Welfare Strategic Delivery Group

25.03.19

Pobl Group, Newport



Welcome and Introductions

Steve Evans, CCHA (Chair) and Julie Little, Pobl (Vice-Chair)

- SDG Review
- Focus of the Group
- Future meeting dates
 - 22nd May (Conwy or Wrexham)
 - 11th September (Swansea)
 - 4th December (Cardiff or Newport)



Updates (SRS Landlord Forum)

- Next meeting: 13th June
- DWP requesting suggestions for improvements to the Landlord Portal
- DWP believe that the situation with untidy tenancies is improving, is this the case?



Updates (53 Week Rent year)

- Meetings held with Director General of UC and DWP officials.
- A solution has been proposed to amend the UC regulations to reflect that there are more than 52 weeks in a year.
- Unfortunately, this solution requires ~£50m in additional funding. DWP have taken the decision to seek this funding in the Autumn Budget.
- Therefore it is unlikely that a solution will be in place until April 2020.



Updates (53 Week Rent year)

Housing association asks tenants for extra rent to avoid Universal Credit issue

NEWS 13/03/19 3:15 PM BY NATHANIEL BARKER

A housing association in the North West has asked its tenants to pay extra rent, to avoid slipping into arrears next year because of a Universal Credit technicality.



Updates (53 Week Rent year)

- Landlords and/or claimants must declare their actual number of rent free weeks. Unfortunately, this retains the week defecit. E.g:
- 3 rent free weeks for all tenants. Rent = £100
- $((52-3) \times 100)/12 = \pm 408.33$
- Monthly payment required to cover 50 payments= £416.67



2019 Rent Increase Process (UC)

- Guidance has been circulated on the April rent increase process for UC tenants. Also included in the UC Landlord Guide
- Dual route process
 - Self reporting: "higher" tolerance than 2018
 - Bulk upload through Landlord Portal in "mid-April"
- As previously, claimants cannot report change until it has occurred
- Self-reporting claimants will not break system

UC Managed Migration

- DWP to start pilot of the Managed Migration process in July 2019, in Harrogate.
- Up to 10,000 legacy benefit claimants will be asked to migrate.
- "Who knows me" approach. Key to securing data sharing throughout Managed Migration.



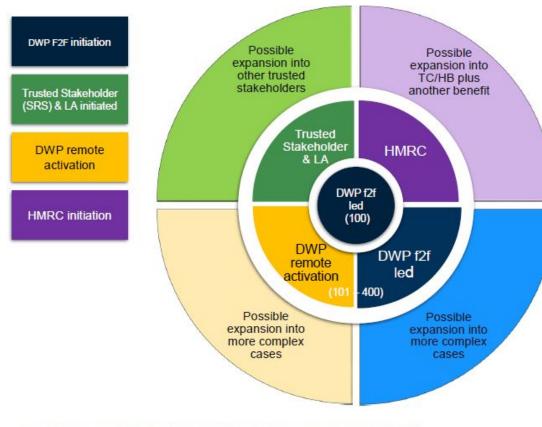
We worked with you

Service Design Workshops

We discussed



Who knows me



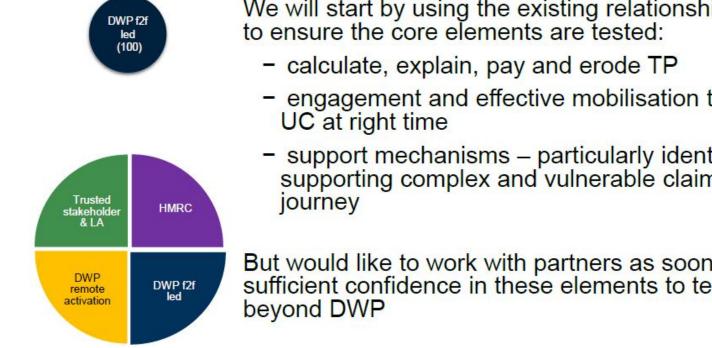
All numbers illustrative and to be continuously reviewed during pilot

Hypothesis that if an organisation *knows the claimant*, they are best placed to assess their readiness to move and to help them through the move

*knows the claimant defined as having had recent contact through f2f and/or telephony channels and an organisational/financial interest in supporting claimants through migration

We estimate at least 50% of claimants have this type of relationship with Jobcentres, HMRC, their LA or SRS landlord.

