

# **Crisis and Resilience Fund Housing Payments Policy 2026-27**

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# 1. Introduction, National Framework and CRF Outcomes

- 1.1 This policy establishes the formal framework through which Bromsgrove District Council and Redditch Borough Council ("the Councils") will administer the Housing Payment element of the Crisis and Resilience Fund ("CRF") for the 2026-27 financial year.
- 1.2 The CRF replaces Discretionary Housing Payments (DHPs) from 1 April 2026 and is delivered through a consolidated Section 31 grant framework. This policy translates that national framework into a local decision-making approach for the Council.
- 1.3 The Housing Payment strand forms part of the wider CRF model, alongside Crisis Payments, Resilience Services and community-based support. Housing Payments are intended not only to address immediate rental pressure, but also to contribute to broader prevention and resilience outcomes.
- 1.4 In administering Housing Payments, both Council will seek to support the following outcomes: maintaining safe and sustainable accommodation; preventing homelessness and repeated crisis; and connecting households to wider support that improves longer-term resilience.
- 1.5 Both Councils will apply a No Wrong Door approach. Applicants presenting through Revenues and Benefits, Housing, Housing Options, customer services or partner organisations will, wherever practicable, be directed to the most appropriate CRF element and any related support.
- 1.6 This policy should be read as a local Housing Payments policy under the CRF. It does not create any entitlement to payment, and all awards remain discretionary.

## Local delivery features carried forward from the historic DHP approach

Feature	How reflected in this policy
Homelessness prevention	Priority given to tenancy sustainment and cases where an award can realistically prevent eviction or homelessness.
Support for vulnerable households	Explicit weight given to disability, domestic abuse, caring responsibilities, safeguarding concerns and dependent children.
Rent deposit / advance	Provision retained for deposit, rent in advance and removal costs where needed to secure suitable accommodation.

<b>Feature</b>	<b>How reflected in this policy</b>
Exceptional rent arrears help	One-off arrears support allowed only in exceptional circumstances and where there is a credible path to sustainment.
Encouraging self-help	Assessment includes reasonable steps being taken around budgeting, debt advice, employment, landlord negotiation or rehousing.
Shared service delivery	Benefits Service, Housing and advice agencies are all built into the operating model.

## **2. Phased Transition and Funding Structure**

- 2.1 The former DHP scheme ceased on 31 March 2026. Under the CRF transition arrangements, Housing Payment funding for 2026-27 will reflect historic DHP funding levels, subject to the annual Grant Determination Letter and any conditions attached to Section 31 funding.
- 2.2 Each Council may supplement Housing Payment funding with locally determined resources where it considers that this is justified, lawful and financially prudent.
- 2.3 The scheme is cash-limited. The Councils are therefore entitled to take account of budget availability, value for money and the need to prioritise households in greatest housing need when determining awards.
- 2.4 Each Council will maintain a clear audit trail between Housing Payments and statutory Housing Benefit administration, including appropriate financial coding, record keeping and management information.

## **3. Legal Basis and Nature of Discretion**

- 3.1 Housing Payments under the CRF will be administered having regard to the relevant CRF guidance, the annual Grant Determination Letter, applicable public law principles, and any relevant case law or departmental guidance bearing on the exercise of discretion.
- 3.2 A Housing Payment may only be awarded where the applicant is entitled to Housing Benefit or to Universal Credit that includes a housing costs element in respect of rental liability.
- 3.3 Any award must relate to housing costs and must not exceed the level of eligible housing costs that can lawfully be supported through the Housing Payment scheme.

- 3.4 No payment will be made where doing so would be contrary to the governing conditions of the scheme, including circumstances where the applicant is excluded by reason of no recourse to public funds or other statutory restriction.
- 3.5 Housing Payments are discretionary payments. They are not Housing Benefit, do not form part of Universal Credit, and there is no statutory right of appeal to the First-tier Tribunal against a decision on a Housing Payment application.
- 3.6 Each Council will have regard to relevant guidance from the Department for Work and Pensions and will meet all applicable monitoring and data return requirements under the CRF framework.

