

Briefing

Monitoring the use of discretionary housing payments in Scotland

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Shelter
Scotland

Summary

- Increasing the discretionary housing payment (DHP) budget is a response by the UK government to mitigate the impact of welfare reform, helping individuals adjust to housing benefit cuts in both the social and private sectors by providing short-term help with housing costs. DHPs are not intended to cover rent shortfalls incurred through welfare cuts in their entirety; under occupancy deductions are estimated to add up to around £50m per year,¹ while the 2013-14 DHP allocation for Scotland from the Department of Work and Pensions (DWP) is just over £16m.
- Local authorities can 'top up' their DHP funds by 2.5 times the amount allocated by the DWP, and Shelter Scotland welcomes the Scottish Government's decision to enable local authorities to top up their DHP funds to this maximum by making 20m of funding available in October 2013.
- As of 31 December 2013 local authorities have £15,116,499 to spend by 31 March 2014. The level of spending in each local authority across Scotland has been varied. By the end of December 2013 10 local authorities had spent equal to or above 66% of their overall DHP budget for the year, while eight local authorities had spent less than 30% of the funding available.²
- Four local authorities had spent less than 25% of their DHP budget. These authorities may be in danger of failing to spend even their initial DHP allocation from the DWP. As this money cannot be carried over into 2014-15 some authorities run the risk of failing to help vulnerable individuals affected by welfare cuts.
- Only 14 local authorities have a DHP policy published on their website. While some authorities substitute this with detailed information on eligibility and potential length of award on their website, those who do not should take action.

¹ Scottish Government, 'Impact of under-occupancy provision', January 2012

<http://www.scotland.gov.uk/Topics/Built-Environment/Housing/supply-demand/chma/Benefitchanges/underoccupancy>

² Scottish Government, 'Discretionary Housing Payments in Scotland: 1 April to 31 December 2013', February 2014

<http://www.scotland.gov.uk/Topics/Statistics/Browse/Social-Welfare/dhp>

Recommendations

- All local authorities should endeavour to allocate their whole DHP fund, including the extra contribution from the Scottish Government, by the end of 2013-14. Those local authorities who have yet to spend the DWP portion of the DHP pot should prioritise this before the end of the financial year, as this money cannot be carried over into 2014-15. This requires a proactive and hands on approach to allocating DHP to those who need it most. Local authorities should also review all previous DHP applications in light of the funds made available by the Scottish Government in October 2013.
- Every local authority should publish an updated DHP policy referencing the increased funding made available by both the Scottish Government and the DWP, along with eligibility criteria and the likely length and duration of DHP award. These should be promoted to potential applicants and circulated amongst local advice agencies. This will help ensure that DHP gets to those who need it most. Where this information is not included in a detailed policy, published on the local authority's website, it should be published in another form. For example on a webpage from which an individual can apply for a DHP.
- In raising awareness of their DHP funds local authorities should make sure they emphasise the fund's role in mitigating the impact of welfare cuts other than the under occupancy deduction, such as the benefit cap and changes to housing benefit for tenants in the private rented sector.

Introduction

Shelter Scotland published a briefing on DHPs in June 2013 – updated in November 2013 to reflect increased funding from the DWP – which set out good practice and key principles in the allocation of DHPs.³ Nine months on, in the context of recent welfare reforms, DHPs play an important role in mediating cuts to household budgets, preventing homelessness and extreme hardship. After the Scottish Government provided local authorities with £20m of funding to enable them to ‘top up’ their DHP budgets, alongside additional funding from the DWP, Shelter Scotland has been monitoring how this fund is being administered. It is vital we know how much DHP budget has been spent to date, and what the reasons behind DHP applications are to ensure the fund is getting to those who need it most. This briefing looks at how effectively local authorities have been in managing their DHP fund since budgets were increase, as well as considering each local authority’s DHP policy. Our aim is to support local authorities in making the best use of their DHP budgets to help those affected by welfare cuts.

