Team (Neighbourhood Housing Officer).
3.3.5	Customers that are approved for home starter assistance will be able to choose items (up to a value determined by OVH) from a list provided by an approved OVH supplier and OVH will arrange for delivery / installation where required.

3.3.6	Any items provided under home starter assistance 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.
3.3.7	OVH will ensure that customer receive a manufacturer's warranty with all items provided via home starter assistance (where this is applicable). OVH will advise customers to register the warranty and contact the manufacturers should they experience problems with any items provided.
3.4	Appeals and Complaints
3.4.1	Although there are no obligations on OVH to provide hardship funding, where customers are refused access on the grounds of not meeting the criteria (and in the name of transparency and fairness), OVH will allow customers to appeal the decision using the provisions outlined in its 'Complaints, Appeals and Feedback Policy'.
3.4.2	If customers are refused access to hardship funding on the grounds that the budget has been exhausted, an internal appeal will not be allowed.
3.4.3	Where customers believe there is an element of service failure in OVH's handling of hardship assistance they may submit a complaint via OVH's complaints process (see OVH Complaints and Feedback Policy for further details).
4	Implementation
4.1	All OVH staff need to be aware of the Financial Hardship 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 financial hardship.
5	Performance
5.1	Six-monthly reports will be provided to OVH's Executive Management Team on the effectiveness of all measures designed to alleviate the impacts of Welfare Reform / financial hardship on OVH customers, where requested.
6	Consultation
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 08-04-2022.
7	Review
7.1	This Policy will be reviewed annually (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 / financial hardship and its effects on OVH customers.			
8	Equality Impact Assessment			
8.1	Was a full Equality Impact Assessment (EIA) required?	No		
8.2	When was EIA conducted and by who?	An EIA Relevance Test was completed by the Policy and Strategy Manager and the Policy Writer in April 2022		
8.3	Results of EIA	The Relevance Test identified that there is likely to be a disproportionately higher percentage of people in lower income groups who will have multiple protected characteristics who are most likely to suffer the worst detrimental effects of financial hardship. The OVH Financial Hardship Policy is, however, a mitigation tool and there are deemed to be sufficient safeguards in place to ensure it is operated in a fair and consistent manner for all groups regardless of any protected characteristics.		
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			
Date of revision:		Reason for revision:	Consultation record:	Record of amendments:
New Policy – Not applicable- Approved on 20 th September 2022		Not Applicable	See Section 6	Not Applicable