



FINANCIAL INCLUSION POLICY

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1.0 Scope

This policy applies to:

- all of the council's social housing tenants;
- all applicants to the council's Housing Register for social housing

2.0 Purpose

The purpose of this policy is to improve the financial inclusion of social housing tenants and applicants to the Housing Register for social housing within the borough.

Financial inclusion is defined by the World Bank as follows:

“Financial inclusion means that individuals and businesses have access to useful and affordable financial products and services that meet their needs – transactions, payments, savings, credit and insurance – delivered in a responsible and sustainable way.

Being able to have access to a transaction account is a first step toward broader financial inclusion since a transaction account allows people to store money, and send and receive payments.”

Aspects of Financial Inclusion include:

- Access to bank accounts
- Identity verification issues
- Digital exclusion
- Recent trends in saving
- Access to credit
- Financial education and capability
- Self-exclusion

For the purposes of this policy, all references to “tenants” include tenants of Broxtowe Borough Council and applicants registered on the Homesearch Choice Based Lettings system for social housing with Broxtowe Borough Council.

3.0 Aims and Objectives

The aim of this policy is to help identify and provide support to social housing tenants who may be at risk of, or experiencing financial exclusion within wider society.

The objective of this policy is for the council to work with tenants to provide support and advice to improve the financial inclusion of tenants by providing debt advice,

welfare benefits advice and financial capability education. The support to tenants may include, but is not limited to:

- To provide support and advice to help tenants maintain a tenancy;
- To assist tenants to complete forms and act as an advocate for tenants;
- To provide debt management advice and budgeting advice.
- To assist in setting up bank accounts and source cheaper fuel providers
- To provide access to affordable, accessible contents insurance
- To provide some financial education
- Signposting and referrals to partner agencies for specialist advice

4.0 Regulatory Code and Legal Framework

This policy is set within the context of relevant legislation such as:

- The Housing Act 1985
- The Housing Act 1989
- The Equality Act 2010
- The Human Rights Act 1998
- The Pre-Action Protocol for possession Claims by social landlords 2015

5.0 Policy

5.1 Financial Inclusion Service

5.1.1 Role of the Financial Inclusion Officer

Broxtowe Borough Council offers a Financial Inclusion service to applicants on the waiting list for housing and tenants.

The service will:

- Carry out home visits as required
- Offer budgeting advice and support
- Assist tenants to make applications for welfare benefits
- Give basic debt advice
- Signpost & make referrals to other agencies
- Access funding from voluntary organisations
- Provide information about bank accounts
- Provide information about services available from credit unions
- Provide information about affordable energy

The following are out of scope of the service:

- Providing advice about bank accounts or any other financial products
- Insolvency

- Benefit appeals

5.2 Pre-tenancy commencement

The council will:

- Carry out an affordability assessment prior to the formal offer of accommodation being made, to ensure that the property is affordable and sustainable in the long term.
- Offer referrals to the financial inclusion officer or Citizens Advice
- Provide an Energy Performance Certificate to each prospective tenant so that they are aware of the potential energy costs for the property, as well as further energy saving measures they may take.

5.3 Post-tenancy commencement

The council will:

- Promote the role of the Financial Inclusion Officer and other financial advice services to vulnerable tenants across the district.
- Offer and promote the Tenants' Home Contents insurance scheme which may be paid for on a weekly basis
- Work in partnership with internal council departments and external agencies, such as Citizens Advice to help tenants sustain their tenancy;
- Offer a wide range of rental payments, including Direct Debit and help tenants access appropriate bank accounts to support Direct Debit;
- Raise awareness of affordable credit and other financial products available via the local credit union
- Promote access to training and pre-employment courses when possible

5.4 Monitoring and Good Practice

5.4.1. Monitoring

The financial inclusion officer will be responsible for recording relevant data about all referrals. This will be monitored by the Income Collection Manager for consistency and good practice.

5.4.2. Good Practice

All financial inclusions officers employed by the council will be affiliate members of the Institute of Money Advisers and work to the IMAs statement of Good Practice (appendix 1).

6.0 Related Policies, Procedures and Guidelines

This policy should be read in conjunction with the following council documents:

- Tenancy Agreement
- Rent Arrears Policy and Rent Recovery Procedure
- Discretionary Housing Payments Policy
- People with Additional Support Needs Policy
- Allocations Policy

7.0 Review of the Policy

This policy will be reviewed every three years. It is not expected that there will be changes to regulation or legislation which will have an impact on the need to review this policy sooner.

8.0 Document History and Approval

Date	Version	Committee Name
5/06/2019	1	Housing Committee

Appendix 1 – Statement of Good Practice

The Institute of Money Advisers

MONEY ADVICE STATEMENT OF GOOD PRACTICE A Statement of Good Practice for Money Advice Organisations

THE OUTLINE

1.1 This document aims to be a statement of what is generally held to be good money advice practice by the members of the Institute of Money Advisers (IMA).

