

Guidance for social landlords

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CIH aims to ensure members are equipped to do their job by working to improve practice and delivery. We also represent the interests of our members in the development of strategic and national housing policy.

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Practice Guidance Rent Payment and Collection under Universal Credit

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Acknowledgements

CIH Scotland would like to acknowledge the support of the following in the preparation of this guidance:

- Scottish Government's Housing and Welfare Reform team
 http://www.scotland.gov.uk/Topics/Built-Environment/Housing/16342/hbreform
- Scottish Housing Best Value Network: http://shbvn.org.uk/welfare-reform
- Scottish Federation of Housing Associations, http://www.sfha.co.uk/sfha/welfare-reform
- Association of Local Authority Chief Housing Officers
 http://www.alacho.org
- Convention of Scottish Local Authorities http://www.cosla.gov.uk
- Peter Meehan, consultant
- The Money Advice Service for support and contribution https://www. moneyadviceservice.org.uk/en/categories/universal-credit-and-other-benefits

The Knowledge Hub

This guidance is accessible on the Scottish Government's Housing and Welfare Reform Knowledge Hub https://knowledgehub.local.gov.uk/group/ scottishgovernmenthousingandwelfarereformgroup

The guidance can offer only a single snapshot summary of what is currently happening around rent payment and collection, with some initial practice examples for reference. The Knowledge Hub will play an important role in being *the* place to find, post and discuss new initiatives and emerging practice.

It is hoped that social landlords will promote the Knowledge Hub to all their staff and that managers and their teams will help make it dynamic by uploading information about their own practice approach or wider examples they have come across.





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Introduction

This practice guidance, which has received financial support from the Scottish Government, is aimed primarily at Scottish social landlords. It is relevant for staff across a range of job functions given the scale and range of changes under welfare reform. It looks at how it can be made easier for tenants to pay rent, and how landlords can adapt and improve rent collection arrangements. It focuses on the transformational shift in rent collection and rent payment culture arising from the introduction of Universal Credit, with its phased introduction commencing in October 2013. It aims to support social landlords with information and practice suggestions as they explore and action plan for this significant change in organisational culture.

The migration to Universal Credit is now under way through the Pathfinder Projects in north east England, assisted by learning from the DWP's 12 national Universal Credit pilot projects as well as the six Direct Payment Demonstration Projects, of which the Scottish participant is Dunedin Canmore Housing Association in Edinburgh.

The anticipated risks to rental income, continuity of service delivery and housing supply investment are well documented and serve as a reminder of the change agenda in which the social housing sector is operating.

Universal Credit is a single means tested welfare payment which will be paid directly into the bank accounts of eligible working age households, monthly by electronic transfer. The payment will include housing costs to cover eligible rent and service charges (less any deductions) for claimants living in social housing.

Claimants are then responsible for paying contractual rent charges to their social landlord, contrary to the existing system which ensures rent subsidy is paid direct to the social landlord under Housing Benefit third party arrangements.

The new Universal Credit system of welfare disconnects social landlords from the familiar Housing Benefit administration arrangements around which rent payment and



collection systems have been designed and delivered for a generation. It marks a notable and fundamental change at the centre of which is a new and as yet largely uncharted customer/landlord relationship.

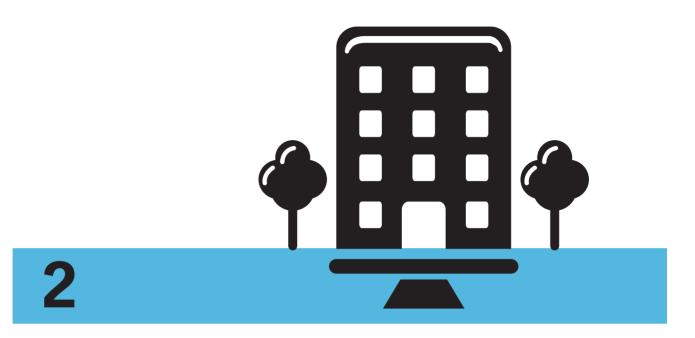
This guidance looks at financial inclusion as the central issue for social housing providers dealing with the welfare reforms. An outline of existing payment and collection practice is followed by practical information, suggestions and examples aimed at supporting social landlords to make progress as they plan how to adapt housing service design and delivery. The guidance also seeks to support landlords to encourage changes in tenant behaviour around rent payment, to fit with the emerging Universal Credit system.

What will have a significant bearing on future payment behaviour is that in the migration to the new Universal Credit system, many tenants will already have been impacted by other welfare changes such as the social size criteria, increased non-dependant deductions, the migration from Incapacity Benefit onto Job Seekers Allowance and not Employment Support Allowance, or from Disability Living Allowance onto Personal Independence Payments.

An increased number of tenants will have rent arrears by the time they migrate to Universal Credit, and many others (according to DWP information) will already have other debts. This presents obvious challenges and risks to both tenants and landlords.



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Financial inclusion – bank accounts for all?

The monthly payment of Universal Credit into a bank account is designed to mimic the paid work experience. It assumes that claimants will be suitably banked by the date of their claim and that they have the financial capability for monthly budgeting. These assumptions are contrary to learned patterns of behaviour from the current welfare system where, for a generation, benefits have been paid weekly or fortnightly.

In addition, it is variously reported that as many as 4-14% of the population have no bank account, preferring to operate in the cash economy. For example, there are some four million Post Office Card Account holders in the UK who fall under the 'unbanked' category, as these accounts are only capable of receiving money (including Universal Credit) but not paying bills (such as rent payments) electronically. Furthermore, it is estimated that a much greater proportion of the population have bank accounts which are dormant. Gaining the confidence of these households is as much of a challenge as addressing the unbanked. These households are disproportionately concentrated in the social rented sector, which has traditionally provided housing for those with no or limited market power. As social landlords gather business knowledge to support preparations for Universal Credit, more and more are finding this to be the case.



Getting more people 'banked' has been UK Government policy since 1997. Together with the banks, the Government set targets to halve the number of unbanked individuals in the UK by 2009. And while the precise number of households who remain unbanked or unsuitably banked may not be clear, what is apparent is that Universal Credit provides a trigger event that will prompt unbanked or unsuitably banked social housing tenants to change behaviour in order to receive their welfare benefit, pay their rent and sustain their tenancy.

Under Universal Credit the financial capability and resilience of tenants is fundamental to the business of social landlords. The traditional approach of social landlords is likely to need reviewing, with financial inclusion strategy, policy and processes needing to be mainstreamed within customer service and business planning activities. So the change goes well beyond improved rent collection and debt recovery.

Supporting suitable banking products

Social landlords in Scotland are in the process of gathering information on the proportion of unbanked or unsuitably banked tenants in support of specific service planning for their customers. Of the 650,000 social housing tenants in Scotland in 2012, 60-70% were receiving Housing Benefit.

