1. **SUMMARY**

1.1. To provide an update on Waltham Forest Housing’ ("WFH") preparedness in relation to risks and mitigations of Universal Credit ("UC") full service.

1.2. LBWF entered a UC “live” service from 18th May 2015 for single new job seekers only. UC “full” service is due to roll out in Waltham Forest from February 2018 in Walthamstow Job Centre Plus (JCP) areas and May 2018 for Leytonstone JCP areas. This is expected to include a wider spectrum of household compositions (couples and families) which will present further challenges to the way income is managed.

1.3. WFH also has a number of properties outside of Waltham Forest who will be subject to full UC. There are currently 238 tenancies across Billericay / Wickford; Basildon Council will be moving to full UC in November 2017. There are 76 tenancies in Epping; Epping Forest District Council is expected to migrate to full UC in September 2018.

2. **RECOMMENDATION**

2.1. For this report to be noted and support the risk mitigation measures planned.

3. **BACKGROUND**

3.1. The Centre for Social Justice , an independent think tank established by Iain Duncan Smith, published a 370 page report called 'Dynamic benefits: Towards welfare that works’ in September 2009. The report set out the problems with the current benefit and tax credit systems before going on to set out a solution in the form of UC.

3.2. The coalition government published a consultation in July 2010 to gather views about welfare reform. The consultation document ‘21st Century welfare’ reiterated the problems in the current benefit and tax credit systems and set out a range of proposals which all involved a radical overhaul of the existing systems. The consultation closed on 1st October
2010. Following the consultation exercise, the government announced that their chosen option is UC.

3.3 In November 2010, DWP published a white paper which set out more information about UC. Alongside this, HMRC published a new consultation about real time data which is an important part of UC.

3.4 UC replaces the following benefits into one simple monthly payment for people (of working age) in and out of work and uses PAYE in real time information (“RTI”).

- Income-based Jobseeker’s Allowance (“JSA”)
- Housing Benefit
- Working Tax Credit
- Child Tax Credit
- Income-related Employment and Support Allowance (“ESA”)
- Income Support

3.5 If tenants are already claiming benefits, their local Jobcentre Plus or Tax Credits office will tell them when they have to move to UC.

3.6 If tenants are in receipt of Housing Benefit (HB), this will be included in their monthly UC payment. Tenants would then be expected to pay LBWF directly. Landlords are normally informed of all new UC claims made but in practice this has not been in all cases.

3.7 Couples who are both entitled to claim UC, shall receive one monthly joint payment paid into a single bank account.

3.8 UC is paid monthly in arrears so it can take up to six weeks after a claim is made to receive the first payment. This means rent arrears from the start.

3.9 There are no limits on how many hours a week claimants can work if claiming UC. Instead, the amount they get would gradually reduce as they earn more, so they would not lose all their benefits at once.

3.10 All UC claims have to be made online.

3.11 The UC journey is depicted in fig 1.0 below. LBWF is currently in the middle phase;

![Diagram of UC journey with phases and benefits included](image-url)
Below is a list of the corresponding London Jobcentre areas and Local Authorities that are already live with UC Full Service up to the end of June 2017.

<table>
<thead>
<tr>
<th>Month</th>
<th>Local Authority</th>
<th>Jobcentre area</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 2016</td>
<td>London Borough of Hammersmith &amp; Fulham</td>
<td>Hammersmith JCP</td>
</tr>
<tr>
<td>October 2016</td>
<td>London Borough of Lambeth</td>
<td>Kennington Park JCP</td>
</tr>
<tr>
<td></td>
<td>London Borough of Southwark</td>
<td>Peckham JCP (50%)</td>
</tr>
<tr>
<td>November 2016</td>
<td>London Borough of Hammersmith &amp; Fulham</td>
<td>Shepherds Bush JCP</td>
</tr>
<tr>
<td></td>
<td>London Borough of Southwark</td>
<td>Peckham JCP (50%)</td>
</tr>
<tr>
<td>December 2016</td>
<td>London Borough of Hammersmith &amp; Fulham</td>
<td>Fulham JCP</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Shepherds Bush JCP</td>
</tr>
<tr>
<td>February 2017</td>
<td>London Borough of Tower Hamlets</td>
<td>Poplar JCP</td>
</tr>
<tr>
<td>March 2017</td>
<td>London Borough of Tower Hamlets / City of</td>
<td>City Tower JCP</td>
</tr>
</tbody>
</table>

4. PROPOSAL

4.1 LBWF tenancies operate a weekly rental charge. As UC is paid monthly, this makes rent collection and arrears recovery on these accounts more challenging and time consuming.