Making best use of discretionary housing payments

DHPs are not intended to fully mitigate the impact of welfare cuts, given the limit on DHP budgets. However, they do play a role in mitigating the impact of welfare changes on the most vulnerable in society, and as a consequence they should be used effectively. The DWP’s guidance manual on DHPs⁴ emphasises their role in mediating welfare reforms such as the under occupancy deduction, cuts to local housing allowance and reductions to housing benefit applied by the benefit cap. These guidelines emphasise the discretionary nature of the fund and consequently are very broad, the objectives of the DHP fund are identified by the DWP as:

- alleviating poverty
- encouraging and sustaining people in employment
- tenancy sustainment and homelessness prevention
- supporting the vulnerable and the elderly in the local community

³ Shelter Scotland, ‘Allocating Discretionary Housing Payments (DHPs) in Scotland’, November 2013,

http://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/shelter_scotland_briefing_on_discretionary_housing_payments_dhps2

⁴ Department of Work and Pensions, Discretionary Housing Payments Guidance Manual, August 2013, <https://www.gov.uk/government/publications/discretionary-housing-payments-guidance-manual>

- supporting domestic violence victims who are trying to move to a place of safety.

However, when it comes to specific circumstances of eligibility there is a strong focus on people who are not eligible, e.g. those who have an increased rent liability through rent arrears. The main purpose of the DWP guidance seems to be to define terms such as 'rent shortfall', in order to aid local authorities in interpreting the role of the DHP fund. To ensure that potential applicants know who can apply for a DHP, and to help local authorities make best use of the DHP fund, Shelter Scotland issued a briefing on DHPs.⁵ We recommended that local authorities:

- publish a DHP policy outlining targeted groups, 'who should be applying' and 'how payments will be made'
- have a clear process as to how applications will be processed and DHPs awarded
- support partnerships with advice and support organisations in order to position DHPs within a wider support framework.

We believe that this approach is essential if we are to encourage eligible applicants to apply to their local authority's DHP fund, where possible preventing hardship and homelessness as a consequence of the UK government's welfare reforms.

2013-14 funding for discretionary housing payments

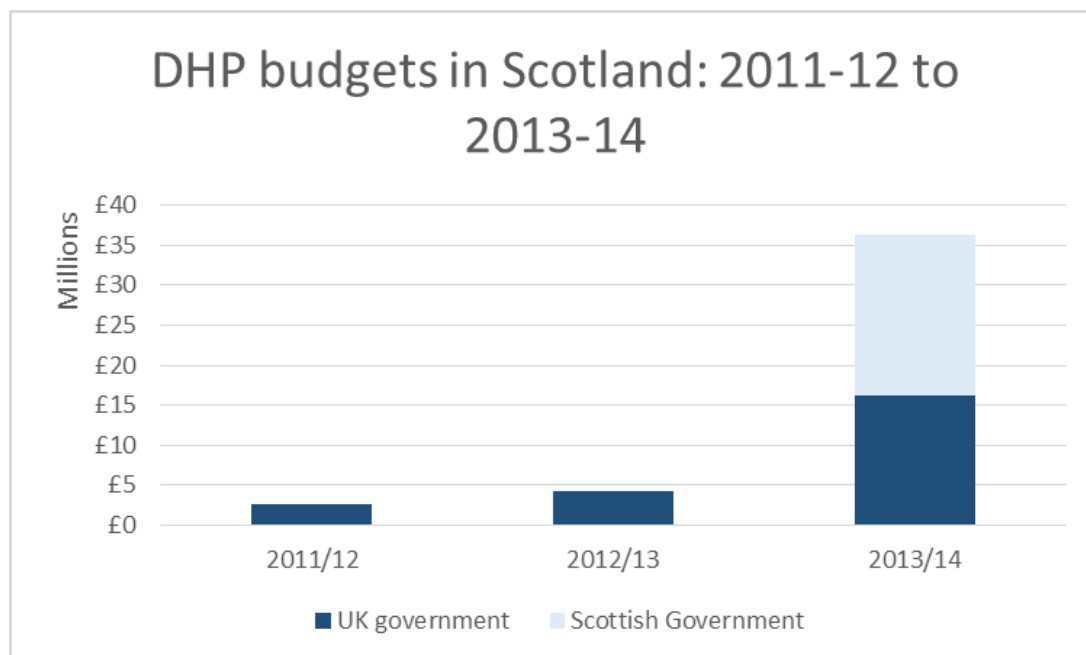
Because of the large number of households affected by the under occupancy deduction – or 'bedroom tax' – in Scotland, local authorities have been faced with a large increase in demand for DHPs. As of 31 December 2013 76,230 applications had been made for DHP, with 52,680 being successful. Some local authorities in Scotland reported an 800% increase in DHP applications since the introduction of the under occupancy deduction.⁶

