

Cabinet

Tuesday 31 October 2017

4.00 pm

Ground Floor Meeting Room G02A - 160 Tooley Street, London
SE1 2QH

Appendices (part 1)

List of Contents

Item No.	Title	Page No.
11.	Introduction of Public Space Protection Orders (PSPOs) to tackle dog related anti-social behaviour (ASB) Appendices 1, 2, 3, 4, 5, 6, 8 and 9 (appendix 7 online)	1 - 43
12.	Safe as Houses Independent Social Research into Early Impacts of Universal Credit (UC) among Social Housing Tenants Appendix 1	44 - 126

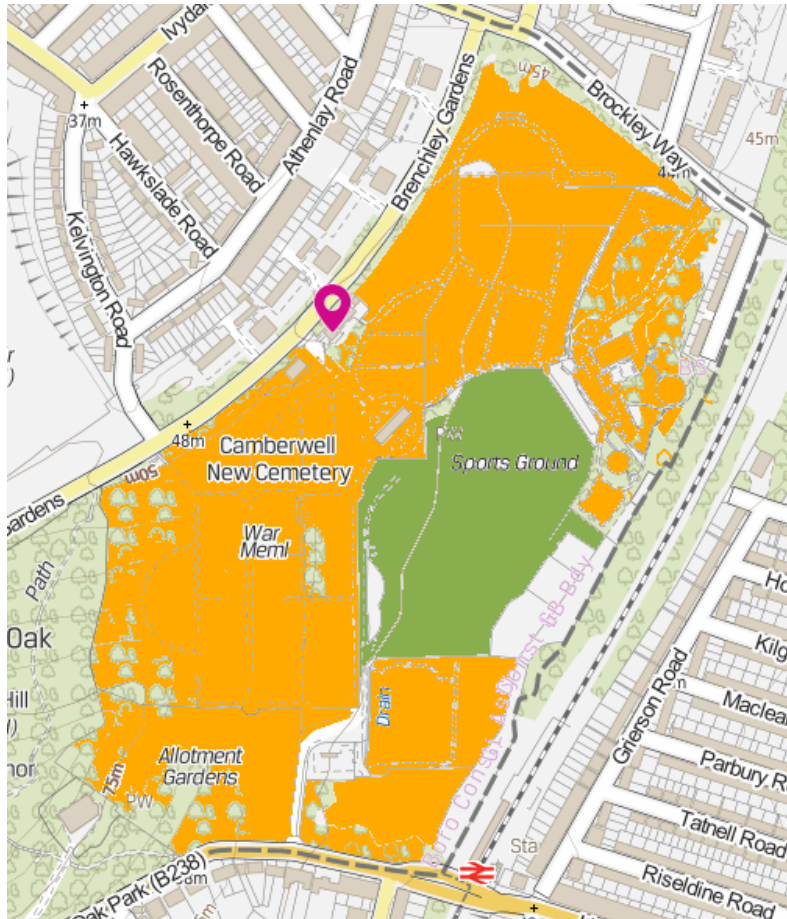
Contact

Paula Thornton 020 7525 4395 or email: paula.thornton@southwark.gov.uk
Webpage: www.southwark.gov.uk

Date: 23 October 2017

APPENDIX 1

PSPO restrictions and requirements – Camberwell New Cemetery and Honor Oak Crematorium



Amber Zone indicates PSPO provision for:

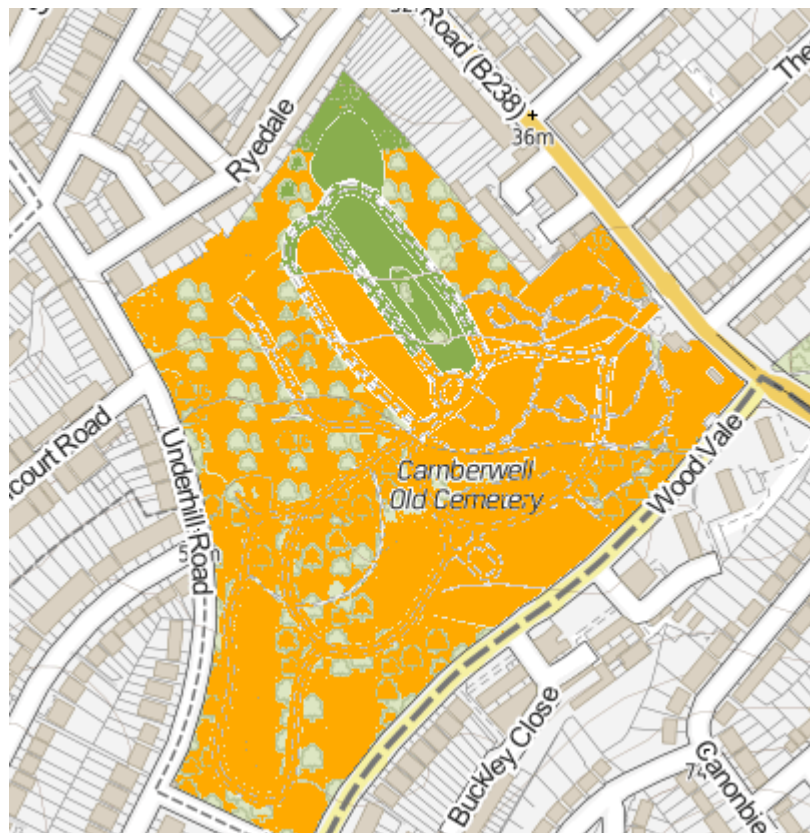
- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

APPENDIX 2

PSPO restrictions and requirements – Camberwell Old Cemetery



Amber Zone indicates PSPO provision for:

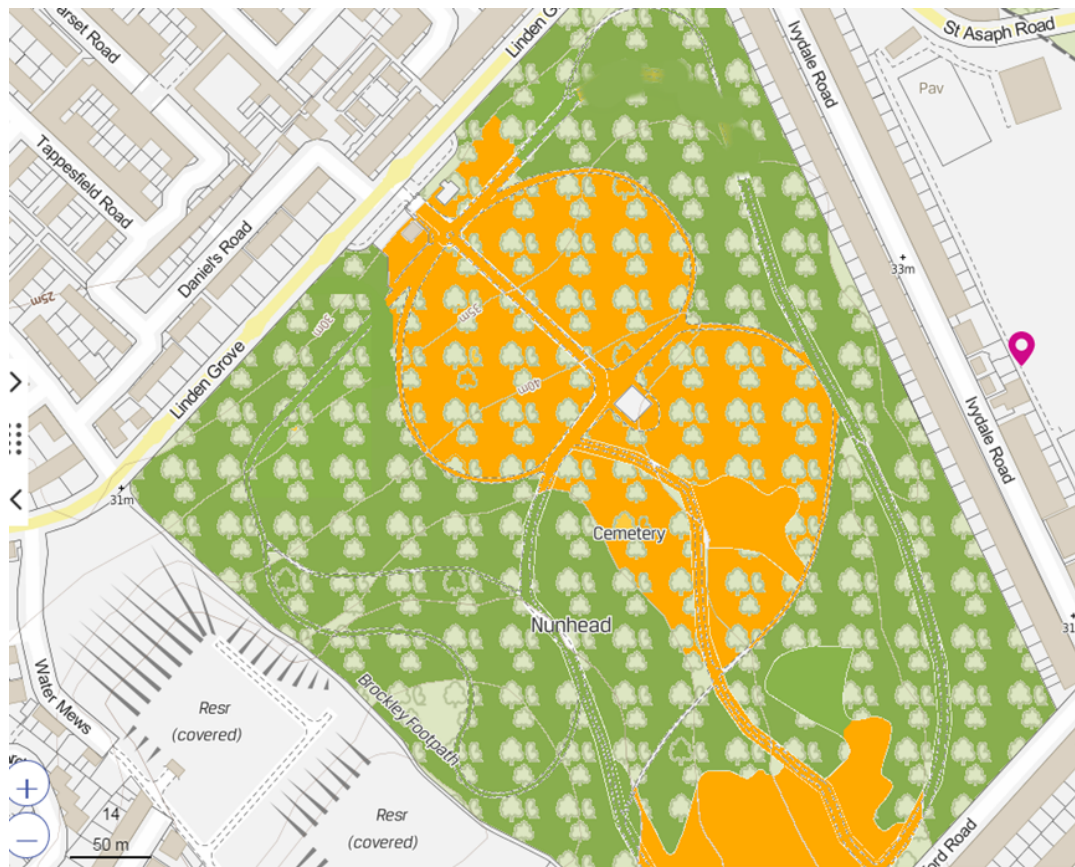
- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

APPENDIX 3

PSPO restrictions and requirements – Nunhead Cemetery



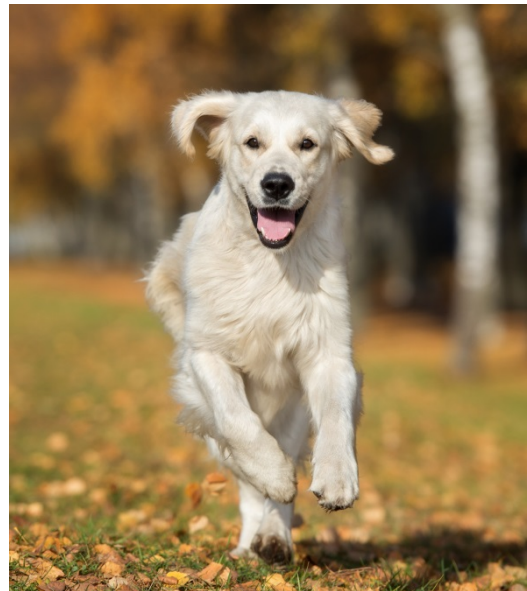
Amber Zone indicates PSPO provision for:

- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

Join our **COMMUNITY** CONVERSATION



Let's talk about... responsible dog ownership

Have your say on how we can reduce dog related anti-social (ASB) behaviour within Southwark.

In order to reduce dog related ASB and encourage responsible dog ownership, Southwark Council would like to introduce a Public Space Protection Order (PSPO) to include the following:

- For those responsible for a dog(s) to pick up and dispose of any dog mess
- To exclude dogs from children's play areas
- To keep dogs on leads at all times within cemeteries and burial grounds
- To put a dog on a lead when instructed to do so by an authorised officer
- To limit the number of dogs under the control of one owner (maximum of four) – replacing the current Dog Control Order provision

The majority of dog owners and walkers in Southwark behave responsibly, but dog related anti-social behaviour is still a concern for Southwark residents.

Please complete the questionnaire enclosed by 5 June 2017, to share your views on our proposals and the potential options for extending controls.

Further information on PSPOs can be found at the end of this questionnaire.

Dog related anti-social behaviour questionnaire

- 1) Do you support a borough-wide Public Space Protection Order (PSPO) to make it a requirement for dog walkers to pick up after their dog(s)?
 - Agree strongly
 - Agree
 - Disagree
 - Disagree strongly

- 2) Do you support the proposal to exclude dogs from children's play areas?
 - Agree strongly
 - Agree
 - Disagree
 - Disagree strongly

- 3) Do you support the proposal for dogs to be on leads within cemeteries and burial grounds at all times?
 - Agree strongly
 - Agree
 - Disagree
 - Disagree strongly

- 4) Do you think that dogs should be excluded from cemeteries and burial grounds?
 - Agree strongly
 - Agree
 - Disagree
 - Disagree strongly

- 5) Do you think that dogs should be put on a lead when instructed to do so by an authorised officer?
 - Agree strongly
 - Agree
 - Disagree
 - Disagree strongly

- 6) Do you think that a PSPO should be introduced limiting the number of dogs under the control of one walker to a maximum of four within Southwark's cemeteries?
 - Agree strongly
 - Agree
 - Disagree

- Disagree strongly

7) Do you think that a PSPO should be introduced limiting the number of dogs under the control of one walker to a maximum of four within Southwark's parks and open spaces?

- Agree strongly
- Agree
- Disagree
- Disagree strongly

8) Do you think that a PSPO should be introduced limiting the number of dogs under the control of one walker to a maximum of four borough wide?

- Agree strongly
- Agree
- Disagree
- Disagree strongly

9) Do you think that a PSPO should be introduced requiring dogs to be on leads at all times in Southwark's designated nature reserves?

- Agree strongly
- Agree
- Disagree
- Disagree strongly

10) Do you think that a PSPO should be introduced requiring dogs to be excluded from Southwark's designated nature reserves?

- Agree strongly
- Agree
- Disagree
- Disagree strongly

11) Do you have any other ideas or comments on the dog related ASB PSPO proposal not covered by the above questions?

12) Please tell us about any locations or areas where you feel dog mess is a particular problem.

Thank you for your views.

Equality monitoring

Please confirm if you are filling in this form as:

- 1) Individual
- 2) Dog owner
- 3) Professional dog walker
- 4) On behalf of a group (please tell us which group)

(Please circle the most appropriate option above)

Are you a Southwark resident?

Yes

No

(Please circle the most appropriate option above)

Age

Are you...

<input type="checkbox"/> Under 16	<input type="checkbox"/> 35-44	<input type="checkbox"/> 75-84
<input type="checkbox"/> 16-17	<input type="checkbox"/> 45-54	<input type="checkbox"/> 85-94
<input type="checkbox"/> 18-24	<input type="checkbox"/> 55-64	<input type="checkbox"/> 95+
<input type="checkbox"/> 25-34	<input type="checkbox"/> 65-74	

Disability and health

Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

Yes, limited a little

Yes, limited a lot

No, not limited

Please tick the box or boxes below which best describes the nature of your impairment(s):

<input type="checkbox"/>	Hearing / Vision (e.g. deaf, partially deaf or hard of hearing; blind or partial sight)
<input type="checkbox"/>	Physical / Mobility (e.g. wheelchair user, arthritis, multiple sclerosis etc.)
<input type="checkbox"/>	Mental health lasting more than a year (e.g. severe depression, schizophrenia etc.)
<input type="checkbox"/>	Learning difficulties (e.g. dyslexia, dyspraxia etc.)
<input type="checkbox"/>	Memory problems (e.g. Alzheimer's etc.)

If you wish to specify your impairment, please do so here:

National identity

What do you consider to be your national identity?

Ethnicity

What do you consider to be your ethnicity? Please pick one section below and tick one box.

White or White British

- | | |
|--|---|
| <input type="checkbox"/> British | <input type="checkbox"/> Northern Irish |
| <input type="checkbox"/> English | <input type="checkbox"/> Irish |
| <input type="checkbox"/> Scottish | <input type="checkbox"/> Gypsy, Roma or Irish Traveller |
| <input type="checkbox"/> Other White (please specify if you wish): | |

Black or Black British

- | | |
|--|---|
| <input type="checkbox"/> Black British | <input type="checkbox"/> Sierra Leonean |
| <input type="checkbox"/> Caribbean | <input type="checkbox"/> Somalian |
| <input type="checkbox"/> Nigerian | <input type="checkbox"/> Other African |
| <input type="checkbox"/> Other Black (please specify if you wish): | |

Asian or Asian British

- | | |
|--|-------------------------------------|
| <input type="checkbox"/> Asian British | <input type="checkbox"/> Pakistani |
| <input type="checkbox"/> Indian | <input type="checkbox"/> Vietnamese |
| <input type="checkbox"/> Bengali | <input type="checkbox"/> Filipino |
| <input type="checkbox"/> Any other Asian (please specify if you wish): | |

Mixed Background

- White and Black Caribbean
- White and Black African

White and Asian

Other mixed background (please specify if you wish):

Other Ethnicities

Arab

Latin American (please specify if you wish):

Any other ethnicity (please specify if you wish):

Preferred language

What is your preferred language?

English

Other (please specify if you wish):

Religion or belief

What is your religion or belief?

Christian

Jewish

Sikh

Buddhist

Hindu

No religion

Other religion or belief (please specify if you wish):

Marriage or civil partnership status

Are you married or in a civil partnership?

Married

Registered in a civil partnership

Divorced

Formerly in a civil partnership which is now legally dissolved

Widowed

Surviving member of a civil partnership

Sex

Are you...

Male

Female

Gender reassignment

Is your gender identity the same as the gender you were assigned at birth?

Yes

No

Pregnancy or maternity

Are you currently pregnant and/or on maternity leave?

Yes

No

Sexual orientation

Are you...

Heterosexual/straight

Gay man

Lesbian/Gay woman

Bi-sexual

If you prefer to use your own term please specify this here:

Further information

What is a Public Space Protection Order?

Public Space Protection Orders (PSPOs) were introduced under the Anti-Social Behaviour Crime and Policing Act 2014. These orders allow us to impose conditions on the use of a particular area that will help us to deal with a nuisance or problem that is detrimental to the local community's quality of life.

What happens if someone doesn't comply with requirements of a PSPO?

Breach of a PSPO is a criminal offence, subject to a fine of up to £1000.

A breach occurs when a person without reasonable excuse:

- does anything that they are prohibited from doing by a PSPO
- fails to comply with a requirement of a PSPO

A Fixed Penalty Notice (FPN) can be issued, which discharges liability to conviction for the offence, unless unpaid. The FPN can be issued by a police officer or council officer up to a maximum value of £100.

Why introduce a PSPO?

The majority of dog owners and walkers in Southwark behave responsibly, but dog related anti-social behaviour is still a concern for Southwark residents and is one of the greatest sources of complaints from communities received by the Community Warden's Service. Residents have reported being attacked and frightened by 'packs of dogs', dogs knocking over children, disrupting funeral services and attacks on animals within Southwark's cemeteries, parks and open spaces.

Dog mess is unpleasant which, if not picked up, can pose a health risk from Toxocariasis. This disease is caused by coming into contact with the dog mess of dogs that haven't been properly wormed. Symptoms of Toxocariasis can include fever, headaches, a cough and more rarely, seizures and blurred vision which can lead to blindness if not treated.

Introduction of a PSPO for dog related ASB will mean that officers can issue fixed penalty notices to dog owners who behave irresponsibly.

For further information please email: Dogpspo@southwark.gov.uk



THE KENNEL CLUB

Making a difference for dogs

Kennel Club Response to Southwark Council Public Spaces Protection Order Consultation

Submitted on 5th June 2017 by: The Kennel Club, Clarges Street, Piccadilly, London W1J 8AB, tel: 020 7518 1020, email: kcdog@thekennelclub.org.uk

The Kennel Club is the largest organisation in the UK devoted to dog health, welfare and training, whose main objective is to ensure that dogs live healthy, happy lives with responsible owners. As part of its External Affairs activities the Kennel Club runs a dog owners group KC Dog with approximately 5,000 members, which was established to monitor and keep dog owners up to date about dog related issues, including Public Spaces Protection Orders (PSPOs) being introduced across the country.

As a general principle we would like to highlight the importance for all PSPOs to be necessary and proportionate responses to problems caused by dogs and irresponsible owners. It is also important that authorities balance the interests of dog owners with the interests of other access users.

Comments on consultation process

We would like to welcome the proactive approach the Council has taken in promoting this consultation. The consultation plan demonstrates thought was put into the process. In addition to social media posts, we also found signs promoting the consultation during a site visit to Nunhead Cemetery.

However, we have been contacted by a local dog walker who is concerned that local pressure groups may be making multiple submissions to the consultation in support of enhanced restrictions on dog owners. If possible, we would ask the Council to check for duplicated IP addresses of those responding to the online consultation form.

Response to proposed measures

Dog fouling

The Kennel Club strongly promotes responsible dog ownership, and believes that dog owners should always pick up after their dogs wherever they are, including fields and woods in the wider countryside, and especially where farm animals graze to reduce the risk of passing Neospora and Sarcocystosis to cattle and sheep respectively.

We would like to take this opportunity to encourage the local authority to employ further proactive measures to help promote responsible dog ownership throughout the local area in addition to introducing Orders in this respect.

These proactive measures can include: increasing the number of bins available for dog owners to use; communicating to local dog owners that bagged dog poo can be disposed of in normal

litter bins; running responsible ownership and training events; or using poster campaigns to encourage dog owners to pick up after their dog.

Dog access

The Kennel Club does not normally oppose dog exclusion or dog on lead orders in playgrounds, or enclosed recreational facilities such as tennis courts or skate parks, as long as alternative provisions are made for dog walkers in the vicinity. We would also point out that children and dogs should be able to socialise together quite safely under adult supervision, and that having a child in the home is the biggest predictor for a family owning a dog.

The Kennel Club can support reasonable “dogs on lead” orders, which can - when used in a proportionate and evidenced-based way – include areas such as, picnic areas, or on pavements in proximity to cars and other road traffic.

The council should be aware that dog owners are required, under the Animal Welfare Act 2006, to provide for the welfare needs of their animals and this includes providing the necessary amount of exercise each day. Their ability to meet this requirement is greatly affected by the amount of publicly accessible parks and other public places in their area where dogs can exercise without restrictions. This section of the Animal Welfare Act was included in the statutory guidance produced for local authorities by the Home Office on the use of PSPOs.

Accordingly, the underlying principle we seek to see applied is that dog controls should be the least restrictive to achieve a given defined and measurable outcome; this is the approach used by Natural England. In many cases a seasonal or time of day restriction will be effective and the least restrictive approach, rather than a blanket year-round restriction. For instance a “dogs exclusion” order for a beach is unlikely to be necessary in mid-winter.

The Government provided clear instructions to local authorities that they must provide restriction free sites for dog walkers to exercise their dogs. This message was contained in the guidance document for DCOs, and has been retained in both the Defra/Welsh Government and Home Office PSPO guidance documents, with the Defra guidance for PSPOs stating ‘local authorities should ensure there are suitable alternatives for dogs to be exercised without restrictions’.

A common unintended consequence of restrictions is displacement onto other pieces of land, resulting in new conflict being created. It can be difficult to predict the effects of displacement, and so the council should consider whether alternative sites for dog walkers are suitable and can support an increase in the number of dog walkers using them.

To be compliant with the Public Sector Equality Duty we submit the council should consider the accessibility of restriction free alternatives for those with reduced mobility (including but not limited to those with a disability or elderly persons for instance). Alongside considering any direct impact as a result of the PSPO upon those with protected characteristics.

We welcome the inclusion of “dog on lead by direction” provisions, which should allow a more targeted approach to tackle the individuals who allow their dogs to run out of control. We would also recommend local authorities make use of the other more flexible and targeted measures at their disposal such as Acceptable Behavioural Contracts and Community Protection Notices. Kennel Club Good Citizen Training Clubs and our accredited trainers can also help those people whose dogs run out of control due to them not having the ability to train a good recall.

Nature reserves and cemeteries

We are concerned about the proposal to introduce a PSPO to protect nature reserves. We would submit that the legal test for the introduction of a PSPO can't be met purely on the basis of protecting nature. The Anti-social Behaviour, Crime and Policing Act 2014 is clear that a PSPO can only be introduced 'where activities have had or are likely to have a detrimental effect on the quality of life of those in the locality...'. It is clear from the Act, its accompanying explanatory notes and Government guidance documents that this is referring to the effects on people, and not other non-human species.

From the information available to us, there is no apparent evidence to show detrimental effects on people in the locality. Thus, we submit that a PSPO introduced on the stated disturbance to nature is flawed.

We would be happy to work with the council to develop more appropriate measures to mitigate against potential negative impacts of dogs to sensitive nature reserves.

We understand that the proposals surrounding nature reserves are meant to mainly restriction dogs at Nunhead Cemetery. On the Friends of Nunhead Cemetery Group we found the following text: 'Since its formation in 1981, FONC has taken the view that owners exercising their dogs responsibly in the cemetery were welcome. This was because in the early days we were keen to encourage such visitors since the cemetery had been largely shunned by the public and dog-walkers went some way to discouraging vandals and other unwelcome visitors from anti-social behaviour.' We believe that if on lead and exclusion orders are introduced at the cemetery then the amount of dog owners visiting will fall as the most important amenity for dog owners is off lead exercise.

Typically, the Kennel Club would not oppose a dogs on lead restriction for a cemetery to ensure mourners are not unduly disturbed by off-lead dogs. However, having visited Nunhead Cemetery we would submit a formalisation of the current zoning approach would be a more locally appropriate solution.