Early stages of the pilot



We will start by using the existing relationships in the jobcentre

- engagement and effective mobilisation to successfully claim
- support mechanisms particularly identifying and supporting complex and vulnerable claimants through their

But would like to work with partners as soon as we have sufficient confidence in these elements to test 'who knows me'



UC Managed Migration

- Further engagement with DWP in the run up to the start of pilot, and throughout pilot.
 - June workshop
 - SRS Landlord Meeting
 - Additional workshops.
- Post-pilot, further regulations must be passed by Parliament to allow roll out of Managed Migration. Not expected before Summer 2020.



Background:

On 1 October 2018 the Secretary of State for Work and Pensions announced that the Department for Work and Pensions (DWP) will fund Citizens Advice, including Citizens Advice Scotland, to provide a new Help to Claim service from 1 April 2019.

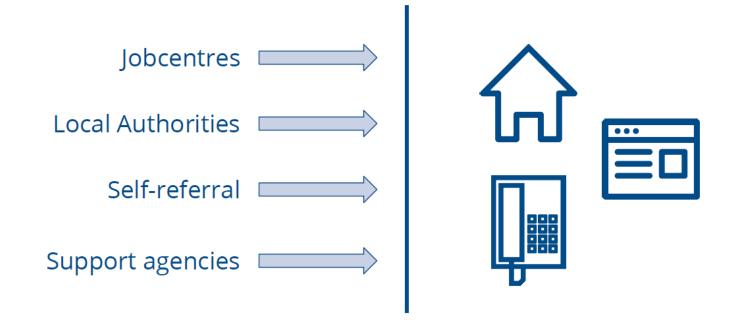
This announcement means that we are creating a brand-new partnership between DWP and Citizen's Advice to deliver the new service, providing the best possible support for the most vulnerable customers to claim Universal Credit.

Key messages:

- New service not Universal Support repackaged
- Led by Citizens Advice/Citizens Advice Scotland, supported by DWP
- A national, consistent service will be delivered
- A test and learn approach is being adopted throughout
- Partnership working across communities is still key

Help to Claim Service

Accessing the service



Step 1: Multi-channel access





Step 2: Individual needs assessment



Step 3: Support to start a claim



Check entitlement



Set up email or accounts

Work through to-dos Access phone or home visit support

Step 4: Completing a claim

Depending on their level of need this might include help to:



Verify their identity



Access adaptations and easements



Provide additional evidence

Understand

monthly payments



Apply for additional financial support

Step 5: Access to longer term support



No wrong door

Ensuring a smooth client journey



Sharing best practice and insight

Housing Related Support Funding

- Supporting People has been replaced by the Housing Support Grant.
- Existing guidance/frameworks/paperwork remains this year.
- Welsh Government devising new framework and guidance for April 2020. CHC sits on the engagement steering group.



Reviewing the Welfare SDG

- Ratifying our Terms of Reference.
- Setting our priorities for 2019/20.



Covering Operational Issues

• DWP/CHC roundtable: review





Helping social housing tenants find alternatives to high-cost credit

Community Housing Cymru Welfare Strategic Delivery Group

Alison Wade, 25 March 2019

What is the FCA and what does it do?