## **4. Core Delivery Principles**

- 4.1 Housing Payments will be delivered in a way that is person-centred, needs-based, accessible and focused on tenancy sustainment.
- 4.2 In line with the Councils' established DHP approach, both Councils will seek through this policy to help alleviate poverty, encourage and support employment where relevant, prevent homelessness, support vulnerable households and provide support at a time of crisis.
- 4.3 Awards will not be made on a first-come, first-served basis. Applications will be considered on their merits, taking account of urgency, vulnerability, sustainability and the overall demands on the budget.
- 4.4 Responsibility for day-to-day operation of the policy will lie with the Benefits Service, working closely with Housing Services, Housing Options and other relevant internal teams.
- 4.5 Each Council will work with advice agencies, landlords, social landlords and support organisations to promote the scheme, identify households at risk and maximise the preventative value of awards.
- 4.6 Housing Payments should ordinarily support short-term adjustment or crisis resolution. However, longer awards may be made where exceptional circumstances justify this, including where disability-related needs or other enduring factors make the tenancy sustainable only with longer-term support.
- 4.7 Both Councils recognises that some applicants will require practical help to resolve the underlying cause of the shortfall. Where appropriate, awards may therefore sit alongside support relating to budgeting, debt, employment, tenancy issues or rehousing.

## **5. Anti-Poverty Commitment**

### **Anti-Poverty and Financial Inclusion**

- 5.1 It is recognised that financial hardship and housing insecurity are often closely linked.
- 5.2 Through the delivery of Housing Payments both Councils aim to:
- reduce the risk of homelessness;
  - support households experiencing financial hardship;
  - improve housing stability;
  - and connect residents to wider financial inclusion and anti-poverty initiatives.
- 5.3 Housing Payments will therefore form part of the wider approach to tackling poverty, improving resilience and supporting vulnerable households.

## **6. Equality Act 2010 and Public Sector Equality Duty**

- 6.1 Each Council will exercise its discretion under this policy in accordance with the Equality Act 2010, including the Public Sector Equality Duty in section 149 of that Act.
- 6.2 In determining any application, we will have due regard to the need to eliminate unlawful discrimination, advance equality of opportunity and foster good relations between persons who share a protected characteristic and those who do not.
- 6.3 Particular regard will be given, where relevant, to disability-related housing needs, the position of households with children, the circumstances of victims of domestic abuse, carers, and the cumulative impact of welfare reform or financial hardship on vulnerable households.
- 6.4 Reasonable adjustments will be made where required so that disabled applicants are not placed at a substantial disadvantage in accessing or evidencing a claim.
- 6.5 Decision makers must actively consider equality implications as part of the exercise of discretion and record relevant factors on the case record.

## **7. Applications for Housing Payments**

- 7.1 Applications may be made by the person entitled to Housing Benefit or Universal Credit housing costs, or by an appointee, advocate or authorised representative acting on that person's behalf.
- 7.2 Applications should normally be made using the prescribed form, whether online or by another approved route.

- 7.3 The application process will require the applicant to provide sufficient information and evidence to enable a proper determination to be made, including details of household composition, income, capital, expenditure, rent liability, shortfall and the circumstances giving rise to the request.
- 7.4 Where an applicant has difficulty completing a form, the Benefits Service may provide assistance by telephone, in person, through assisted digital support or by signposting to an advice agency.
- 7.5 Referrals may also be received from Housing Services, Housing Options, social landlords, Citizens Advice and other support agencies. A referral does not itself confer entitlement but may be treated as supporting evidence where relevant.

## **8. Eligibility Conditions**

- 8.1 To qualify for consideration, the applicant must be entitled to Housing Benefit or Universal Credit including housing costs towards rental liability.
- 8.2 Applicants receiving only Council Tax Reduction, or requiring support solely for Council Tax, are not eligible for a Housing Payment under this policy, although they may be signposted to other local support where available.
- 8.3 Housing Payments may be considered for people in the private rented sector, social rented sector, temporary accommodation or other qualifying rented accommodation, subject to the rules of the scheme and the facts of the case.
- 8.4 The Benefits Service may consider applications from households facing a shortfall due to welfare reform, local housing allowance restrictions, social sector size criteria, non-dependant deductions, income taper effects, the benefit cap or other pressures affecting the ability to meet housing costs.
- 8.5 A person who is not in receipt of a qualifying benefit at the material time cannot receive a Housing Payment, even if they would otherwise appear to be in financial need.
- 8.6 Where a Housing Payment cannot lawfully be awarded, the Benefits Service will, where appropriate, signpost the household to other help, including homelessness prevention assistance, debt advice or wider CRF support.