A substantial number of tenants will need encouragement and practical support to open a bank account or (where appropriate) more effectively manage an existing or dormant account, including help with monthly budgeting.

Landlords need to factor in the potential for tenants to demonstrate a level of resistance to banking products in response to previous negative experiences. Research indicates that around 60% of the unbanked have previous negative experiences of bank charges, and there is evidence that banking is particularly costly to those on lower incomes as charges and penalties can outweigh any benefits.

Social landlords must be able to provide, either directly or indirectly, good information resources as well as robust advice and support about banking products. Resistance to bank accounts is likely to be an understandable and rational response in many cases, making this resource intensive delivery work. A later section sets out a suggested approach to managing, segmenting and targeting customer contacts based on a willingness/ability matrix.

Addressing this 'poverty premium' has been another key element of the financial inclusion agenda and serves as a reminder that simply supporting access to bank accounts is not necessarily the end game. Unless the most suitable types of products are promoted and encouraged, there is the risk that rent payments will be lost to or compromised by bank charges arising from limited or undeveloped monthly budgeting skills.

Notably, research by the Financial Inclusion Taskforce in 2009 examined 134,000 basic bank accounts in Glasgow and found 100,000 returned items at a cost of £1.25 million. This is money lost to tenants that might otherwise cover rent costs, or from another perspective, resources redirected from tenants, social landlords and the local economy to



the financial services industry. Banking products that can offer budget management capacity, no overdraft facilities, and low or no charges are likely to appeal to reluctant conscripts.



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Rent collection and payment under Housing Benefit

Rent collection

Scottish Housing Best Value Network statistics for 2011/2012 show that 62.2% of rent in local authorities is accounted for by Housing Benefit payments, while for RSLs 57.7% is accounted for in this way. For the social landlord this means no rent collection transaction cost but does involve administration costs for this majority group of tenants in supporting and managing Housing Benefit claims and payments.

With the majority of rental revenue having been accounted for by bulk payment, social landlords have been significantly disconnected from rent collection systems and processes, and therefore transactional volume and costs have not been budgetary factors for the bulk of rent collection.

Good working relationships have developed between local authority Housing Benefit teams and social housing providers to support this rent accounting system. When a Housing Benefit payment is not received, a housing officer is often more likely to make an immediate personal contact with their Housing Benefit colleague before contacting the tenant. The good working relationship with Housing Benefit partners will become redundant under Universal Credit, where the changed customer/landlord relationship places the business focus on building and maintaining personal contact with the customer.

Rent payment: tenants on full Housing Benefit

Clearly there is an equivalent disconnect for tenants in receipt of full Housing Benefit who have been alienated from a payment culture, and who will consequently require information, advice and often direct assistance in this cultural shift.

The extent of the disconnection is expressed in a phrase landlords may be all too familiar with - 'I don't pay rent'.

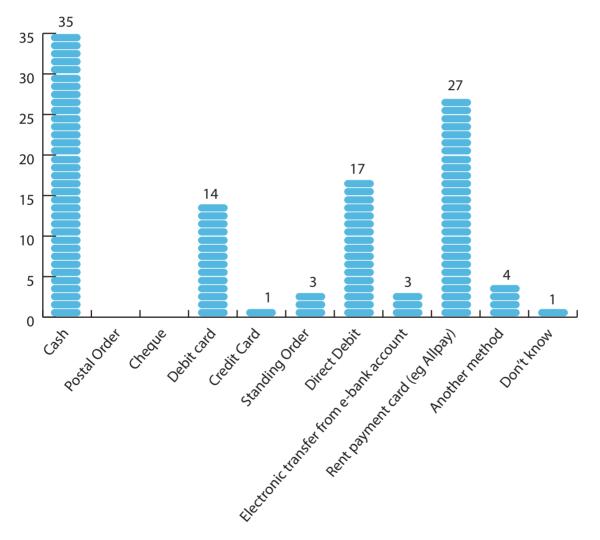


Rent payment: tenants on partial Housing Benefit

The DWP conducted a baseline survey¹ for their Direct Payment Demonstration Projects which involved looking at the payment methods of tenants receiving partial Housing Benefit. This found that:

- Only a fifth of tenants normally used a fully automated method to pay rent
- 22% were not up to date with their rent
- The most commonly cited reason for arrears was problems with HB admin
- They were more likely to have debts than savings 52% in debt or behind with payments
- 37% had sought advice or help about money management, mainly from a CAB

The baseline position on current payment methods is shown in the following graph, and social landlords may find it useful to compare this with their own payment method profile:



Base: Tenants on partial HB (604) Note: Respondents could mention more than one method

¹http://research.dwp.gov.uk/asd/asd5/report_abstracts/rr_abstracts/rra_822.asp



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This baseline example provides a visual representation of an existing payment culture. Only a fifth of rental income is securely and reliably paid and collected (direct debit and e-bank transfer). Cash is by far the preferred method of payment, with 35% of tenants paying this way, with a further 27% paying by a rent payment card (a 'cash card'). Social landlords are under great pressure to promote a secure, automated payment method to this significant majority of tenants whose current behaviour clearly demonstrates a preference to pay in cash.

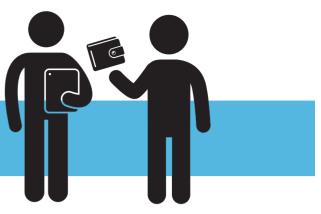
To achieve maximum rental income security many social housing providers are seeking to transform how this graph looks in terms of their own rent collection activity, by introducing targets of 60%-70% on direct debit payments or other reliable electronic banking methods. For all social landlords this is a significant re-positioning of activity, and amounts to a very considerable amount of work alongside existing activities, and on top of the pressures on the front-line arising from collecting under-occupation deductions.





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Preparing tenants for Universal Credit

(a) Reviewing and developing your financial inclusion strategy

A review of the landlord's existing financial inclusion strategy could consider how existing practice approaches could be improved and what new practice approaches might be adopted. The review is likely to take account of the new customer intelligence collected in recent months. Overall, a landlord's aims are likely to include the need to:

- build resilience to the rental income risks under Universal Credit
- improve financial inclusion interventions across all business processes
- promote and reinforce tenant knowledge of contractual rent obligations
- review and improve the rent collection system
- develop a more positive payment culture
- help tenants maximise and then make the most of their income
- promote and/or support access to suitable payment options
- promote and/or support access to affordable credit
- promote and/or support access to affordable warmth
- understand more about the financial capability of tenants
- help improve the financial capability of tenants
- promote and/or support access to the Scottish Welfare Fund, Discretionary Housing Payments, food banks or other charitable forms of welfare or hardship support
- find partners to collaborate with on particular work streams

There are a number of social landlords who have already successfully integrated financial inclusion into the core of their day to day business activity, such as RCT Homes in Wales, which is included as a practice example in section 8. These models will help organisations reflect on how well their existing service design fits with the financial inclusion culture of the Universal Credit system.