The Financial Conduct Authority

What we do

We are an **independent public body** funded entirely by the firms we regulate by charging them fees

Our **work and purpose** is defined by the Financial Services and Markets Act 2000

Our strategic objective is to **ensure that the relevant markets function well** for individuals, for large and small businesses, and for the economy as a whole

Our operational objectives are to:

- secure an appropriate degree of protection for consumers
- protect and enhance the integrity of the UK financial system
- promote **effective competition** in the interests of consumers

How we do it

We **regulate the conduct** of more than 58,000 businesses. We are also the **prudential regulator** for more than 18,000 of these

We make **rules**, give **guidance**, **supervise** the firms and markets we are responsible for, and **enforce** the rules (where necessary)

We use a **proportionate approach** to regulation, prioritising the areas and firms that pose a higher risk to our objectives

We are **accountable** to HM Treasury and to Parliament

Context of the guidance

- High-cost Credit Review is a key FCA priority.
- We have examined how the **largest high-cost credit markets** are working for consumers.
- An important part of our work is promoting alternatives to highcost credit.
- In May 2018, we consulted on draft guidance for social landlords.
- In December 2018, we summarised the feedback received and published the finalised guidance (FG18/6).

Alternatives to high-cost credit: our approach

What are the issues we want to address?



Consumers who can't access mainstream credit are using expensive high-cost credit products

Our interventions may reduce the availability of high-cost credit for some consumers

Why are consumers not using lower So we are aiming to increase cost alternatives to high-cost credit? availability and awareness of: There is limited availability ~~ Lower cost credit XX of alternatives Consumers have limited Alternatives to credit that meet awareness of alternatives consumers' needs How are we doing this? By taking action on By working closely By bringing issues we are best with Government, the organisations placed to address, eq together to develop private sector and the not-for-profit sector effective approaches, providing guidance to deliver change by including to social housing landiords to help them providing expertise working with firms on understand regulation new business models supporting initiatives to on credit broking and products promote alternatives, eq. · reducing FCA fees for · holding a forum for Government's work community finance towards a no-interest housing associations organisations and and providers of loans scheme, the credit unions Financial Inclusion Policy household goods to Forum see how they can work together to improve

consumers' access

to goods

Rationale and aims of the guidance

We found that social housing providers:

- play an important role in helping their tenants access essential household goods and lower cost credit
- can be deterred from doing so by uncertainty over what sorts of activities are credit broking
- often do not know what FCA authorisation entails or what to expect

The guidance has three main aims:

1.

to **clarify the current law on credit broking**, including the types of activities likely and not likely to be credit broking

2.

3.

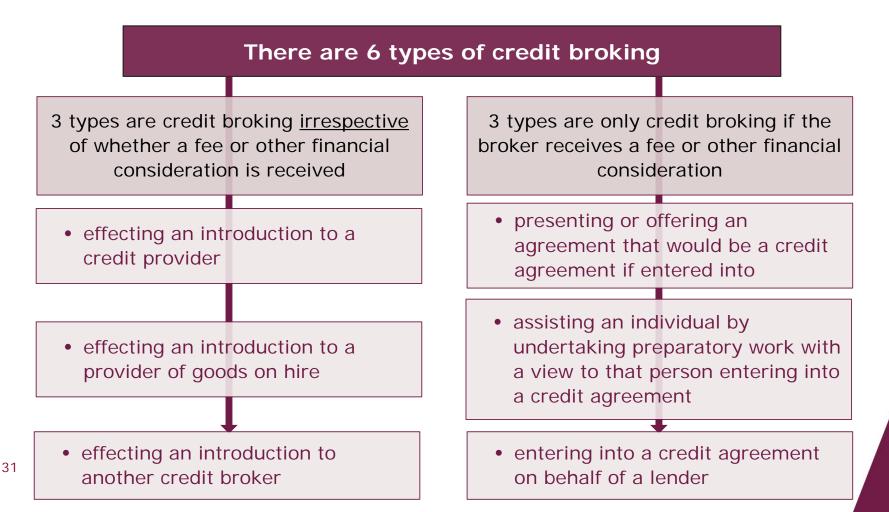
to **set out the options available** to social landlords, and where to find further information

to **explain how the FCA can help** and support social landlords with getting authorised for credit broking

30

What is credit broking?