With regard to excluding dogs from these sites, it is important the Council takes account of section 64 of the Anti-social Behaviour, Crime and Policing Act 2014. Which provides clear rules regarding 'Orders restricting public right of way over highway'. In law, dogs are considered as a natural accompaniment to pedestrians, in the same manner a pram or pushchair is. Given that highways (including public rights of way) run through some (if not all) of these sites, we therefore submit this section of the Act is applicable.

These requirements are distinct and additional to the standard consultation, publicity and notification requirements as detailed under Section 72 of the Act.

Maximum number of dogs a person can walk

The Kennel Club feel that an arbitrary maximum number of dogs a person can walk is an inappropriate approach to dog control that will often simply displace and intensify problems in other areas. The maximum number of dogs a person can walk in a controlled manner depends on a number of factors relating to the dog walker, the dogs being walked, whether leads are used and the location where the walking is taking place.

An arbitrary maximum number can also legitimise and encourage people to walk dogs up to the specified limit, even if at a given time or circumstance, they cannot control that number of dogs.

We thus suggest that defined outcomes are used instead to influence people walking more than one dog, be that domestically or commercially, such as dogs always being under control, or not running up to people uninvited, on lead in certain areas etc.

For example, an experienced dog walker may be able to keep a large number of dogs under control during a walk, whereas an inexperienced private dog owner may struggle to keep a single dog under control. Equally the size and training of the dogs are key factors; this is why an arbitrary maximum number is inappropriate. The Kennel Club would recommend the local authority instead uses “dogs on lead by direction” orders and targeted measures such as Acceptable Behaviour Contracts and Community Protection Orders to address people who don’t have control of the dogs they are walking.

A further limitation of a maximum number of dogs per person is that that it does not stop people with multiple dogs walking together at a given time, while not exceeding the maximum number of dogs per person. Limits can also encourage some commercial dog walkers to leave excess dogs in their vehicles, which can give rise to welfare concerns.

If a maximum number of dogs is being considered due to issues arising from commercial dog walkers, we instead suggest councils look at accreditation schemes that have worked very successfully in places like the East Lothian council area. These can be far more effective than numerical limits, as they can promote wanted good practice, rather than just curb the excesses of just one aspect of dog walking. Accreditation can also ensure dog walkers are properly insured and act as advocates for good behaviour by other dog owners. The Kennel Club is currently developing a national Code of Practice for Commercial Dog Walking for launch in 2017, alongside a national accreditation and training scheme that councils can work with us to apply and promote in their areas.

Assistance dogs

We request that appropriate exemptions are put in place for those who rely on an assistance dog and registered blind people. There are in total seven charities training registered assistance dogs in the UK that we submit should be included. We would suggest that to find out more information about the range of assistance dogs now legally recognised under disability legislation in the UK that need to be accommodated, go to www.assistancedogs.org.uk.

For the proposed dog fouling measures we suggest the Council adopts the following wording:

This offence does not apply to a person who –

- a) is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
- b) has a disability which affects his mobility, manual dexterity, physical coordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a prescribed charity and upon which he relies for assistance.

For the dog access restrictions including dog exclusion we submit the Council adopts the following wording:

These offences do not apply to a person who –

- a) is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
- b) is deaf, in respect of a dog trained by Hearing Dogs for Deaf People (registered charity number 293358) and upon which he relies for assistance; or
- c) has a disability which affects his mobility, manual dexterity, physical coordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a prescribed charity and upon which he relies for assistance.

Appropriate signage

It is important to note that in relation to PSPOs the “The Anti-social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014” make it a legal requirement for local authorities to –

“cause to be erected on or adjacent to the public place to which the order relates such notice (or notices) as it considers sufficient to draw the attention of any member of the public using that place to -

- (i) the fact that the order has been made, extended or varied (as the case may be);
and
- (ii) the effect of that order being made, extended or varied (as the case may be).”

With relation to dog access restrictions such as a “Dogs on Leads Order”, on-site signage should make clear where such restrictions start and finish. This can often be achieved by signs that on one side say, for example, “You are entering [type of area]” and “You are leaving [type of area]” on the reverse of the sign.

While all dog walkers should be aware of their requirement to pick up after their dog, signage should be erected for the PSPO to be compliant with the legislation.

APPENDIX 6

Dogs Trust Response to the PSPO Consultation

Dear Sir/Madam,

Dogs Trust has been made aware that Southwark Council is planning to introduce a series of Public Space Protection Orders. As the UK's largest dog welfare charity, we would like to make some comments for consideration.

1. Re; Fouling of Land by Dogs Order:

- Dogs Trust consider 'scooping the poop' to be an integral element of responsible dog ownership and would fully support a well-implemented order on fouling. We urge the Council to enforce any such order rigorously. In order to maximise compliance we urge the council to consider whether an adequate number of disposal points have been provided for responsible owners to use, to consider providing free disposal bags and to ensure that there is sufficient signage in place.

2. Re; Dog Exclusion Order:

- Dogs Trust accepts that there are some areas where it is desirable that dogs should be excluded, such as children's play areas, however we would recommend that exclusion areas are kept to a minimum and that, for enforcement reasons, they are restricted to enclosed areas. We would consider it more difficult to enforce an exclusion order in areas that lack clear boundaries.
- Dogs Trust would highlight the need to provide plenty of signage to direct owners to alternative areas nearby in which to exercise dogs.

3. Re; Dogs on Leads Order:

- Dogs Trust accept that there are some areas where it is desirable that dogs should be kept on a lead.
- Dogs Trust would urge the Council to consider the Animal Welfare Act 2006 section 9 requirements (the 'duty of care') that include the dog's need to exhibit normal behaviour patterns – this includes the need for sufficient exercise including the need to run off lead in appropriate areas. Dog Control Orders should not restrict the ability of dog keepers to comply with the requirements of this Act.
- The Council should ensure that there is an adequate number, and a variety of, well sign-posted areas locally for owners to exercise their dog off-lead.

4. Re; Dogs on Lead by Direction Order:

- Dogs Trust enthusiastically support Dogs on Leads by Direction orders (for dogs that are considered to be out of control or causing alarm or distress to members of the public to be put on and kept on a lead when directed to do so by an authorised official).
- We consider that this order is by far the most useful, other than the fouling order, because it allows enforcement officers to target the owners of dogs that are allowing them to cause a nuisance without restricting the responsible owner and their dog. As none of the other orders, less fouling, are likely to be effective without proper enforcement we would be content if the others were dropped in favour of this order.

5. Re; Taking more than a specified number of dogs onto a land:

- The behaviour of the dogs, competency of the handler, needs to be taken into consideration if considering this order. Research from 2010 shows that 95% of dog owners have up to 3 dogs. Therefore the number of dogs taken out on to land by one individual would not normally be expected to exceed four dogs.

We believe that the vast majority of dog owners are responsible, and that the vast majority of dogs are well behaved. In recognition of this, we would encourage local authorities to exercise its power to issue Community Protection Notices, targeting irresponsible owners and proactively addressing anti-social behaviours.

We work with Councils across the UK in a variety of ways to help them to promote Responsible Dog Ownership. Please do not hesitate to contact me should you wish to discuss this matter.

We would also be very grateful if you could inform us of the outcome of the consultation process and of subsequent decisions made in relation to the Public Space Protection Orders.

Yours faithfully,

Jessica Hutton

Campaigns Assistant

LONDON BOROUGH OF SOUTHWARK

THE ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014

**DOG FOULING AND DOG CONTROL
PUBLIC SPACES PROTECTION ORDER**

The London Borough of Southwark (“the Council”) in exercise of their powers under section 59 of the Anti-Social Behaviour Crime and Policing Act 2014 (“The Act”) hereby makes the following Order: -

This Order is made on **[INSERT]** and shall have effect for a period of 3 years thereafter, unless extended, varied or discharged by further order(s) under the Council’s statutory powers.

OFFENCES

Prohibitions

Part 1 – Dog Fouling

1. If a dog defecates at any time on land to which this part of the Order applies and the person who is in charge of the dog at the time fails to remove the faeces from the land forthwith, that person shall be guilty of an offence unless:
 - i. he has reasonable excuse for failing to do so; or
 - ii. the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.
2. This part of the Order applies to all public places in the Authority (see Schedule 1).

For these purposes, a “public place” means any place to which the public or any section of the public has access on payment or otherwise, as of right or by virtue of express or implied permission.

3. For the purpose of this part of the Order:
 - i. placing the faeces in a receptacle on the land which is provided for this purpose, or for the disposal of waste, shall be a sufficient removal from the land;
 - ii. being unaware of the defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces, shall not be a reasonable excuse for failing to remove the faeces;

Part 2 – Dogs on Leads

1. If a person shall be guilty of an offence if they are in charge of a dog who is not on a lead in specific land unless:
 - i. he has reasonable excuse for failing to do so; or
 - ii. the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.
2. For these purposes, a “lead” means any rope, cord, leash or similar item used to tether, control or restrain a dog, but does not include any such item which is not actively being used as a means of restraint so that the dog remains under a person’s close control.

Part 3 - Exclusion

1. A person in charge of a dog shall be guilty of an offence if, at any time, he takes the dog onto, or permits the dog to enter or to remain on, any land detailed in Schedule 4 below unless:
 - i. he has reasonable excuse for failing to do so; or
 - ii. the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his failing to do so.
2. This part of the Order applies to land identified as Children Play Areas within Parks and Opens Spaces (Schedule 5) known as:

Burgess Park, Children's Playground, Chumleigh Street, SE5
Burgess Park, Children's Playground, Chumleigh Street, SE5
Burgess Park, Adventure Playground, Chumleigh Street, SE5
Burgess Park, Children's Playground, Burgess Park West
Burgess Park, Astro pitch
Burgess Park, Cricket/rugby pitch
Dulwich Park, Children's Playground, College Road, SE21
Dulwich Park, Tennis Courts, College Road, SE22
Dulwich Park, Tennis Courts, College Road, SE23
Dulwich Park, MUGA, College Road, SE24
Geraldine Mary Harmsworth Park, Children's Playground, St George's Road, SE1
Geraldine Mary Harmsworth Park, MUGA, St George's Road, SE1
Geraldine Mary Harmsworth Park, Sports area, St George's Road, SE1
Peckham Rye Park , Children's Playground, Strakers Road, SE15
Peckham Rye Park , Adventure Playground, Strakers Road, SE15
Peckham Rye Park , Skate Park, Strakers Road, SE15
Peckham Rye Park , Arboretum Picnic Area, Strakers Road, SE15
Peckham Rye Common, Children's Playground, Strakers Road, SE15
Southwark Park, Children's Playground, Gomm Road, SE16
Southwark Park, Tennis Courts, Gomm Road, SE16

Belair Park, Children's Playground, Gallery Road, SE21
Belair Park, Tennis Courts, Gallery Road, SE21
Belair Park, Skate Park, Gallery Road, SE21
Bermondsey Spa Park, Children's Playground, Spa Road, SE16
Bermondsey Spa Park, Adventure Playground, Spa Road, SE16
Bird-in-Bush Park, Children's Playground, Bird in Bush Road, SE15
Bird-in-Bush Park, BMX Track, Bird in Bush Road, SE15
Brimmington Park, Children's Playground, Culmore Road, SE15
Brimmington Park, Sports area, Culmore Road, SE15
Brunswick Park, Children's Playground, St Giles Road, SE15
Brunswick Park, Tennis Courts, MUGA, St Giles Road, SE15
Brunswick Park, MUGA, St Giles Road, SE15
Camberwell Green, Children's Playground, Camberwell Road SE5
Christchurch Gardens, Children's Playground, Blackfriars Road, SE1
Cossall Park, Children's Playground, Cossal Walk SE15
Cossall Park, MUGA, Cossal Walk SE15
Dr Harold Moody Park, Children's Playground, Consort Road, SE15
Dr Harold Moody Park, MUGA, Consort Road, SE15
Falmouth Road, Children's Playground, Falmouth Road, SE1
Faraday Gardens, Children's Playground, Portland Street, SE17
Faraday Gardens, MUGA, Portland Street, SE17
Goose Green Playground, Children's Playground, East Dulwich Road SE15
Guy Street Park, Children's Playground, Guy Street, SE1
Guy Street Park, MUGA, Guy Street, SE1
Honor Oak Sports Ground, Children's Playground, Honor Oak Park SE23
Honor Oak Sports Ground, Tennis Courts, Honor Oak Park SE23
Honor Oak Sports Ground, MUGA, Honor Oak Park SE23
Honor Oak Sports Ground, Picnic Area, Honor Oak Park SE23
Jowett Street Park, Children's Playground, Jowett St/Surrey Canal, SE15
King George's Field, Children's Playground, Lower Road, SE16
King George's Field, MUGA, Lower Road, SE16
King's Stairs Gardens, Children's Playground, Jamaica Road, SE16
Leathermarket Gardens, Children's Playground, Leathermarket Street, SE1
Leyton Square, Children's Playground, Peckham Park Road, SE15
Leyton Square, Adventure Playground, Peckham Park Road, SE15
Leyton Square, Playroom Grounds, Peckham Park Road, SE15
Little Dorrit Park, Children's Playground, Borough High Street, SE1
Long Lane Park, Children's Playground, Long Lane SE1
Long Meadow, Children's Playground, Gipsy Hill SE19
Lucas Gardens, Children's Playground, Peckham Road, SE5
Marlborough Playground, Children's Playground, Union Street SE1
Mint Street Park, Children's Playground, Mint Street, SE1
Mint Street Park, Adventure Playground, Mint Street, SE1
Mint Street Park, Football Pitch, Mint Street, SE1
Nelson Square, Children's Playground, Nelson Square SE1
Newington Gardens, Children's Playground, Harper Road, SE1
Nunhead Green, Children's Playground, Nunhead Lane, SE15

Nursery Row Park, Children's Playground, East Street, SE17
Oakley Place, Children's Playground, Nile Terrace, SE1
Pasley Park, Children's Playground, Chapter Road, SE17
Paterson Park, Children's Playground, Lynton Road, SE16
Paterson Park, MUGA, Lynton Road, SE16
Pearson's Park, Children's Playground, Rotherhithe Street, SE16
Pelier Park, Children's Playground, Pelier Street, SE17
Pullens Open space, Children's Playground, Amelia Street SE17
Salisbury Row Park, Chatham Street, SE16
Shuttleworth Park, Children's Playground, Southwark Park Road, SE16
St James's Churchyard, Children's Playground, Thurland Road, SE16
St John's Churchyard, Children's Playground, Tower Bridge Road, SE1
St Mary's Churchyard, Newington, Children's Playground, Newington Butts, SE17
St Mary's Churchyard, Rotherhithe, Children's Playground, St Marychurch Street, SE16
St Mary's Frobisher, Children's Playground, St Mary's Road, SE15
Sumner Park, Children's Playground, Sumner Road, SE15
Sunray Gardens, Children's Playground, Sunray Avenue, SE14
Sunray Gardens, MUGA, Sunray Avenue, SE14
Surrey Square, Children's Playground, Surrey Square SE1
Tabard Gardens, Children's Playground x2, Tabard Street, SE1
Tabard Gardens, MUGA, Tabard Street, SE1
Tabard Gardens, Football Pitch, Tabard Street, SE1
Tanner Street Park, Children's Playground, Tanner Street, SE1
Tanner Street Park, Tennis courts, Tanner Street, SE1
Victory Community Park, Children's Playground, Victory Place, SE17
Warwick Gardens, Children's Playground, Lyndhurst Way, SE15
Warwick Gardens, Sports area, Lyndhurst Way, SE15
Whites Grounds Skate Park, Skate Park, Druid Street, SE1
Surrey Docks Adventure Playground, Adventure Playground, Trident St, SE16
Central Venture Park, Entire site (play, skate, MUGA), Kelly Avenue SE15
Fredericks Adventure Playground, Adventure Playground.

3. This part of the Order applies to land identified as Children Play Areas within Housing Estates (see Schedule 6) known as:

Estate	Post Code
Abbeyfield Estate	SE16
Acorn Estate	SE15
Adams Gardens Estate	SE16
Ainsty Estate	SE16
Alberta Estate	SE17
Albion Estate	SE16
Alvey Estate	SE17
Arnold Estate	SE1

Astley Estate	SE1
Atwell Estate	SE15
Aylesbury Estate	SE17
Aylton Estate	SE16
Aylwin Estate	SE1
Barlow Estate	SE17
Barset Estate	SE15
Bells Gardens Estate	SE15
Bonamy Estate	SE16
Borough Road Estate	SE1
Brandon Estate	SE1
Brayards Estate	SE15
Brimmington Estate	SE15
Brunel Estate	SE16
Cadiz Street Estate	SE17
Camberwell Grove Estate	SE5
Canada Estate	SE16
Champion Hill Estate	SE5
Champion Park Estate	SE5
Cherry Garden Estate	SE16
Cleve Hall Estate	SE5
Clifton Estate	SE15
Cluny Estate	SE1
Colegrove/Radnor Estate	SE15
College Road Estate	SE19
Comber Estate	SE5
Congreve Estate	SE17
Consort Estate	SE15
Coopers Road Estate	SE1
Cossall Estate	SE15
Crawford Estate	SE5
Creasy Estate	SE1
Croxted Road Estate	SE21
Denmark Hill Estate	SE5
Dickens Estate	SE16
Doddington Grove Estate	SE17
Dodson Estate	SE1
Dowlas Estate	SE5
Downtown Estate	SE16
Draper Estate	SE1
East Dulwich Estate	SE22

Elim Estate	SE1
Elizabeth Estate	SE17
Elmington Estate	SE5
Elmington Estate - New Build	SE5
Eveline Lowe Estate	SE16
Fair Street Estate	SE1
Frankland Close Estate	SE16
Friary Estate	SE15
Friern Estate	SE22
Gateway Estate	SE17
Gaywood Estate	SE1
Glebe Estate	SE5
Goschen Estate	SE5
Haddonfield Estate	SE8
Harold Estate	SE1
Havil Street Estat	SE5
Hawkstone Estate	SE16
Herne Hill Estate	SE24
Howlands Estate	SE16
Inville Estate	SE17
Irwell Estate	SE16
Keetons Estate	SE16
Kinglake Estate	SE17
Kingston Estate	SE17
Kingswood Estate	SE21
Kipling Estate	SE1
Kirby Estate	SE16
Lancaster Estate	SE1
Lant Estate	SE1
Lawson Estate	SE1
Ledbury Estate	SE15
Lettsom Estate	SE5
Linden Grove Estate	SE15
Lindley Estate	SE15
Lockyer Estate	SE1
Longfield Estate	SE1
Lordship Lane Estate	SE22
Lynton Estate	SE1
Lytcott Grove Estate	SE22
Manor Estate	SE16
Mardyke Estate	SE17

Marshalsea Estate	SE1
Mawbey Estate	SE1
Meakin Estate	SE1
Millpond Estate	SE16
Minnow Street Estate	SE17
Moncrieff Estate	SE15
Neckinger Estate	SE16
Nelson Estate	SE17
Neptune Street Estate	SE16
New James Street Estate	SE15
New Place Estate	SE16
Newington Estate	SE17
Newlands Estate	SE15
Newlands Estate li	SE15
North Peckham Estate	SE15
Nunhead Estate	SE15
Oakley Place Estat	SE1
Oliver Goldsmith Estate	SE15
Osprey Estate	SE16
Park Street Estate	SE1
Pasley Estate	SE17
Pedworth Estate	SE16
Pelican Estate	SE15
Pelier Estate	SE5
Pennack Road Estate	SE15
Penrose Estate	SE17
Plough Estate	SE8
Pomeroy Estate	SE15
Portland Estate	SE17
Pullens Estate	SE17
Purbrook Estate	SE1
Pynfolds Estate	SE16
Queens Road Estate	SE1
Rennie Estate	SE16
Rochester Estate	SE1
Rockingham Estate	SE1
Rodney Estate	SE17
Rouel Road Estate	SE16
Rye Hill Estate	SE15
Salisbury Estate	SE17
Sceaux Gardens Estate	SE5

Scovell Estate	SE1
Setchell Estate	SE1
Silverlock Estate	SE16
Silwood Estate	SE16
Slippers Place Est	SE16
Southampton Way Estate	SE5
Southwark Park Estate	SE16
St Crispins Estate	SE16
St Johns Estate	SE1
St Marys Estate	SE16
St Olaves Estate	SE1
St Saviours Estate	SE1
Sturdy Road Estate	SE15
Sunray Estate	SE24
Swan Mead Estate	SE1
Swan Road Estate	SE16
Sydenham Hill Estate	SE23
Tabard Gardens Estate	SE1
Tappesfield Estate	SE15
Tustin Estate	SE15
Tyers Estate	SE1
Unwin Estate	SE15
Vauban Estate	SE16
Webber Row Estate	SE1
Whites Grounds Estate	SE1
Woodland Road Estate	SE19
Wyndham Estate	SE5

Part 4 - Dog Handlers - Maximum 6-Dogs, 3-Off Leads

1. A person in charge of more than one dog shall be guilty of an offence if at any time, he takes onto any land in respect of which this Order applies, more than six dogs of which the maximum of 3-dogs are off their lead unless:
 - i. he has reasonable excuse for doing so; or
 - ii. the owner, occupier or other person or authority having control of the land has consented (generally or specifically) to his doing so.

For the purposes of this article a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog.

Requirements

Part 5 - Dogs on leads by Direction

1. A person in charge of a dog will be guilty of an offence if at any time, on land to which this part of the Order applies, they fail to comply with a direction given to them by an authorised person to put and keep the dog on a lead for such period and/or in such circumstances as directed by the officer, unless he can show that:-

- i. he has a reasonable excuse for failing to do so; or
- ii. the owner, occupier, or other person or authority having control of the land, has consented (generally or specifically) to him failing to do so.

2. For these purposes, a "lead" means any rope, cord, leash or similar item used to tether, control or restrain a dog, but does not include any such item which is not actively being used as a means of restraint so that the dog remains under a person's close control.

3. This part of the Order applies to all public places in the Authority (Schedule 1), the green zone area within Camberwell New Cemetery and Honour Oak Crematorium (Schedule 2), the green zone area within Camberwell Old Cemetery (Schedule 3) and the green zone area within Nunhead Cemetery (Schedule 4).

For these purposes, a "public place" means any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission.

4. For the purposes of this part of the Order, an authorised person of the Council may only direct a person to put and keep a dog on a lead if such restraint is reasonably necessary to prevent a nuisance, or behaviour by the dog that is likely to cause annoyance or disturbance to any other person, or the worrying or disturbance of any animal or bird.

6. Exemptions

Nothing in this order shall apply to a person who:-

- i. is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948; or
- ii. is deaf, in respect of a dog trained by Hearing Dogs for Deaf People (registered charity number 293358) and upon which he relies for assistance; or
- iii. has a disability which affects his mobility, manual dexterity, physical coordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a prescribed charity and upon which he relies for assistance and are in charge of a dog trained by members of Assistance Dogs UK and are accredited by Assistance Dogs International or the International Guide Dog Federation, namely
 - a. Canine Partners (Registered charity no: 803680)
 - b. Dog A.I.D. (Registered charity no: 1098619)

- c. Dogs for Good (Registered charity no: 1092960)
- d. Guide Dogs (Registered charity no: 209617)
- e. Hearing Dogs for Deaf People (Registered charity no: 293358)
- f. Medical Detection Dogs (Registered charity no:1124533)
- g. Support Dogs (Registered charity no: 1088281)
- h. The Seeing Dogs Alliance (Registered charity no: 1156790)

For the purpose of this order –

- A person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog;
- Placing the faeces in a receptacle on the land which is provided for the purpose, or for the disposal of waste, shall be sufficient removal from the land;
- Being unaware of the defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces shall not be a reasonable excuse for failing to remove the faeces
- “an authorised officer of the Authority” means Authorised Officer is an officer of the council with delegated authority to enforce the PSPO regulations, Police Officer or PCSO.
- Each of the following is a "prescribed charity" –
 - Dogs for the Disabled (registered charity number 700454)
 - Support Dogs Limited (registered charity number 1088281)
 - Canine Partners for Independence (registered charity number (803680)
- 8. An authorised person Authorised Officer is an officer of the council with delegated authority to enforce the PSPO regulations, Police Officer or PCSO and must show authorisation when reasonably requested to do so.