## 9. Definition of Housing Costs and Exclusions

- 9.1 There is no exhaustive statutory definition of 'further financial assistance' for these purposes. Each Council will interpret housing costs in accordance with the CRF framework and the established approach previously taken under the DHP policy.
- 9.2 Housing Payments may be considered to help with a recurring rent shortfall between eligible Housing Benefit or the Universal Credit housing element and the contractual rent or rental liability, subject to the rules of the scheme.
- 9.3 The Benefits Service may also consider one-off or lump-sum housing-related costs where this is consistent with the local DHP approach and the CRF framework, including rent in advance, tenancy deposits, removal costs and, where justified, short-term liability on two homes.
- 9.4 In line with the local DHP approach, applications for rent deposit or rent in advance should normally be supported by evidence of the proposed tenancy, the amount required, and the reasons why assistance is necessary to secure or sustain suitable accommodation.
- 9.5 The Benefits Service may, in exceptional circumstances, consider a one-off payment towards rent arrears where this is necessary to prevent homelessness, the arrears are linked to exceptional personal circumstances, and there is credible evidence that the tenancy will be sustainable going forward. Such awards will not normally clear all arrears and may be made only where the applicant is engaging with support and there is a realistic repayment arrangement for any remaining balance.
- 9.6 Housing Payments may also be considered where a claimant needs short-term support while moving to more affordable accommodation, returning to work, dealing with adapted accommodation, or addressing a temporary mismatch between need and current housing costs.
- 9.7 Housing Payments will not be awarded for ineligible service charges, water charges, fuel costs, meals, sanctions, amounts that fall outside housing costs under the scheme, or needs that are more appropriately met through another statutory duty or fund.
- 9.8 The Benefits Service will not normally award a Housing Payment where the shortfall arises wholly from expenditure that could reasonably be reduced, from the deliberate taking on of unaffordable accommodation without good reason, or from a refusal to engage with reasonable steps that would improve the household's position.

## **10. Circumstances Where Housing Payments May Be Considered**

10.1 Housing Payments may be considered in a wide range of circumstances where assistance with housing costs would help to prevent homelessness, sustain accommodation or support a transition to a more sustainable housing position.

10.2 Examples include (but are not limited to):

- Shortfalls between Housing Benefit or Universal Credit housing costs and contractual rent.
- Restrictions arising from the Local Housing Allowance.
- The social sector size criteria.
- Non-dependant deductions.
- The benefit cap.
- Temporary reductions in income or delays in benefit payments.
- Exceptional personal circumstances affecting the ability to meet rent.
- Cases involving domestic abuse, safeguarding concerns or sudden crisis.
- Disability-related housing needs.
- Situations where a household is moving to more suitable or affordable accommodation.

10.2 Each case will be considered individually on its merits.

## **11. Two Homes**

### **Liability for Two Homes**

11.1 In certain circumstances the Benefits Service may consider a Housing Payment where a claimant is temporarily liable for rent on two properties.

11.2 This may arise, for example, where:

- a claimant must move to alternative accommodation quickly;
- a tenancy overlap occurs while moving to more affordable accommodation;
- domestic abuse or safeguarding issues require an urgent move;
- adaptations or disability-related housing needs necessitate relocation.

11.3 Awards for two homes will normally be short-term and limited to the minimum period necessary to complete the move.

## **12. Moving to More Affordable Accommodation**

### **Support for Moves to More Affordable Accommodation**

12.1 Both Councils encourage claimants whose accommodation is unaffordable in the longer term to consider moving to more suitable housing where possible.

12.2 Housing Payments may therefore be considered where assistance would support:

- relocation to more affordable accommodation
- downsizing
- moves to accommodation better suited to disability or caring needs
- moves required to prevent homelessness

12.3 Where appropriate, the Benefit Service will work with Housing Options services or landlords to facilitate sustainable housing solutions.

## **13. Rent Deposit and Rent in Advance**

### **Rent Deposit and Rent in Advance**

13.1 Housing Payments may be awarded to assist with tenancy deposits or rent in advance where this is necessary to secure suitable accommodation.

13.2 Applicants will normally be expected to provide:

- evidence of the proposed tenancy
- confirmation of the deposit or advance rent required
- details of why assistance is necessary

13.3 Assistance may be refused where:

- the accommodation is clearly unaffordable,
- the tenancy would not be sustainable,
- or alternative assistance is available.

## **14. Rent Arrears (One-Off Payments)**

### **Exceptional Assistance with Rent Arrears**

14.1 In exceptional circumstances the Benefits Service may consider a one-off Housing Payment towards rent arrears where:

- the arrears have arisen due to exceptional hardship or crisis;
- the payment would prevent homelessness; and
- there is a credible plan to sustain the tenancy going forward.

14.2 Payments will normally:

- not clear all arrears, and
- require the claimant to engage with budgeting advice, housing support or debt assistance where appropriate.