- The Regulated Activities Order 2001 defines the **types of financial activities requiring FCA authorisation**. These include credit broking.
- Legislation would be needed to change the Order. Our guidance cannot change it.



Where is the boundary?

- Whether an activity is credit broking **depends on all the facts and circumstances of the case**.
- No definitive black and white list can be created.
- But as a general indication:

| Not likely to be credit broking (no authorisation needed) | Likely to be credit broking (authorisation needed) |
|---|--|
| Providing general information to a tenant about services available from credit unions and CDFIs (no specific provider named) | Referring a tenant to or recommending a specific credit provider , e.g. a particular credit union |
| Referring a tenant to a local charity or community organisation that gives household goods to people free of charge | Referring a tenant to or recommending a specific provider of goods on hire |
| Referring a tenant to a seller of goods , e.g. second-hand furniture shop, local recycling scheme | Referring a tenant to or recommending a specific credit broker (including credit broking websites) |
| Referring a tenant to a website or other source of information which is not credit broking | Giving a tenant contact details for a specific credit provider, provider of goods on hire, or credit broker |
| | Calling a credit provider etc. or setting up a meeting on the tenant's behalf |

UNRESTRICTED

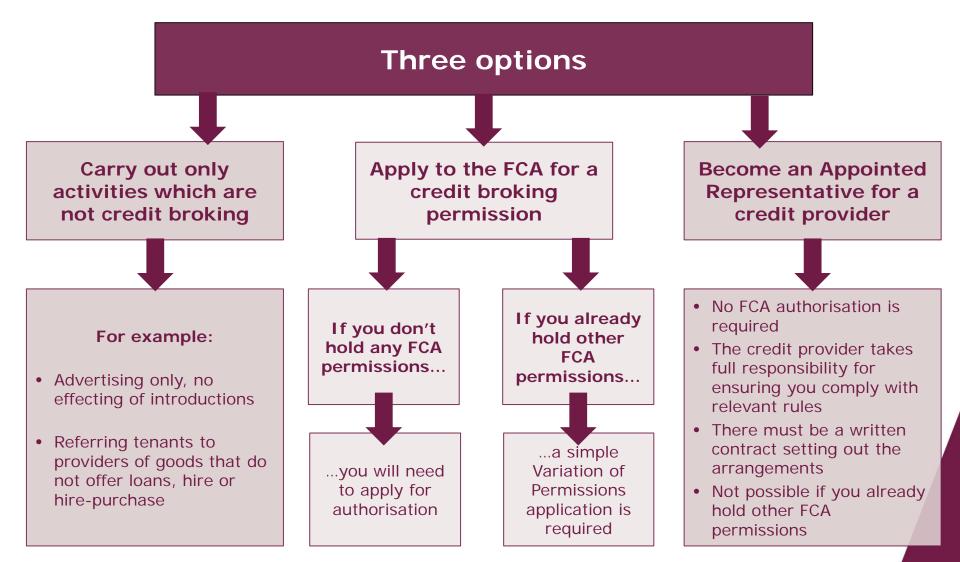
How is this affected by the proposed legislative change?

| May 2018 FCA CP18/12 | Consultation on draft guidance for social landlords 'We believe there is a case to consider an amendment to the regulatory boundary to remove credit broking by RSLs from the requirement to be authorised'. |
|------------------------------------|--|
| October 2018 | HM Government Budget announcement: '[the] government will simplify regulation to make it easier for RSLs to direct tenants to alternatives to high-cost credit.' |
| November 2018 FCA CP18/35 | '[W]e very much welcome the announcement in the Budget [] we would encourage the Government to bring forward the necessary legislation as soon as is practicable.' 'it remains appropriate to finalise the guidance as it still has a role to play'. In particular: Timing of legislation / entry into force of changes is unknown Scope of exclusion is unknown The guidance goes beyond just clarifying the existing law |
| December 2018 FCA CP18/43 | Summary of feedback received on draft guidance and our response to it. Publication of finalised guidance – FG18/6 |

The law remains as described in the guidance

We will review it after legislative changes are in place

What options are available?