6. Penalty

A person who is guilty of an offence under this order shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale

Schedule 1

Part 1 - Dog Fouling

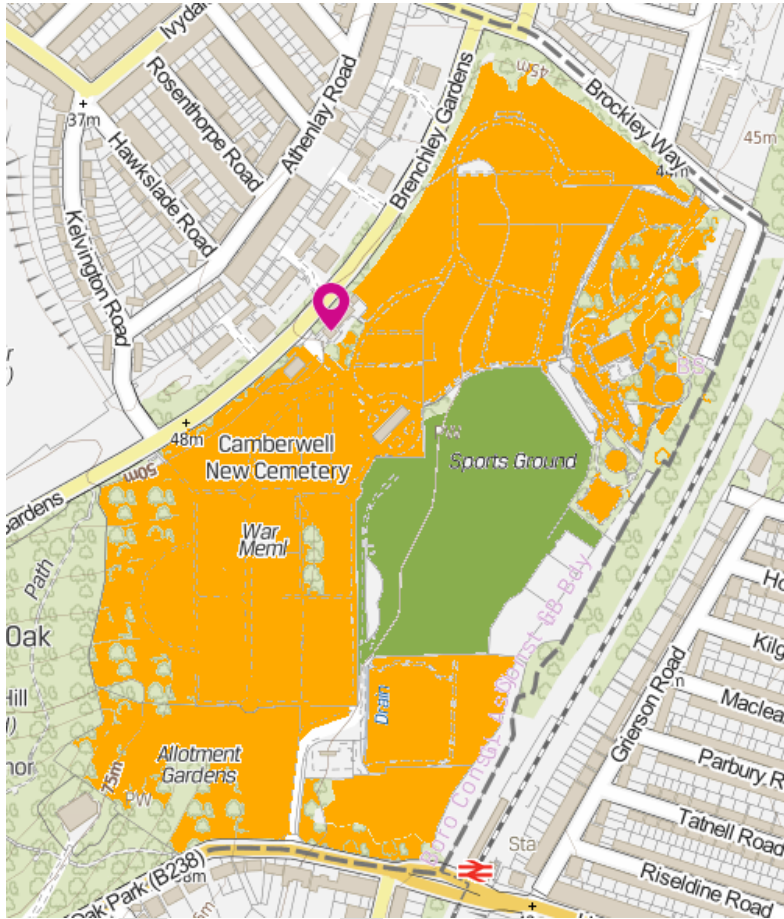
Part 4 - Dog Handlers - Maximum 6 Dogs, 3-off Lead

Part 5 - Leads on Direction

DRAFT

Schedule 2

Camberwell New Cemetery and Honor Oak Crematorium



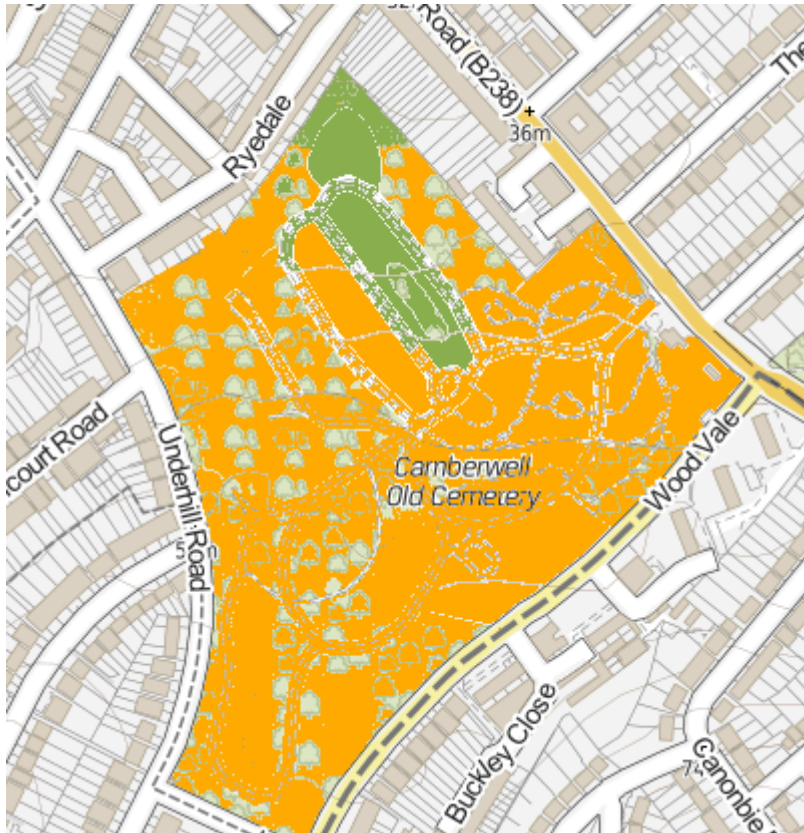
Amber Zone indicates PSPO provision for:

- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

Camberwell Old Cemetery



Amber Zone indicates PSPO provision for:

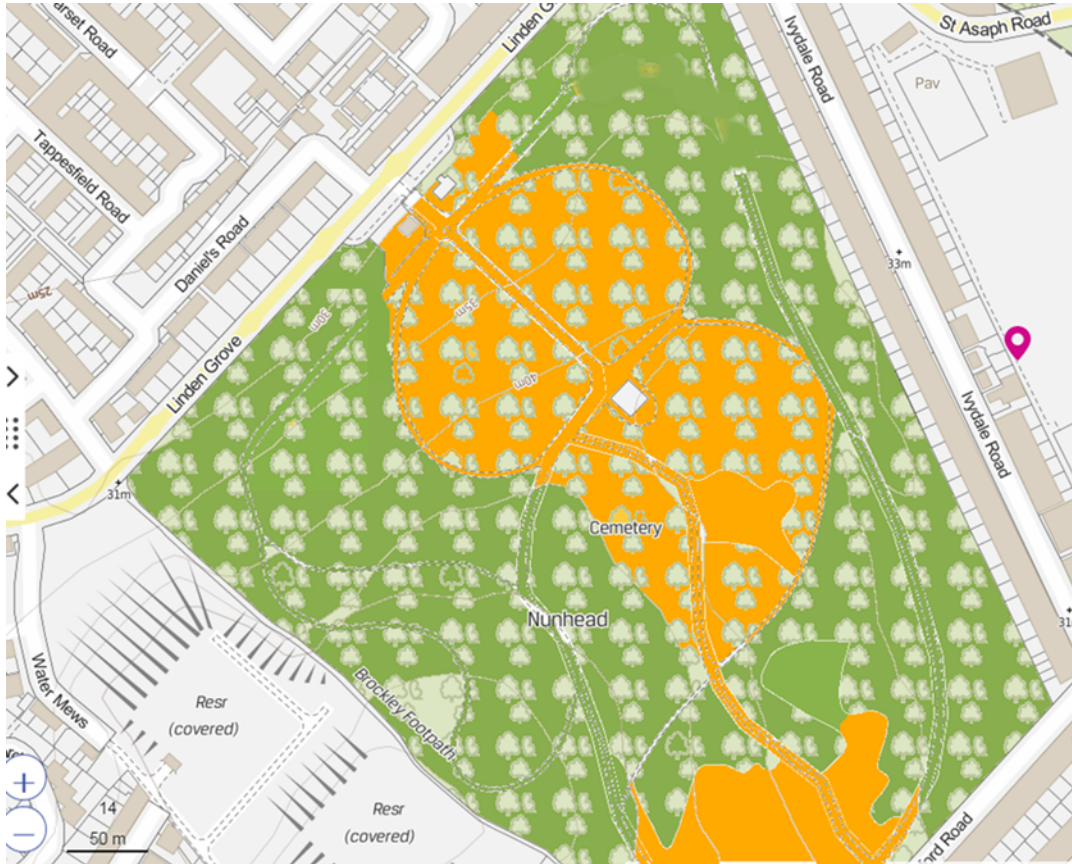
- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

Schedule 4

Nunhead Cemetery



Amber Zone indicates PSPO provision for:

- Dogs on leads at all times.
- Picking up dog mess after your dog
- Maximum of six dogs with one handler.

Green Zones indicate areas covered by the borough wide provisions of:

- Picking up dog mess after your dog
- Put your dog on a lead when instructed to do so by an authorised officer
- Maximum of six dogs per owner/walker with up to three dogs off a lead at any one time.

Schedule 5 Exclusions

Children Play Areas within Parks and Open Spaces

MAPS OF EACH TO BE INCLUDED

Burgess Park, Children's Playground, Chumleigh Street, SE5
Burgess Park, Children's Playground, Chumleigh Street, SE5
Burgess Park, Adventure Playground, Chumleigh Street, SE5
Burgess Park, Children's Playground, Burgess Park West
Burgess Park, Astro pitch
Burgess Park, Cricket/rugby pitch
Dulwich Park, Children's Playground, College Road, SE21
Dulwich Park, Tennis Courts, College Road, SE22
Dulwich Park, Tennis Courts, College Road, SE23
Dulwich Park, MUGA, College Road, SE24
Geraldine Mary Harmsworth Park, Children's Playground, St George's Road, SE1
Geraldine Mary Harmsworth Park, MUGA, St George's Road, SE1
Geraldine Mary Harmsworth Park, Sports area, St George's Road, SE1
Peckham Rye Park , Children's Playground, Strakers Road, SE15
Peckham Rye Park , Adventure Playground, Strakers Road, SE15
Peckham Rye Park , Skate Park, Strakers Road, SE15
Peckham Rye Park , Arboretum Picnic Area, Strakers Road, SE15
Peckham Rye Common, Children's Playground, Strakers Road, SE15
Southwark Park, Children's Playground, Gomm Road, SE16
Southwark Park, Tennis Courts, Gomm Road, SE16
Belair Park, Children's Playground, Gallery Road, SE21
Belair Park, Tennis Courts, Gallery Road, SE21
Belair Park, Skate Park, Gallery Road, SE21
Bermondsey Spa Park, Children's Playground, Spa Road, SE16
Bermondsey Spa Park, Adventure Playground, Spa Road, SE16
Bird-in-Bush Park, Children's Playground, Bird in Bush Road, SE15
Bird-in-Bush Park, BMX Track, Bird in Bush Road, SE15
Brimmington Park, Children's Playground, Culmore Road, SE15
Brimmington Park, Sports area, Culmore Road, SE15
Brunswick Park, Children's Playground, St Giles Road, SE15
Brunswick Park, Tennis Courts, MUGA, St Giles Road, SE15
Brunswick Park, MUGA, St Giles Road, SE15
Camberwell Green, Children's Playground, Camberwell Road SE5
Christchurch Gardens, Children's Playground, Blackfriars Road, SE1
Cossall Park, Children's Playground, Cossal Walk SE15
Cossall Park, MUGA, Cossal Walk SE15
Dr Harold Moody Park, Children's Playground, Consort Road, SE15
Dr Harold Moody Park, MUGA, Consort Road, SE15
Falmouth Road, Children's Playground, Falmouth Road, SE1

Faraday Gardens, Children's Playground, Portland Street, SE17
Faraday Gardens, MUGA, Portland Street, SE17
Goose Green Playground, Children's Playground, East Dulwich Road SE15
Guy Street Park, Children's Playground, Guy Street, SE1
Guy Street Park, MUGA, Guy Street, SE1
Honor Oak Sports Ground, Children's Playground, Honor Oak Park SE23
Honor Oak Sports Ground, Tennis Courts, Honor Oak Park SE23
Honor Oak Sports Ground, MUGA, Honor Oak Park SE23
Honor Oak Sports Ground, Picnic Area, Honor Oak Park SE23
Jowett Street Park, Children's Playground, Jowett St/Surrey Canal, SE15
King George's Field, Children's Playground, Lower Road, SE16
King George's Field, MUGA, Lower Road, SE16
King's Stairs Gardens, Children's Playground, Jamaica Road, SE16
Leathermarket Gardens, Children's Playground, Leathermarket Street, SE1
Leyton Square, Children's Playground, Peckham Park Road, SE15
Leyton Square, Adventure Playground, Peckham Park Road, SE15
Leyton Square, Playroom Grounds, Peckham Park Road, SE15
Little Dorrit Park, Children's Playground, Borough High Street, SE1
Long Lane Park, Children's Playground, Long Lane SE1
Long Meadow, Children's Playground, Gipsy Hill SE19
Lucas Gardens, Children's Playground, Peckham Road, SE5
Marlborough Playground, Children's Playground, Union Street SE1
Mint Street Park, Children's Playground, Mint Street, SE1
Mint Street Park, Adventure Playground, Mint Street, SE1
Mint Street Park, Football Pitch, Mint Street, SE1
Nelson Square, Children's Playground, Nelson Square SE1
Newington Gardens, Children's Playground, Harper Road, SE1
Nunhead Green, Children's Playground, Nunhead Lane, SE15
Nursery Row Park, Children's Playground, East Street, SE17
Oakley Place, Children's Playground, Nile Terrace, SE1
Pasley Park, Children's Playground, Chapter Road, SE17
Paterson Park, Children's Playground, Lynton Road, SE16
Paterson Park, MUGA, Lynton Road, SE16
Pearson's Park, Children's Playground, Rotherhithe Street, SE16
Pelier Park, Children's Playground, Pelier Street, SE17
Pullens Open space, Children's Playground, Amelia Street SE17
Salisbury Row Park, Chatham Street, SE16
Shuttleworth Park, Children's Playground, Southwark Park Road, SE16
St James's Churchyard, Children's Playground, Thurland Road, SE16
St John's Churchyard, Children's Playground, Tower Bridge Road, SE1
St Mary's Churchyard, Newington, Children's Playground, Newington Butts, SE17
St Mary's Churchyard, Rotherhithe, Children's Playground, St Marychurch Street, SE16
St Mary's Frobisher, Children's Playground, St Mary's Road, SE15
Sumner Park, Children's Playground, Sumner Road, SE15
Sunray Gardens, Children's Playground, Sunray Avenue, SE14
Sunray Gardens, MUGA, Sunray Avenue, SE14
Surrey Square, Children's Playground, Surrey Square SE1

Tabard Gardens, Children's Playground x2, Tabard Street, SE1
Tabard Gardens, MUGA, Tabard Street, SE1
Tabard Gardens, Football Pitch, Tabard Street, SE1
Tanner Street Park, Children's Playground, Tanner Street, SE1
Tanner Street Park, Tennis courts, Tanner Street, SE1
Victory Community Park, Children's Playground, Victory Place, SE17
Warwick Gardens, Children's Playground, Lyndhurst Way, SE15
Warwick Gardens, Sports area, Lyndhurst Way, SE15
Whites Grounds Skate Park, Skate Park, Druid Street, SE1
Surrey Docks Adventure Playground, Adventure Playground, Trident St, SE16
Central Venture Park, Entire site (play, skate, MUGA), Kelly Avenue SE15
Fredericks Adventure Playground, Adventure Playground.

Schedule 6 Exclusions

Children Play Areas within Housing Estates

ADDRESS AND MAPS TO BE INCLUDED

Estate	Post Code
Abbeyfield Estate	SE16
Acorn Estate	SE15
Adams Gardens Estate	SE16
Ainsty Estate	SE16
Alberta Estate	SE17
Albion Estate	SE16
Alvey Estate	SE17
Arnold Estate	SE1
Astley Estate	SE1
Atwell Estate	SE15
Aylesbury Estate	SE17
Aylton Estate	SE16
Aylwin Estate	SE1
Barlow Estate	SE17
Barset Estate	SE15
Bells Gardens Estate	SE15
Bonamy Estate	SE16
Borough Road Estate	SE1
Brandon Estate	SE1
Brayards Estate	SE15
Brimmington Estate	SE15
Brunel Estate	SE16
Cadiz Street Estate	SE17
Camberwell Grove Estate	SE5
Canada Estate	SE16
Champion Hill Estate	SE5
Champion Park Estate	SE5
Cherry Garden Estate	SE16
Cleve Hall Estate	SE5
Clifton Estate	SE15
Cluny Estate	SE1
Colegrove/Radnor Estate	SE15

College Road Estate	SE19
Comber Estate	SE5
Congreve Estate	SE17
Consort Estate	SE15
Coopers Road Estate	SE1
Cossall Estate	SE15
Crawford Estate	SE5
Creasy Estate	SE1
Croxted Road Estate	SE21
Denmark Hill Estate	SE5
Dickens Estate	SE16
Doddington Grove Estate	SE17
Dodson Estate	SE1
Dowlas Estate	SE5
Downtown Estate	SE16
Draper Estate	SE1
East Dulwich Estate	SE22
Elim Estate	SE1
Elizabeth Estate	SE17
Elmington Estate	SE5
Elmington Estate - New Build	SE5
Eveline Lowe Estate	SE16
Fair Street Estate	SE1
Frankland Close Estate	SE16
Friary Estate	SE15
Friern Estate	SE22
Gateway Estate	SE17
Gaywood Estate	SE1
Glebe Estate	SE5
Goschen Estate	SE5
Haddonfield Estate	SE8
Harold Estate	SE1
Havil Street Estat	SE5
Hawkstone Estate	SE16
Herne Hill Estate	SE24
Howlands Estate	SE16
Inville Estate	SE17
Irwell Estate	SE16
Keetons Estate	SE16
Kinglake Estate	SE17
Kingston Estate	SE17

Kingswood Estate	SE21
Kipling Estate	SE1
Kirby Estate	SE16
Lancaster Estate	SE1
Lant Estate	SE1
Lawson Estate	SE1
Ledbury Estate	SE15
Lettsom Estate	SE5
Linden Grove Estate	SE15
Lindley Estate	SE15
Lockyer Estate	SE1
Longfield Estate	SE1
Lordship Lane Estate	SE22
Lynton Estate	SE1
Lytcott Grove Estate	SE22
Manor Estate	SE16
Mardyke Estate	SE17
Marshalsea Estate	SE1
Mawbey Estate	SE1
Meakin Estate	SE1
Millpond Estate	SE16
Minnow Street Estate	SE17
Moncrieff Estate	SE15
Neckinger Estate	SE16
Nelson Estate	SE17
Neptune Street Estate	SE16
New James Street Estate	SE15
New Place Estate	SE16
Newington Estate	SE17
Newlands Estate	SE15
Newlands Estate li	SE15
North Peckham Estate	SE15
Nunhead Estate	SE15
Oakley Place Estat	SE1
Oliver Goldsmith Estate	SE15
Osprey Estate	SE16
Park Street Estate	SE1
Pasley Estate	SE17
Pedworth Estate	SE16
Pelican Estate	SE15
Pelier Estate	SE5

Pennack Road Estate	SE15
Penrose Estate	SE17
Plough Estate	SE8
Pomeroy Estate	SE15
Portland Estate	SE17
Pullens Estate	SE17
Purbrook Estate	SE1
Pynfolds Estate	SE16
Queens Road Estate	SE1
Rennie Estate	SE16
Rochester Estate	SE1
Rockingham Estate	SE1
Rodney Estate	SE17
Rouel Road Estate	SE16
Rye Hill Estate	SE15
Salisbury Estate	SE17
Sceaux Gardens Estate	SE5
Scovell Estate	SE1
Setchell Estate	SE1
Silverlock Estate	SE16
Silwood Estate	SE16
Slippers Place Est	SE16
Southampton Way Estate	SE5
Southwark Park Estate	SE16
St Crispins Estate	SE16
St Johns Estate	SE1
St Marys Estate	SE16
St Olaves Estate	SE1
St Saviours Estate	SE1
Sturdy Road Estate	SE15
Sunray Estate	SE24
Swan Mead Estate	SE1
Swan Road Estate	SE16
Sydenham Hill Estate	SE23
Tabard Gardens Estate	SE1
Tappesfield Estate	SE15
Tustin Estate	SE15
Tyers Estate	SE1
Unwin Estate	SE15
Vauban Estate	SE16
Webber Row Estate	SE1

Whites Grounds Estate	SE1
Woodland Road Estate	SE19
Wyndham Estate	SE5

DRAFT

London Borough Dogs in Cemeteries Benchmarking Exercise

APPENDIX 9

Borough	Dog Status Cemetery Rules & Regulations					
	Dogs Allowed without Restriction	Dogs Allowed On Leads Only At All Times	Assistance Dogs Allowed	On Leads Only & Number Restricted	Professional Dog Walkers Allowed	Playing Ball/Throwing Allowed
Barking & Dagenham	N	N	Y	N	N	N
Barnet	N	Y	Y	N	N	N
Bexley	N	N	Y	N	N	N
Bromley	N	N	Y	N	N	N
Camden	N	Y	Y	Y	N	N
City of London	N	N	Y	N	N	N
Croydon	N	N	Y	N	N	N
Ealing	N	Y	Y	N	N	N
Enfield	N	N	Y	N	N	N
Greenwich	N	N	Y	N	N	N
Hackney	N	N	Y	Y	Y	Y
Hammersmith & Fulham	N	Y	Y	N	N	N
Haringey	N	Y	Y	N	N	N
Harrow	N	Y	Y	N	N	N
Havering	N	N	Y	N	N	N
Hillingdon	N	N	Y	N	N	N
Hounslow	N	Y	Y	N	N	N
Islington	N	Y	Y	Y	N	N
Kensington & Chelsea	N	Y	Y	N	N	N
Kingston upon Thames	N	N	Y	N	N	N
Lambeth	N	N	Y	N	N	N
Lewisham	N	Y	Y	N	N	N
Merton	N	Y	Y	Considering DCO Permitting Max 4 Per Walker	Considering DCO Permitting Max 4 Per Walker	N
Newham	N	Y	Y	N	N	N
Redbridge	N	N	Y	N	N	N
Richmond Upon Thames	N	Y	Y	N	N	N
Southwark	Y	Partly	Y	N	Y	Y
Sutton	N	N	Y	N	N	N
Tower Hamlets	N	N	Y	Y	Y	N
Waltham Forrest	N	Y	Y	Y	N	N
Wandsworth	N	Y	N	N	N	N
Westminster	N	Y	Y	N	N	N

safe as houses:

the impact of universal credit on tenants and their rent payment behaviour in the London boroughs of Southwark and Croydon, and Peabody

The Smith Institute



**The Smith Institute**

The research for this report was led by Paul Hunter, head of research at the Smith Institute

The Smith Institute
Somerset House, South Wing, Strand,
London, WC2R 1LA
Tel: 020 3141 7536
Email: info@smith-institute.org.uk
Website: www.smith-institute.org.uk
Twitter @smith_institute

The research was conducted in partnership with:



CROYDON | Delivering
www.croydon.gov.uk | for Croydon



safe as houses:

the impact of universal credit on
tenants and their rent payment
behaviour in the London
boroughs of Southwark and
Croydon, and Peabody

The Smith Institute

Foreword

The London boroughs of Southwark and Croydon were among the first areas in the country to see the early rollout of full service universal credit (UC). Between the two boroughs, we manage and let almost 50,000 social rented council homes. In October 2016, in partnership with Peabody, we jointly commissioned the Smith Institute to undertake this research into the impact of UC rollout on our tenants.

This is the first in-depth, independent analysis of the rollout of universal credit full service, which examines the experience and rent payment behaviours among social housing tenants before, during and after their claim for UC. The research confirms our concerns that more tenants are falling into significant rent arrears, or deeper into rent arrears, under UC than under the previous housing benefit system. Delays in payments, in particular, are leading to a build-up of rent arrears which people often struggle to pay back.

The research shows clearly the impact universal credit is having on individuals, with delayed payments putting people into debt, causing considerable stress. Many people transitioning onto UC are already facing difficult circumstances due to unemployment, disability or low income. The wellbeing of those tenants, many of whom have desperate personal stories to tell, must be central to considerations of the new benefit system.

In Southwark alone, where only 12% of council tenants have moved onto universal credit, rent arrears for UC tenants total over £5.3m. If this is reflected nationally, rent arrears among council tenants claiming UC across the country as a whole could reach many hundreds of millions of pounds by the end of the planned rollout period. Hundreds of thousands of social housing tenants could find themselves in significant debt while social landlords incur substantial additional costs. We do not believe this is either acceptable or necessary.

This report highlights a number of areas where efforts should be focused to make improvements. These findings are consistent with and reinforce the recommendations that both Southwark and Croydon Councils have been making to DWP over the last year. As universal credit continues to be rolled out across the country, we believe that steps must urgently be taken to address the challenges highlighted in this report.