## **15. What CRF Housing Payments Cannot Cover**

### **Costs That Cannot Normally Be Met**

14.3 Housing Payments cannot normally be used to meet:

- Council Tax liability
- service charges that are ineligible for Housing Benefit
- water charges
- fuel or utility costs
- food or daily living expenses
- benefit sanctions or reductions
- penalties or court costs
- costs not directly related to housing

14.4 Where these needs arise the Benefits Service may direct the applicant to other elements of the Crisis and Resilience Fund or external support services.

## **16. Financial Assessment**

16.1 On receipt of an application, the Benefits Service will undertake a full assessment of the household's financial position using the application, benefit information already held, and any further evidence considered necessary.

16.2 We will consider income, capital, savings, essential expenditure, debts, the level of rent shortfall, household needs, and any other relevant financial or personal circumstances.

16.3 In keeping with local policy, the Benefits Service will consider whether the shortfall can reasonably be met from other income or savings and whether the household is taking reasonable steps to help itself, including engaging with employment, debt advice, budgeting support, landlord negotiations, rehousing options or other relevant interventions.

16.4 Where appropriate, the Benefits Service may take into account income that is disregarded for Housing Benefit purposes where it is reasonable to do so in a discretionary scheme, but it will not adopt a mechanistic approach. Disability-related benefits and analogous payments will be considered carefully and should not be treated in a way that undermines disability-related needs.

- 16.5 Particular weight may be given to medical needs, disability, caring responsibilities, domestic abuse, safeguarding concerns, risks of homelessness, the needs of dependent children, and the practical availability of alternative accommodation.
- 16.6 The Benefits Service will consider whether an award would realistically prevent homelessness, secure or sustain accommodation, or assist the household to move to a more affordable and sustainable position.
- 16.7 Where expenditure appears excessive or includes non-essential items, the Benefits Service may conclude that some contribution should be made by the household from its own resources. However, the service will take a realistic and humane view of expenditure and avoid purely formulaic decision making.
- 16.8 The decision maker will identify and record which CRF outcome or outcomes the proposed award supports, including immediate crisis prevention, tenancy sustainment, homelessness prevention, or connection to wider resilience support.

## **17. Backdating**

- 17.1 Housing Payments may be backdated where the Benefits Service is satisfied that there is good reason for the delay in applying and the qualifying conditions were met throughout the relevant period.
- 17.2 Backdating will only be considered for periods during which Housing Benefit or the Universal Credit housing element was payable in respect of the rent liability concerned.
- 17.3 Backdating will remain discretionary and be limited in nature where this is justified by the evidence, administrative practicality or budget considerations.

## **18. Change of Circumstances**

- 18.1 Recipients of a Housing Payment must notify the Benefits Service promptly of any relevant change in circumstances, including changes in income, capital, rent liability, household composition, address, benefit entitlement or any matter that may affect the award.
- 18.2 Failure to report a material change may result in revision of the award, recovery of any overpayment, termination of ongoing assistance or investigation where appropriate.
- 18.3 The Benefit Service may review an award at any time if circumstances change or if further information comes to light.

## **19. Decision Making and Governance**

- 19.1 All applications will be considered by an authorised officer of the Benefits Service.
- 19.2 The Benefits Service will aim to make decisions as promptly as practicable once all relevant information has been received. Timescales may vary according to urgency, complexity and the completeness of the evidence provided.
- 19.3 In deciding whether to award a Housing Payment, The Benefits Service will consider the scale of the shortfall, the purpose of the award, the likelihood that the award will achieve a meaningful outcome, the availability of budget, and whether there is a realistic pathway to a sustainable housing position.
- 19.4 Awards may be made as a weekly amount for a defined period, as a one-off lump sum, or in another format considered appropriate to the circumstances.
- 19.5 Awards will usually be for a fixed period and will not normally exceed 12 months without further review, although further applications may be made and exceptional longer support may be considered where justified.
- 19.6 Payment may be made to the applicant, landlord, agent, appointee or another suitable recipient, depending on the circumstances and the need to protect the tenancy or secure value for money.
- 19.7 The decision notice will set out the outcome, the reasons for the decision, the amount and period of any award, any conditions attached, and the requirement to report changes of circumstances.
- 19.8 Because Housing Payments are discretionary, there is no statutory appeal to the tribunal. However, an applicant who is dissatisfied may request an internal review within one month of the date of the decision notice, setting out why they disagree and providing any further information they wish to be considered.
- 19.9 A review will be considered by a senior officer, the Quality Team or another officer not involved in the original decision, wherever practicable. If the applicant remains dissatisfied after review, they may use the Councils' complaints process.