4.2 As at July 2017, there were 9530 Council tenancies. The Housing Benefit (HB) composition is depicted by chart below;

![Chart showing HB composition](Fig_2.0)

4.3 From the above chart it can be seen that around 63% of our tenants are in receipt of some element of HB at present. As it stands around 50% of our rental income is received via HB. That equates to c.£28m per annum.
4.4 According to our Revenues and Benefits department there were 8,275 Council residents in receipt of HB at the end of May 2017. This includes Council Tenancies (CT) and Temporary Accommodation (TA). Table 2.0 below provides an estimated breakdown of this figure.

Table 2.0

<table>
<thead>
<tr>
<th>WFH</th>
<th>Working Age (currently 18 to 64)</th>
<th>Pensioners (exempt from UC)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Tenants</td>
<td>4218 (51%)</td>
<td>2102 (25.4%)</td>
</tr>
<tr>
<td>Temporary Accommodation</td>
<td>1929 (23.3%)</td>
<td>26 (0.3%)</td>
</tr>
</tbody>
</table>

Note: There are 26 pensioners in TA. 85% of 2300 residents in TA are currently in receipt of HB.

4.5 From the above table it can be seen that a significant proportion (51%) of current residents claiming HB are CT’s who fall into the ‘working age’ category and would therefore be subject to moving onto UC at some stage in the future. That is 44% (4218/9530) of the 63% stated in paragraph 4.3 which represents c.£12m of current rental income.

4.6 There have been no evictions to date that were solely due to arrears caused by UC.

4.7 There are currently only 14 households in TA are on UC so the financial impact is minimal. There are, however, significant TA specific risks that are identified below and, although Housing Solutions have plans to mitigate these, it is very likely that income collection in TA will be adversely affected as UC is rolled out.

4.8 In addition to the exclusions that apply to all tenures, other rules apply to TA, however these are yet to be announced. Originally the Government had been planning on excluding TA residents from UC entirely. This was then reversed, with the Government instead saying that all TA residents should be included, in line with the regulations for other tenures. However, following the pilot schemes around the country that showed that people were particularly adversely affected when they were in short term TA the Government proposed that TA residents were exempted from UC either for the first 6 weeks or until a decision had been reached on their homelessness application. A final decision had been expected in spring this year, but it was delayed because of the General Election and has still not been announced. Although Housing Solutions continue planning for UC introduction, not knowing what the final decision is hampers assessment about the financial impact that UC will have on income collection.

4.9 A characteristic of TA that could put income at risk after UC is the number of households that move through it and transfer between various forms of it. Although the number of residents in TA only changes comparatively slowly, unlike Social tenants, there is a large churn of households within that number.

4.10 In the first 6 months of 2017 there were 732 households either moving into TA for the very first time, or moving between forms of TA. Over the year this would be 1400+ households moving into a new address, a 60% churn.
4.11 The highest risk time for a benefit claim is when the household moves into a new TA address. Each of the 1,400 moves represents a risk because it is a change for UC, may mean that the person needs to attend a new JCP if they change DWP area and will require vigilance to ensure that correct payments start promptly, to the correct rent account for the new TA. Currently this is done through staff accessing Academy but after UC it will mean Income staff contacting DWP for information or calling residents in to look at their UC journal together, which could be costly for those further away and significantly more time consuming for Income officers. Housing Solutions are working with our relationship manager to reduce data sharing issues and in individual case resolution, with learning where relevant, but it will be a much slower, staff intensive process.

4.12 The sign up process itself will also be affected. At present people going into TA complete the borough’s on line HB form with the new resident. This takes in the region of 30 minutes for a single person or a couple. According to those who have already been involved in the application process, UC on line for a couple takes closer to 90 minutes. The relevant staff are receiving support and training to ensure that they are as efficient as possible, but it will be difficult to avoid any staff impact.

4.13 **Impact on WFH:** As at July 2017, we had 117 Council tenants claiming UC (WFH and TMOs combined). Our combined rent collection rate on these cases was 95.76%.

4.14 The graph below shows the level of churn for WFH UC (CT) cases since May 2015. Note, this excludes TMO’s who collectively have 15 UC cases between them at July 2017.