Cllr Fiona Colley
Southwark Council Cabinet Member for Finance, Modernisation and Performance

Introduction and main findings

Introduction and main findings

In October 2016, the Smith Institute was commissioned by the London Borough of Southwark, in partnership with the London Borough of Croydon, Peabody and Family Mosaic (Peabody and Family Mosaic were later to merge but are referred to separately in the report), to undertake research into the impact of Universal Credit (UC) roll out on tenants, with specific regard to rent payment behaviours and the support tenants were receiving.

The terms of reference were to:

1.a. How is the early roll-out of Universal Credit (UC) affecting rent payment behaviours among residents in social housing tenants in the London borough of Southwark?

- *evaluate the impact of changes to how housing cost support is claimed, calculated and paid to social housing tenants under UC – looking specifically at whether rent payment behaviours among these groups are changing*
- *identify obstacles to positive behaviour change, particularly where the absence of such change may make it more difficult for social housing tenants to cope with the new arrangements*
- *where obstacles are identified develop proposals / recommendations on how these might be addressed*

1.b. How are identified changes in behaviour – or the absence of behaviour change – affecting the tenancies of those social housing tenants who are receiving housing cost support under the new arrangements?

- *evaluate the effectiveness of arrangements for making payments to social landlords and the associated safeguards for rental payments*
- *evaluate the effectiveness of communication with social housing tenants intended to increase their readiness for new arrangements and enhance their ability to cope*
- *evaluate the accessibility and effectiveness of the forms of support available to help individuals identified as needing support to budget effectively and improve their financial independence*

The work undertaken to answer these questions was split into two pieces of research. The first, undertaken by the Smith Institute, was an analysis of 775 tenants' rent accounts to give a quantitative understanding of how rent behaviours were changing (compared with rent accounts of those moving onto Housing Benefit); how rent behaviour changed over time; whether any arrears accrued were paid down and whether there were any differences in rent payment behaviour between different groups. The second piece of research was a qualitative study commissioned by the Smith Institute and undertaken by the research company BritainThinks. This work involved undertaking 36 in-depth telephone interviews and four focus groups with tenants. The purpose was to: understand their journey once they found out they were on UC; document and evaluate their understanding of the new system; and examine what worked and what could be done better.

The research findings from these two pieces of work are presented below as two separate but complementary reports:

- **Section 1:** Safe as Houses: The impact of universal credit on tenants and rent payment behaviour in the London boroughs of Southwark and Croydon, and Family Mosaic and Peabody (Page 8)
- **Section 2:** Universal Credit in Southwark: Qualitative Research Findings – Full report prepared for Safe as Houses Research Delivery Advisory Panel (Page 34)

The findings show the challenges faced by all those involved with the new system (details of the changes are outlined at the start of both reports). The rent account analysis by the Smith Institute highlights the financial implications of UC and how this changes over time, while the qualitative work gives a sense of the challenges that UC present to tenants, not least during the period between making a claim and receiving their first payment.

At the end of both reports key issues are highlighted where efforts may be best focused to improve the system, which is still being rolled out incrementally across the country.

Summary of the findings

A fuller summary of the findings can be found at the start of both reports,

Section 1: Rent account analysis

The report examined 775 rent accounts of tenants of the London Borough of Southwark, London Borough of Croydon, Peabody and Family Mosaic and moving onto Universal Credit (UC). These were compared with 249 accounts of those on the legacy housing benefit (HB) system.

Main findings

- **Growing rent arrears:** Arrears rose by £89,000 over the period (an increase of £115 per claimant). In total 3.4% of rent owed was not paid over the period. However, the level of rent owed to the landlords varied depending on the starting point taken (i.e. including the period before people claimed UC).
- **Rent shortfalls were highest at the start:** In week 1, 36% of the total value rent owing was not paid. By week 8 this had dropped to around 6% and accrued arrears started to be paid down around week 13.
- **Arrears were larger for those on UC than HB:** By week 20, UC tenants were on average £156 in arrears while HB tenants overpaid by 4% of rent due (reflecting repayments).
- **Those on UC were more likely to underpay by more:** Whilst UC tenants were no more likely to underpay than HB tenants the level of underpayment varied widely. 39% of cases of underpayment being by more than 75% of rent due. The HB figure was just 8%.
- **Big underpayments and underpayers contributed most to arrears:** 69% of the value of underpayments was from those failing to pay more than 75% of rent owed. The top fifth of those in arrears collectively owed over half of the level of arrears.
- **Arrears accrued early are paid down, but stabilise with time:** There is a pattern of arrears accumulating each week for 11 weeks. After around week 11 arrears do start to be paid down, but not enough to pay back all arrears accumulated.
- **Arrears fall as a percentage of total rents owed with time:** As a result of arrears being paid down after week 11 and then being around the amount owed from week 20, accumulated arrears as a proportion of total rents steadily falls from just below 40% in week 1 to around 5% in week 28.
- **There are likely to be significant costs to landlords:** If after the period covered by the available data tenants continued to meet their rent overall (as the data for the latter weeks suggests) levels of arrears to rent would fall to around 2% for the year. Nevertheless, for a landlord with 20,000 tenants this would represent around £5.4m more than HB claimants, with arrears accumulating quickly within the space of three months.
- **Alternative payment arrangements (APAs) have a positive impact on arrears:** Overall those who moved onto APAs saw arrears fall. For the period from claiming UC, and including when the alternative payment arrangement was agreed, overall arrears were in surplus of 8.2% of rent owed (versus 3% for those on direct payments). They were in more arrears before moving to APAs, accumulating on average £21 of arrears per day. After that the average repaid was £4 per day. However, including the arrears before transitioning to UC those with APAs were 50% more in arrears than those paying directly.
- **Arrears are accumulated before transitioning to UC:** There was a ratcheting up in weekly arrears before people transitioned onto UC. The data for HB claimants suggests arrears accumulate, but not to the same extent. Furthermore, they fall rapidly immediately after the claim. As a result, accumulated arrears (including the period before the claim) peaks higher and later than for HB claimants, and is much higher after 20 weeks.
- **There are differences between landlords:** Arrears are higher amongst Southwark tenants (at around 8% of rent owed) than in Croydon or for Peabody/Family Mosaic tenants, where tenants pay down arrears accrued before moving onto UC. Some of the difference may be due to APAs not being used as much in Southwark, but this does not explain the whole difference.

Conclusions

- Arrears build up most quickly in the first few weeks. This suggests that **changes to payment timings could significantly reduce the initial build-up of arrears** which the data suggests people often struggle to repay.
- **Tenants entering formal alternative payment arrangements see arrears rapidly fall.** Extended use and greater focus on triggering them or help seeking agreement with DWP on individual cases could help reduce overall levels of arrears.
- There appears to be **differences in rent payment behaviours by landlord.** This suggests that landlords have a significant role to play in reducing arrears.
- For landlords wanting to minimise arrears, **attention should be on the 20% of those who are in the largest arrears. This group makes up the majority of total arrears.** However, the rent analysis cannot determine whether changing behaviour amongst this group may be harder/more expensive.
- As arrears ratchet up quickly in the first few weeks of people moving onto UC there **may be cash flow (as well as staffing) implications for landlords** if large numbers move onto UC at the same time.
- Repayments appear to tail off towards the end of the period covered. This would suggest that there may be a longer-term cost

to the landlord of people moving onto UC as **arrears may prove difficult to recover**.

Section 2: Qualitative research

Main findings

- **Top of mind associations with UC are generally negative**, and are primarily driven by claimants' direct experiences of the transition process – specifically delayed payments.
- Claimants describe **both positive and negative experiences** of the UC application process. However, there are clear issues in terms of how quickly claimants receive payment.
- **Delayed UC payments have put many into debt and rent arrears**, causing considerable stress to individuals.
- There is a **strong aversion to debt**. Claimants use a range of strategies to cope financially, with many relying on friends and family (though this is not an option for everyone).
- **Many are struggling to manage their finances on UC** – for some it's adapting to a single monthly payment, but for others it's simply "not having enough money to get by".
- **UC can feel like a 'one size fits' all process**. Claimants with unusual or changing circumstances can find the system inflexible and challenging to navigate.
- There is a clear **role for better and more joined-up support and information** – it's less about budgeting and more about clarity of what UC means for individuals.

Conclusions

- The research has shown that the principle of moving to UC is less of an issue (though it is problematic for some) than the **process itself**.
- Participants in this research almost universally have **experienced financial hardship** as a result of transitioning onto UC; notably as a result of the **significant delays** to payment.
- The impact this has on claimants' ability to pay their rent is significant – with tenants falling into **arrears**, or into **worse arrears**.
- It is hard to ascertain the extent to which negative attitudes towards UC will change over time – with views often **coloured by recent difficulties** with the transition process.
- The findings have significant **implications for the council**, but also the **wellbeing of the individuals themselves**, many of whom have desperate personal stories to tell.
- There is a clear role for **better and more joined-up support** and information
 - Before the transition, during the waiting period and whilst in arrears
- There is a sense that the organisations involved in delivering UC are **not working together** as well as they could
 - UC, the council, Job Centres, Citizens Advice
- **Housing Officers** are providing one of the key support mechanisms for those transitioning onto UC, and supporting claimants in managing rent arrears. In addition to the cost of the arrears themselves, this will be causing a significant increase in their workload and wider strain on council resources.
- It will be important to understand how quickly **rent arrears are being re-paid**, and the implications for claimants managing debt repayment (especially given the emotional strain associated with being in debt).

Contents

Section 1: Safe as Houses: The impact of universal credit on tenants and rent payment behaviour in the London boroughs of Southwark and Croydon, and Family Mosaic and Peabody Page 8

Section 2: Universal Credit in Southwark: Qualitative Research Findings – Full report prepared for Safe as Houses Research Delivery Advisory Panel Page 34

Section 1: The impact of universal credit on tenants and rent payment behaviour in the London boroughs of Southwark and Croydon, and Family Mosaic and Peabody

The Smith Institute

Contents

Table of figures	9
Executive summary	10
Context	12
Scope of the report	12
Background to UC	12
Approach	13
The accounts examined	13
Rebasing rent payments	14
What happens when people move onto UC?	15
Did the tenants build up arrears after they moved onto UC?	15
How did rent accounts change over time?	15
What proportion of the rent is owed by tenants on UC and how does this compare with those on housing benefit?	16
What proportion of tenants accrued arrears after moving onto UC?	17
Levels of underpayment by period	18
What is the impact of UC on the proportion of tenants failing to pay some or all their rent?	18
Were the total arrears accrued due to a few paying very little rent, or because lots of people underpaid a little?	18
Do people consistently underpay?	19
Are arrears accrued in the early stages paid down over time?	19
Are people with certain characteristics more likely to underpay?	22
Before UC	25
What impact do alternative payment arrangements have on arrears?	27
Differences between Southwark and Croydon tenants	27
Conclusion	32

Table of figures

Figure 1: Proportion of rents owing not paid each week	16
Figure 2: Numbers with rent account data by week	16
Figure 3: Proportion of rent owed not paid each week, HB and UC	17
Figure 4: Proportion of tenants underpaying each week by how much	18
Figure 5: Accumulated rent arrears by week up to 20 weeks	19
Figure 6: Accumulated rent arrears by week up to 24 weeks	20
Figure 7: Accumulated rent arrears by week up to 28 weeks	20
Figure 8: Accumulated rent arrears by week up to 32 weeks	21
Figure 9: Accumulated rent arrears as a proportion of accumulated rents owed up to 28 weeks	21
Figure 10: Accumulated rent arrears as a proportion of accumulated rents owed with on trend projection for the 52 weeks	22
Figure 11: Modelled accumulated rent arrears by week for a landlord with 20,000 tenants	22
Figure 12: Proportion of rent owed not paid each week by UC transition month	23
Figure 13: Proportion of rent owed not paid each week before and after transition to UC	26
Figure 14: Proportion of rent owed not paid each week before and after transition to HB and UC	26
Figure 15: Accumulated rent arrears as a proportion of accumulated rent owed each week before and after HB and UC claim	27
Figure 16: Weekly arrears by landlord with HB comparison	28
Figure 17: Cumulative arrears as proportion of cumulative rents owed by landlord	29
Figure 18: Weekly rent arrears before and after transition to UC by landlord	29
Figure 19: Cumulative arrears as proportion of cumulative rents owed by landlord pre and post UC transition	30
Figure 20: Weekly rent arrears before and after transition to UC by landlord, excluding those with APAs	30
Figure 21: Cumulative arrears as proportion of cumulative rents owed by landlord excluding those on APAs	31
Figure 22: Cumulative arrears as proportion of cumulative rents owed by landlord pre- and post-UC transition excluding those on APAs	31

Executive summary

The report examined 775 rent accounts of tenants of the London Borough of Southwark, London Borough of Croydon, Peabody and Family Mosaic who have moved onto Universal Credit (UC). These were compared with 249 accounts of those on the legacy housing benefit (HB) system. In both instances tenants had moved on to either UC or HB between August and October 2016 and rent accounts were tracked until the end of March 2017 (apart from a few whose accounts were closed before then).

The analysis was designed to examine the impact UC had on the rent behaviours of tenants and whether arrears were higher under the new system; how rent behaviour changed over time; and the overall impact on arrears. The work is quantitative so did not evaluate the human cost and personal impacts which is covered in the qualitative section of the report. Nor does the analysis cover the externality costs either to tenants (such as increased levels of personal debt to cover rent when waiting for UC payments) or to the landlord (increased cost and greater workloads on officers supporting tenants).

The rent account analysis shows:

Growing rent arrears

- Arrears rose by £89,000 over the period.
- The increase in arrears per claimant averaged £115.
- On average, each person was in seven days of arrears at the end of their UC period.
- In total 3.4% of rent owed was not paid over the period, however there was a range of rent owed by landlord and depending on the starting point taken (i.e. including the period before people claimed UC).
- On average, each UC claimant accrued over £0.60 worth of arrears per day.

Rent shortfalls were highest at the start

- In week 1, 36% of the total value rent owing was not paid.
- By week 8 this had dropped to around 6% and accrued arrears started to be paid down around week 13.

Arrears were larger for those on UC than HB

- By week 20, UC tenants were on average £156 in arrears while HB tenants overpaid by 4% of rent due (reflecting repayments).
- Comparing total rents paid to rents owed for each week shows that those claiming HB immediately paid more rent than was due before stabilising around the level of rent owed in week 9. UC claimants follow almost the exactly opposite trajectory accruing arrears for the first 12 weeks before starting to overpay slightly.

Those on UC were more likely to underpay by more

- 70% of accounts failed to pay all their rent in the first week, dropping to 56% by week 20.
- Whilst UC tenants were no more likely to underpay than HB tenants the level of underpayment varied widely. 39% of cases of underpayment being by more than 75% of rent due. The HB figure was just 8%.

Big underpayments and underpayers contributed most to arrears

- 69% of the value of underpayments was from those failing to pay more than 75% of rent owed.
- The top fifth of those in arrears collectively owed over half of the levels of arrears.

Arrears accrued early are paid down, but stabilise with time

- There is a pattern of arrears accumulating each week for 11 weeks.
- After around week 11 arrears do start to be paid down, but not enough to pay back all arrears accumulated.
- For those accounts with data for 28 and 32 weeks, total rent arrears stabilise around week 20 – total rent arrears are not paid down but neither do they increase.

Arrears fall as a percentage of total rents owed with time

- As a result of arrears being paid down after week 11 and then being around the amount owed from week 20, accumulated arrears as a proportion of total rents steadily falls from just below 40% in week 1 to around 5% in week 28.
- If after the period covered by the available data tenants continued to meet their rent overall (as the data for the latter weeks

suggests) levels of arrears to rent would fall to around 2% for the year.

- Nevertheless, for a landlord with 20,000 tenants this would represent around £5.4m more of arrears when compared with HB claimants, with the arrears accumulating within the space of three months.

Who are most vulnerable to underpaying?

- Much of the data suggests there is little difference between: the time when people transitioned (suggesting that the system has not improved or deteriorated); those who have had rent accounts for longer (and therefore more used to the old system); different age groups; or different household sizes (although single households may be slightly more prone).
- There do appear to be differences by gender, with men more likely to be in bigger arrears.
- Those with more than 4 weeks arrears at the start are more likely to be in less arrears at the end. This appears to be due to the large numbers that move to alternative payment arrangements.

Alternative payment arrangements have a positive impact on arrears

- Overall those who moved onto alternative payment arrangements (APAs) saw arrears fall. For the period from claiming UC, and including when the alternative payment arrangement was agreed, overall arrears were in surplus of 8.2% of rent owed (versus 3% for those on direct payments).
- They were in more arrears before moving to APAs, accumulating on average £21 of arrears per day. After that the average repaid was £4 per day.
- However, including the arrears before transitioning to UC those with APAs were 50% more in arrears than those paying directly.

Before and after UC

- There was a ratchetting up in weekly arrears before people transitioned onto UC.
- The data for HB claimants suggests arrears accumulate, but not to the same extent. Furthermore, they fall rapidly immediately after the claim.
- As a result, accumulated arrears (including the period before the claim) peaks higher and later than for HB claimants, and is much higher after 20 weeks.

Differences between landlords

- Arrears are higher amongst Southwark tenants (at around 8% of rent owed) than in Croydon or for Peabody/Family Mosaic tenants, where tenants pay down arrears accrued before moving onto UC.
- Some of the difference may be due to APAs not being used as much in Southwark, but this does not explain the whole difference.

Context

Scope of the report

This report forms part of a series of work commissioned by the London Borough of Southwark (and involving the London Borough of Croydon, Family Mosaic and Peabody) to examine the impact of UC roll out on rent payments.

The report, as set out in the project brief, examines the following question: "How is the early roll-out of Universal Credit (UC) affecting rent payment behaviours among residents in social housing tenants?"

The report looks at the rent accounts of those who have switched onto UC. To assess the impact of the transition to UC the findings are compared with a control group of those who claimed housing benefit during the same period.

Background to UC

UC has been a flagship policy for government since 2010. It seeks to simplify the benefit system, and by so doing make work pay, reduce poverty and promote greater independence. Since legislation was enacted in 2012, UC has been trialled in various pathfinder areas and subsequently rolled out in stages in other areas. For example, there were Direct Payment Demonstration Projects, which piloted the impact of payments to tenants directly rather than to landlords in six areas, including Southwark.

"Full-service" Universal Credit (UCFS) was tested in a single postcode area in south London in late 2014. UCFS was subsequently expanded to an area that included a small part of Southwark by the end of 2015. This formed the first phase of Government's plan to extend UCFS to the whole of Britain by 2018. During 2016 it has been rolled out further in Southwark as well as in the nearby borough of Croydon (the other borough examined in this report).

As part of the government's welfare reform programme UC will replace the following benefits:

- Income-based Jobseeker's Allowance
- Income-related Employment and Support Allowance
- Income Support
- Working Tax Credit
- Child Tax Credit
- Housing Benefit

The simplification of several payments into one involves a number of changes, including:

- Recipients applying and managing their account online
- A single, household monthly claim
- Payment of rent to the claimant rather than directly to the landlord
- A time delay from when housing cost support can be claimed and when claimants will receive their first payment

These changes could potentially result in tenants experiencing additional financial difficulties, and for landlords it could result in (more) rent payments being missed or underpaid. If a tenant's arrears do become too high, then local authorities can apply for an alternative payment arrangement, thereby allowing rent to be paid directly to the landlord.

Approach

To understand the impact of UC on rent payment behaviour the report examines the rent accounts of those who have transitioned on to UC and compares them with those on the existing payment arrangement – housing benefit.

The rent accounts are analysed to see what differences there may be in payment rates, levels of underpayment, payments over time, whether certain groups underpay more than others and whether alternative payment arrangements make a difference?

The accounts examined

To examine the potential impact of UC on rent payment behaviour the report examines rent accounts of tenants.

The rent accounts for those moving on to UC are tenants of the London Boroughs of Southwark and Croydon and Peabody and Family Mosaic tenants living in Southwark.

The rent account analysis covers the period from January 2016 to the end of March 2017 and those who moved onto UC during the period August to October 2016.

The data includes 817 rent accounts for those moved onto UC.

Of those 817 accounts 38 were removed because of incomplete data, such as not having a start date for when the claimant was informed that they need to make a UC claim (which was the main reason for not including accounts) and discrepancies over the age of tenants.

This left 775 accounts for those moving onto UC – 393 from Southwark, 343 from Croydon 35 from Peabody and 4 from Family Mosaic.

This data is compared with a control group of those on the legacy arrangements (housing benefit).

255 rent accounts for housing benefit tenants were examined and covered the same period as the UC tenants.

Due to some missing data on rent account balance at the time of their HB claim, the number of rent accounts examined was reduced to a group of 249. All 249 accounts were Southwark tenants. HB data from Croydon was not available because the whole of the borough was UC live by April 2016, meaning they had no new HB claims whereas Southwark was only partially UC live in August 2016.

An analysis of the data shows the close characteristics of the two datasets. The table below profiles the demographics of claimants, their rent levels and information on when they made their claim and how long they have been a Southwark tenant. One area where there is notable difference is in regard to their rent balance at the start of the position. This is explored later in the report.

The table shows that average rents are slightly below £120 a week for those moving onto UC and HB, that tenants tend to be aged in their early 40s and are more likely to be female. The closeness of the comparator makes it a robust benchmark to assess the impact of UC on rent payments.

	Universal credit	Housing benefit
Average weekly rent	£121.40	£117.16
Less £100	9%	10%
£100-£112.50	24%	27%
£112.50-£125	36%	38%
£125-£150	25%	18%
£150+	6%	7%
Average age	41.0	42.2
16-24	5%	4%
25-34	32%	28%
35-44	23%	24%
45-54	25%	28%
Over 55	16%	17%

Gender		
Male	34%	36%
Female	66%	64%
Average household size		
1	35%	33%
2	23%	36%
3	18%	16%
4+	23%	16%
Property type		
Flat	64%	74%
Maisonette	20%	18%
House	16%	7%
Account start date		
2015 onwards	21%	13%
2010-2015	31%	31%
2005-2010	24%	19%
2005-2010	11%	15%
Pre 2000	14%	22%
Account balance at UC/HB claim		
Surplus	19%	58%
Balanced	1%	0%
Arrears	80%	41%
UC/HB claim date		
August	27%	33%
September	36%	42%
October	37%	25%

Rebasing rent payments

Within the rent account data people are moving onto UC at different times and staying on for different periods. Furthermore, data on levels of arrears is taken regularly at the end of each month making for different lengths of periods between measures of rent arrears/surpluses – i.e. some might be claiming UC and due to pay rent for a whole month and others will enter or leave half way through a month.

As tenants were moving onto UC at different times in the year and given the relatively recent roll out of UC the rent accounts were split into weekly periods. This meant splitting arrears/surpluses accrued between two data points into arrears/surpluses per day and doing so for however many data points were available. This data was then plotted into weekly arrears/surpluses for each account.

Accounts were thus rebased. All start at the same point in order to track their position in each week from the start to week 25. Accounts may be in arrears or surplus at the start, but all are rebased to start from £0.

The same method was also used for the comparator (housing benefit) group. However, the data was not available for the precise time they claimed housing benefit so the first available monthly figure is used as the starting point.

What happens when people move onto UC?

The following section examines what happened after the date that tenants need to make a UC claim. The section examines various questions, similar to those explored during tests of the direct payment demonstration project. The focus is on the impact of UC on rent payment behaviour and how this differed from the comparator housing benefit rent accounts.

Did the tenants build up arrears after they moved onto UC?

There was an improvement in the number of accounts that moved from arrears to surplus after moving to UC.