## **20. Award of Housing Payments**

### **Award of Housing Payments**

- 20.1 Where the Benefits Service decides to make an award, the payment may take the form of:

- a **weekly or periodic payment**
- a **lump-sum payment**
- a **payment made directly to the landlord**
- or another arrangement considered appropriate.

20.2 The Benefits Service will determine the **amount and format** of the award having regard to:

- the level of rent shortfall
- the financial circumstances of the household
- the sustainability of the tenancy
- the available budget.

## 21. Period of Award

### Period of Award

21.1 Housing Payments will normally be made for a **limited period**.

21.2 The length of the award will depend on the circumstances but may include:

- short-term assistance to resolve a crisis
- support during a transition period (for example when moving accommodation)
- longer awards in exceptional cases where disability or other factors justify extended support.

21.3 Awards will normally **not exceed 12 months without review**, although further applications may be considered.

## 22. Decision Notification

### Notification of Decision

22.1 Applicants will be notified in writing of the decision.

22.2 The notification will include:

- whether the application has been approved or refused
- the amount of any award
- the period of the award
- the method of payment
- the reasons for the decision
- the right to request a review.

## 23. Appeals / Reviews

### Reviews and Complaints

23.1 Housing Payments are discretionary and **there is no statutory right of appeal to the First-tier Tribunal.**

23.2 However, applicants may request an **internal review** of the decision within **one month** of the notification.

23.3 The review will normally be undertaken by:

- a senior officer, or
- an officer not involved in the original decision.

23.4 If the applicant remains dissatisfied, they may pursue the matter through the appropriate Councils corporate complaints procedure.

## 24. Overpayments

24.1 Where a Housing Payment is overpaid, the Benefits Service will decide whether the overpayment is recoverable, taking into account the cause of the overpayment, whether the recipient could reasonably have realised they were not entitled, and the circumstances of the case.

24.2 Recoverable overpayments may be recovered by offset against ongoing Housing Payment awards where appropriate, or otherwise by invoice and the normal recovery processes.

24.3 A decision may be made not to recover all or part of an overpayment where recovery would be unreasonable, disproportionate or contrary to good administration.

## 25. Fraud

25.1 Both Councils are committed to protecting public funds. Any person who seeks to obtain or increase a Housing Payment by making a false statement, providing false evidence or failing to disclose a material fact may be investigated.

25.2 Suspected fraud may be referred for investigation and may lead to recovery action, withdrawal of support, use of both Councils corporate anti-fraud powers, or criminal proceedings where appropriate.

## **26. Wraparound Support and Resilience Services**

- 26.1 Housing Payments are intended, where appropriate, to act as a gateway to wider support rather than as a stand-alone cash response.
- 26.2 Applicants may therefore be referred or signposted to debt advice, budgeting support, homelessness prevention, employment and skills support, welfare advice, domestic abuse services, health-related support, social landlord tenancy support, or other relevant services.
- 26.3 Referrals will normally be voluntary, but the Benefits Service may take into account an applicant's willingness to engage with support when deciding whether a discretionary award is likely to achieve a sustainable outcome.

## **27. Publicity**

### **Publicity and Awareness**

- 27.1 The Benefits Service will take reasonable steps to ensure that residents, landlords, partner organisations and advice agencies are aware of the availability of Housing Payments.
- 27.2 This may include:
- information on each Council's website
  - signposting by Revenues and Benefits staff
  - liaison with housing providers
  - information provided through support organisations.

## **28. Proactive Targeting, Data Use and Out of Area Cases**

- 28.1 Each Council may use lawful data sharing, internal intelligence and partnership working to identify households at risk of rent shortfall, homelessness or repeat crisis and to target preventative interventions.
- 28.2 Housing Payments do not replace or limit any homelessness duties that may arise under Part VII of the Housing Act 1996.
- 28.3 Responsibility for administration of a Housing Payment will ordinarily rest with the authority responsible for the claim in accordance with the governing guidance and local government arrangements applicable at the time of application.

28.4 Where a household moves into or out of the area, the Benefits Service may liaise with the other relevant authority or support service to promote continuity of assistance, but there will be no automatic right to continuation of an award.

## **29. Review of Policy**

29.1 This policy will be reviewed annually, or sooner if required by changes in legislation, guidance, grant conditions, local delivery arrangements or budget position.

29.2 Minor technical amendments may be made by the appropriate delegated officer to maintain legal compliance and operational effectiveness.

## **30. Delegated Powers**

30.1 Both Councils delegates day-to-day operation of this policy to the Welfare Support Manager, in accordance with each Councils' constitution and scheme of delegation.

30.2 Officers exercising delegated authority under this policy must do so consistently with the law, this policy, the CRF framework and the wider governance arrangements.