![Fig 4.0](image)

4.15 Since May 2015 to date we have observed our weekly HB receipts reduce from 54% to 50% (as per para 4.3). Note, this relates to Council tenancies only. The reasons for this reduction in HB over time is not clear to us nor our Benefits team and it is assumed that this is a result of various changes to circumstances of our residents i.e. gaining employment, vulnerabilities, migrating to UC. As a result we have run HB campaigns, to boost awareness and take up of HB. It could be that that the similar level of residents are claiming HB but the level of the HB awards have decreased.
over time (again, due to a change in circumstances). We do not currently have the historical data to determine this point.

4.16 The arrears on 102 WFH UC cases (CT) amount to £153,328.10 as at July 2017 which equates to average arrears of £1,503.22. At this time, we have 34 APA's in place due to cases being over 8 weeks in arrears. See table 3.0 below;

Table 3.0

<table>
<thead>
<tr>
<th>WFH UC Dashboard</th>
<th>May</th>
<th>June</th>
<th>July</th>
<th>Monthly Variance</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. of UC cases</td>
<td>91</td>
<td>98</td>
<td>102</td>
<td>4</td>
</tr>
<tr>
<td>Total UC arrears</td>
<td>£134,599.12</td>
<td>£142,594.73</td>
<td>£153,328.10</td>
<td>£10,733.37</td>
</tr>
<tr>
<td>Average UC arrears</td>
<td>£1,479.11</td>
<td>£1,455.05</td>
<td>£1,503.22</td>
<td>£48.17</td>
</tr>
</tbody>
</table>

4.17 The combined CT UC arrears (including TMO's) as at July were £182,935. This represents 5.5% of our current rent arrears including water charges. On average, combined UC total arrears appear to have increased by around £7k each month which would equate to £84k each year.

4.18 Curo Group who manage 13,000 homes across the west of England experienced an increase in UC cases by 1081 in the first year of migrating to full UC. Their rent arrears also increased by 0.29% in that year. If we assume the rate of roll out accelerates in the same way in LBWF, this would equate to an increase in overall rent arrears by £162k i.e. to £1,830,504. In other words our UC rent arrears could potentially double in just the first year. Furthermore, a survey conducted, with L&Q as the pilot, indicated that their arrears are expected to rise to 6.2% from 3.9%.

4.19 London Borough of Southwark expanded to full service in November 2016 and now has 3,960 UC cases for Council tenants of which 71% are in arrears. This works out to be 440 UC cases each month. The average level of arrears is £1151.67 and the total level of arrears for UC tenants is £3.4m which is 30% of their total arrears.

4.20 Whilst it is challenging to deal with UC cases and liaise with the DWP, the overall impact has not been so extensive to date. This is due to the relatively low numbers that we have dealt with (or know about) at this time. Nevertheless, the concept of transitioning all legacy benefits (including HB) onto UC in coming years is daunting and will need careful consideration and planning.

4.21 Housing Benefit service. This allows for close working with a service that is focussed on maximising the rental income for the Council. After UC goes live however this will change and the DWP and contact centre will vary according to which area the TA is in.

4.22 WFH presently has TA in 44 Local Authorities. Unfortunately, LA boundaries do not coincide with DWP ones and some Local Authorities having more than one DWP area in them. This means that there will be
more than 44 DWP offices and several service different Service Centres involved with our TA once UC is introduced, which will bring a range of administrative issues. For instance, the introduction of UC is phased, with new DWP areas being added every month between July 2017 and September 2018. This means that the roll out will affect various areas at different times and will be significantly more complicated to co-ordinate than working in just one DWP area to its single timetable. It will necessitate careful phasing of publicity, ensuring that households claim the correct benefit and know where their individual JCP is when they are being signed up for TA etc.

4.23 UC for single people aged under 35 in TA is restricted to the shared room rate, (for this purpose a pregnant woman counts as a single person). The shared room rate is £79 a week, the average rent that we currently charge to these cases is £202. The difference for the few people presently affected by UC is made up through DHP applications. However, there are currently 80 people in this situation in TA, which would mean a loss of £510,000 once UC is rolled out across all TA.

4.24 Mitigation could be to ensure that all people in these circumstances, where it is safe and legal, are moved to a room, where the loss is less. Placing this group in LBWF owned/leased hostels would also reduce the actual monetary cost, particularly if there are single, over 35 year old hostel residents who could be moved out and their rent not restricted.

4.25 Risk Mitigation: To date we have prepared well for UC in the sense that staff are aware of the nature and implications of UC. We remain a reactive service under UC as we are not able to determine which tenant would be impacted next. Having attended UC workshops with peers, it is apparent that we are on the right path to mitigating the risks of UC and in many cases ‘ahead of the game’ when compared to others.