How can the FCA help?

- Specialist team to help housing associations
- **Dedicated mailbox** for your enquiries: <u>RSL@fca.org.uk</u>
- **Examples of queries** you could direct to the team:
 - Are our activities credit broking?
 - Do we already hold any FCA permissions? Which ones?
 - How does the application process work?
 - How much information do we need to provide to answer question X of the application?
 - Can someone review our documentation before we submit our application?
- If you send your application reference number to the mailbox, we will expedite the processing of your application.



A & **D**

Contacts

Alison Wade Policy Lead on Alternatives to High-cost Credit alison.wade@fca.org.uk 020 7066 0246

For queries about the guidance for social landlords, whether your activities might be credit broking, authorisation processes, etc. you can also write to: <u>RSL@fca.org.uk</u>

Break



StepChange Debt Charity Introduction

Dave Orbinson Senior Relationship Manager 25th March 2019



StepChange Debt Charity

The UK's leading debt charity; we help over half a million people overcome their debt problems each year.

We provide UK wide coverage with centres in Wales, England and Scotland

We offer independent, impartial and confidential advice to people in problem debt.

Our service is free to clients; we receive funding from various sources, including donations from the financial services industry.

We work with over 900 partner organisations and deal with both secured and unsecured debt.

In total we're managing over £4.5 billion worth of debt for our clients.



StepChange Debt Charity -Telephone and online





Our process





Advocacy Team (Cardiff)

We provide specialist support to our vulnerable clients throughout their journey with StepChange



Some of our training;

- ✓ Macmillan Cancer Support
- ✓ Samaritans
- ✓ Mental Health Foundation

Some of our partners;

- ✓ Barclays
- ✓ Shelter
- ✓ HSBC

We sensitively explore clients' needs through the conversations our advisors have



Debt Solutions



Debt solutions available in Wales

Debt solutions not available in Wales



Aftercare

After receiving debt advice the client will have ongoing support from us regarding any queries, concerns or changes to circumstances they may have.



For our clients;

- ✓ Advice Plus team
- ✓ Client support team

For our creditor & partners;

- ✓ Customer Service team
- ✓ Access to our portal

We complete annual budget reviews with clients and re-advise where suitable



Service Demand – New Clients

Last year, over 657,000 people came to us for help with their debt problems.

In 2018 we delivered full debt advice to over 304,000 clients through telephone and online channels.

More and more of our new clients are seeking first time advice online (61% compared to 39% by phone)

In Wales we delivered full telephone debt advice to over 6,500 clients (Debt Remedy clients are more challenging to report accurately due to anonymity of process.)

We estimate that approximately 2.4% of all clients supported across the UK are Welsh. The Welsh population accounts for 5% of the UK population.



Clients in Wales



Wales Client Profile

Age Band: 78% of Welsh clients are in the 25-59 age bracket

Marital Status: A similar proportion of our Welsh clients are married (22%) compared to all charity clients (23%)

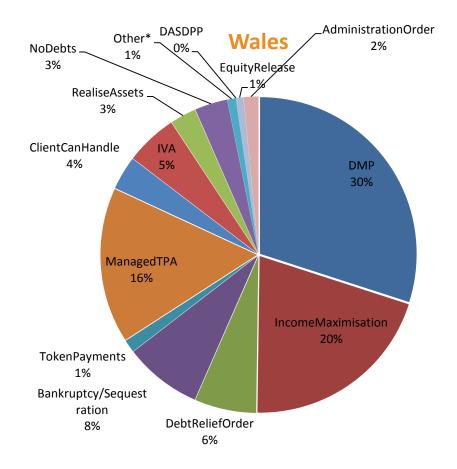
Housing Status: A higher proportion of our Welsh clients (26%) are homeowners compared to all charity clients (20%)