By the end of the period:

- 406 accounts were in surplus
- Eight accounts were neither in surplus or arrears
- 361 accounts were in arrears

This was an improvement from the starting position of:

- 145 accounts in surplus
- 6 accounts neither in surplus or arrears
- 624 accounts in arrears

However, overall the rent accounts highlight the worsening levels of rent owed:

- 406 accounts were in a worse financial position by the end
- 361 accounts were in a healthier position than at the start
- Eight accounts were the same

Whilst a large number of accounts were in a better position the general position worsened with total arrears:

- At the start of the period arrears were £613,000
- By the end of the arrears had risen to £703,000
- In total, arrears had risen by £89,000

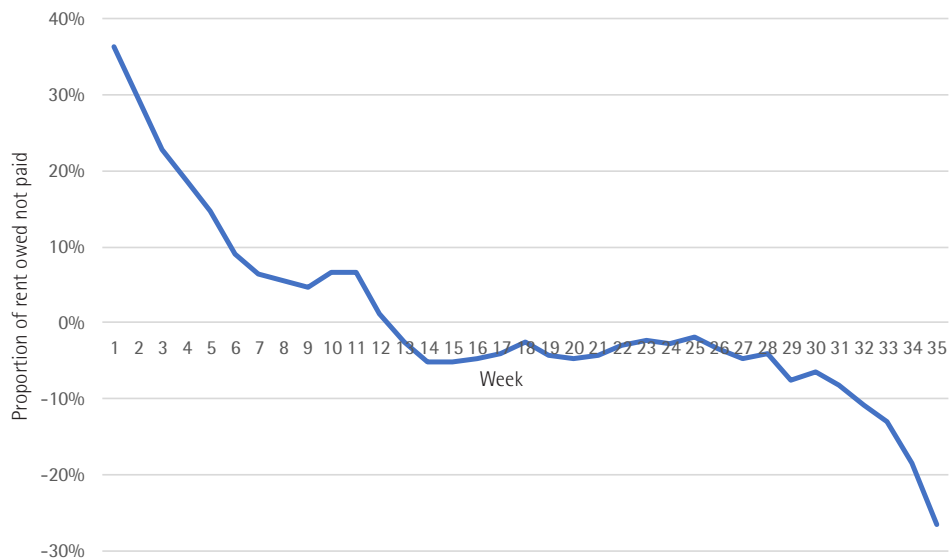
Examining the data for when tenants were on UC (the date that they need to make a claim to last period data is available), the accounts show that:

- The increase in arrears per claimant averaged £115
- On average, each person moving onto UC accrued £0.60 of arrears per day
- The average period that a tenant was identified as making a UC claim for housing costs was 193 days
- On average, each person was a week in arrears (7 days) at the end of the period
- In total 3.4% of rent owed was not paid over the period

How did rent accounts change over time?

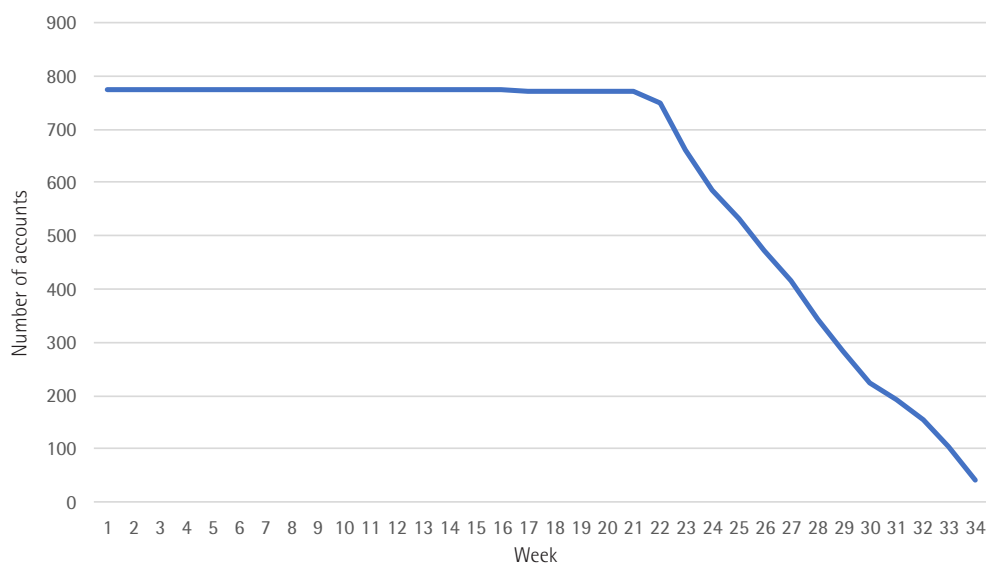
The graph below shows the proportion of rent payments that were short of the rent owed in each period. In week 1, 36% of the total value of rent owing was not paid. By week 8 this had dropped to around 6% before overall rent arrears start to be paid down at week 13. Small amounts continue to be paid back (3%-5% per week) during weeks 13 and 28. After that rent repayment becomes much higher. This pattern of rent payment behaviour was apparent in the qualitative research (see section 2), with the initial weeks said to be particularly problematic as they waited to receive their first UC payment, and was also the cause of considerable stress.

Figure 1: Proportion of rents owing not paid each week



However, the number of rent accounts which information is available for declines with time as some people transitioned at a later point. This means the sample becomes much smaller towards the latter weeks – dropping below 350 accounts by week 28 and below 200 by week 31, and therefore perhaps less reliable.

Figure 2: Numbers with rent account data by week



What proportion of the rent is owed by tenants on UC and how does this compare with those on housing benefit?

Rent arrears might be high amongst UC claimants but it tells us little about the impact of UC unless we compare it with those on the existing HB system.

In the UC group, for those accounts that had data for 20 weeks 6% of rents due were not paid. This totalled £188,000 or £156 per tenant. For those accounts reaching the 28th week arrears do fall to £142 per tenant.

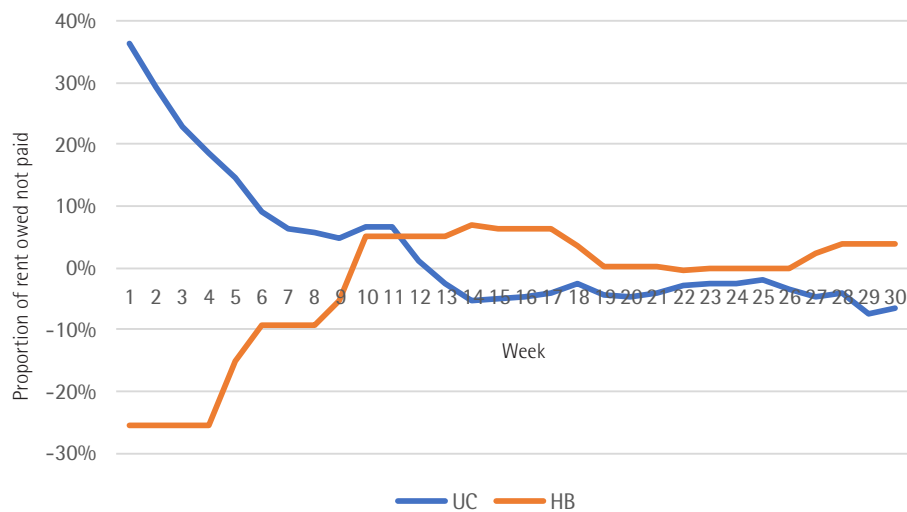
For the comparator HB group, by the 20th week rents are 5% over what was due (reflecting repayments) and 4% by week 28.

Shifting patterns of arrears

The levels of arrears also change over time. There is an almost opposite impact between claiming HB and UC, with UC claimants falling

into arrears as they transition onto UC with 36% of rent not paid in the first week. In contrast, HB claimants overpay in the first six weeks – presumably as back-dated rent is paid. The graph shows the long period it takes for UC claimants to start to fully meet their rent - it is not until week 13 they start paying down arrears.

Figure 3: Proportion of rent owed not paid each week, HB and UC



Splitting rent payments (the amount of rents paid as a proportion of total rents owed) into seven periods of four weeks further illustrates the differences between UC and HB:

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7
UC	73%	91%	95%	104%	104%	103%	103%
HB	125%	111%	98%	94%	97%	100%	99%

This table suggests that over the longer term, UC tenants start to pay all their rent and start repaying debts accrued, something echoed in the qualitative research. This improvement may be a combination of factors, such as receiving their first UC payment, receiving a lump sum of universal credit owed and repayment arrangements agreed with the council (these issues are explored in more detail in the qualitative research). The data also suggests that in the period observed that overpayments to clear arrears towards the end of the period are likely to have some impact. For HB claimants, underpayments that may have accrued before the claim start to be repaid immediately before rent payments start to settle down at a level close to the amount due.

What proportion of tenants accrued arrears after moving onto UC?

Examining the first and last recorded rent period up to 30 weeks, shows that 52% of UC tenants accrued arrears after moving to UC. For those on housing benefit the proportion of those accruing arrears drops to around 42%.

	UC	HB
Arrears	52%	42%
Balance	1%	0%
Surplus	47%	58%

NB: UC columns does not sum to 100% due to a rounding error

The picture is worse still when examining the numbers in arrears, as people are often in arrears before making a claim. This shows that almost eight out of ten tenants on UC have a negative balance at 30 weeks compared with just over two thirds on HB.

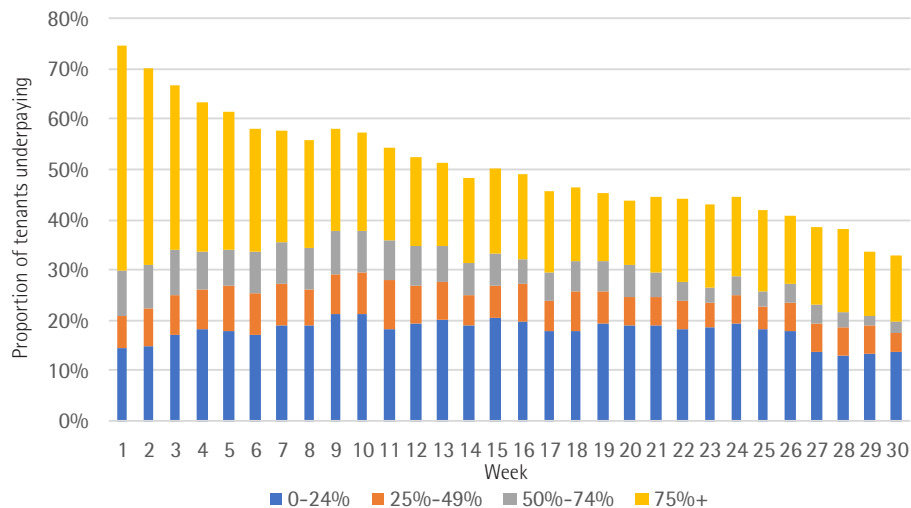
	UC	HB
Arrears	77%	68%
Balance	2%	0%
Surplus	21%	32%

Levels of underpayment by period

Examining the individual rent accounts, we can see when they are most likely to underpay and by how much.

The graph below shows at the start both the high numbers not paying their rent and the high proportion not paying large proportions of their rent – three quarters of those who moved onto UC do not pay all their rent in week one and 45% of people underpaid by 75% of their rent. The picture improves with a higher proportion of people paying, and those underpaying doing so by less. By week 5, around 60% are underpaying, a similar proportion in week 10, 44% in week 20 and 33% by week 30. Over the same period the number underpaying by 75% of rent of their rent falls to 27% by week 5, 20% in week 10, 13% in week 20 and 13% by week 30. This supports the findings from the qualitative research (section 2) where people struggled in the first weeks whilst they waited for their first UC payment.

Figure 4: Proportion of tenants underpaying each week by how much



Examining just those accounts underpaying shows the reduction in high value underpayments from a high starting point in the first month, although it creeps up towards the end. Conversely lower value underpayments rise after the first month (see below).

	Month 1	Month 2	Month 3	Month 4	Month 5	Month 6	Month 7
0-24%	23%	31%	36%	40%	41%	43%	40%
25%-49%	11%	14%	15%	14%	14%	12%	13%
50%-74%	12%	14%	15%	13%	13%	9%	9%
75%+	53%	41%	34%	34%	32%	36%	38%

What is the impact of UC on the proportion of tenants failing to pay some or all their rent?

Tenants failed to make their full rent payments 51% of the time under UC. For those on HB the figure is fairly similar at around 49%. What matters is the extent to which UC tenants are likely to underpay by large amounts. In 39% of cases rents were underpaid by more than 75% for those on UC. For those on HB the figure is just 8% - in short underpaying by over three quarters of rent due increases fivefold for the UC group.

Were the total arrears accrued due to a few paying very little rent, or because lots of people underpaid a little?

Examining underpayments by proportion of rent owed emphatically shows that the largest component of rent owed was due to large underpayments, which constituted 69% of the total value of arrears.

	Value of underpayments
0-24%	8%
25%-49%	9%
50%-75%	15%
75%+	69%

Part of this is explained by the large number of large underpayments, but by no means all.

	Proportion of underpayments	Value of underpayments
0–24%	36%	8%
25%–49%	13%	9%
50%–75%	12%	15%
75%+	39%	69%

Of those in arrears, the top 20% accounts (in terms of value of arrears at the end of the period) had over half the value of arrears.

	Proportion of the value of rent arrears
1st quintile	52%
2nd quintile	25%
3rd quintile	14%
4th quintile	7%
5th quintile	2%

Do people consistently underpay?

For the 22,000 weeks' worth of data examined, 51% of the weeks resulted in tenants not fully meeting their rent. And underpayments and overpayments were made by not just a few people but most - 93% of tenants both underpaid and paid the full amount in different periods.

This suggests that most have varied rent history (and hardly anyone pays all the time). When added to earlier data examining rent period over time, it suggests people may underpay at the start and improve thereafter.

Are arrears accrued in the early stages paid down over time?

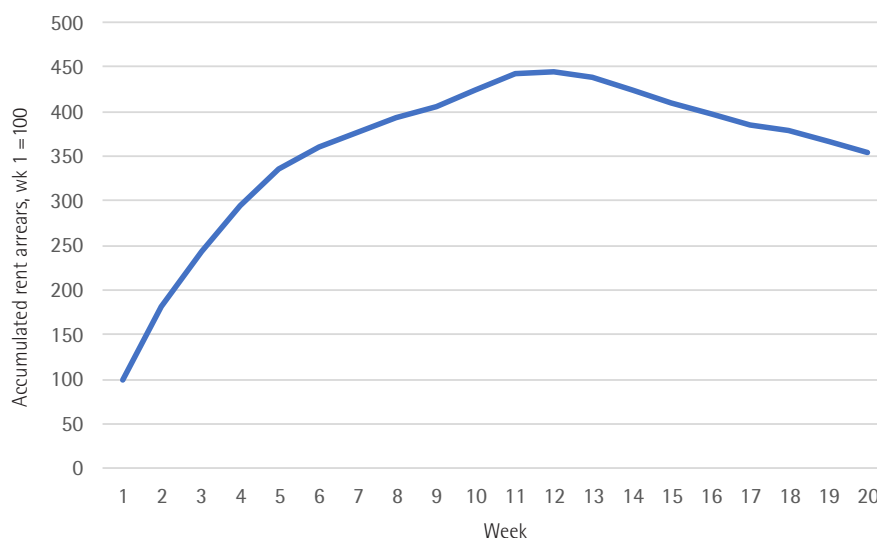
Examining the accounts for the first 20 weeks, there is a gradual decline in the number of accounts in weekly arrears from over 70% of accounts failing to pay all their rent at the start, dropping to 61% in week 12 and 56% at week 20.

The data also shows that 58% of accounts were in a worse position than four weeks previously for week 8 (i.e. than week 4) and around 55% in week 12, 51% in week 16 and in week 20 some 47% of accounts were in a worse position than week 16.

Whilst some manage to pay back some of the debt they have accrued at an aggregate level there is a pattern of increasing cumulative arrears until week 11, which can be seen in the chart below. After this point arrears start to be paid down and by week 20 drop to three and a half times what they were after week 1.

Figure 5: Accumulated rent arrears by week up to 20 weeks

Week 1 = 100

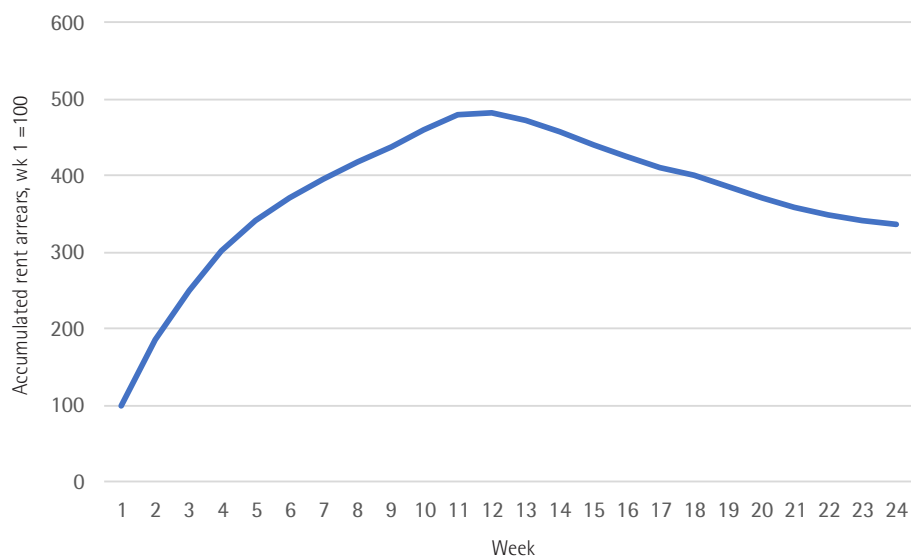


Base: 775 rent accounts

For those accounts with data for 24 weeks, rent arrears start to be paid down around week 11 (from a higher base) and fall thereafter:

Figure 6: Accumulated rent arrears by week up to 24 weeks

Week 1 = 100

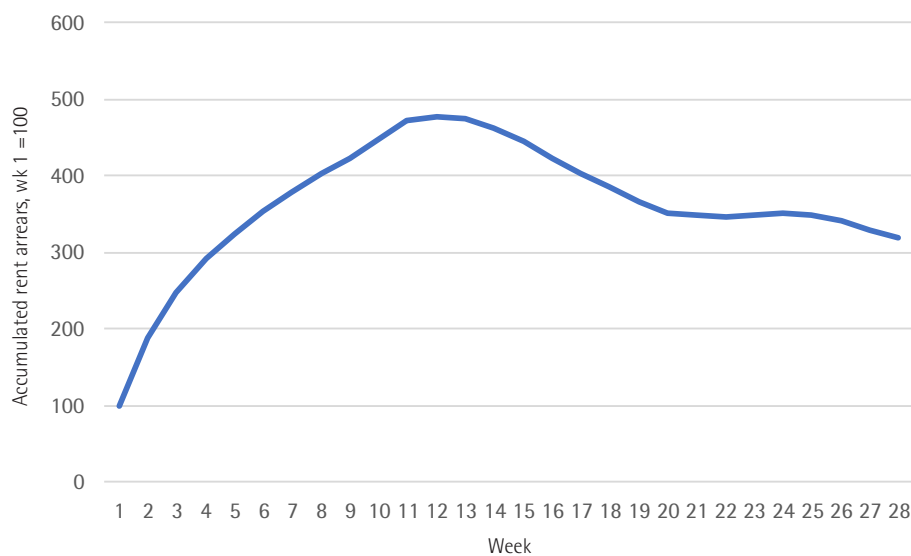


Base: 666 rent accounts

For those accounts which make it past week 28, whilst arrears peak and start to fall around the same time, there appears to be a levelling off in the amounts being repaid around week 20. If this were to continue then arrears would not be paid down.

Figure 7: Accumulated rent arrears by week up to 28 weeks

Week 1 = 100

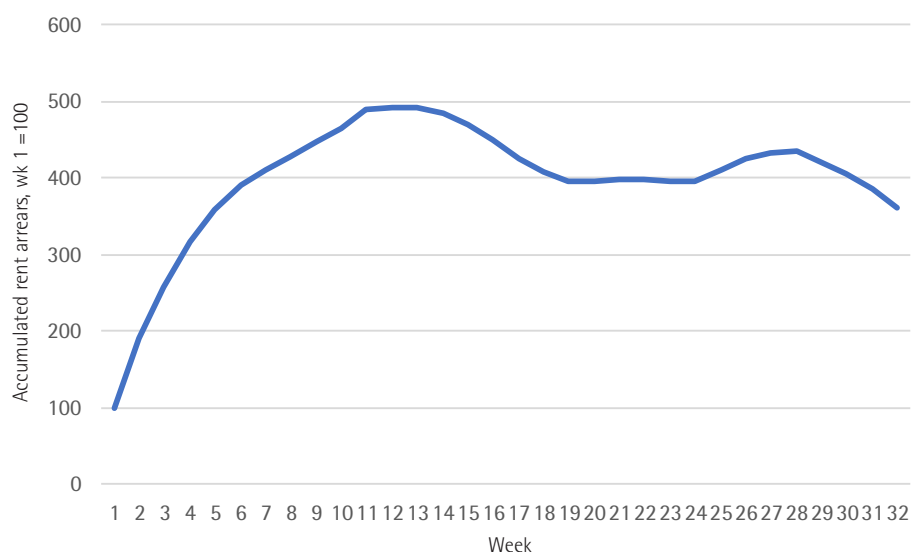


Base: 421 rent accounts

For the much smaller group of accounts that have data up to the 32nd week, again repayments stabilise around week 20, moving up and then down at the 24 and 28 week points respectively. This suggests, like the data for the accounts to week 28, that overall tenants may repay rents in their third month on UC - this only lasts for a short period before rent repayments stabilise around week 20.

Figure 8: Accumulated rent arrears by week up to 32 weeks

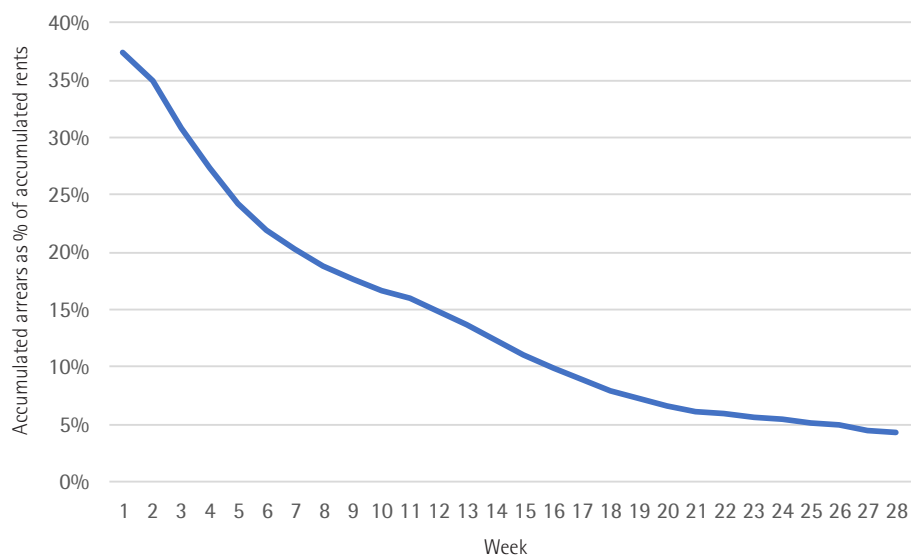
Week 1 = 100



Base: 196 rent accounts

The data suggests that rents are accumulated in the first 11 weeks, fall for 8 weeks and thereafter stabilise but overall are not necessarily paid down. This has positive and negative implications for social landlords, negative in the sense that all arrears do not appear to be paid back, but overall, they do not get worse after the initial period. Taken as a proportion of rents owed, if this pattern was to continue it would mean the rent shortfall as a proportion of rent owed would decline with time.

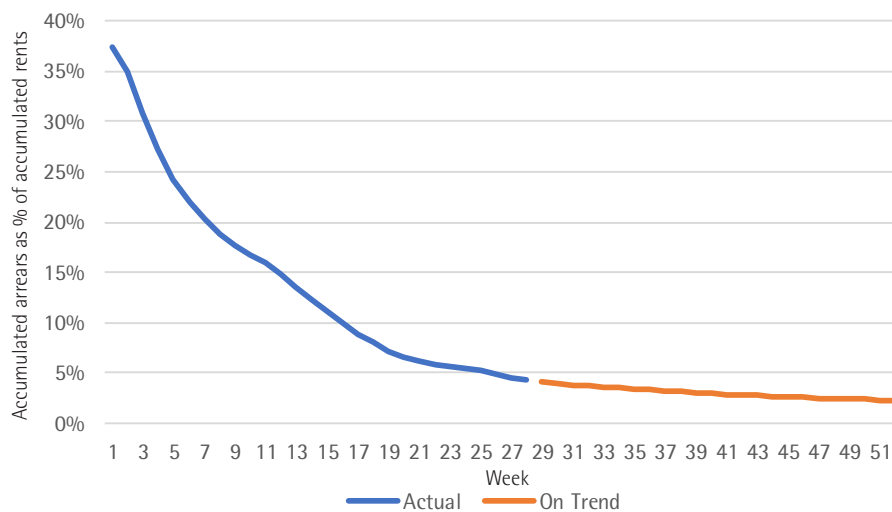
The graph below tracks this cumulative impact for the accounts reaching week 28 as a proportion of total rents owed. Arrears are just below 40% in week 1, but steadily falling as a proportion of overall rents owed to 4% in week 28.