In addition, the amount of money available to local authorities for DHPs increased twice during 2013-14. In July 2013 the DWP announced additional DHP funding for all local authorities. In particular, rural authorities received a very large proportionate increase in their 2013-14 funding. In October 2013 the Scottish Government provided additional funding which allowed local authorities to top up their DHP budget to the maximum 2.5

⁵Shelter Scotland, 'Allocating Discretionary Housing Payments (DHPs) in Scotland', November 2013, http://scotland.shelter.org.uk/professional_resources/policy_library/policy_library_folder/shelter_scotland_briefing_on_discretionary_housing_payments_dhps2

⁶ Para. 53, Scottish Affairs Committee, 'The Impact of the Bedroom Tax in Scotland: Interim Report', December 2013, <http://www.publications.parliament.uk/pa/cm201314/cmselect/cm��otaf/288/28806.htm#n75>

times the initial DWP allocation. Shelter Scotland recognises that these changes will have presented many local authorities with significant challenges.

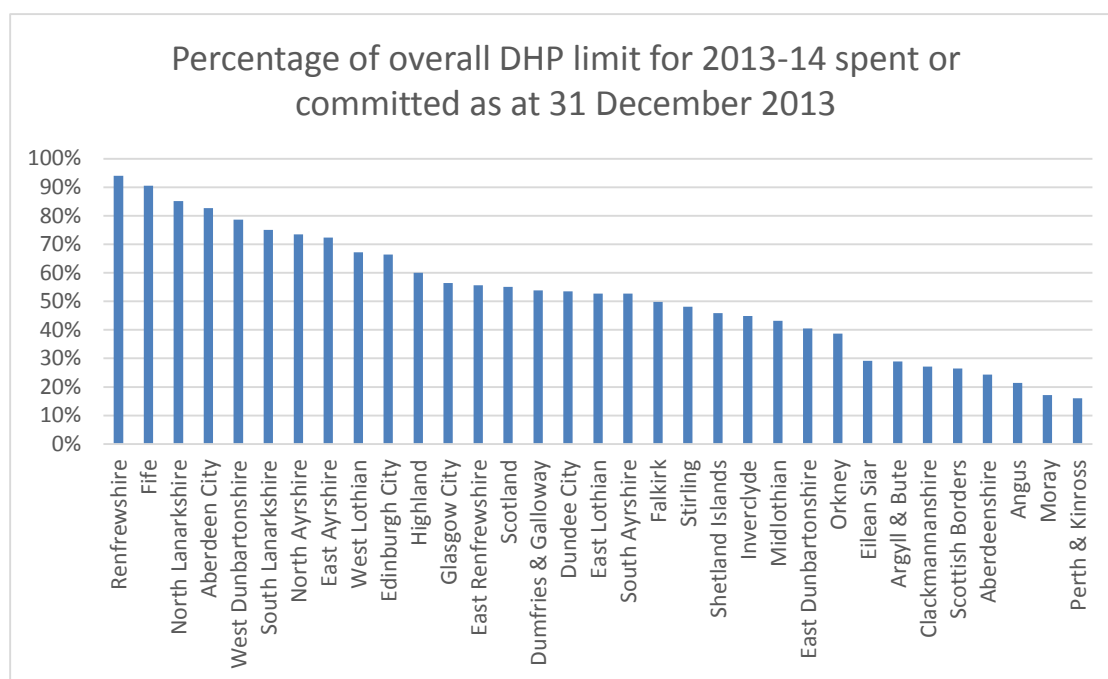


Nevertheless there are very large differences in the extent to which local authorities have been able to manage these changes, and ensure that those who need the help that DHPs provide, receive it.