4.26 In October 2017, the DWP delivered briefing sessions to front line staff across WFH on full UC and the changes this will bring. We also plan to explore what this could mean for roles in the future by delivering a pre-tenancy conference in January 2018 through an external specialist from HQN in Rental Income Excellence.

4.27 We continue to promote a Direct Debit (DD) culture within the Income Service to help tenants get into the habit of paying their priority bills monthly. Whilst we currently offer 4 dates of DD payments, it is advisable that any date of the month is made available to our tenants to choose from. This has been noted and due to be addressed through our digital offer.

4.28 Our 2017-18 CAB contract was specifically adjusted to deal with benefit appeals so UC claims would also be included in this.

4.29 We are also considering appointing a project management resource to support us with this process of migrating onto full UC roll out.

4.30 We consistently deploy Income Maximisation through early intervention. This means at sign up stage, we identify debts, benefit requirements (including UC), budgeting needs, welfare reform risk, vulnerabilities etc. We aim to carry this forward as we deem it a crucial part of our work which
can potentially ‘make’ or break’ a tenancy. We have initiated the following measures so far;

- Housing benefit ceased – Our Revenues and Benefits department inform us of tenants moving to UC from HB on a weekly basis.
- Cases in 8 weeks arrears – If arrears reach the equivalent of 2 month’s rent, the claimant will have housing payments switched to the landlord, or managed payments. This would also apply if claimants demonstrate difficulties in managing their finances or have vulnerabilities which would place their tenancy at risk.
- Rent affordability checks for new tenants to determine whether the tenant can/should receive direct payments from the start of their tenancy and work with them to become financial independent. This is based on the background knowledge we have of the tenant.
- Improve our profile of vulnerable tenants who may require switch back to direct payments.
- Financial and digital inclusion, checking that residents have banks accounts and access to the internet. If not, sign post to relevant locations in the borough. From fig 6.0, it would appear the level of digital exclusion is relatively low in Waltham Forest.

![Map showing the overall likelihood of digital exclusion](image)

**Fig 6.0**

4.31 We will need to enhance being proactive in our engagement with residents via automation which could include SMS, AVM and email contacts. This will go hand in hand with our digital strategy and operate alongside our Rent Sense contract which shall run beyond 31st October for year two of implementation.

4.32 The London boroughs of Southwark, Croydon and Hounslow were amongst the first places in the country to experience UC full service rolled out. Please see Appendix A which was sent to the Secretary of State for Work and Pension and details some of the suggestions that were made for mitigating the impacts of full UC.

4.33 As outlined in 7.10, the Council has TA in at least 43 other areas which our DWP Borough Relationship Manager (BRM) does not cover. The BRM has provided us with the contact details of other BRM’s in 22 of the areas in which TA is located. This leaves a further 21 areas that Housing Solutions is still working to find the names and contact details for. Income Services will be doing the same although for two other areas outside LBWF.
4.34 Housing Solutions will, necessarily, need to focus on building links with the higher density TA areas, probably the 11 that have more than 50 households in them, but even then it will be difficult to build the same relationship with that many areas and their respective service centres and this is likely to impact negatively on rental income, particularly in complex cases.

4.35 The Housing costs that can be paid by HB are mirrored by UC, so theoretically there should be no impact on the PRS as a direct result of UC. In actuality though there are differences that will impact. The sanctions if households do not comply with the rules on, for example, preparing for or seeking work have increased significantly. For instance, if a single person is considered to be work ready but, without a good reason, does not apply for or take up an offer of available work, they will have a reduction in their UC of £73 per week for 3 months, (£57 for a couple). If the person is sanctioned again within 12 months the sanction will increase to 6 months, with the third offence resulting in a 3 year sanction. Households subject to this level of sanction are likely to struggle to pay their rent and fall into arrears. In addition, if the person is receiving too little in their personal allowances to meet the level of sanction, the difference will come from their Housing costs, which is a new introduction.

4.36 Landlords and agents are also wary of the impact of UC to their rental stream and this may affect the borough’s ability to procure as UC is rolled out. Housing Solutions will be working with landlords to mitigate this i.e. by inviting the DWP to address the Landlord forum. One way that would reduce landlord risk and so make letting property to the Council a more attractive option is guaranteeing the rent. This moves the risk to the Council however, as with TA, the cost of maximising UC payments is likely to increase.

