



Homeless Action Scotland

Consultation on Universal
Credit
(Claims and Payments)
(Scotland)
Regulations 2017

Jules Oldham
Head of Policy & Operations
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UC Response

1. Do the draft regulations meet the policy intent of offering a choice to applicants on having their UC payments made twice monthly?

Homeless Action Scotland is pleased to see the possibility of having UC payments made on a more frequent basis than monthly, and agree that the draft regulations meet the policy intent.

However, we do wish to highlight the following points to allow this to work with as little confusion, and as much long term stability to the claimant as possible:

Payment frequency

1) Ideally, to allow for the payments to be easy to manage (considering it will be a high percentage of vulnerable people who choose this option) we would request this is changed to being every two weeks / fortnightly, rather than the suggested twice monthly. This would allow the amount to remain the same, and the day of payment easy to both remember and manage.

or

2) If the above is not possible, we would hope there can be set dates provided to the claimant that would be applicable from month to month to allow for budgeting and planning. For example, a claimant would know that every 3rd and 18th of the month, (whether it was a month with 28, 29, 30 or 31 days) they would receive their payment.

If the second of the options was used, we would also request that there was no postcode attachment (or similar pattern) used to apply dates; it should not be easy for other people to know when someone is receiving money unless the claimant has told them. This adds a small level of security (for instance, from loan sharks) to some more vulnerable claimants. For example, everyone in EH12 should not receive their payments on the 7th and the 22nd of every month, it should vary from person to person in that area.

Meeting the Criterion

We would also recommend that the request for a more frequent payment is not an option only to be available to people who meet a set criterion. Where there has been a request for a more frequent payment, it could be someone who would not meet any exemption needs, but who budgets better on a shorter time frame, and by doing so avoids getting into financial difficulties.

Taking this into account, we would suggest the two payments are offered as standard to everyone; to enable people to make the decision that best suits their financial

circumstances, and for it not to become something people a) need to know of before being able to access or b) need to be in difficulty to access.

Reverting to monthly payments



In addition to this, we would request for the change not to be implemented for short time periods, unless requested by the claimant. Sorting financial plans to suit one timeframe, only for it then to revert to another could be more detrimental to someone's finances than the payment remaining the same. All changes should only be made at the request of the claimant.

Overall, we would request the option to be as person centred and accessible as possible.

2. Do the draft regulations meet the policy intent of offering a choice to UC applicants on managed payments of rent direct to landlords?

Homeless Action Scotland is pleased to see the option for rental payments to be made directly to landlords. We agree that the regulations meet the policy intent, and see this option as a provision that works in line with someone not in receipt of benefits who pays rent or a mortgage. In many cases this provides a better safety net for the claimant than money needing to be paid via them.

However, we would like to take this opportunity to highlight the importance of a claimant having the choice to opt into this method, rather than the process being imposed. It should be clear to the claimant:



that they pay rent



how much rent is being paid



to whom it is being paid



how to (start and) stop the payments being paid through the direct payment process

We would expect this to be standard for all types of tenancies and accommodation, preventing the situation where someone is of the belief that they "don't pay rent".

As with our response to question 1, we would request the option to be as person centred and accessible as possible.

Homeless Action Scotland gives full permission for this submission to be published.

Submitted by Jules Oldham, Head of Policy & Operations, Homeless Action Scotland, Stanhope House, Stanhope Place, Edinburgh, EH12 5HH

jules@homelessactionsotland.org.uk