Some social landlords are going further still on building financial capability, seeking to work more closely with local Job Centre Plus colleagues and/or other partners to promote, support and/or fund access to training, employment and skills development opportunities for working age tenants on benefits. These new relationships are likely to assist the evolving Local Support Service Framework being promoted by DWP for delivery arrangements under Universal Credit. A link to this DWP guidance is included for reference at section 9.

Meanwhile, some social landlords already recognise access to employment as something they can support through a social value approach to procurement, where job opportunities for tenants or keeping resources within the local community and economy are fundamental elements of contract specification and evaluation.

More recently, there have been reports in the housing trade press of housing associations advertising job vacancies to tenants in the first round of recruitment. It seems likely that these type of approaches may gather momentum within the housing industry moving forward given the mutual benefits to financial resilience.

(b) Raising staff and tenant awareness about paying rent

Staff awareness

The new payment culture under Universal Credit will place an imperative on organisations to make sure that all customer facing, front line staff (including those who deal with telephone contacts only), regardless of job function, will require at least contextual knowledge of the new welfare system.

Child Poverty Action Group has developed a very useful Universal Credit e-learning module – designed for front line workers who want to develop a better understanding of Universal Credit, though they may not be involved in working directly with welfare benefits or money advice in their day to day role. Find out more about this module and other Welfare Reform resources at http://www.cpag.org.uk/scotland

With Scottish Government support, CIH Scotland is offering subsidised briefing sessions on different aspects of preparing for Universal Credit, and these include some sessions aimed specifically at frontline staff. For more information, contact scotlandlearn@cih.org

Tenant awareness

General awareness of the benefit changes has gathered pace, but it is not yet clear to what extent tenants know, understand and accept that their contractual rent due will be paid as part of their Universal Credit for onward transaction to their landlord.

Communicating and promoting this enormous shift in payment culture is worthy of a campaign approach – one which some landlords may well have in place already. By definition, campaigns have a clear goal, depend on a high level of organisation, and a dynamic approach.

'Tenants talking to tenants' can be an effective communication tool as part of such a campaign. One option may be to involve existing active or 'interested' tenants (e.g. from the landlord's Register of Interested Tenants if there is one) to support delivery of this

payment culture message. Where there is not yet such capacity it may be possible to use interest in the welfare reforms as the basis for a recruitment drive of active tenants.

Landlords may want to brainstorm with front line staff and tenants and other relevant organisations what might improve the look and design of communications on rent payment. Many social landlords are already providing clear and easy to understand information to tenants, usually in a tabulated format, about existing standard rent payment methods and how to use them. This is more and more likely to include an online payment option and a scanning option for mobile smartphone technology.

Moving forward it is likely that landlords will be promoting (if not directly supporting) a wider range of suitable banking products and additional collection options, including smartphone applications where phones become doorstep collection terminals. This makes it more important than ever to offer accessible stand alone leaflets, information cards or downloads which explain new methods in an 'infographics' friendly format.

Info-graphics are graphic visual representations of information, data or knowledge designed to present complex information quickly and clearly. This communication format lends itself easily to social media approaches, but has the added value of being more visually appealing as a hard copy download than traditional written communications.

Many landlords may already have a strapline and freephone number to promote the welfare reform changes. Some organisations are promoting the message by using the strapline on existing promotional materials such as pens, postcards, posters and envelopes. Some local authorities are promoting the changes using advertisements on public transport. There is potential for sponsorship or partnership support to promote and use the strapline more widely than just within the landlord organisation, to reach customers through links they have with other bodies such as health and social care agencies and other public services.

Communication plans are more and more likely to involve use of social marketing techniques and social media. Some providers are hosting programmed 'social media advice days' using Facebook and/or Twitter. These are being recognised as having enormous capacity to deliver the message, provide advice and information and promote understanding.

Moreover, social marketing techniques are also being used to deliver key messages by more traditional communication methods such as letter and postcard, to tenants who do not yet have access to modern social media communications options. Tenants or themes can be 'segmented' to help delivery of the right message to the right customers using a range of different methods (see section (d) below).

(c) Advice and information

The information, advice, encouragement and practical assistance many tenants will need to support access to suitable bank accounts involves the availability of comprehensive money and debt advice services.

Social landlords will need to be absolutely clear about how their own organisational arrangements for delivering general and specialist advice, information and support on



financial capability fit with wider provision. Knowledge of who is doing what locally is critical for workforce planning and making best use of internal resources. It can also be useful for identifying themes or work streams suitable for collaboration with other bodies.

Many social landlords are having conversations about the potential for savings or 'collective gain' from working together to offer advice, information, welfare and money advice. Such collaboration may also lead to offering tenants suitable financial products for Universal Credit.

Under the *Making Advice Work* campaign, the £7.45 million grant funding from the Scottish Government and the Money Advice Service for the period to the end of March 2015 is aimed at helping those affected make the transition to the new benefits system. Managed by the Scottish Legal Aid Board, there is a specific funding stream for social landlords which particularly welcomes *'partnership projects which would deliver help to tenants of more than one social landlord'*².

The cost of investing in suitable banking products as part of improved financial inclusion services, or of upskilling staff to manage the shift in payment and collection culture, may yet feel counter intuitive to social landlords given the cost implications of Universal Credit. However, the risk of doing nothing to support tenants is increasingly acknowledged as being greater.

Free national information and advice tools

In addition to organisational or partnership workforce investment for delivering one to one support to those affected, social landlords may wish to take advantage of national specialist tools that have been developed to help people get ready for Universal Credit. For example, a Universal Credit Toolkit has been developed by the Money Advice Service. This web-based toolkit offers a range of practical resources such as:

- Online guides e.g. 'choosing a bank account for your Universal Credit payment' or 'managing your rent payments on Universal Credit'
- An action plan tool including budgeting and how to access the internet
- A 'get ready for Universal Credit' video
- An interactive timeline which includes links to further information, tools and videos.

The toolkit is free for social landlords to syndicate from their own websites:

https://www.moneyadviceservice.org.uk/en/articles/universal-credit-an-introduction

The Money Advice Service held a webinar on the purpose and intentions of this product on the Demonstration Project Direct Payment Learning Network in March 2013 - *What can the Money Advice Service offer to universal credit claimants and partners?* You can access the presentation slides and listen to the Money Advice speakers talk about the toolkit at the learning network hosted by CIH at http://www.cih.co.uk/ directpaymentslearningnetwork.



² www.slab.org.uk/providers/advice/grant-funding

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(d) Improving intelligence about customers

Social Landlords are going to be in serious competition for the first call on tenants' Universal Credit income. If other creditors (for example door step lenders or pay day loan companies) have better information about what motivates prompt payment because they have greater personal contact, then social landlords need to be prepared for that competition.