Household Composition: 62% of our Welsh clients are single and 33% of our single Welsh clients have children

Average Debt Value: Welsh clients owe slightly less than our clients from the rest of the UK at £11,487 (compared to £11,566)



Debt Advice Recommendations



30% of Welsh clients are suitable for a debt management plan which is higher than the rest of UK clients (26%)

Similar numbers of Welsh clients and clients from the rest of the UK are recommended a token payment plan (16%)

A slightly lower number of Welsh clients have a deficit budget (20%) compared to the rest of the UK (22%)

Recommendations across other solutions are broadly comparable



Debt Management Clients

| | Wales | UK total |
|---------------------------------|--------|----------|
| New DMPs Activated in 2018 | 2,222 | 38,626 |
| Average DMP Surplus in 2018 | £173 | £178 |
| Active DMP Clients in 2018 | 11,291 | 190,479 |
| % Active DMP Clients from Wales | 5.9% | |

Those Welsh clients setting up a DMP have a lower surplus than all those from the rest of the UK

Our intention is to support more clients in Wales



What Next?



WoW Transformation – Our vision

Our transformation of processes and infrastructure will allow us to move to an 'omni' channel model. Clients will be able to switch seamlessly between telephone and online advice services, for example, telephony crisis support delivery, then online support for account management.

Key benefits





Empower the client, allowing much more selfservice where they are able to do so

Stepping Forward – Our 4 Year Strategy









Problem debt continues to be an issue in Wales

The free sector has a significant and increasing role to play in supporting people experiencing problem debt

More flexible and impactful solutions are required to help provide increasingly cost effective services

 StepChange aspires to support higher volumes of Welsh residents experiencing problem debt



Any Questions?





Llywodraeth Cymru Welsh Government

www.llyw.cymru www.gov.wales

Developing Advice Networks in Wales

JJ Costello

Content

- Introduction
- Background
- Information & Advice Action Plan
- Advice Networks
- Questions

Introduction

- Welsh Government committed to promoting sustainable improvements to the health & well-being of all the people of Wales;
- Recognises social welfare law information & advice has an important role in:
 - helping people make informed decisions & enforcing their rights to Civil Justice;
 - ensuring everyone in Wales has a fair & equal chance in life.

Advice Sector - Background

- Welsh Government's Advice Services Review in 2013 made a number of recommendations to develop advice service provision throughout Wales, including:
 - 1) New Funding Approaches additional funding was needed and funding ought to be longer term and outcome-focused.
 - Promoting Advice Networks advice stakeholders should be linked & should develop links to PSB's to ensure the planning of advice services is integrated with other services;
 - 3) Quality Assured Services greater consistency was required across the sector to enable more partnership working, based on increased trust amongst providers;
 - 4) Understanding Demand a detailed study of the demand for social welfare advice across Wales was required;

New Funding Approaches

- In 2014, Welsh Government established a new Frontline Advice grant programme to complement existing BABLs, Community Focussed & Homelessness Prevention grants;
- Work is now progressing to merge WG's three of these grant funding streams into a single fund;
- □ From January 2020, the new Single Advice Fund aims to;
 - promote more focus on preventative services 'resolution & resilience' approach;
 - better joined –up & collaborative working to ensure all resources within a locality are utilised as effectively as possible;
- Exploring how to develop outcomes that capture the full value for individuals gained from successful advice interventions.