5. CONSULTATION

5.1 We have formed a ‘Housing’ group of key players which includes Housing Management, Housing Solutions and Income Services. Moving forward under full service, it would be a key part of UC case management within Income Services to inform Housing Management of households that are claiming UC so they can be tracked and monitored for potential tenancy breaches.

5.2 We are working with the DWP and our Revenues and Benefits department to plan local roll out of full UC service. From a Housing rents perspective, it would be useful to learn about any delivery models being considered by other parts of the Council i.e. Customer Service and Service design/commissioning as WFH would effectively be at the receiving end of any loopholes with respect to rent collection and arrears. Failure to support new UC claimants with making claims or sign posting correctly could mean delayed income for our residents which are likely to translate into delayed payment of priority bills such as rent and council tax.

5.3 Consultation is not required with all residents as UC is a government welfare reform scheme aimed at new job seekers of working age that the
Council has no control over. Impacted residents are being engaged as necessary.

6. IMPLICATIONS

6.1 Finance, Value for Money and Risk

6.1.1 UC imposes a big budgeting and prioritising responsibility on tenants. Whilst in theory, the concept is beneficial; it should be noted that this is far from straightforward for landlords and tenants. Tenants in receipt of legacy benefits will naturally be accustomed to receiving their benefits on a weekly or fortnightly basis. Under UC this will be changed to monthly starting with a 6-8 week wait for the first payment. In some instances, this will pose a dilemma on what to do with the money i.e. does the rent get prioritised or are there other less important bills and desires that need to be fulfilled? The challenges of live UC are complicated further under full UC as the number and types of cases increase and change dramatically adding further obstacles in the mix.

6.1.2 Peers operating in full UC service areas have reported a significant rise in rent arrears. UC is paid monthly which poses a big risk. The amount claimants receive is calculated each month, and depends on their circumstances and earnings during that time. This is known as an assessment period. The first assessment period usually starts 7 days after claimants submit their claim. Therefore, UC claimants would normally receive their first payment no more than seven days after their first assessment period has finished. According to an Inside Housing article dated 25/07/17, organisations around the country are calling for the seven-day waiting period on new Universal Credit claims to be removed (Barker, 2017).

6.1.3 As an example, for an assessment period of 16 July to 15 August, the first payday will be 22 August. Claimants would then receive future payments on the 22nd day of each month. This means tenants moving to UC could potentially be without any income for up 5 weeks but in reality this has been commonly between to 6-8 weeks in the initial period of making a claim. The same delay would apply to any housing costs being claimed which means inevitable rent arrears. According to an Inside Housing article dated 25/07/17 Councils are losing £6.7m in Universal Credit arrears (Barker, 2017).

6.1.4 Collection rate: Our rent collection is measured on a monthly basis i.e. from the first Monday to the Sunday after the last date of the month. Under a weekly charge and subsequent weekly HB payments, this provides a consistent picture of the rent collected each month. Under UC, housing costs (replacement for HB) would be the month’s equivalent of HB in one payment and this could be on various dates of the month for different tenants. This could distort our performance figures and take out the consistency which has been applied to date, for example the initial 6-8 week delay with new claims would negatively impact the collection figures.
6.1.5 **LIVE to FULL service:** The phased transition has helped us prepare for UC as a whole. We have embedded processes to manage and deal with UC cases efficiently and effectively. However, the challenge will be the type and number of UC cases moving forward from February 2018 onwards. This will have implications on staffing as new pressures are felt in the service. Higher arrears cases are generally more complex in nature involving tenant vulnerabilities which take longer to resolve and involve partnership working.

6.1.6 One operational challenge has been open/free liaison with the DWP, particularly for the TMO’s who manage 10% of the Council’s housing stock. As they are not strictly “LBWF” officials, the TMO’s often come across barriers to communication so Income Services are required to step in to facilitate. The current arrangement is for the TMO’s to email the LBWF UC inbox so these emails can be forwarded to UC using the LBWF email address. Responses received from UC are then forwarded onto the TMO’s.

6.1.7 **KPI’s:** These should be reflective of the upcoming challenges and a realistic view should be taken of the expected increase in arrears learning from peers and resulting collection rate. According to an Inside Housing article dated 25/07/17, “Almost three-quarters of Universal Credit claimants – or 73% – were in arrears, owing an average of £772.21, up from £611.73 a year earlier” (Barker, 2017).

6.1.8 **Evictions:** The number of evictions could rise as a knock on effect from higher arrears and court action. This could lead to negative press and subsequent increase in homelessness. Our Pre-Eviction Panel process has been refined and ensures involvement of all key stakeholders to prevent homelessness and sustain tenancies where possible.