Getting to know tenants as customers has been and will continue to be a major theme for social landlords in preparing for changes to the benefit system. There has already been much investment in strengthening the front-line to enable the capture and collation of data relevant to planning for change. In terms of what is then done with this data, segmentation can help.

Segmentation is a marketing term for the process of sub-dividing customers into groups with different needs to whom services can then be tailored more precisely to their circumstances. So for example, landlords may want to target close personal operational relationships with those low income households most at risk from door step lenders or pay day loan companies. These households are rarely just motivated by price when accessing credit: speed and convenience are equally important. Being close to these customers and being in a position to offer good information about locally accessible affordable credit initiatives or debt advice services will help safeguard them and build improved customer relationships.

In terms of financial inclusion, we may have gained insight into how many of our customers do not have bank accounts, have unsuitable accounts, or have underused accounts. But what does this actually tell us about their capability?

- Who needs information about suitable bank accounts?
- Who needs practical help to open a bank account?





- Who needs encouraged to open a bank account?
- Who needs information about budget management?
- Who needs help with budget management?
- Who may be at risk and in need of more intensive support?

Grouping tenants by these 'needs' categories is critical not just to making sure tenants receive a suitable service response, but also to make best and most effective use of all available staff resources.

In the following DWP matrix, tenants are segmented by their ability to manage money, and their level of anxiety about the transition to a new benefits system and all that this implies:

Ability

Able = 1) can regularly budget, 2) does not run out of money all/most times, 3) have not borrowed if they have run out.

Mainly Able = if they score poorly on one of the above aspects

Unable = if they score poorly on two or all three of the above

Anxiety

Not Worried – if none of the changes will make it harder to budget

Worried - if one of the changes will make it harder

Very Worried – if two or three of the changes will make it harder

	Able (budget well on all 3 questions)	Mainly able (does not budget well on one question)	Unable (does not budget well on 2 or 3 questions)
Not worried (not worried about any aspect of changes)	Ready & able	Ready & mainly able	Not worried & unable
Worried (worried about one aspect)	Worried but able	Worried & mainly able	Worried & unable
Very worried (worried about 2 or 3 aspects)	Very worried but able	Very worried & mainly able	Very worried & unable



This 'triage' approach to customer segmentation can help inform what, where and how to plan and deploy staffing resources. For example, customers in the RED could be assisted by referral for switchback arrangements where the housing costs are paid direct to the landlord as the criteria align with eligibility for alternative payment arrangements under the DWP's Personal Budgeting Support Guidance (see section 7).

In addition, customers in RED and AMBER groups are likely to be suited to budget accounts, while those falling into the GREEN are likely to find that basic or current account functionality meets their needs (see section 5 for information on banking products).

(e) Reviewing and developing rent account accessibility

Landlords may want to consider how their tenants can get sight of their rent account. Do they have to travel to a service point, or a local housing office, to see the payment they have made show on their account? Would it help them to have more immediate access to their account? As well as saving them on transport costs, it might help acknowledge the value of their payment if they can see it showing on their account at the point of transaction, or as soon as possible afterwards.

Landlords may also want to consider whether they can offer online access to rent accounts to make it easier for tenants to check their account. How helpful would staff find this as a monitoring mechanism if the front-line is developed to offer door to door collection methods? Could this help improve rent collecting performance, and what might the investment cost be?

Where landlords may not yet be ready to move to online accessible rent accounts, they may be able to consider issuing up to date rent statements more regularly, or text messaging balances, payments or debits.







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Promoting banking products

Social housing landlords are permitted to promote basic banking products. A transactional bank account is not a regulated product in the way that insurance, investment or credit products are and hence there is no problem in providing general information or even signposting or referring to a specific provider or product.

The Financial Services Authority produced guidance for social landlords in 2010 and many social landlords may already reference this guidance in their financial inclusion strategies: http://www.fsa.gov.uk/pubs/guidance/guidance9.pdf

Basic advice on bank accounts for Universal Credit is available from the Money Advice Service at https://www.moneyadviceservice.org.uk/en/articles/choosing-a-bankaccount-for-your-universal-credit-payment

The cost effectiveness of entering into arrangements with banking product providers must obviously stand the test of a business case. Critically, in the culture shift from cash weekly payment to electronic monthly payments, social landlords are likely to favour accounts which offer a 'credit trigger' facility rather than the more common 'date trigger', and will also seek to ensure that products offer payment 'frequency variation' rather than fixed dates, given that across the landlord's tenancies, Universal Credit will be paid on any and potentially every day of the month. Frequency variation triggers allow landlords to offer direct debits everyday of the month, such as with Allpay and some credit unions.

(a) Basic bank accounts

Basic bank accounts are universally available in principle, but can nevertheless be difficult to access for those on low incomes. They can be characterised as follows;

- Other than straightforward ID verification, no credit check is needed to open an account.
- The account can accept Universal Credit
- It allows automated payments
- There is no overdraft facility
- Cash cards can be restricted to provider's machines



- There is not always a debit card
- There is no cheque book
- There are usually penalties for returned direct debits.

For many tenants basic bank accounts may be a perfectly viable solution in terms of their financial capability, but there may be other barriers to opening up bank accounts that landlords need to bear in mind.

Barriers to opening up a basic bank account can be both real and perceived. While high street banks are required to offer basic bank account products, it is nonetheless common knowledge that some tenants do not experience a positive reception when trying to open an account. Some social landlords have involved tenants in mystery shopping access to basic accounts at local high street banks as part of their financial inclusion approach.

'Trusted Partner'

These barriers have led to some social landlords taking on a third party intermediary role in which housing staff have a delegated 'Trusted Partner' status within the terms of a formal agreement between the landlord and a bank (this need not of course be the landlord's business bank or development lender). This facility gives the housing staff the capacity to verify ID and address criteria, and authorise or 'open' new basic bank accounts. For example, Prospect Community Housing (Edinburgh) and Wishaw and District Housing Association both have trusted partner status with the Royal Bank of Scotland.

Many credit unions, and ethical banks such as Grand Central Savings, also operate on this basis to support easier access to banking products locally, using staff with 'people skills' that suit the customer profile. In the first instance social landlords are likely to want to speak to their existing banker or lender about the potential for this service development. With an interest in good collection performance, there may be potential for good terms.

Financial Incentives

It is becoming more common for social landlords to offer direct financial incentives to either encourage tenants to open bank accounts or otherwise develop their resilience to the changes ahead. This offers the chance to be innovative about incentives which can range from a one off cash deposit to open an account, to the offer of contents insurance, to a more creative incentive such as offering a discounted monthly broadband charge to help make it easier for tenants to make and manage the Universal Credit online claim and access online money management resources.

(b) Current accounts

Current accounts are familiarly offered by high street banks, and are also available from around 25 credit unions in Scotland. This account:

- Accepts Universal Credit
- Allows automated payments



- Has an overdraft facility
- Provides a cash card and pin, a debit card and cheque book
- Requires a credit check to be carried out to access the product
- Involves fees and charges for overdrafts, direct debits and standing orders.