Discretionary housing payment budget spend to date

By the end of December 2013, two thirds of the way through 2013-14, 10 local authorities had spent equal to or above 66% of their overall DHP budget for the year, while eight local authorities had spent less than 30% of the funding available.⁷

⁷ Scottish Government, 'Discretionary Housing Payments in Scotland: 1 April to 31 December 2013', February 2014, <http://www.scotland.gov.uk/Topics/Statistics/Browse/Social-Welfare/dhp>



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High spending local authorities

Those authorities who are towards the top end of DHP spend seem to have been able to cope with the additional funding well. While some appear to be close to running out – for example Fife and Renfrewshire who have spent 90% and 94% of the fund respectively – it may be that those authorities have committed DHP for applicants over the whole financial year, and the fund has been effectively managed.

We also know that some local authorities – for example City of Edinburgh, North Lanarkshire and East Renfrewshire – have seen a marked change in their DHP spend over the period 30 November 2013 to 31 December 2013. For example, North Lanarkshire spent 34% of their total DHP fund in December, Edinburgh spent 27%, and East Renfrewshire spent 21%.⁹ These authorities have clearly reacted effectively to make good use of the additional funding made available by the Scottish Government in October 2013. While measuring spend in this way might be a crude method of measuring local authorities' DHP spend, this does suggest that local authorities are working hard to ensure that the DHP fund available will reach those who need it by the end of the financial year.

⁸ *Ibid*

⁹ Scottish Government, 'Discretionary Housing Payments in Scotland: 1 April to 31 December 2013', February 2014 and 'Discretionary Housing Payments in Scotland: 1 April to 30 November 2013', January 2014, <http://www.scotland.gov.uk/Topics/Statistics/Browse/Social-Welfare/dhp>

Of the authorities who are spending DHP effectively, we know that Edinburgh City Council reviewed and amended their DHP policy, changing their priority criteria – this may have resulted in more applications being made for DHP in Edinburgh. While other authorities have not increased their DHP spend at the same rate as other authorities, we do know that some are currently reviewing all existing applications, looking to extend or renew awards – for example Inverclyde Council. We would encourage all local authorities to consider taking this kind of action, if they have not already done so.

Low spending local authorities

Unfortunately not all local authorities have matched these levels of spending. Eight authorities had spent less than 30% of their DHP allocation by 31 December 2013. With Angus, Moray, Aberdeenshire and Perth and Kinross all having spent less than 25% of their overall spend limit.¹⁰ This is concerning given that all four authorities have three months in which to spend over 75% of their remaining DHP fund. In particular, authorities who are not on track to spend the DWP portion of the DHP fund should be proactive in spending this portion of the DHP pot, as it cannot be carried over into 2014-15. For example Perth and Kinross have only spent 39% of the UK government contribution to their DHP budget, 16% of the total funding available to them.

It is imperative that DHP reaches those who need it, and due to the nature of housing stock in rural areas many affected by the under occupancy deduction will find it harder to locate suitable alternative accommodation than those in urban areas. These households may need DHP to cover rental shortfalls over a longer period of time than other households in areas where finding alternative accommodation is easier. It should however be noted that these authorities are located in rural areas, where there may be issues of access to local authority services, and this may have had an impact on DHP take up.

The extra funding made available by the DWP in July 2013 resulted in funding for Scotland's rural authorities rising to 2 to 3 times higher than their initial allocation. Taken together with the Scottish Government's additional funding, rural authorities are in a situation where they need to make a significantly greater adjustment their DHP policies and practices, than other authorities.

