

## **Welfare Benefits and Debt Advice Policy**

### **Introduction**

Grand Union Housing Group is committed to providing high quality, free and confidential welfare benefit and debt advice services accessible to our customers to assist them to maximise their income and, as a consequence, sustain their tenancies/homes. The purpose of this policy is to set out Grand Union's approach to providing these services.

For the purposes of this policy, customers are defined as tenants and shared owners who rent a home from Grand Union and includes those residing with them. Other types of customers are not included in the definition.

### **Policy statement**

Grand Union acknowledges that the welfare benefits system can be complex and difficult to navigate and so assistance is required to ensure that customers' income is maximised in order to sustain tenancies and quality of life.

Grand Union also acknowledges that personal debt can be a hindrance to customers in sustaining their tenancies and that providing specialist advice in this area will help improve customers' financial capability and overall wellbeing.

### **Objectives**

- to identify customers who require, or who may require in the future, support and/or advice in the management of their tenancy and other financial liabilities
- to encourage and promote partnerships with external and internal agencies in assessing and meeting the support needs of customers
- to provide high quality information, advice and support on welfare benefits
- to provide a high-quality Financial Conduct Authority (FCA) licensed money advice service to provide information, advice and support to deal with personal debt
- to maximise customers' income
- to prevent or reduce rent arrears and other liabilities
- to reduce court actions due to rent arrears
- to sustain tenancies and minimise the need for evictions, thereby reducing homelessness
- to provide a home visiting service where a customer requires this
- to maintain confidentiality.

### **Other related policies**

- Allocations Policy
- Complaints Policy
- Data Protection Policy

- Equality & Diversity & Customer Care Policy
- Health and Safety Policy (Corporate)
- Market Rent Policy
- Rent Arrears Policy
- Rent Policy
- Safeguarding from Abuse Policy

### **Information common to both services**

We will obtain permission from the customer to share information with other agencies, where it is necessary to provide support for that customer, in line with general data protection legislation. Verbally given consent can be relied upon for urgent things such as referring for emergency hardship support; when given this should be noted on our information systems.

There are certain situations where, by law, we do not have to obtain prior permission to disclose personal information, such as where there are safeguarding concerns – please see our Data Protection Policy for more information on this.

We can provide information and advice via letter, text, email or telephone and where support is required, we can conduct appointments via the phone, online video call or at the customer's own home or another location which is suitable and safe for both us and the customer.

Appointments will normally only be provided during office opening hours, but exceptions can be made where there is no alternative and any risk can be managed.

### **The Welfare Benefits Advice service**

We can assist Grand Union customers with all types of benefits, from making new claims to assistance with first tier tribunal appeals.

We will advise what a customer's entitlement should be and provide support, where needed, for them to make a claim, request a review of a decision or help with formal appeals.

We would be unable to assist a customer to make a claim, request a review of a claim or appeal a decision on a claim where we determine entitlement does not exist.

Where we determine that a customer is receiving benefit they are not entitled to, we will first advise them that this is the case and advise them to contact the relevant benefit agency immediately. If the customer does not provide evidence that they have reported the circumstances promptly we will contact the relevant office directly to report the change. Where we are in receipt of benefit directly in respect of a customer (such as for Housing Benefit or Universal Credit Housing Costs) we may report information immediately as we have a legal duty to do so.

Where we suspect benefit fraud is being committed by a customer, we have a duty to report this to the relevant agencies and will follow our procedures.

### **The Debt Advice service**

All Grand Union customers will have access to a free debt advice service funded by us. However, customers living within the former South Northamptonshire area will be referred (with their explicit verbal permission) to the West Northamptonshire Council Money Advice service, which provides free money advice for all residents in West Northamptonshire and to which Grand Union contributes financially. A list of towns and villages for which this applies can be found in the appendix.

All debt advice provided by West Northamptonshire Council Money Advice will be provided in accordance with their policies and procedures.