The Post Office has recently announced intentions to develop a range of new current account products for Universal Credit (see section (e) below).

(c) Pre-paid cards

Like basic bank accounts, prepaid cards do not let tenants get into debt.

The idea behind prepaid cards is simple: the card is 'loaded' with cash, and used to withdraw cash or make purchases or payments. Once the balance is used, it is not possible to withdraw any more money or make any further purchases or payments.

Pre-paid cards can be 'open loop' or 'closed loop'. An 'open loop' prepaid card can be accepted and used for transactions at any location, for any purchase or payment. A 'closed loop' prepaid card is restricted to an exclusive product and/or payee.

In this sense, closed loop pre-paid cards 'loaded' with the rent payment on 'pay day' (Universal Credit day), could serve as a secure budgeting³ aid when ring fenced in this way.

Pre-paid cards are increasing in popularity because:

- They are not credit cards and a no credit check is required, although an identity check is
- It is difficult to get into debt with prepaid cards as the money is loaded up-front
- They can offer competitive or no transaction charges (but they do not offer a direct debit facility)
- They are generally Visa or Mastercard which makes them familiar, and they therefore carry no stigma
- They can be combined with 'ghost' current accounts to offer budget/jam jar facility to put the housing costs in. And with a closed loop facility they can also be useful to develop reward schemes because of the value to the retailer or supplier

Many local authorities are already using prepaid cards to support delivery of school meals and social care, for example, so there are likely to be partners in your area who can share their experience of this type of product.



³ http://www.which.co.uk/money/bills-and-budgeting/guides/how-to-plan-an-effective-budget/

Pre-payment cards



However, much as there are advantages, pre-paid cards are not necessarily the best Universal Credit option for everyone.

The National Prepaid Cards Steering Group has produced detailed guidance with case study examples on the use of prepaid cards in local government⁴. While there are no Scottish local authorities involved, this is nonetheless a valuable source of information on the practical application of prepaid cards.

(d) Budget ('jam jar') accounts

A 'jam jar' account is essentially a type of budgeting account. It works by accepting the Universal Credit into a 'ghost' current account. The money is then automatically filtered into 'jam jars' which are separate, virtual 'wallets' for rent, utilities, loans, savings, free money etc. Once in the 'jam jar', the money is ring-fenced by mandate and the customer cannot get access to that money. Rent payments can be prioritised. The 'free money' (balance) is loaded onto a prepaid debit card on which there is no overdraft facility. Members can be encouraged to save if it is a credit union account.

They are not always called jam jar accounts and, contrary to popular belief, are not always provided by credit unions, much as the Growth Fund has specifically promoted the capacity building of credit unions and jam jar accounts.

Other providers, such as Grand Central Savings' *HomeGuard* Account, Barclays and Allpay, offer budget account models, while a great many credit unions do not.

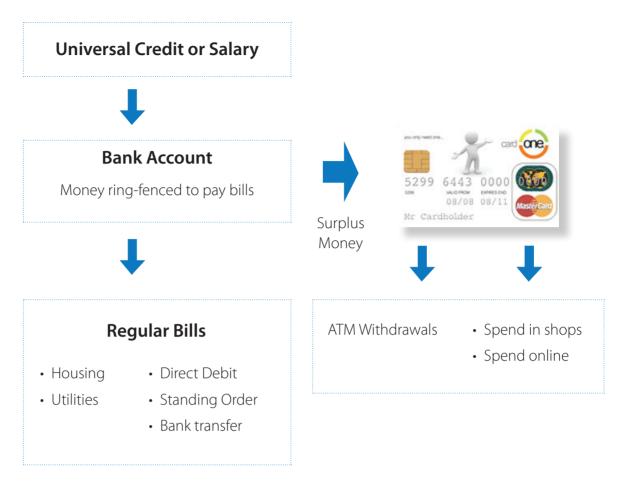
This type of product can be expensive for the account holder, and in some cases this cost is being met by the social housing provider as it offers a great deal of rent collection security. It is likely to grow in appeal for partnerships or groups of landlords working together to source and deliver cost effective, secure rent collection options. For example, First Alliance Credit Union is working with a collective of social landlords in Ayrshire, while West Lothian Credit Union (see section 8) has been working with all social landlords in its geographic boundary to evidence the demand and need for and feasibility of a jam jar account.

⁴ http://www.mastercard.com/uk/business/en/prepaid/commercial/downloads/guide/A-Guide-to-the-Use-of-Prepaid-Cards-in-Local-Government-Supported-by-MasterCard.pdf



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Jam Jar Account - what is it?



Further information about jam jar accounts can be found in a 2011 article from the magazine Social Finance.⁵

(e) Post Office accounts

Post Office Card Account

The Post Office Card Account was designed specifically to receive pensions, benefits and tax credits. The benefit of the account is that there is no overdraft facility and no charges and no credit check required to get an account. These accounts can accept Universal Credit payments, but they are not capable of any payment transactions. Anecdotally, many customers with a Post Office Card Account lift all money from their account on the day it is paid, and thereafter operate in the cash economy.

Post Office Current Account

The Post Office recently launched a trial venture, bringing current account banking to its branches for the first time since it sold Girobank 23 years ago.

⁵ http://www.socialfinance.org.uk/resources/social-finance/new-approach-banking-extending-use-jam-jar-accounts-uk



The pilot will run in just 29 East Anglian branches before a planned roll-out across all 11,500 branches in 2014. In partnership with the Bank of Ireland, the Post Office has revealed three current accounts.

The Standard Account is free to those who stay in credit, offers a debit card and charges 14.9% on overdrafts. The Packaged Account, at £8 a month, offers discounted travel and breakdown cover on Post Office bookings, while the Control Account targets low income customers who will pay a £5 monthly fee but not be charged extra on direct debits or standing orders which are returned unpaid.

Interested customers can register their interest online at postoffice.co.uk/ currentaccounts/register

(f) Developments in mobile phone technology

Payment of rent with an iPhone or Android device is becoming increasingly popular because of an 'App' from Allpay that enables payment from a phone. Using Allpay from a smartphone is the same secure environment as when making payments from a computer.

The App is available on the Apple App Store or from Google Play and is free to tenants to download and use, providing their landlord has formally signed up to Allpay's internet payments.

Social housing providers can make the barcodes available on their main websites and on rent payment pages, to make it easier for tenants to download the app. They can also use the bar code in newsletters and correspondence.

Find out more about the Allpay app at http://www.allpay.net/allpay-payment-app

Further developments in mobile technology will continue to have relevance for rent payment practice. For example, Allpay is currently developing a mobile phone 'Pay as you Go' top up. This option allows tenants to 'save' money for rent each time they buy a top-up for their mobile phone. For example, 10% of the cost of the top up purchase is credited to rent.