Angus for example initially received £130,802 in DHP funding from the DWP. This was then further topped up by the DWP in July 2013 as part of the funding made available to rural authorities, adding £282,704 to the DHP fund as well as adding £12,204 in additional transitional funding. Then the Scottish

¹⁰ *Ibid*

Government announced their top-up of £614,019 in October 2013, taking the total DHP pot in Angus to £1,033,765 – eight times the initial DHP allocation they received from the UK government. In Angus there are 728 social tenants affected by the under occupancy deduction as of November 2013, and the number decreasing only very slightly from month to month.¹¹

Authorities in this position should focus on spending the DWP allocation of their DHP fund – as this must be spent in this financial year. It is vital that DHP is spent or committed before the end of 2013-14, to make sure that those who need help most receive it. This would avoid inevitable rent arrears and potential eviction, and homelessness.

Discretionary housing payment policies

Since the introduction of the under occupancy deduction Shelter Scotland have emphasised the importance of a published and widely circulated policy from an early stage.¹² So far we are aware of only 14 local authorities who have a fully published DHP policy. Other authorities have information on applying for DHP on their website, including guidelines to applying and 'FAQ' sections, alongside the application form.¹³

Published DHP policies

Every published DHP policy has been updated since 1 April 2013 to reflect the DWP's guidelines, reiterating the core aims and objectives of the DHP fund. A few local authorities have also redrafted their policy since the Scottish Government made additional funds available in October 2013. Edinburgh City Council, alongside Inverclyde, have redrafted their policy and reviewed their allocation process in light of this top up. We encourage every local authority to do the same, particularly given that DHP funding from the DWP and the Scottish Government has not been reduced significantly in 2014-15 compared with 2013-14.¹⁴

¹¹ Department of Work and Pensions, Stat-Xplore, February 2014

¹² Shelter Scotland, 'Allocating Discretionary Housing Payments (DHPs) in Scotland', November 2013 (first published in June 2013)

¹³ See Appendix 1

¹⁴ Department of Work and Pensions, 'HB Subsidy Circular S1/2014: Discretionary Housing Payments for local authorities 2014 to 2015', January 2014

<https://www.gov.uk/government/publications/hb-subsidy-circular-s12014-discretionary-housing-payments-for-local-authorities-2014-to-2015>

As for eligibility priorities, the published policies vary with regard to groups such as foster carers and disabled people living in significantly adapted homes hit by the under occupancy deduction as priority groups. For example, Aberdeenshire Council¹⁵ puts those facing homelessness as a top priority group in line with the objectives of the DHP fund, and Argyll and Bute¹⁶ have clearly ranked priority groups with 'Priority Group A' including foster carers, those forced to move away from kinship/carer networks and disabled people in significantly adapted properties.

Shelter Scotland recommends that there should be a 'clear process' for allocating DHP funds. Those local authorities with published policies gave very specific information on the process through which applications would be considered, awarded, monitored and reviewed. In many cases the focus was on information regarding the formal processes of the application, keeping information regarding applicants and suitability to a minimum, reflecting the discretionary nature of the fund. However, there are examples of policies that are very clear on how they intend to award DHPs.

Fife Council¹⁷ clearly state the circumstances in which they will award a DHP along with the level and length of that award. For example, "Reductions in Housing Benefit or Universal Credit due to Under Occupancy and Benefit Cap Legislation from April 2013" and "The rent is more than the Local Housing Allowance or Shared Room rate".

This makes it easier for households to predict the utility of making a DHP claim and can aid in longer-term management of household budgets. This is an improvement on many policies that reiterate the DWP guidelines that DHPs are for covering a generic 'shortfall' in housing costs due to various circumstances.

Internal DHP policies

Many local authorities who do not have a published policy do have internally circulated DHP policies. These policies offer clear guidance as to who is eligible for a DHP and in which circumstance. Most give very specific examples of circumstances in which a DHP should be awarded. For example, East Renfrewshire (who do not have a published policy)

¹⁵ Aberdeenshire Council, 'Discretionary Housing Payments Policy', August 2013
http://www.aberdeenshire.gov.uk/benefits/ct_benefit/AberdeenshireCouncil-CouncilDemocracy-Benefits-DiscretionaryHousingPayment.asp