All other customers can access our in-house debt advice service provided by the Financial Wellbeing Team. Our debt advice service is licensed and authorised by the FCA for debt adjusting, debt counselling and credit information services.

Our debt advice service will aim to advise customers on their options for dealing with their personal debt, from assisting with negotiating repayment plans to assessing their insolvency options. The service will support and assist customers with their chosen option where possible or signpost the customer to an appropriate agency. Limitations to our service will be clearly stated to customers. The Debt Advice Procedure outlines this in more detail.

The advice given will always have regard to the customer's best interests. For example, where there are rent arrears or other charges owed by the customer to Grand Union, these will not be unduly favoured in any advice given, meaning they are given the appropriate weight of priority for the customer's situation.

We recognise that most customers approaching us for debt advice are already likely to be vulnerable due to being in debt, but they may also be vulnerable for other additional reasons. We will adapt our service to suit customers' needs, including providing more time to engage/provide information and adapting how we communicate and provide advice.

We recognise conflicts of interest can sometimes arise and where these cannot be managed, we will signpost the customer to access advice from an independent agency in their own best interests. Examples include:

- Grand Union are undertaking possession or other legal proceedings against the customer
  - Where such proceedings relate to rent arrears, we will wherever possible offer access to debt advice and give time for this process to be followed before applications to court are considered.
- We are advising another person who has an interest in the customer's situation, such as a joint debt.

## **Complaints**

Complaints and appeals will be dealt with in accordance with the Complaints Policy, with exception to those relating to the Debt Advice service (i.e., to issues relating to debt adjusting, debt counselling and/or credit information services), which will be dealt in accordance with the Money Advice Complaints Procedure.

## **Monitoring and review**

Appropriate supervisory review will be undertaken to ensure that the service is of the highest quality.

Customers will have the opportunity to comment on the level of service they received when their case is closed.

This policy will be reviewed in accordance with the policy review programme.

<b>Person responsible for review:</b>	Director of Wellbeing and Safeguarding
<b>Supported by:</b>	Financial Wellbeing Manager
<b>Ratified by:</b>	Director of Wellbeing and Safeguarding
<b>Date policy reviewed:</b>	30 November 2022
<b>Date of next review:</b>	December 2025

## Appendix

List of places in West Northamptonshire where customers will be referred to the West Northamptonshire Council Money Advice team instead of our in-house Financial Wellbeing Team.

- Abthorpe, Adstone, Ashton, Astcote, Aston le Walls, Astrop, Aynho
- Blakesley, Blisworth, Brackley, Bradden, Brafield-on-the-Green, Bugbrooke
- Caldecote, Castle Ashby, Chacombe, Charlton, Chipping Warden, Cogenhoe, Cold Higham, Cosgrove, Courteenhall, Croughton, Culworth
- Deanshanger, Denton
- Easton Neston, Edgcote, Evenley, Eydon
- Farthinghoe
- Gayton, Grafton Regis, Grange Park, Greatworth, Greens Norton, Grimscote
- Hackleton, Harpole, Hartwell, Helmdon, Hinton-in-the-Hedges, Horton
- King's Sutton, Kislingbury
- Litchborough, Little Houghton, Lower Boddington
- Maidford, Marston St Lawrence, Middleton Cheney, Milton Malsor, Moreton Pinkney
- Nether Heyford, Newbottle
- Old Stratford, Overthorpe
- Passenham, Pattishall, Paulerspury, Pimlico, Potterspury, Pury End
- Quinton
- Radstone, Roade, Rothersthorpe
- Shutlanger, Silverstone, Slapton, Stoke Bruerne, Sulgrave, Syresham
- Thenford, Thorpe Mandeville, Tiffield, Towcester
- Upper Boddington, Upper Heyford
- Wappenham, Warkworth, Weedon Lois, Weston, Whiston, Whitfield, Whittlebury, Wicken, Woodend, Wootton
- Yardley Gobion, Yardley Hastings