The use of mobile/smartphone technology for cash transactions is a revolution on the horizon in the UK. In the near future, the 'chip' on our debit and credit cards will be in our smartphones; banks will not necessarily be on the high street. Hence in investigating or investing in new payment system technology it is important to clarify with the supplier that it is flexible enough for future developments without having to re-invest again later.

Things move quickly with mobile technology and banking methods. As an example, a micro-lending initiative in Kenya, the 'M-Pesa' revolution⁶ began with deposits into an account stored in cell phones, with balances sent using SMS texts. These 'deposits' are then redeemed for cash. This has become the ultimate model of low cost banking – there are no branches, yet in one month 140,000 accounts were opened, and £446 million of payments are transacted each month through this model. There is speculation that this mobile revolution may emerge in the UK.

⁶ http://www.safaricom.co.ke/business/m-pesa/mobile-banking-services



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(g) Continuing to promote direct debits

Direct debits will remain the landlord's choice of payment options given the level of security and control they offer to the payee. But there is recognition that direct debits have significant limitations under Universal Credit, resulting in gaps that need to be addressed through the support and promotion of wider payment options.

One major limitation of direct debits is that payment dates are generally fixed on one or perhaps two dates of the month, which makes them generally incompatible with the fact that under Universal Credit, claimants can be paid on any day of the month. This makes it difficult to guarantee sufficient funds will be available on the 'rent due' date, increasing the risk of penalties for the tenant and arrears for the landlord. This is why the 'frequency variation' products such as those offered by Allpay and some credit unions, as noted earlier, may well be a deal breaker in negotiating suitable financial products for customers.

Moving to a system of flexible payment dates impacts on transactional and administration costs to the social landlord. For this reason some social landlord/credit union partnerships are developing rent payment schemes in which rent is collected from tenants' budget accounts on flexible dates and transferred into 'ghost accounts' for later onward transaction to the social landlord on the traditional direct debit collection dates. Other financial product providers, such as Allpay, currently offer a flexible direct debit option.

(h) Working with other bodies

Work with credit unions

Credit unions vary significantly in what they can offer and in their governance and management arrangements. Landlords need to determine, in each case, whether a particular credit union delivers what its customers need.

A wide range of organisations have developed out of the financial inclusion/ regeneration agenda from 2003 onwards, e.g. *Greater Easterhouse Money Advice Project* and *Cash in your Pocket* (Aberdeen/Aberdeenshire). These are primarily advice organisations: where such bodies exist in the landlord's area, it may be worth finding out more about their views on budget account developments.

Collaboration between social landlords

There are already instances of social housing providers working together, for example to collaborate with credit unions to share the subsidy costs of jam jar accounts, such as in Ayrshire and West Lothian.

Equally, there have been informal suggestions that social housing providers (both local authorities and registered social landlords) form a regional or even national consortium to negotiate a suitable range of products with an existing financial product provider. Not only would this offer the benefit of maximum collective gain, it could facilitate the development of common good practice standards and processes.



Financial Products for Universal Credit – a quick comparison

Services and features	Current account	Basic bank accounts	Jam jar account	Post Office® card account	Pre-paid cards
Accepts Universal Credit payments	Yes	Yes	Yes	Yes	Yes
Allows automated payments – eg Direct Debits and standing orders	Yes	Yes (All basic bank accounts and some offered by credit unions)	Yes	No	Yes
Overdraft facility	Yes	No Some accounts offer a small buffer (£10- £15)	No	No	No
Cash card with PIN for cash machine	Yes	Yes May be restricted to provider's own machines.	Yes	Yes Can only be used at the Post Office.	Yes Can only be used at the Post Office.
Debit card	Yes	Sometimes	No	No	No
Cheque book	Yes	No	No	No	No
Credit checks needed when you open the account	Yes	No	No	No	No
Fees and charges	Fees and interest charged on overdrafts. Penalties for returned standing orders or Direct Debits.	Usually charge penalties for returned standing orders or Direct Debits.	Monthly fee around £10- £15. No penalties for returned standing orders or Direct Debits.	No fees.	Monthly fee



Examples of housing provider and financial product partnerships

RSL/Housing Service	intermediary	Bank/Finance	Examples of Products
River Clyde Homes Glasgow City Council	Grand Central Savings	Bank of Scotland	 Homeguard 'budget' account Basic bank account Supersaver Account
Irvine Housing Association	First Alliance Credit Union	The Co-operative Bank	 Share Accounts Loan Accounts Summer Accounts Christmas Accounts Junior Accounts Current Accounts Pre Paid Cards Budget Accounts (Jam Jar) Insurance Products Bill Payment Accounts Corporate Member Accounts Flexible direct debits
Local Authorities In Scotland 300 Housing Associations in England	Allpay	Lloyds TSB/Mastercard/ Visa and others	 'paypoint' cash card Flexible direct debits Pre-paid cards Smartphone App
West Lothian Council WESLO Housing + others	West Lothian Credit Union	The Co-operative Bank	 Savings accounts Low cost loans Prepaid debit card Funeral Plans FREE insurance on savings and loans Budget Account (Jam Jar – in development – see section 8)
West Lothian Council WESLO Housing + others	Scotcash	Royal Bank of Scotland	 Basic Bank Accounts Savings accounts Loans White goods Energy advice
GHA Glenoaks HA ng homes Link Group + others	Pollok Credit Union	The Co-operative Bank	 Pre-paid card Smartphone app Loans Budget (Jam Jar) account Non Contributory life insurance





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Reviewing rent collection

CIH's UK office produced detailed guidance on this topic in February 2013 entitled *How* to...manage income collection effectively⁷, which complements this more specific CIH Scotland guidance on rent payment and collection under Universal Credit.

A value for money review of rent collection arrangements could include the following:

- How much is it costing your organisation to collect the level of income it does?
- What are the transactional costs of the rent payment options you currently offer and what will the impact of Universal Credit be on these costs?
- How can you encourage tenants to use the most cost effective products that offer you and them better financial resilience, and what incentives can you offer or broker?
- How much is legal action costing your organisation, and what, if anything, is this telling you about your procedures?
- Of all the things you do to collect rent arrears, do you know which has the greatest impact (e.g. texts, phone calls, face to face contact)?
- Is it sufficiently easy for tenants to get in touch if they are having problems paying their rent (e.g. a dedicated phone line or website contact link)?
- Is the reintroduction of cash collection an option, perhaps in conjunction with other providers and making use of existing public access points to minimise capital and revenue overheads?
- Do you need to invest in hand held mobile technology for housing staff to use on home visits?
- Would it be cost effective to deploy mobile collection kiosks in some communities?
- are your frontline staff working hours flexible enough to deliver services to promote rent payment outwith normal office hours?
- In terms of your rent debit cycle, are any 'free weeks' relevant to the majority of your customers under Universal Credit?
- Is there sufficient focus on bank account and wages arrestment in debt recovery?
- Can you offer a smartphone App for tenants to pay rent, order direct debit forms or set rent payment reminders?