¹⁶ Argyll and Bute Council DHP policy <http://www.argyll-bute.gov.uk/council-and-government/discretionary-housing-payments>

¹⁷ Fife Council, 'Discretionary Housing Payments Policy', October 2013
<http://www.fifedirect.org.uk/publications/index.cfm?fuseaction=publication.pop&pubid=9292A01B-AA7D-83A0-80B667D6318A4B7C>

offer a breakdown of personal circumstances to consider when awarding an application (such as financial and medical situation) along with specific examples. Similarly, they offer a clear ranking of priority groups. Furthermore, Aberdeen City Council, who only offer a brief online 'FAQ' section, in their internal DHP policy offer a very clear, structured guide to the level and length of awards based upon individual circumstances. Such policies should be made available publically, encouraging both potential claimants and advisers to apply for a DHP.

Information on applying for DHPs

18 of the 32 local authorities do not have a detailed, published policy on DHPs. Instead they have an online guide or 'FAQs' accompanying an online application form. These sources of information vary hugely in comparison to the published policies. We believe that is essential to have a policy on DHPs, despite the finite budget and discretionary nature of the payments.

While many online guidelines reiterate the DWP aims and objectives they lack clarity in presenting important information. For example, North Ayrshire Council¹⁸ simply list the information needed for the application in answer to 'Am I Entitled to DHP?' without explaining the role of the DHP fund. Once again, while this reflects the discretionary nature of the fund, in terms of inviting people to apply there is not enough information as to how such information will be considered. It is essential that applicants, and advisers working with applicants, have access to this information.

While some authorities, for example Shetland Islands Council¹⁹ and Inverclyde Council,²⁰ have no published policy but have a very clear and detailed system of allocation priority. Inverclyde offer a list of priority groups, detailing specific qualifying circumstances, the rate and duration of a resulting award and examples of evidence to support a claim. Shetland have an 'eligibility scoring system' whereby the personal circumstances of the applicant (disabled, kinship carer) is scored against their social circumstances (fleeing domestic violence, foster carer) in order to determine the level of award they can be given. In the absence of a full DHP policy this system is to be commended, as it recognises the importance of DHPs. There is an argument to be made that such a rigid system cannot work with a cash limited pot. However, with the ongoing monitoring of the DHP fund that is

¹⁸ North-Ayrshire Council online information on DHPs <http://www.north-ayrshire.gov.uk/resident/benefits/housing-benefits/discretionary-housing-payments.aspx>

¹⁹ Shetland Council online information on DHPs http://www.shetland.gov.uk/about_benefits/DiscretionaryHousingPayments.asp

²⁰ Inverclyde online information on DHPs <http://www.inverclyde.gov.uk/advice-and-benefits/housing-benefit-and-council-tax-reduction/discretionary-housing-payment/discretionary-housing-payment-priorities/>

recommended by the DWP it is reasonable to suggest that such systems can be altered pending changing circumstances.

Conclusion

- There is large variation in the proportions of DHP budgets being spent across Scotland – only 10 of the 31 local authorities have spent 90% of their estimated spend for 2013-14. While four authorities have spent less than 25% of the total fund available to them. This may reflect fluctuating demand patterns across Scotland, or worse, a less than proactive approach to promoting the DHP fund.
- Demand for DHP is high – with 76,230 applications for payments by the end of December 2013. In some cases demand is high but the amount of successful application remains low. This may be indicative of local authorities managing the DHP fund according to the fund levels in place before the Scottish Government's top up and the increased funding for rural areas from the UK government. Some local authorities have adjusted to this quickly by increasing their rate of DHP spend in November and December, others need to work hard to make sure all DHP is spent before the end of the financial year.
- Shelter Scotland recommended that local authorities should produce a clear, published DHP policy in order to ensure consistent decision making. Where this has been done it has been done well. Some local authorities such as Edinburgh²¹ have updated their policies in response to the additional budget from the Scottish Government. This ensures that decisions made regarding DHP awards are made from up to date guidelines, responding to renewed circumstances.
- Many local authorities provide very little information to the public regarding DHPs. These authorities offer only brief guidelines as to who is eligible and the information required for the application, but do have detailed internal policies covering priority groups along with the level, and length of, awards. It is imperative that all authorities have published DHP policies, ensuring potential applicants and advisers know of the fund and who should apply.