6.1.9 **Notifications:** There are currently three ways WFH are informed about its tenants claiming UC as follows;

1. The tenant informs us directly
2. HB send us a change of benefit email
3. The DWP email us about rent cost verification

This leaves WFH vulnerable to cases where for example the DWP fail to notify us (as has been the case in some instances) and the tenant chooses not to engage, instead prioritises other bills.

6.1.10 **Sanctions:** If tenants do not keep to their UC Claimant Commitment to find work and fail to attend appointments or turn down job offers they may receive a sanction. A sanction is a reduction in their UC which is imposed if the DWP think claimants have not completed a mandatory activity that they agreed to and they cannot provide a good reason to explain why.

6.1.11 **Missing payments:** We have come across some tenant’s who insist that UC housing costs should have been received by the Council but WFH is unable to trace any record of this. With an
unclear channel of communication between WFH and the DWP, this has proven to be challenging to determine and can take time. We are of course ironing out these issues with time and now have dedicated email addresses to use for such queries.

6.1.12 **Joint tenancies:** The DWP use tenancy agreements to determine rental liabilities between named parties. We have a number of joint tenancies where either one tenant has moved out or passed away but the tenancy has remained in joint names. The DWP is therefore likely to assess the remaining tenant for 50% of the rent which is a loss in income for the Council.

6.1.13 **Financial and domestic abuse/violence:** UC is paid to one dedicated member of the household each month. Financial issues is one of the common triggers that set off abusers, alongside disagreement with the intimate partner, protracted periods of unemployment, anger escalation and jealousy / envy. This will have wider implications for Housing Management to monitor and intervene on cases that are claiming UC.

6.1.14 Protected claim start date: Unlike HB claims, claimants will not be able to make an intention to claim to protect their claim start date. Their UC claim shall be deemed to have started from the moment they submit their claim online. Learning from peers, in practice, the process of making a UC claim is more onerous and time consuming than described by the DWP. This means a level of digital support will need to be facilitated for LBWF residents. Also, as UC claims expect a claimant commitment to be made and honoured to avoid sanctions, UC claims should not be made by solely by representatives without tenants’ knowledge and undertaking. The impact of differences between full and live UC service is summarised by fig 3.0 below;

![Fig 3.0](image.png)

6.2 **Legal**

6.2.1 Court action will be inevitably rise due to complications with payments i.e. sanctions leading to partial payments. This would naturally translate into a respective increase in the legal budget. Whilst the Council can apply for a managed payment through an Alternative Payment Arrangement (“APA”), this could initially only be
done if the tenant owed 8 weeks or more rent arrears. We have recently learnt that APA’s are possible if we can demonstrate a tenant is finding it difficult to manage their finances or there are known vulnerabilities. This means we can apply for this at tenancy start as vulnerabilities are picked up at sign up stage. A level of discretion can be applied to allow time for payment to be received although we are expected to protect the Council's interest.

6.3 Equalities and Diversity

6.3.1 Whilst WFH pick up and address vulnerabilities from the start of tenancies (and throughout), there is little room for tenant vulnerabilities to be addressed with the DWP without the tenant being present. Closer working is key along with data sharing between WFH and the DWP. We have had a number of instances where tenants have not responded to calls and home visits by the Income Maximisation Team due to language barriers learning difficulties for example, thereby accrued large rent arrears as a result. Such cases inevitably progress through our rent escalation policy and proceed towards eviction.

6.4 Sustainability (including climate change, health, crime and disorder

6.4.1 Whilst there is no evidence to date of implications on health, crime and disorder as a direct result of UC in Waltham Forest, these may be areas that could be triggered by the financial hardship that is imposed by the very nature of UC.

6.5 Council Infrastructure (e.g. human resources, accommodation or IT issues

6.5.1 Our internal process for requesting APA’s is established and the Income Maximisation Team are familiar with the forms that need completing. We have introduced a template document to be used via Northgate for responding to DWP enquiries regarding housing costs. This is to help manage the churn as the number of cases increase.

6.5.2 Our in-year UC rent collection and arrears reporting are in place however, in preparation for full service, we are working across the Rent Service and Housing Management to carry out targeted Tenancy Audits to enhance the data held on Northgate. This will help us to identify and report more accurately on the number of tenants that are and can potentially be impacted by UC. With this information we can target specific cohorts of tenants. For example, one of the targeted projects we did previously was working with single tenants under 35 who are subject to UC under the live service.