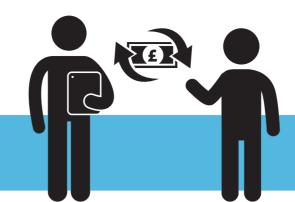


⁷ http://www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/How_to._manage_income collection_effectively



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Maximising payment of housing costs direct to the landlord

Rent Arrears Direct

Improving rent collection under Universal Credit should include maximising the number of working age tenants currently in receipt of a working age DWP passported benefit (IS/ JSA/ESA) with an arrangement for third party payments (sometimes also known as rent arrears direct). Under current arrangements, payment of Housing Benefit direct to the landlord is compulsory where third party payments are being made.

It is highly probable that third party payments will remain under Universal Credit and act as a switchback trigger to ensure housing costs are paid direct to the landlord under the DWP's arrangements for 'payment exceptions' (as set out in their Personal Budgeting Support guidance).

The length of time that claimants will remain under switchback arrangements will be until the arrear is paid off in full. Current arrangements for eligibility are four weeks' rent owed, and this looks set to continue under Universal Credit arrangements. The current arrangements also allow for payments to continue if the arrears have arisen as a result of an ongoing ineligible charge (e.g. water rates or fuel) which can continue to be deducted at source indefinitely.

It is anticipated that Universal Credit will also continue to be paid direct to landlords for tenants deemed to be vulnerable, as with the existing arrangements for the private rented sector being delivered in accordance with Local Housing Allowance safeguarding guidance. Social landlords are recommended to become familiar with this guidance and seek to identify which of their tenants fall into the vulnerability groups.

Current DWP approach to arrangements under Universal Credit

DWP estimates of the proportion of social housing tenants who will be eligible for payment direct to the landlord continues to grow, based on learning from the various Universal Credit pilot and pathfinder projects. There is now expected to be at least 30% occurrence of direct landlord payment under a fully migrated Universal Credit system, but this projection looks set to increase with completion of the pilots, implementation of other welfare reforms and clearer customer data from social landlords about the financial capability status of tenants.



Of more immediate practical interest and use is the DWP Guidance on Personal Budgeting Support:

https://www.gov.uk/government/publications/universal-credit-local-support-services-framework

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In summary, this DWP guidance sets out the two elements of budgeting support – money advice and alternative payment arrangements – that will be made available to tenants where there is a risk of financial harm.

The following levels and types of money advice are planned to be delivered from external organisations with relevant expertise – e.g. money advice services, CAB:

- Signpost to online services
- Single session over the phone
- Intensive face to face session with follow up calls

The following criteria will be used to identify whether there is eligibility for an alternative payment arrangement. Can a claimant:

- Pay their bills on time?
- Budget income and outgoings over a calendar month?
- Manage a single payment to the household (i.e. not require a split payment between couple claimants)?

Assessments are made against 'Tier One' (highly likely/probable) and 'Tier Two' (less likely/ possible) factors, with full details set out in the guidance.

Direct payment to a landlord can be triggered at any time during the claim if necessary to safeguard the claimant's home/sustain the tenancy. Arrangements will be subject to review. Crucially, details from a third party, including the landlord, can be used to inform decisions.

'Arrears Switchback'

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The value of, or length of time in, arrears before a claimant can be referred for an alternative payment arrangement has now been confirmed as two months following an announcement by Lord Freud at CIH's annual conference in June.



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8 Practice examples

Please see following pages



1. West Lothian Credit Union: jam jar account and prepaid debit card feasibility study

A working group consisting of the Credit Union, West Lothian Council and all main social landlords in the area was established for the purpose of taking part in a feasibility study to examine the potential demand for budget accounts for citizens in West Lothian.

The group considered budget account models provided by other credit unions, notably in Wolverhampton (Walsave) and Ayrshire (First Alliance) where social housing providers financially incentivise credit union membership for their tenants.

Collaboration in the feasibility study made sure that the evidence gathered for any second stage development would cover all social housing tenants in the geographic area, and not just a discrete group of tenants.

The working group was coordinated and facilitated by a project worker seconded from the credit union. The worker was responsible for sourcing funding for and subsequently undertaking the feasibility study. The study was funded through Investing in Ideas. Costs for the project worker post were funded by West Lothian Council (financial inclusion resources from the General Fund (not Housing Revenue Account) and a contribution from the adult education budget) and West Lothian CAB.

The feasibility study findings demonstrated that:

- 66% of social tenants had transactional bank accounts
- 59% pay some form of bank charges
- 21% said they had used doorstep/payday lenders
- 20% admitted rent arrears
- 49% liked the idea of jam jar accounts
- 32% would like to pay bills through jam jar accounts
- 21% would like budgeting advice
- 23% would like debt management advice

The feasibility study provided a detailed cost plan/business case for West Lothian Credit Union to provide jam jar accounts. This cost plan provides the basis for any subsequent funding applications. It also demonstrates that the delivery of jam jar accounts to social housing tenants will require finance, for example to cover software, admin and general running costs. The monthly fee assessed in the business case is £5 per month per tenant. This is competitive for credit union account costs. The monthly tenant transaction fee will be charged to social landlords by deduction from the rent payment being sent from the Credit Union to the social landlord each month.

For further information contact:

Alison Wright info@westlothiancreditunion.co.uk http://www.livingstoncreditunion.co.uk 01506 436666



2. Scotcash: Consortium approach to keeping money in the local economy

Scotcash is a not-for-profit personal lending Community Development Finance Institution (CDFI) set up in 2006. Its purpose is to help individuals who cannot access credit at an affordable rate from banks or loan companies. Scotcash offers an alternative to high cost doorstep lenders and illegal loan sharks through a range of affordable and easily accessible products.

Scotcash provides relatively small loans (typically up to £500) to help meet the costs of everyday needs (e.g. domestic appliances, school uniforms, returning to work). It also provides access to basic bank accounts, credit union savings accounts, independent debt advice, income maximization, discounted white goods and food parcels. Essentially, Scotcash provides a wrap-around financial inclusion service aimed at serving communities and saving citizens money.

Scotcash is managed by a board of representatives comprising:

- Glasgow City Council
- Glasgow Housing Association
- ng homes
- Royal Bank of Scotland (RBS)

Scotcash board recognises that financial exclusion can impact severely on those without a credit history, a bank account or who are near or below the poverty threshold, and that these factors can compromise tenancy sustainability and have a corrosive effect on RSLs income stability and potentially continuity of service provision for all tenants, as well as housing supply investment for future customers.

The consortium approach is central to financial inclusion collaboration, facilitation and promotion. Scotcash works with over 30 housing associations across Glasgow to promote inclusion and provide access to relevant and affordable products. This includes joint marketing campaigns, promotion at tenant events and sharing housing association premises to bring services closer to the community.