Figure 9: Accumulated rent arrears as a proportion of accumulated rents owed up to 28 weeks

Base: 421 rent accounts

If the pattern of rent arrears stabilised for the period after 28 weeks as the data suggests – if additional arrears were not accrued but equally existing arrears were not paid back – then by the end of the year rents owed as a proportion of yearly rent owed would fall to 2%. This of course makes the large assumption that payment behaviour will stay as it has for the latter weeks where there is data available.

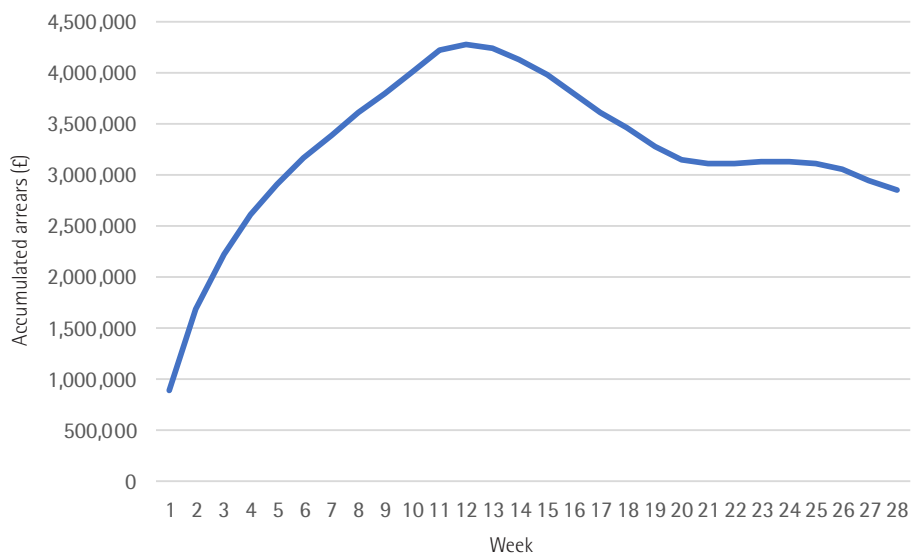
Figure 10: Accumulated rent arrears as a proportion of accumulated rents owed with on trend projection for the 52 weeks



Base: 421 rent accounts

Put into perspective, 4% of rents owed by week 28 for these accounts equates to £142 per account. For 20,000 tenants that would be equivalent to around £2.9m of arrears over the year. Furthermore, this could place pressure on cashflow during the initial transition period.

Figure 11: Modelled accumulated rent arrears by week for a landlord with 20,000 tenants



If contrasting this with the positive position HB claimants are in at the end of the period would suggest that the cost to landlords could be significantly higher. As noted earlier, after 28 weeks HB claimants on average have overpaid by around 4% of rent due. There if the difference between UC and HB is scaled up to 20,000 accounts then the cost to the landlord would be almost doubled to around £5.4m.

Are people with certain characteristics more likely to underpay?

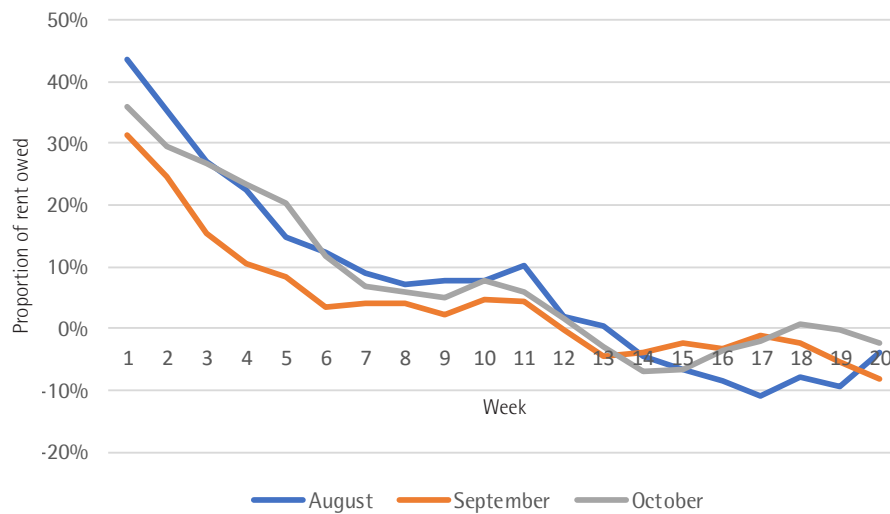
Information was available about different characteristics of claimants. Data on employment status and number of dependents was not available, thereby making it hard to eliminate other potential factors for payment rates. Nevertheless, it is instructive to see whether any factors for which information is available do appear to have a material impact.

When people transitioned onto UC

UC is a new system which may take time to bed in, with those who are initially moved onto UC facing longer delays in payments. However, there is a mixed picture with those transitioned in August initially having the largest arrears followed by the October

claimants. All the accounts follow a similar trajectory.

Figure 12: Proportion of rent owed not paid each week by UC transition month



The September accounts had the lowest levels of accumulated arrears at week 20, with August and October accounts higher. This would suggest that any variance was not due to the system becoming any better or worse with time.

	Accumulated arrears (week 20)
August	7%
September	4%
October	8%

New accounts

It was mentioned at one of the UC focus groups as part of the qualitative research that those who are used to the old benefit system may find transitioning harder as they were accustomed to benefits being paid weekly and the rent paid directly to the landlord. To assess whether the data supports this hypothesis the arrears of those tenants who have more recently had rent accounts started were compared with others.

At least half of accounts open in 2016, 2015 or prior to 2015 were in arrears after moving onto UC.

	2016	2015	Pre-2015
Proportion of accounts in arrears	51%	53%	53%

The more established rent accounts when they underpaid were likely to do so by more than the 2015 and 2016 accounts.

	2016	2015	Pre-2015
0-25%	39%	39%	34%
25-50%	12%	12%	14%
50-75%	13%	13%	12%
75%+	36%	36%	40%

But overall, there were similar levels of arrears as a proportion of rents, with accounts which started in 2015 and 2016 in marginally less arrears than the longer established accounts.

	2016	2015	Pre-2015
Arrears as proportion of rent	2%	3%	4%

Those in arrears and surplus

To see whether those already in arrears were less likely to pay or that those with a surplus used this headroom whilst waiting to claim UC, the data was analysed by those: with a surplus when they first claimed UC; those with less than four weeks' worth of arrears; and those with more than four weeks of arrears.

The number of accounts in arrears at the end was higher for those entering UC with a surplus.

	Surplus	Less than 4 weeks arrears	Over 4 weeks arrears
Proportion of accounts in arrears	65%	59%	44%

Those in surplus when transitioning onto UC were more likely to underpay by a little compared with the other groups. Those with larger arrears at the start were more likely to underpay by a lot.

	Surplus	Less than 4 weeks arrears	Over 4 weeks arrears
0-25%	49%	42%	26%
25-50%	15%	15%	12%
50-75%	10%	12%	14%
75%	26%	31%	49%

Overall, those with more than 4 weeks-worth of arrears had lower arrears at the end of the period. Those with less than four weeks arrears and those with a surplus had above average arrears.

	Surplus	Less than 4 weeks arrears	Over 4 weeks arrears
Arrears as proportion of rent	7%	6%	1%

This appears to be a counter-intuitive finding. However, those with over four weeks' worth of arrears are far more likely to move to alternative payment arrangements (28% do versus 4% of those with less than 4 weeks of arrears and just 1% who are in surplus). If you exclude those with alternative payment arrangements in the over 4 week arrears category then the levels of arrears rises.

Gender

Men appear to be slightly more likely to be in arrears than women at the end of the UC period.

	Male	Female
Proportion of accounts in arrears	58%	50%

Men were more likely to underpay by more than 75% of rent owed and less likely to underpay by a lower amount (less than 25% of rent owed).

	Male	Female
0-25%	30%	38%
25-50%	13%	13%
50-75%	12%	13%
75%+	45%	36%

Overall men are more likely to be in arrears. On average arrears for men are 7% of total rent, for women it is 2%.

	Male	Female
Arrears as proportion of rent	7%	2%

Age

To assess whether age has an impact on rent payment behaviours the sample was split into three age ranges: under 35s, 35-50 year olds, and the over 50s. This was a fairly even split in numbers, representing 35%, 37% and 28% respectively.

Data on underpayments suggests that those over 50 are more likely to be in arrears and underpay by more, although the differences are not huge.

	Under 35	35-50	Over 50
Proportion of accounts in arrears	54%	49%	57%

	Under 35	35-50	Over 50
0-25%	36%	40%	32%
25-50%	13%	15%	12%
50-75%	11%	14%	13%
75%+	40%	31%	44%

However, the overall impact of these differences is minimal with no noticeable difference in level of arrears by age – see below.

	Under 35	35-50	Over 50
Arrears as proportion of rent	4%	3%	4%

Household size

To see whether the household size had an influence on the rent payment behaviour, the sample was split into four categories: single; two-person; three-person; and four-person plus households.

The data shows that similar proportion of households were in arrears.

	1 person	2 person	3 person	4+ person
Proportion of accounts in arrears	51%	55%	51%	49%

The data shows single households slightly more likely to make larger underpayments.

	1 person	2 person	3 person	4+ person
0-25%	33%	39%	37%	36%
25-50%	13%	14%	14%	13%
50-75%	11%	13%	13%	12%
75%+	44%	37%	37%	39%

Overall there are similar levels of arrears as a proportion of rent, perhaps with single households more susceptible to arrears.

	1 person	2 person	3 person	4+ person
Arrears as proportion of rent	5%	3%	2%	3%

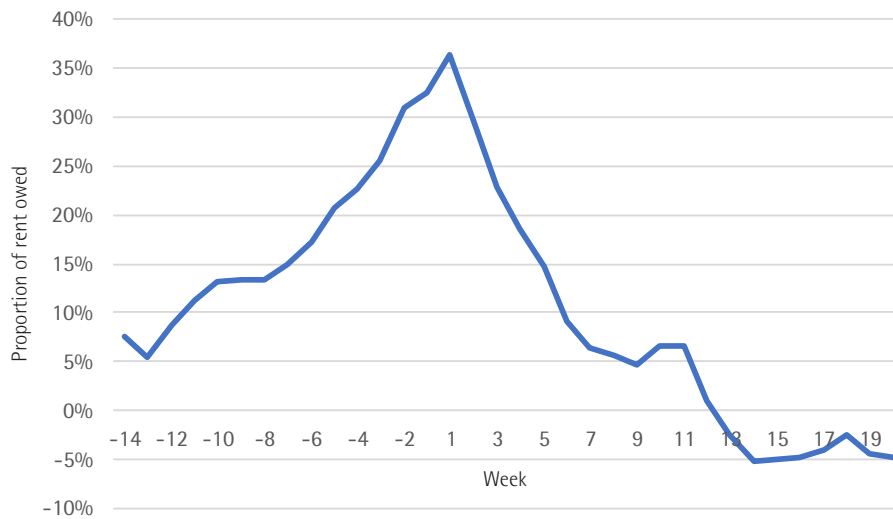
Before UC

The analysis to this point has focused on what happens after people move onto UC. However, this could mask the levels of arrears for at least two reasons. First, that arrears accrue when circumstances change (for example becoming unemployed) and people make a new or different claim. Second, that the landlords do not pick up the actual time when they have made a claim meaning that there is a lag between the claim and payment that is not fully identified in the data.

The precise balance between causes cannot be picked up in the data, although it does show that there is a ratchetting up in the levels of arrears before a first claim is made. The graph below shows that 14 weeks prior to the date their claim is logged, weekly arrears rise

from around 9% to 13% for 8 weeks before, to 23% for 4 weeks before, and to 33% the week before.

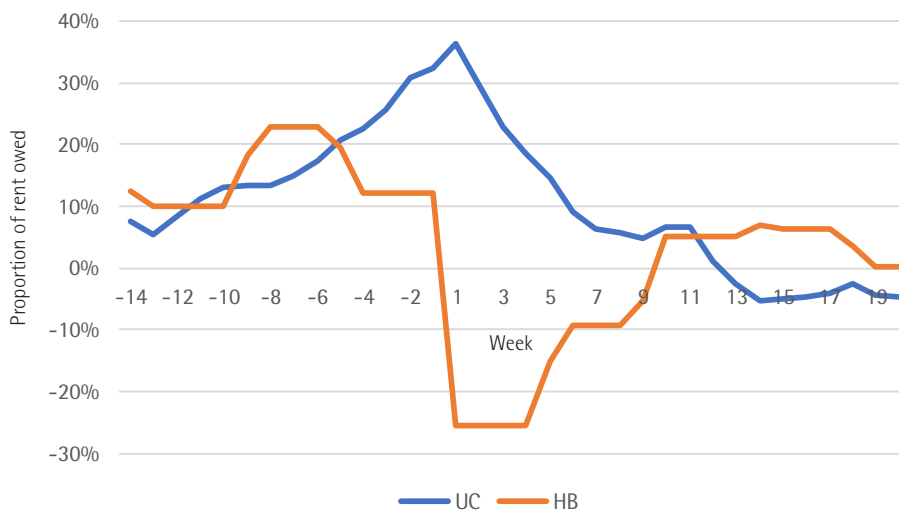
Figure 13: Proportion of rent owed not paid each week before and after transition to UC



As we don't know why there are mounting arrears to the point of claim being registered it is hard to tell the real impact of UC as opposed to potential other factors (for example, people losing their job and unable to pay their rent whilst they wait to make a claim).

There is data from the housing benefit sample which shows that like the UC sample tenants fail to make their full rent in the weeks before the move to claiming benefits. Overall, average weekly arrears as a percentage of rent do not climb in the same way as under UC - HB weekly arrears fluctuate around 10%-20% rather than building up steadily to just below 40% as under UC. Furthermore, they fall rapidly once HB is claimed and claimants start to repay prior arrears immediately unlike UC (as previously mentioned).

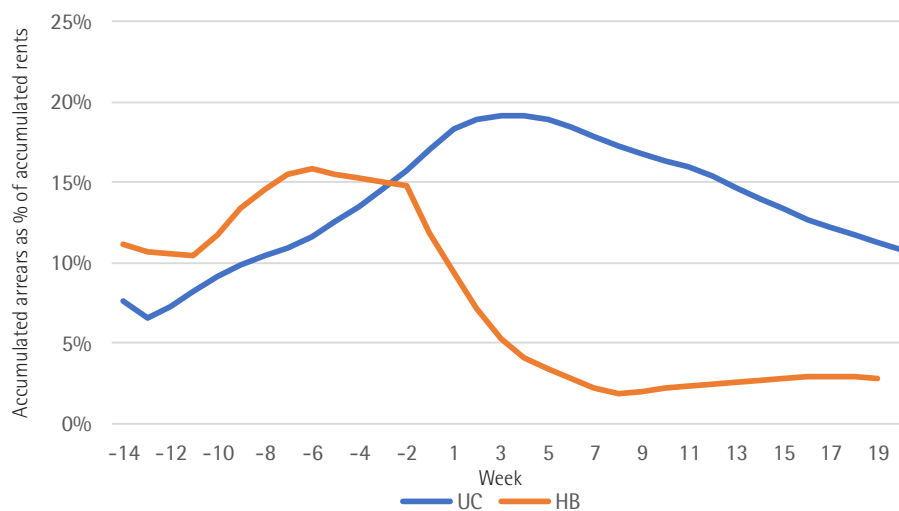
Figure 14: Proportion of rent owed not paid each week before and after transition to HB and UC



Tracking accumulated arrears as a percentage of rent owed for both HB and UC shows that those moving onto HB build up arrears in the 14 weeks prior to making a claim, which peaks at just above 15% of rent owed during the period. This is then rapidly paid down by week 8 where arrears are around 2-3% of the amount owed. It then plateaus at this level thereafter.

For those UC claimants, arrears rapidly build up to nearly 20% of rent owed by week 2 on UC. After that arrears as a proportion of total rent (until that point) then slowly tail off. By week 20 on UC (34 weeks covered in total) arrears are around 10% of what was owed over the 34-week period. As the graph below illustrates, the gap between HB and UC arrears widens dramatically from around two weeks before the claim and then narrows. However, even by week 20 there is a significant gap.

Figure 15: Accumulated rent arrears as a proportion of accumulated rent owed each week before and after HB and UC claim



What impact do alternative payment arrangements have on arrears?

The data until now has focused on the payment history of those on UC regardless of whether they move to an alternative payment arrangement. This can be triggered when a claimant is deemed unable to make payments or if arrears are too high.

Of the 775 UC rent accounts examined, there were 111 accounts (14%) with details on alternative payment arrangements.

Overall rent owed for those who had moved onto an alternative payment arrangement, including the period before the arrangement was agreed, were in surplus by 8.2% of rent due. In contrast the total for the other accounts, stood at 3%. Furthermore, arrears before those who later were on APA stood at 38% of rent (for an average of 50 days). For those not on APA arrears were more modest at 10% using the same 50-day benchmark.

	Arrears pre-APA/Before 50 days (Direct payment)	Arrears post APA/After 25 days	Overall arrears	Arrears per person (£)
APA	38%	-23%	-8.2%	-£286
Direct payment	10%	1%	3%	£131

The data shows that for each day before a tenant moved to alternative arrangements they underpaid by an average of £21.17. Once they moved to alternative payment arrangements they paid an additional £4 per day. As a result, at the end of the period the accounts were in surplus by £286 for those with alternative payment arrangements. For those paying direct they were in arrears of £131. This means APA tenants are three and half weeks' worth of rent better off.

Increased use of APA would therefore be advantageous for the landlords and for those tenants struggling to pay their rent. However, as shown earlier those moving to APAs are more likely to be in larger arrears when they move onto UC. As such, whilst they are in surplus during the UC period they are starting from a worse position and do not repay pre-UC arrears. Indeed, their total arrears at the end of the period the data covers are on average 50% higher than those with direct payments.

Differences between Southwark and Croydon tenants

The analysis has focused on the impact on tenants overall, this section examines whether tenants' rent accounts are different for Southwark, Croydon and Peabody/Family Mosaic tenants.

The split by landlord shows that Southwark tenants were more likely to find themselves in arrears, especially compared with Peabody/Family Mosaic tenants.

Furthermore, Southwark was the only landlord to have rent arrears over the whole period. Arrears totalled 8% of rent owed, equivalent to £270 owing per tenant or 16 days of rent.

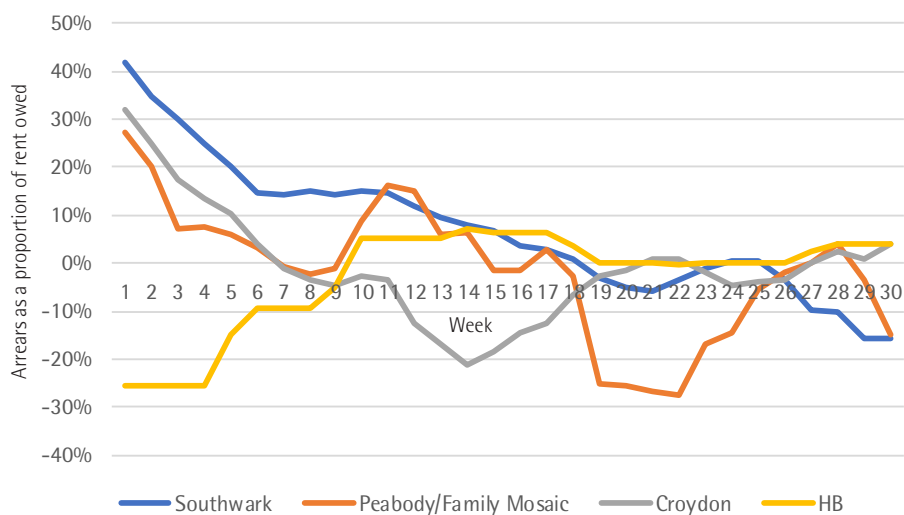
This contrasts with the other landlords where there was a surplus once moving onto UC, with Croydon tenants on average overpaying by £45, equivalent to 3 days of rent. It should be noted, however, that Croydon supported 47 tenants with £72,000 of Discretionary Housing Payments to help with rent arrears and prevent evictions.

Whilst Croydon and Peabody/Family Mosaic tenants after the transition onto UC were in surplus, levels were not as high as those on HB which were 4% in surplus by week 28.

	Southwark	Croydon	Peabody/Family Mosaic
Worse	57%	49%	36%
Arrears as proportion of rent	8%	-1%	-1%
Rent owing per tenant	£270	-£45	-£31
Arrears as days	16	-3	-1

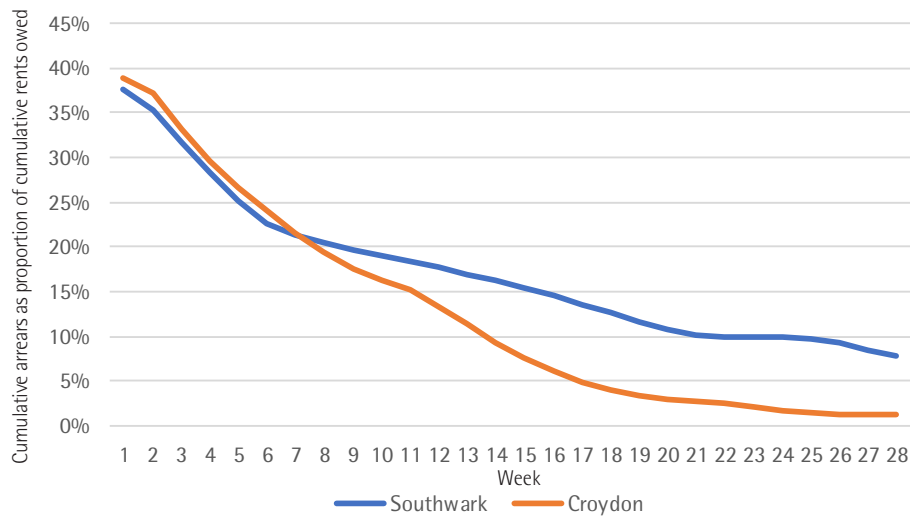
The level of arrears and surpluses affecting the different landlords take a similar pattern of high arrears at the start which falls over time. The difference between Croydon and Southwark tenants is that arrears start at a higher level in Southwark (42% of rent owed versus 32% in Croydon) and they fall more slowly. It is not until week 19 that weekly rent payments are in surplus and people start paying down arrears. In Croydon repayments are overall being made in week 8. The Peabody/Family Mosaic line is more variable, perhaps reflecting the relatively small sample. However, this follows a similar trajectory while the UC accounts contrast with those on HB where arrears are being paid back from the first week onwards.

Figure 16: Weekly arrears by landlord with HB comparison



This difference in weekly arrears has longer-term implications for overall levels of arrears. As noted earlier, cumulative arrears as a proportion of cumulative rents owed declines with time as tenants start paying closer to the rent owed. For those accounts which have data for 28 weeks, those in Croydon diverge from Southwark tenants around week 8 with arrears falling steadily, while in Southwark the decline is shallower.