1.2 It recognises that advisers are operating in a variety of organisations and that the organisations prescribe the tasks they will and will not carry out and the manner in which they will be completed. The IMA has neither the desire nor the ability to interfere in this relationship.

1.3 The Statement covers the relationships between adviser and client, and adviser and creditor. It aims to offer all parties a clear ethical framework within which to operate.

THE SERVICE PROVIDER

The service provider will:

2.1 Be licensed by the Financial Conduct Authority under the appropriate category to provide unless exempt.

2.2 Have professional indemnity and public liability insurance or other appropriate arrangements in place.

2.3 Provide the service free of charge to the client at the point of delivery. Clients will not be charged for any part of the advice or service

2.4 Process all data held in line with Data Protection and Freedom of Information legislation as appropriate.

2.5 Comply with all Health & Safety, Equal Opportunities and Human Rights legislation.

2.6 Ensure, except where a service exists specifically to meet the needs of a particular community, the adviser will not discriminate between clients on the grounds of sex, marriage, race, colour, nationality, ethnic or national origin, disability, age, sexual orientation or religion.

2.7 Ensure the remit, boundaries and limitations of the service are identified in writing to the client.

2.8 Ensure that a written complaints procedure is in place and all service users are made aware of the process.

2.9 Provide unbiased independent confidential advice and take up issues with appropriate authorities or organisations on behalf of individuals or groups.

THE ADVISER

The adviser will:

3.1 Offer clients the full range of options for resolving their debt problems according to their individual circumstances; explain the consequences of each option to enable clients to make informed choices and ensure that all advice given is in the best interest of the individual client.

3.2 Provide impartial advice and not seek to favour any particular creditor or group of creditors; except insofar as different methods of enforcement laid down by statute for different types of debt will be reflected in the priorities and repayments negotiated by advisers.

3.3 Explain clearly the potential consequences of non-payment of any particular debt.

3.4 Be non-judgmental, and give advice and assistance regardless of how debts have arisen.

3.5 Not knowingly aid or abet the continuance of fraudulent activity by a client, taking cognisance of current legislation and any protocol produced by the adviser's agency or organisation in this regard

3.6 Ensure that priorities in dealing with debts are those of the informed choice of the client, not those of the adviser.

3.7 Reserve the right to withdraw their service from any client who wishes to pursue courses of action which could be detrimental to the credibility of their organisation and advise of the consequences of such courses of action.

3.8 Attempt to empower the client to take control of her/his own financial affairs and avoid unnecessary dependency upon the adviser and/or the agency.

3.9 Regularly update the client and her/his creditors of any significant developments in the case and record details in accordance with the adviser's agency or organisation's recording system.

3.10 Develop and agree with the client a course of action, which clearly specifies the methods, time scales and responsibilities for delivering the client's chosen course of action and record this clearly in the client's case notes.

3.11 Carry out all actions in line with their agency/organisation's service delivery standards.

3.12 Refer/signpost the client to an appropriate agency, where issues fall beyond the boundaries of the adviser's agency or organisation's service, with the permission of the client.

3.13 Inform the client where her/his case has been closed and warn her/him that s/he might now be contacted directly by creditors but that s/he can seek further advice and/or assistance from the adviser as necessary

3.14 Advise of the level of advocacy and support available and offer representation before appropriate bodies, e.g. the County Court where resources are sufficient to allow this.

3.15 Ensure that all correspondence is written in plain language taking account of the need to comply with any legal formalities.

3.16 Ensure that they keep up to date with changes in relevant legislation, practice and policies which may affect their work.

THE CREDITOR

The service provider offers the creditor the following assurances: -

The adviser will:

4.1 Treat all creditors impartially at all times and not seek to give any creditor priority over any other in a similar position.

4.2 Take reasonable steps to verify clients' income and outgoings in order to authenticate the client's circumstances in accordance with the FCA's Handbook of Rules and Guidance, the relevant section for debt advice is CONC 8, wherever possible.

4.3 Not discuss opinions or judgements of the client's behaviour with creditors.

4.4 Carry out all agreed actions in line with the adviser's agency / organisation's service delivery standards.

4.5 Inform the creditor when the client's case has been closed in the following circumstances: (i) the adviser has been unable to obtain instructions from the

client for dealing with her/his case or (ii) the client has specifically informed the adviser that s/he wishes to carry on dealing with the case in person.

GENERAL

The adviser will:

6.1 Provide the appropriate level of support to enable the client to report examples of unfair or illegal practices to Trade Associations, the Financial Conduct Authority, local Trading Standards Departments, the Financial Ombudsman or other Regulators where appropriate.

Transfer/copy papers relating to the case only with the client's written consent, when they choose to use another service