Since opening in 2006, Scotcash has collectively saved citizens over £2 million in interest repayments (i.e. as compared with taking the same loan with a doorstep lender).

In addition, Scotcash has:

- provided 7,500 loans valuing in excess of £4m
- opened almost 1800 bank accounts
- encouraged 389 people to save for the future
- helped over 4,000 people access independent money advice for debts worth £10.5m

For further information contact:

Sharon MacPherson, Chief Executive Officer Sharon.MacPherson@glasgow.gov.uk 0141 276 0518



3. Financial inclusion as housing service performance improver: RCT Homes

RCT Homes in South Wales operate within the second largest unitary authority (Rhondda Cynon Taf) in Wales. They have 12,500 properties, transferred from the borough council in 2007. 80% of residents are on some form of Housing Benefit, and 58% in receipt of full HB. 65% of residents are fully dependent on state benefits for their income.

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In 2009 RCT Homes recognised that they needed more information about their tenants and undertook a comprehensive financial inclusion survey. 6,140 questionnaires were completed which highlighted a range of issues relevant to welfare and housing reform, banking and universal credit. Notably:

- Only 67% of the tenants had a bank account;
- 64% used pre payment meters;
- 49% didn't use the internet;
- 34% had experience of high cost home credit (doorstep lending)

RCT's response to the survey was to develop a range of financial inclusion interventions aimed at emphasising good financial decision making (the "demand" side) and access to suitable products and services (the "supply" side).

Good data was key to developing good responses. RCT changed their income recovery functions, introducing a specialist arrears management team, dedicated named recovery officers, specialist benefit and money saver officers, and placing an emphasis on a firmbut-fair transparent approach. Using new technology (and social media) RCT Homes was able to profile tenants and geographic locations for a campaign style approach based on knowledge from the survey. As well as identifying those at greatest risk, this information guided the service design and delivery response.

RCT Homes developed key themes to focus their work:

- maximising tenants' income
 • pre-tenancy advice and access to banking
- access to affordable credit
 - understanding tenants needs
- affordable warmth
- support available to RCT Homes

Specifically, RCT invested in:

- **"sound as a pound"** packs (information for tenants known to all staff, on benefits, budgeting, banking and loans)
- **"money savers"** officers (two full time staff trained to offer in-home advice on budgeting, form-filling, grant applications and advocacy)
- **financial capability tutors** (14 staff members are qualified CAB financial capability tutors and are able to take basic money advice sessions out to the community)
- front-line financial capability (all 125 front line staff were given financial inclusion awareness training)
- four tenancy sustainment officers

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- tenant insight / data analysis tools (tenant and debtor profiling)
- **joint working with Moneyline Cymru** (access to affordable credit savings and bank account part financed by RCT Homes)
- CAB referrals arrangement
- credit scoring (of tenant) at sign up
- appointing a full time Corporate Social Responsibility Officer (to work with local & national businesses)
- establishing affordable Broadband (£6 a month for tenants on benefits)
- promoting tenant advocates (25 x RCT Homes staff volunteer to mentor and support vulnerable tenants by telephone)
- targeting "Don't worry, talk to us" postcard campaigns (Postcard, online, jobcentre, newspaper, radio and bus campaigns to contact tenants who might be affected by specific reforms).

Their arrears performance showed a significant change: in September 2009 arrears were 2.77%, but two years later, despite the recession, arrears had dropped to 1.43%, with evictions remaining broadly similar at 43 (2008/09) and 48 (2010/11).

RCT Homes activities were funded from Big Lottery and from a £400,000 "gift" from Lloyds Bank (after stock transfer). They have established a subsidiary regeneration charity "Meadow Prospect", a trading company "Homeforce" and trading social enterprise "GREW". The collective turnover of these operations in 2010/2011 was £4,000,000.

Securing data on tenants' circumstances was vital to planning for the implications of Universal Credit and welfare reform. Having system functionality and populating robust IT systems with good information on tenants has been the key to planning and preparing for change.

The above information is an extract from: **The Unbanked in Glasgow and the impact of Universal Credit** – *a report for Glasgow Housing Association – Niall Alexander June 2012*





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Useful publications and organisations

- Improving financial inclusion and capability in social housing CIH, 2011 http://www.cih.co.uk/publication-free/display/vpathDCR/templatedata/cih/ publication-free/data/Improving_financial_inclusion_and_capability_in_social_ housing
- How to help tenants manage their money CIH, September 2012 http://www.cih.co.uk/publication-free/display/vpathDCR/templatedata/cih/ publication-free/data/How_to_help_tenants_manage_their_money
- How to manage income collection effectively CIH, February 2013 http://www.cih.org/publication-free/display/vpathDCR/templatedata/cih/publication-free/data/How_to._manage_income_collection_effectively
- Welfare Reform: Practical Approaches CIH, December 2012 free to members (especially worth noting section on 'Supporting tenants to manage money') http://www.cih.co.uk/publication/display/vpathDCR/templatedata/cih/publication/ data/Welfare_Reform_Practical_Approaches
- We need to talk about rent CIH and London & Quadrant, February 2013 http://www.lqgroup.org.uk/_assets/files/Sub-market-rents-3rd-proof1.pdf
- Housemark Welfare Reform Club Benchmarking Report May 2013 http://www.housemark.co.uk/hmresour.nsf/lookup/Welfare%20reform%20 baseline%20report%20May%202013.pdf/\$File/Welfare%20reform%20baseline%20 report%20May%202013.pdf
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 http://www.housing.org.uk/publications/browse/universal-credit-and-financialproducts
- Universal Credit Guidance on Personal Budgeting Support DWP, February 2013 (consultation finished 18 March 2013) https://www.gov.uk/government/uploads/system/uploads/attachment_data/ file/181400/personal-budgeting-support-guidance.pdf
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- A Guide to the use of Prepaid Cards in Local Government National Prepaid Cards Steering Group, May 2013 http://www.mastercard.com/uk/business/en/prepaid/commercial/guidance.html
- Association of British Credit Unions
 http://www.ncvo-vol.org.uk/advice-support/umbrella-bodies-directory/abcul
- Community Development Finance Association Find out more about Community Development Finance Institutions: http://www. cdfa.org.uk/about-cdfis/ and specifically about Scotcash and partners, including ng homes: http://www.cdfa.org.uk/about-cdfis/case-studies/reaching-out-to-the-financiallyexcluded-in-glasgow/
- First Alliance Credit Union http://www.allianceayrshire.co.uk/
- Grand Central Savings http://www.grandcentralsavings.org.uk/
- Scotcash http://www.scotcash.net/
- The Trussel Trust's UK Foodbank Network http://www.trusselltrust.org/resources/documents/Press/General_Foodbank_ Appeal2012_NORDO.pdf



- West Lothian Credit Union
- http://www.livingstoncreditunion.co.uk/
- Pollok Credit Union
- http://www.pollokcu.com



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