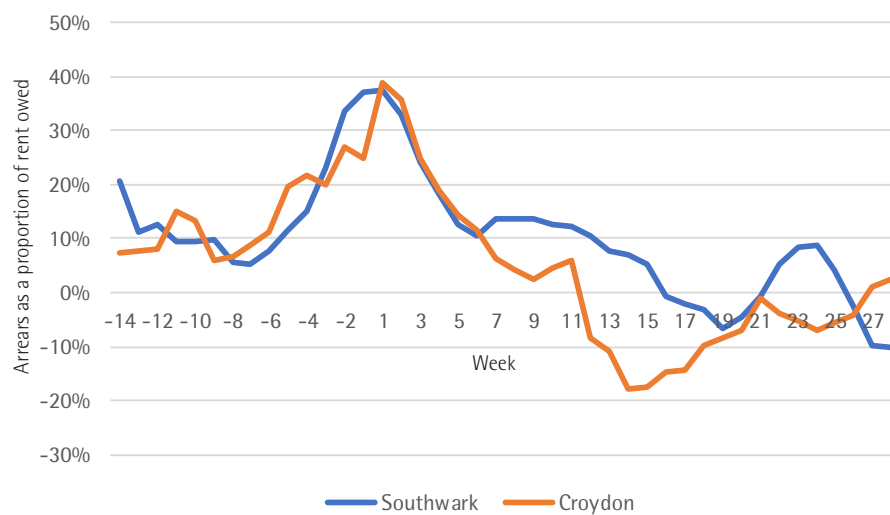
Figure 17: Cumulative arrears as proportion of cumulative rents owed by landlord



Base: Southwark 220 accounts, Croydon 183 accounts

Taking into account the weeks before the tenants move onto UC, both in Croydon and Southwark there is a similar pattern of arrears building up in the weeks ahead of moving onto UC.

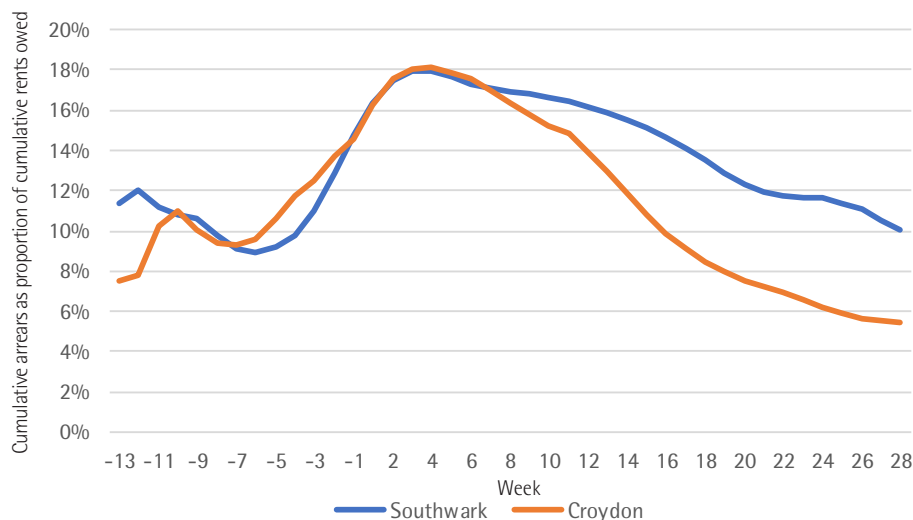
Figure 18: Weekly rent arrears before and after transition to UC by landlord



Base: Southwark 220 accounts, Croydon 183 accounts

Including these weeks into cumulative arrears it shows that Southwark and Croydon tenants start from a similar position, building up around 18% of arrears. After the eight-week mark Croydon tenants' arrears fall faster to around 6% of arrears while Southwark's fall to around 10% of arrears for the period.

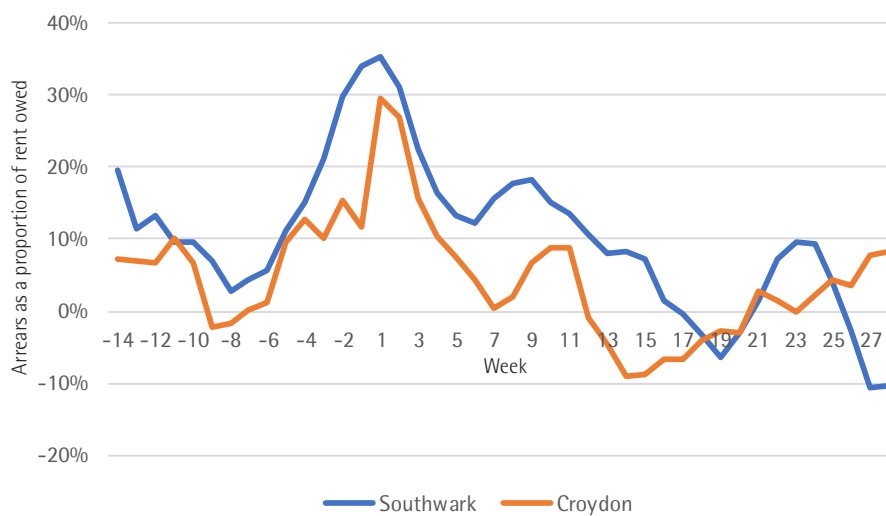
Figure 19: Cumulative arrears as proportion of cumulative rents owed by landlord pre and post UC transition



Base: Southwark 220 accounts, Croydon 183 accounts

In Croydon there was more use of APAs, which could potentially explain this difference. However, excluding those who went onto APAs shows that overall Southwark tenants in most weeks accrue larger arrears.

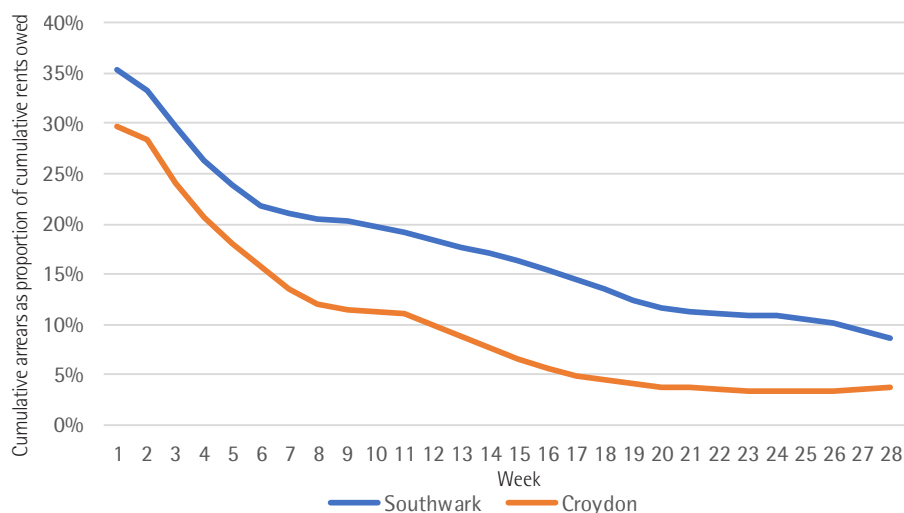
Figure 20: Weekly rent arrears before and after transition to UC by landlord, excluding those with APAs



Base: Southwark 197, Croydon 148

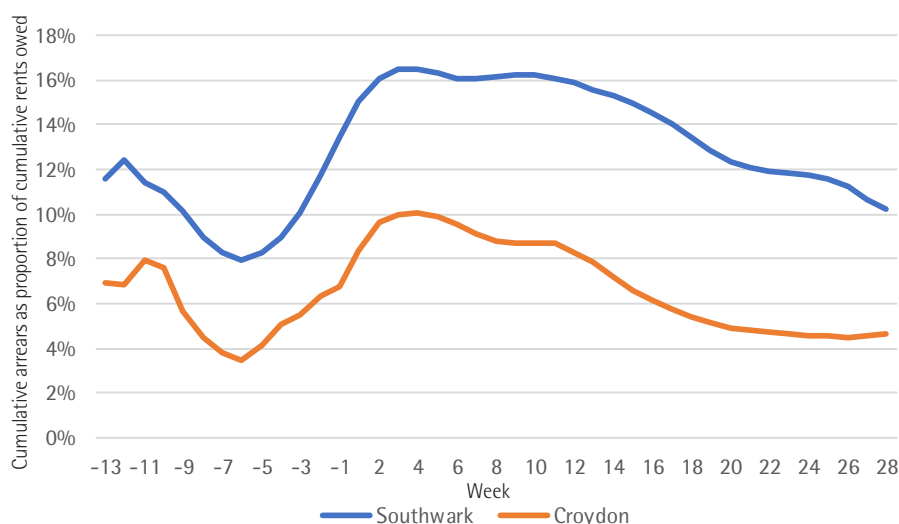
This pattern is also seen in the cumulative arrears, whether before or after moving to UC. Indeed, the overall end position when excluding those on APA suggests very similar outcomes for both Croydon and Southwark. This is not to say they don't make a difference, but as noted earlier, tenants with APAs are likely to have larger prior arrears.

Figure 21: Cumulative arrears as proportion of cumulative rents owed by landlord excluding those on APAs



Base: Southwark 197, Croydon 148

Figure 22: Cumulative arrears as proportion of cumulative rents owed by landlord pre- and post-UC transition excluding those on APAs



Base: Southwark 197, Croydon 148

Southwark's higher levels of arrears could however still be explained by fewer tenants moving onto APAs than in Croydon, which pushes up overall arrears. In Croydon 20% of accounts went onto alternative payment arrangements while in Southwark the figure was 10%. Using the figures on the difference between APA and direct payments if a further 10% of Southwark claimants had APAs then the arrears at the start and end of UC period would have been around a percentage point different - at around 7%. Whilst better it is still above the arrear levels in Croydon.

Conclusion

The rent accounts show that under UC arrears are worse than under the previous HB system. Arrears for UC tenants rise rapidly in the first weeks and it is some time before they start to be paid down. After a period, overpayments tail off and arrears remain. This implies that if on trend the initial debts accrued may not be fully repaid. However, if rent payment behaviour continued on trend arrears as a proportion of rent for the year would drop significantly.

The rent account analysis offers some insights into where efforts could be focused to reduce arrears. For example:

- Arrears build up most quickly in the first few weeks. This implies that changes to payment timings could significantly reduce the initial build-up of arrears, which the data suggests people often struggle to repay.
- Tenants entering alternative payment arrangements see arrears rapidly fall. Extended use and greater focus on triggering them or help seeking a workable agreement with DWP could help reduce overall levels of arrears.
- There appears to be differences in rent payment behaviours by landlord. This suggests that landlords have a significant role to play in reducing arrears.
- For landlords wanting to minimise arrears, the focus should arguably be on the 20% of those who are in the largest arrears. This group makes up the majority of total arrears. However, the rent analysis cannot determine whether changing behaviour amongst this group may be harder/more expensive.
- As arrears ratchet up quickly in the first few weeks of people moving onto UC there may be cash flow (as well as staffing) implications for landlords if large numbers move onto UC at the same time.
- Repayments appear to tail off towards the end of the period covered. This would suggest that there may be a longer-term cost to the landlord of people moving onto UC as arrears may prove difficult to recover.

It is not possible to determine from the statistics the full cost implications to social landlords of having to chase up and support tenants in arrears. It's also not possible to comprehend from the data the implications for tenants, not just in terms of financial security but also wellbeing. What it does show is that arrears are worse and that tenants are likely to accrue large levels of arrears when they make their first UC claim. The following section gives more detail into what UC means for tenants and how it works for them.

Section 2: Universal Credit in Southwark – Qualitative Research Findings

BritainThinks

Contents

01

Overview

02

Key findings

03

Background attitudes towards Universal Credit

04

The transition process in focus

05

Universal Credit and money management

06

Impact of Universal Credit on debt and arrears

07

Information and support provision

08

Reflections and implications

1

Overview

Background and objectives

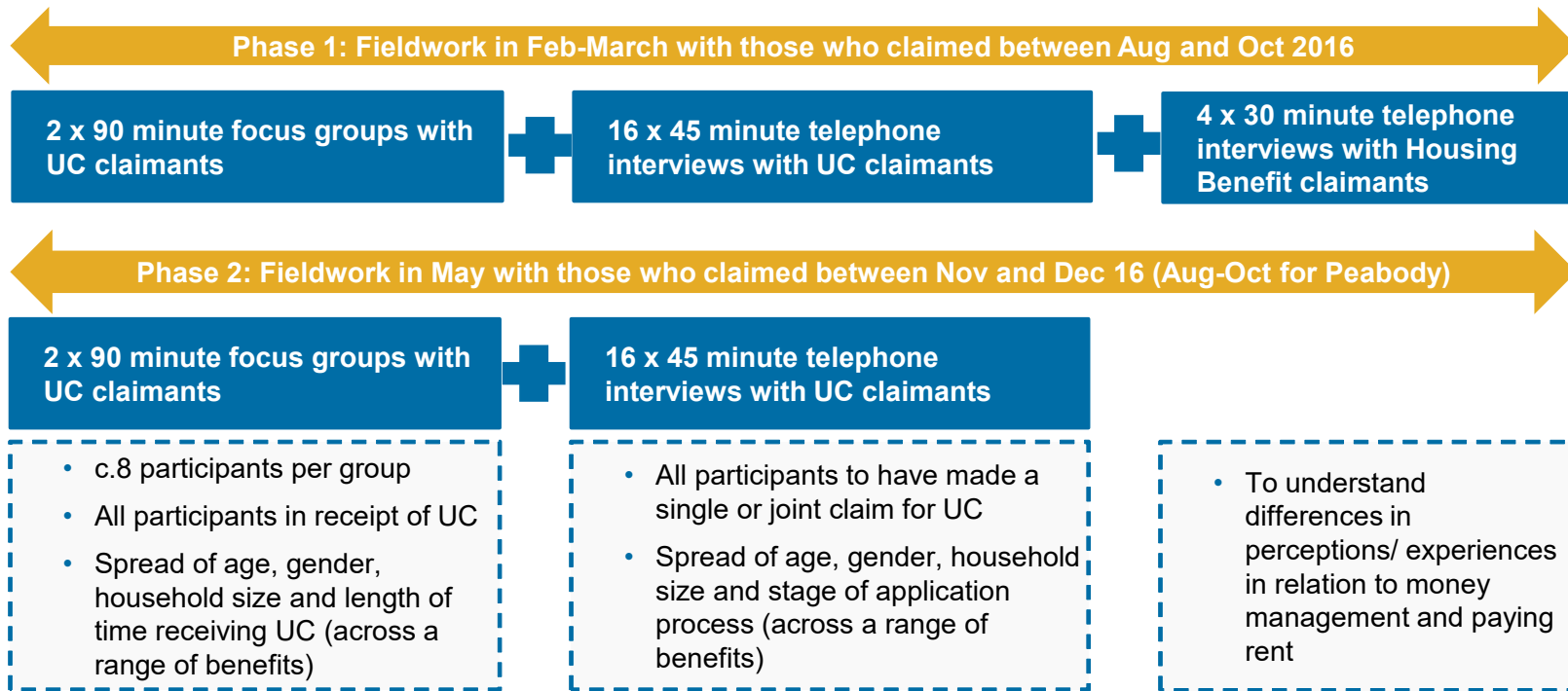
- This report provides headline findings from a **two-phase** qualitative research study investigating the **impact of Universal Credit on Southwark residents**, in particular those who rent from the council.
- The research aims to understand the impact of the new Universal Credit system as it is piloted in the borough, with a particular focus on tenants' ability to **manage their money** and how this may be affecting their **ability to pay rent**.
- It explores the views and experiences of tenants in relation to their experience of applying for this new form of benefit payment, and how they are coping with the new system. Importantly, it attempts to identify **what lessons can be learned** and **where improvements might be made** to mitigate against the risks of people getting into financial difficulties as Universal Credit is rolled out.

Universal Credit (UC) is a new type of benefit designed to support people who are on low income or out of work. It replaces six existing benefits and credits (Jobseeker's Allowance, Employment and Support Allowance, Income Support, Child Tax Credit, Working Tax Credit, Housing Benefit) and is a single monthly payment transferred directly to a claimant's bank account.

Overview of our approach

- The research has been undertaken by independent researchers **BritainThinks**, in partnership with **The Smith Institute**.
- A qualitative approach was adopted for this study, with both phases consisting of a **combination of focus groups and telephone depth interviews** with Southwark Council tenants claiming, or who are in the process of applying for, Universal Credit. We also spoke to two Peabody Trust tenants.
- Qualitative research is **illustrative, detailed and exploratory**. It offers insights into the perceptions, feelings and behaviours of people rather than quantifiable conclusions from a statistically representative sample. Owing to the small sample size and the purposive nature with which it was drawn, findings from this research cannot be considered to be representative of the views of all Southwark tenants. Much of the evidence in this report is based on participants' recall and their perceptions of the Universal Credit process. It is important to remember that even though some perceptions may not be factually accurate, **they represent 'the truth' to the participants** and, as such, are vital in understanding their attitudes and views.

Methodology



2 Key findings

Key findings

- 1** Top of mind associations with UC are generally negative, and are primarily driven by claimants' direct experiences of the transition process – specifically delayed payments
- 2** Claimants describe both positive and negative experiences of the UC application process. But, there are clear issues in terms of how quickly claimants receive payment
- 3** Delayed UC payments have put many into debt and rent arrears, causing considerable stress to individuals
- 4** Many are struggling to manage money on UC – for some it's adapting to a single monthly payment, but for others it's simply not having enough money

Key findings

5

There is a strong aversion to debt. Claimants use a range of strategies to cope financially, with many relying on friends and family (though this is not an option for everyone)

6

UC can feel like a 'one size fits' all process. Claimants with unusual or changing circumstances can find the system inflexible and challenging to navigate

7

There is a clear role for better and more joined-up support and information - it's less about budgeting and more about clarity of what UC means for individuals

3

Background attitudes towards Universal Credit

Awareness of UC is low until application – this has implications for the council dealing with effects of confusion during the transition

- Little **awareness** of, or **knowledge** about, Universal Credit (UC) until it comes to making an application for benefits
 - Tenants appear to have been unaware of the impending roll out (as do existing Housing Benefit claimants yet to move to UC)
- Low awareness can lead to errors and confusion during the application and this puts pressure on the council
 - To provide the necessary support to residents as a result
- But, having been through the application process, most tenants have a good understanding of its **key principles**
 - A monthly payment that replaces multiple benefits
 - Paid directly to the recipient

"I first heard about it when I went to apply at my local job centre, thinking it was still Job Seekers' Allowance. They told me the system had changed."

(Depth, male, phase 2)

"It's everything chucked into one basket."

(Depth, male, phase 1)

"It's just like JSA but you get it all at once, it's up to you to use it wisely."

(Depth, female, phase 1)

Top of mind associations with UC are generally negative – driven by experiences of the transition process

- Spontaneous feedback about UC centres on claimants' **problems during the transition process**
 - The application itself is particularly burdensome for those with unusual circumstances e.g. being self employed or a foreign national
 - Many report having fallen into financial difficulties as a result of lengthy delays to receiving their first payment
- Those with **previous experience claiming benefits** find the system particularly hard to to navigate
 - They are used to claiming under the previous system
 - And feel like they have been 'forced' onto UC
- Compounded by the fact that many are **facing difficult circumstances**
 - Unemployment, disability or health problems, low income
- Though **some are pragmatic** and accept that there will always be teething problems with this kind of system change

"They've got everything wrong. Everything that could possibly go wrong has gone wrong."
(Depth, male, phase 1)

"Anyone new joining would be okay and think 'great idea', but because we've been on other benefits before, that's what's upset people like us."
(Focus group, female, phase 2)

The principle is less of an issue – it is broadly accepted, though changing to monthly payments is hard for some

Most accept the principle...

- ✓ On board with the idea of **encouraging budgeting monthly** – as this mimics employment
- ✓ Moving to a monthly payment regime poses little issue for those **used to a monthly salary**
- ✓ It's nice to **have control** over your own finances
- ✓ **Simplicity** of having all their benefits in one payment

"It sounds great... I would be in sole charge of my money. In other words, it's just as if I was in full-time employment."
(HB depth, male, phase 1)

...but some are unconvinced

- ✗ Particularly those who find it difficult to budget monthly
 - Temptation to **spend** at the start of the month
 - Especially those **used to weekly/ fortnightly payments** from benefits or work
 - Dislike having control over their own rent payments
- ✗ Even those confident in their own ability to budget worry about more **vulnerable groups** e.g. those with substance abuse problems

"I find it difficult being paid monthly, sometimes I have nothing at the end of the month... I was managing fortnightly; now I've got to get my head around monthly."

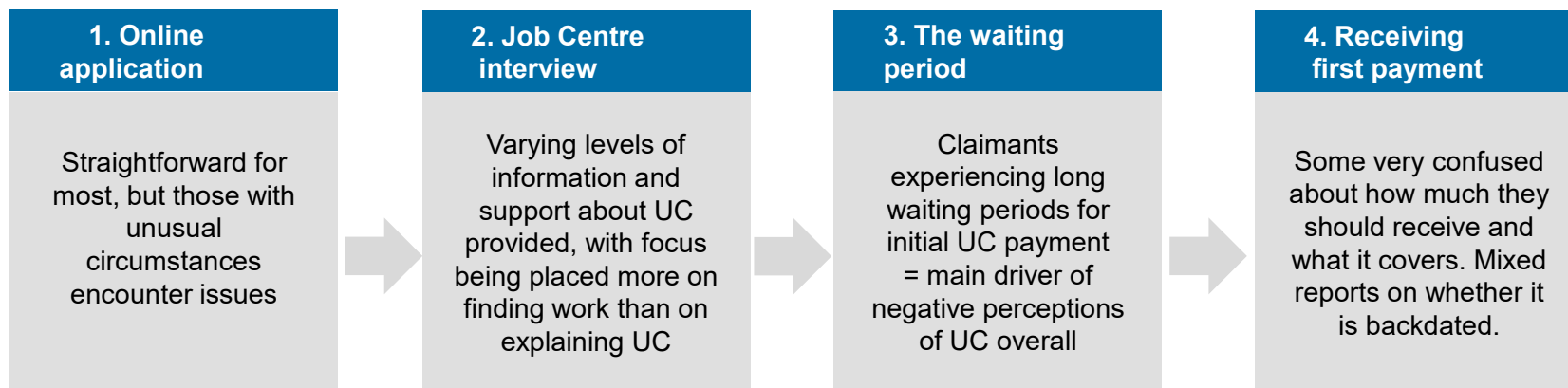
(Focus group, male, phase 1)

4

The transition process in focus

Claimants report mixed experiences at each stage of the transition process – suggesting better support and information will be key going forward...

We broke the Universal Credit transition process into stages, and asked for detailed feedback on each stage:



Stage 1: *The online application*



The online application is straightforward for most people...



- ✓ Those comfortable with **using technology** find the online application straightforward enough
- ✓ **Younger participants**, in particular, prefer applying online
- ✓ Those who aren't confident with computers generally felt they had **support**
 - From the Job Centre, friends and family, or local library
- ✓ Many find the **online account helpful** as a central point for all their information needs

"Online works well, you just have to make it work."
(Focus group, female, phase 1)

"You can access it any time you want, from a phone or tablet. That's good, rather than waiting for letters to come through. It's quicker that way."
(Depth, male, phase 2)

... but, can be frustrating for those with unusual or changing circumstances



- ✘ The application process feels designed as a ‘one size fits all’
 - **Foreign nationals** find the requirements for evidence of UK residency excessive
 - **Temporary contractors** and **freelance/self-employed workers** find it difficult to estimate future earnings, and irregular pay means contacting UC every month to adjust payments
- ✘ Some question the level of **identification and documentation** required
 - Particularly frustrating when it is seen to hold up the payment process
 - Some report issues with the online identification process (through Experian and especially the Post Office)
- ✘ Some confusion for **joint claimants**
 - Not always clear until late in the process that they need to make a joint claim
 - Instances of accounts not linking, and the joint application form can feel repetitive
- ✘ **Online management** of the account is hard for those who aren’t confident online, with learning difficulties or who have English as a second language

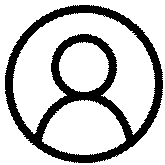
“When it came to my resident test, that’s what took a long time. When you have a different passport, that causes problems.”

(Focus group, female, phase 1)

“I’ve found it very difficult, a simple person cannot understand online. I took two days to do the online application.”

(Focus group, male, phase 2)

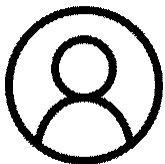
CASE STUDY: When claimants don't fit the mold



Cynthia* is a foreign national. She found the UC application process onerous and frustrating.

She felt she had to provide **unnecessary information** to apply for UC, even though she had lived and worked in the UK for over 15 years. This included: the exact date she arrived in the UK, the airport she arrived at, whether she brought any pets with her, and the number of times she has returned to Jamaica since.

"I still have my Jamaican passport, so I find it very difficult...If you don't have a British passport, it takes you ages for you to even get through."