National Advice Network

- National Advice Network (NAN) established by the Welsh Government in 2015 to provides expert guidance to a strategic approach to the provision of advice services in Wales;
- □ NAN is an expert Advisory Group:
 - publically appointed Chair:
 - > members include: funders, advice providers, & national organisations;

Quality Assured Services

- Welsh Government produced the <u>Information & Advice Quality</u> <u>Framework</u> for Wales;
- IAQF developed to provide a consistent approach to the provision of quality information & advice;
 - > IAQF builds on existing quality standards not reinvented the wheel.

Information & Advice Action Plan

- Information & Advice Action Plan for Wales (IAAP) published in Dec 2016;
- Five year plan to ensure there is a sustainable provision of advice services throughout Wales (carries forward the recommendations of the advice services review);
- □ IAAP champions the prevention approach;
 - promoting public legal education;
 - target early interventions;
 - building the capability & resilience of people.
- □ IAAP requires the Welsh Government, Advice Sector & other stakeholders to work together.

Understanding Demand

- Modelling the Need for Social Welfare Advice published by the Welsh Government in July 2017;
- Provide estimates of the need for advice on six social welfare topics for each of the 22 LA's, includes the need for:
 - Preventative Advice we know early intervention works better by preventing problems.
 - Specialist Advice Services many people need specialist advice to solve crisis problems;

- Welsh Government is currently working on the establishment of local/regional networks.
- Has considered lessons learned from CLSPs and Big Lottery funded networks initiatives in England.
- □ WG lead but needs to be sector owned, co-produced and co-managed.
- Welsh Government recognises dedicated support resources are needed to develop & sustain networks.
- □ Currently in discussion with number of stakeholders.
- Proposals to be agreed and wider engagement events in summer, with aim of inaugural meeting in autumn.

The value of networks includes:

- Increased awareness of advice and related provision
- More joined-up advice services
- Simplified referral in and out
- Understanding need
- Understanding what matters to people seeking advice
- Understanding the impact of advice
- Sharing best practice
- Increased access to training
- Supporting providers to meet the Quality Framework

- Developing collaborative responses to unmet need
- Giving and receiving feedback on public service delivery
- Recognising the benefits of advice in statutory plans
- Awareness of other funding and more co-ordinated funding

- Initial proposals focus on;
- Six regional advice networks (based on Local Health Board areas but with Powys and West Wales combined), led by a steering group, bringing key stakeholders together quarterly to develop and progress an action plan, with annual wider engagement events.

A website offering;

- the opportunity to provide and share advice news, promote training and job opportunities
- an easy to navigate advice provider directory
- the means to make electronic client referrals to a chosen provider
- guidance resources to support and share the work of the regional networks.

Further Information

□ For further information - please contact

JJ Costello - Welsh Government - Advice Services Manager

Email: JJ.Costello001@gov.wales



Lunch



The Future of Welfare in Wales: Assembly Inquiry

Naomi Stocks, Clerk to the Inquiry



Inquiry

Examples of Welfare benefits currently administered by Welsh Government or Welsh Local Authorities:

- Discretionary Assistance Fund (DAF)
- Discretionary Housing Payments (DHP)
- Free School Meals
- Council Tax Reduction (CTR)
- Pupil Development Grant (PDG)

Examples of Welfare benefits currently administered by UK Government:

- Universal Credit
- Housing Benefit (through Local Authorities)
- Job Seeker's Allowance (JSA)
- Child Tax Credit (CTC)
- Working Tax Credit (WTC)

Inquiry

- arguments for and against the devolution of welfare benefits (10 min)
- options for different forms of devolution (i.e. Universal Credit flexibilities, the devolution of specific benefits, the ability to create new benefits etc.) (10 min)
- practical considerations of devolution (i.e. the financial implications, integration of devolved and non-devolved systems, delivery infrastructure etc.) (10min)
- the principles that could underpin the delivery of benefits in Chcymru.org.uk
 Wales. (10min)

Next Meeting 22nd May – North Wales



Diolch. Thanks.

Will Atkinson

Policy Manager, Community Housing Cymru chcymru.org.uk

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