Moira* is a UC recipient, but has found reporting a **change in circumstances** – she has had a baby – challenging. Until the baby is on the system UC won't pay out for child-related benefit. But, it was unclear how she could report the baby's due date online. She then had a caesarian which made it difficult for her to report the birth in person. UC have said they are unable to pay her until she has a birth certificate, but she is struggling to get an appointment at the council to register the birth – the waiting list is long. She's now being threatened with sanctions.

"They were going to sanction me because I hadn't entered the due date online. But nobody knows how to find it on the system, even in the Job Centre... Don't have a baby on Universal Credit!"

*Not participant's real name

Stage 2: *The Job Centre appointment*



Few criticisms of the interview process...

- ✓ Interviews are described as being **generally problem free**
- ✓ Job Centre **staff seen as helpful** and friendly in most cases
 - Especially for those with a pre-existing relationship

...but there are clear differences in the quality and level of information provided

- ✗ A clear **lack of consistency** in terms of the information being provided to claimants
- ✗ For some, particularly those who would have claimed JSA under legacy arrangements, the interview focused more on **looking for work** than it did on explaining the UC process
- ✗ A sense that Job Centre **staff are still learning** and are not fully informed about the process
- ✗ Ultimately, some left feeling confused and ill informed about **what happens next**



"It was good, actually. It was easier than for JSA...I found it easy."
(Focus group, male, phase 1)

"I felt that the people at the Job Centre didn't really know that much about it, because it was all new. It doesn't really fill you with confidence."
(Depth, female, phase 2)

"I think because [my partner] was working, they were more focused on getting his hours up so he doesn't have to rely on Universal Credit."
(Focus group, female, phase 1)

CASE STUDY: Claimants left feeling confused



Anna is currently in part-time work, but after her partner lost his job they made a joint application for UC. At her appointment, Anna felt that the Job Centre **staff focused too much on her finding another job** rather than explaining what UC would mean for her.*

Following the interview, Anna found herself unprepared for the shift to monthly payments. Nor was she expecting the delay before the first UC payment went into her bank account.

She was surprised when she went to the bank the following week to find her Child Tax Credit had not been paid as previously.

**Not participant's real name*

"They didn't mention Child Tax Credits, they don't warn you. As soon as I made my claim, all of my benefits stopped."

"Once we know it's on a set day and we know how much we're getting, we'll be fine. The problem is not knowing how much we're getting."

Stage 3: *The waiting period*



Claimants complain of long waiting periods...



- ✗ Claimants typically **waiting longer than they anticipated** for their first payment
 - In phase 1 typical waiting periods of 2 weeks to 6 months
 - In phase 2 there **appeared to be more consistent** waits, usually between 1-2 months
- ✗ Lots of **uncertainty around when** payments will start
 - While some found all the information readily available via their online account, others felt left in the dark
 - Compounded by the difficulty in getting through to the UC helpline

"The problem is the long waiting before it's sorted out, it's so horrible."
(Depth, female, phase 1)

... almost all cite severe financial challenges as a result

- ✗ Lack of money for rent, bills and living expenses whilst waiting for payment
- ✗ Causing high levels of **stress** and anxiety for some without means to manage
- ✗ Many claimants are **already in difficult circumstances** financially and emotionally – waiting for UC payments only exacerbates this
 - E.g. losing a job, managing on low income, health issues

"It's so scary. Some of the bills piled up, it forces vulnerable people to get into arrears."
(Depth, female, phase 1)

CASE STUDY: The impact of delayed payment



Peter was expecting his UC payment at the end of November. When it didn't come, he phoned UC and was told they had been waiting for additional information from the council. After spending one hour a day for next 10 days on the phone to UC, Peter was told the issues had been rectified and that he would receive payment shortly.*

*However, it took a further six weeks for payment to finally go through. During this waiting period Peter relied on **financial support** from his sister and also used a credit card – he knew about the UC loan, but wasn't keen on taking it. He describes it as an incredibly stressful time for him.*

**Not participant's real name*

"It was a nightmare. The UC people said they were waiting for a letter from the council and that went on for 10 days. I was on the phone an hour a day!"

"I knew about the [UC bridging] loan, but I didn't want to take it because I don't like owing people money."

Stage 4: *Receiving first payment*



For some, checking their first payment via their online account is simple and clear...

- ✓ **Notification** of when to expect first payment e.g. text message and reports of UC checking in to confirm payment received
- ✓ **Breakdown** of amounts including deductions due to advance loan
- ✓ For these individuals this is **preferred** to the previous system, as everything is in one place

... but most find their first payment confusing and it is often less than expected

- ✗ Unclear over **how much** they should receive and amount is **often less than expected**
 - Sometimes significantly reduced due to deductions for advance/ arrears
- ✗ Confusion about **what it is supposed to cover** and the **time period** it is meant to last
 - Especially for those previously in receipt of HB, not used to paying own rent/ council charges
 - Some say amount is sometimes not enough to cover rent
- ✗ Mixed reports of whether or not payments were backdated



"It's clear how much you will be paid, how much is going. Every time you can check online your account, how much you've got rent, how much is Tax Credit."

(Focus group, male, phase 2)

"It was considerably less than what we were originally told we would be entitled to."

(Depth, male, phase 2)

5

Universal Credit and money management

Mixed views on managing money and rent on UC – for those used to the previous system it's challenging

- ✘ Don't like the idea of managing a monthly payment themselves
 - Find **paying their rent themselves** complicated - many prefer the old system of having their rent paid directly to the council and express frustration that this is no longer on offer (unless you can demonstrate significant problems in paying your rent)
 - Confusion around responsibility for paying **service charges**

"You start to take £10 or £20 off it, don't pay the full rent and the council start to get on you. That's what I don't want, I just want it to go straight to the council."
(Focus group, male, phase 1)

- ✘ Hard to manage money **across a whole month**
 - It's tempting to overspend at the start
 - Particularly those who are used to weekly benefits/ salaries previously
 - Concerned about **overspending** and being unable to pay rent

"It makes more sense to pay direct...I don't want arrears, the most important thing is my roof."
(Focus group, male, phase 2)

For those still on Housing Benefit, the idea of a monthly payment and rent not going directly to landlord raises concerns about missing rent payments

Others simply don't have enough money – this is driving financial difficulties rather than poor money management

- ✓ Some see value in the principle in that it **encourages responsibility** for budgeting
 - Gives a sense of control over finances
 - Especially for those who have previously had monthly salaries
- ✓ And feel they **know how to budget**
 - Paying rent is a priority as part of a wider budgeting regime
 - Typically use standing orders or direct debit to pay rent
 - Usually at the start of the month
- ✗ However, tenants come into financial difficulties because they have **less money** than they were expecting and this is compounded by the impact of the extended waiting period
 - Especially when factoring in deductions for arrears, bridging loan and paying off various debts acquired during the waiting period

"It brings some seriousness to somebody's life. You have to work out your spending so that you won't mismanage and be inconsiderate to yourself."

(Depth, female, phase 2)

"I have my account set up in that way [with standing orders]. I don't touch the money [for rent] because I know it's going out."

(Focus group, female, phase 1)

"Universal Credit makes you become responsible. I have to make that payment, the rent first. I've never done the monthly payment before but I think it's good."

(Depth, female, phase 2)

When it comes to budgeting, rent is the priority for most people who worry about losing their home

- Of all bills, most individuals we spoke to said that paying rent was a top priority - as they **worry they could lose their home**
 - The council is not seen as a soft touch here – eviction and being chased for rent are real concerns
 - And paying off arrears is a high priority when it comes to paying off debts
 - Council tax is also a high priority with some citing worries after a summons from the council
- Part of a **wider budgeting regime**
 - E.g. paying something to all bills to avoid any building up
- Although we found evidence that a **minority will prioritise other things**
 - Paying rent is lower priority for this group as they feel their landlord will not evict them

“With or without Universal Credit, the first week of the month I pay my rent.”

(Depth, male, phase 2)

“I have never missed my rent, I have never missed my council tax, I have never missed my bills. I’d rather go hungry.”

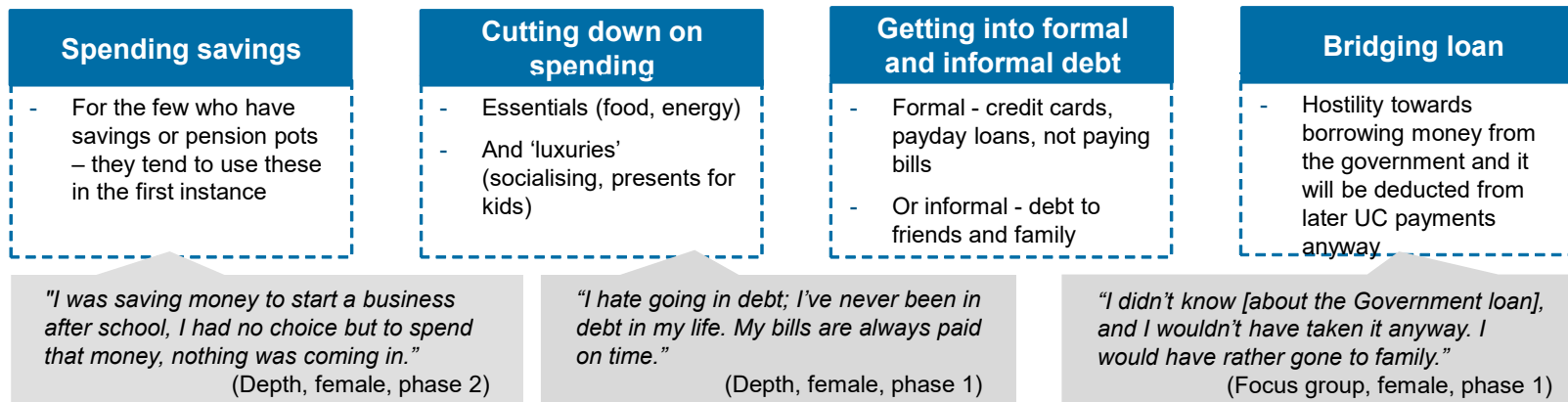
(Depth, male, phase 2)

“I would pay my house rent, but I would not pay the full amount. I would pay some other bills too, my water rate and my council tax.”

(Depth, female, phase 2)

Claimants use a range of strategies to cope financially, and there is a strong aversion to debt

- We shouldn't assume that residents are fine with getting into debt. Most were **extremely resistant to falling into debt**
- Many borrow from friends/family to avoid debt – at an emotional and financial **cost to them and their wider networks**



Arguably arrears would be even higher, if it wasn't for these coping strategies

CASE STUDY: Relying on family for support



Jacqueline is a former shop assistant who has been unable to work since January 2017 due to her disability. She has previously been on Income Support but is now on Universal Credit.*

She received a bridging loan of £400 from DWP to help during the transition period, but found that it was not enough to pay the bills. To cover the difference, she went to her parents for help.

Jacqueline is now in £3,000 worth of debt to her parents, and grateful for the help. She pays them back in regular instalments. But she feels guilty about relying on them – and does not want to have to ask for more support in the future.

**Not participant's real name*

"I had to go to my parents. Luckily they were able to help me with food and bills. I couldn't afford them."

"I can't keep running back to my parents; they're pensioners. Their money is their money".

6

Impact of Universal Credit on debt and arrears

There has been a huge impact of the switch to UC on claimants falling into financial difficulties - and particularly arrears

- As a result of: a) delays to UC payment; b) confusion around the first payment



Significant numbers falling into arrears for the first time

"I've never been in arrears in my life, I now owe over £1,000 in rent."
(Focus group, male, phase 2)



... and those already in trouble falling into worse arrears

"I was in arrears before, but it was not as bad as it is now."
(Depth, female, phase 2)

Those in debt and arrears describe significant impact on their emotional well-being

- Causes high levels of **stress and worry**
 - Many talk about dread of receiving letters from the council and concern about how they will cope with cutting back spending
- Some receiving **multiple letters** from different departments chasing payments e.g. Council Tax, Housing
 - Often comes alongside being chased for other debts like utilities and loans
- Already in **difficult times**
 - Due to health problems, unemployment and low income

"It was stressful, because you wait for 3 or 4 months without rent. They [Southwark] are chasing you."

(Focus group, male, phase 1)

"Especially when you're signed off work with anxiety and depression, and you've got eviction notices coming in. That wasn't a good time."

(Depth, female, phase 2)

"I've had more sleepless nights than you could imagine."

(Depth, male, phase 2)

Most are taking steps to pay off their arrears through formal or informal payment plans - with mixed success

- Mixed feedback on whether **the back payments** are sufficient to cover arrears when UC is eventually paid
 - Some say they are
 - Others say they are not enough to cover arrears, especially taking into account additional debt accrued during waiting period
 - Some say they did not receive a back payment
- Many have set up formal or informal **payment plans** with their landlord or Housing Officer to pay off arrears
- Some have managed to **reduce** arrears over time
- But, some are still in **severe financial difficulties** as a result of the waiting period and struggling to pay arrears as a result

"I had to go to court to try to save my place. I gave them all the information I had from Universal Credit, and now I pay off £20 per month. Peabody are getting the full amount now, and I pay off £20 per month on top of that".

(Depth, male, phase 2)

"I got into £2,000 of arrears [during the waiting period]. Now I'm scrimping and scraping, trying to get food on my table for my kid. He's not working, so that makes it harder".

(Depth, female, phase 2)

CASE STUDY: Coping with rent arrears



Nick has been out of regular work for two years, and was claiming JSA before being referred for UC.*

*He waited five months to receive his first UC payment after his application, during which he **fell into arrears**.*

*A “system error” led to Southwark Council believing he was receiving UC when in fact he wasn’t, so it looked like Nick was intentionally avoiding rent. The council threatened Nick with court proceedings over **rent arrears**, which led him to take out a payday loan. He’s still paying back the payday loan and says he has very little money leftover to live on.*

**Not participant’s real name*

“I nearly lost the roof over my head, just because of Universal Credit.”

“I would prefer for my rent to be paid and receive no money at all, it would be less stressful.”

7 Information and support provision

Significant demand for support throughout the application but less about budgeting and more about clarifying what UC means for them

- There is some desire for help managing spending but, the overwhelming demand is for better information about what UC and the transition period will mean for them:

How much can I expect?

"I'm very prudent with money... I just wanted to know when it was going to be sorted out. I can manage my own money."
(Depth, female, phase 1)

When can I expect it?

"They didn't say how long, or when I'd get my first payment, or how much I'd get. It was just 'deal with it'. I thought, I need to know, because I've got bills to pay."
(Depth, female, phase 2)

What does it look like?

"[I would like] a letter with a breakdown. We know how much our rent is, but when you're on benefits you don't pay the full rent, just a portion."
(Focus group, female, phase 2)

Despite clear avenues for support and information, help provided is often inconsistent and inadequate

Job Centre staff are friendly but info provided is inconsistent

- Job centre staff are thought to be still learning the ropes
- And too much focus on looking for work (as opposed to what UC will mean for claimants)

"[Job Centre staff] are pretty much irrelevant now, which makes it more stressful for me. I can't get the help I need."
(Depth, male, phase 1)

The UC hotline is very problematic

- Hard to get through to and expensive
- Claimants report usually speaking to a different person and say people at the call centre often just direct them to the journal

"The UC people said they were waiting for a letter from the council and that went on for 10 days. I was on the phone an hour a day!"
(Focus group, female, phase 2)

The UC journal chat function is slow to respond

- And for those who aren't confident online or struggle with writing and reading it can be difficult to use
- And it's impersonal – speaking to a different person every time

"Nobody reads your journal properly. You tell them what's going on and 3 days later, nobody's read it."
(Depth, female, phase 2)

Limited use of Citizens Advice

- Few aware of this avenue
- Some have a sense that there is little that they can do to help (including those who have been to Citizens Advice)
- But for those who have used this it has been helpful

"It's good, they helped me. So far it's made a difference."
(Focus group, female, phase 2)

Avenues for support are perceived as not joined up and impersonal - this causes unnecessary stress for claimants

- ✘ An expectation that UC, the council, and the Job Centre should be better informed and communicate with one another
 - Support from UC feels more inflexible and overly-centralised than for other benefits
- ✘ Departments within the council are also not seen to be well linked up
 - Claimants expect the council tax service to know when they are waiting for UC and not send letters chasing payment and vice versa
- ✘ Speaking to a different person every time is frustrating
 - Those transitioning from the old system are used to having a personal contact (e.g. at Job Centre)
- ✘ The result is a lot of stress for claimants, at an already difficult time
 - Being passed from pillar to post is frustrating and letters chasing payments are very concerning

“I want a person. I know you have to queue up – there’s nothing wrong with that. But it was all disjointed; there’s never a common number or a common person.”
(Focus group, male, phase 2)

“They need to have an understanding that the UC process takes six weeks, and in that six weeks the claimant has no income at all. So there’s no point in sending them out letters to say they’re in arrears.”
(Depth, female, phase 2)

“When you’re signed off work with anxiety and depression, and you’ve got eviction notices coming in. That wasn’t a good time.”
(Depth, female, phase 2)

CASE STUDY: Problems with UC hotline and support



Ben is a single parent with a young daughter. Being dyslexic and unable to use a computer, he struggled a lot with the UC application process and had several issues with his claim.*

At one point Ben had no phone so would have to use a public telephone box to contact UC. He complained heavily about having to spend hours there waiting to get through with his daughter.

Already struggling financially, after he got a mobile phone he then had to spend £20 each month on credit just so he would be able to contact the UC hotline.

When he did get through to UC advisors he was advised to borrow money from friends or family, something he was unable to do. He had already taken out a bridging loan and had to supplement it with several pay day loans. These debts now total £2,800.

"I'd sometimes stand in that phone-box in the rain. I had to get through to get my money."

"I was told on the phone, haven't you not got an auntie, uncle or family to borrow money from? But I've not got any family around."

A burden is being placed on the council to support claimants as a result – mainly through Housing Officers

- When other avenues fail, many claimants are turning to existing relationships for support – including Housing Officers
 - Also other landlords and Job Centre staff
 - Housing Officers are seen as very helpful and supportive by claimants
 - But, this is ultimately putting additional cost and burden on the council
- Housing Officers are spending extensive time giving support
 - General support with the UC application including contacting UC on the claimant's behalf
 - And with arrears e.g. setting up payment plans
 - Especially as understanding of arrears is often low so claimants are reliant on others' knowledge to help them navigate

“My Housing Officer is sympathetic – she says if you can't pay, let her know. Don't just go into arrears. She's done that a few times... I pay in instalments and we have an agreement.”

(Focus group, phase 2, female)

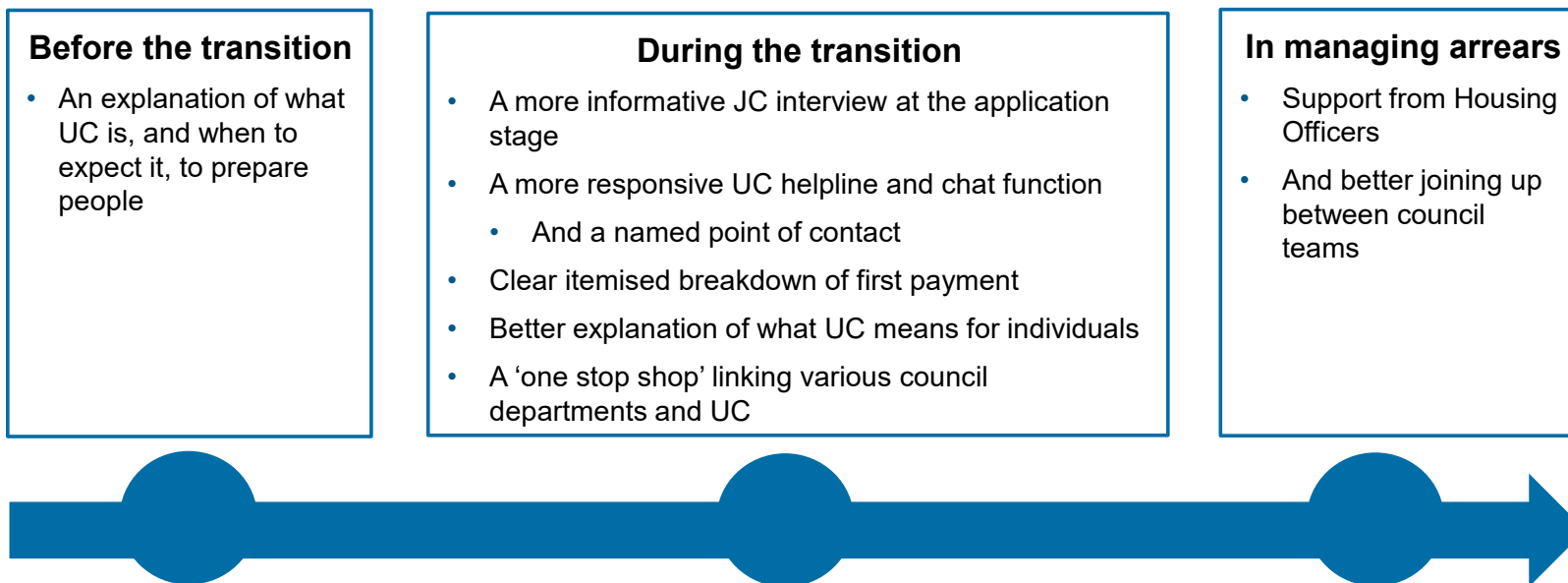
“I got in touch with the landlord, they were quite helpful, told me not to worry about it.”

(Depth, male, phase 2)

“My rent officer has been so helpful with regards to how you pay your rent... she advised me to set up a direct debit or a standing order as soon as possible.”

(Focus group, phase 1, female)

There is a clear role for better and more joined-up support and information



8

Reflections and implications

What have we learnt?

- The research has shown that the principle of moving to UC is less of an issue (though it is problematic for some) than the **process itself**
- Participants in this research almost universally have **experienced financial hardship** as a result of transitioning onto UC; notably as a result of the **significant delays** to payment
- The impact this has on claimants' ability to pay their rent is significant – with tenants falling into **arrears**, or into **worse arrears**
- It is hard to ascertain the extent to which negative attitudes towards UC will change over time - with views often **coloured by recent difficulties** with the transition process
- The findings have significant **implications for the council**, but also the **wellbeing of the individuals** themselves, many of whom have desperate personal stories to tell

What might this mean for social landlords?

- There is a clear role for **better and more joined-up support** and information
 - Before the transition, during the waiting period and whilst in arrears
- There is a sense that the organisations involved in delivering UC are not **working together** as well as they could
 - UC, the council, Job Centres, Citizens Advice
- **Housing Officers** are providing one of the key support mechanisms for those transitioning onto UC, and supporting claimants in managing rent arrears. In addition to the cost of the arrears themselves, this will be causing a significant increase in their workload and wider strain on council resources
- It will be important to understand how quickly **rent arrears are being re-paid**, and the implications for claimants managing debt repayment (especially given the emotional strain associated with being in debt)

The Smith Institute

The Smith Institute is an independent think tank which provides a high-level forum for thought leadership and debate on public policy and politics. It seeks to engage politicians, senior decision makers, practitioners, academia, opinion formers and commentators on promoting policies for a fairer society.

If you would like to know more about the Smith Institute please write to:

The Smith Institute
Somerset House
Strand
London
WC2R 1LA

Telephone +44 (0)20 3141 7536
Email info@smith-institute.org.uk
Website www.smith-institute.org.uk
Twitter [@smith_institute](https://twitter.com/smith_institute)

CABINET APPENDICES DISTRIBUTION LIST (OPEN)**MUNICIPAL YEAR 2017-18****NOTE:** Original held by Constitutional Team; all amendments/queries to
Paula Thornton Tel: 020 7525 4395

Name	No of copies	Name	No of copies
Cabinet Members		Officers	
Victoria Mills	1	Eleanor Kelly	1
		Doreen Forrester-Brown	1
		Deborah Collins	1
Electronic Versions (no hard copy)		Dominic Cain	1
Peter John OBE			
Fiona Colley		Others	5
Stephanie Cryan		Paula Thornton, Constitutional Officer	
Maisie Anderson			
Barrie Hargrove			
Richard Livingstone			
Mark Williams			
Ian Wingfield			
Johnson Situ			
		Total: 10	
		Dated: 18 October 2017	