²¹ City of Edinburgh Council, 'Discretionary Housing Payment Policy', 2014
http://www.edinburgh.gov.uk/downloads/file/10640/city_of_edinburgh_council_discretionary_housing_payment_policy

Appendix 1: discretionary housing payment policies in Scotland 2013-14

| Local authority | Published DHP policy? | Additional commentary |
|------------------|-----------------------|---|
| Aberdeen City | ✗ | Aberdeen City do not have a published policy, but they do have information on DHPs on their website beside the DHP claim form. This is clear on the short-term nature of the DHP award. The council also has an internal policy which is clear and comprehensive on length of award and welfare reforms to be addressed. |
| Aberdeenshire | ✓ | Aberdeenshire council's policy focuses on preventing homelessness. ²² Those facing homelessness will receive 100% of their rental shortfall, with other applicants receiving between 80-100% of the shortfall. The policy emphasises consistent decision-making, based on income and savings. The policy also states that DHPs are payable to claimants, agents or landlords, based upon the discretion of the decision-maker. |
| Angus | ✗ | No published policy but Angus council do have FAQs published on their website. ²³ This outlines eligibility priorities as those affected by welfare reforms, in particular those facing homelessness. |
| Argyll and Bute | ✓ | Argyll and Bute's policy ranks prevention of homelessness as a high priority. ²⁴ States clear rankings of priority groups in anticipation of high demand. It is clear on the length of award, along with exceptions to this, which include those affected by the 'bedroom tax' who are living in specially adapted accommodation. |
| Clackmannanshire | ✗ | Clackmannanshire have notes attached to the end of their online claims form. ²⁵ The council has an internal policy with is clear on the level and duration of awards, depending on the claimant's circumstances. |

²² Aberdeenshire Council, Discretionary Housing Payment Policy, August 2013

http://www.aberdeenshire.gov.uk/benefits/ct_benefit/AberdeenshireCouncil-CouncilDemocracy-Benefits-DiscretionaryHousingPayment.asp

²³ Angus Council, Discretionary Housing Payments,

http://www.angus.gov.uk/services/view_service_detail.cfm?serviceid=1269 (last accessed 4 March 2014)

²⁴ Argyll and Bute Council, Discretionary Housing Payment Policy, April 2013 <http://www.argyll-bute.gov.uk/council-and-government/discretionary-housing-payments>

²⁵ Clackmannanshire Council, Discretionary Housing Payments Claim Form,

<http://www.clacksweb.org.uk/council/forms/housing/applicationfordiscretionaryhousingpayments/>

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|-----------------------|---|---|
| Dumfries and Galloway | ✓ | Dumfries and Galloway Council's policy highlights their desire to work with social landlords and the voluntary sector in awarding DHPs. They also have a specific 'publicity' section in their DHP policy, and send out DHP information with housing benefit awards. |
| Dundee | ✓ | Dundee City Council's policy emphasises the DHP fund's role in supporting disabled people living in adapted accommodation and foster/kinship carers hit by the 'bedroom tax'. ²⁶ |
| East Ayrshire | ✗ | East Ayrshire council have FAQs on the DHP fund on their website. ²⁷ The decision is based upon income/expenditure, efforts made to meet the shortfall, potential changes to expenditure, and potential kinship support and health issues within the household. DHPs are paid alongside housing benefit. |
| East Dunbartonshire | ✗ | East Dunbartonshire have a FAQs section on their website, alongside the DHP claim form. There is no information on how a DHP decision is made, but 'payday loans', 'DWP deductions' and 'repayments and debt' are outlined as reasons for applying. ²⁸ |
| East Lothian | ✗ | East Lothian have a FAQs on their website alongside the claims form. ²⁹ Information is centred on the process of applying and appeals. |
| East Renfrewshire | ✗ | East Renfrewshire council do not have any information online, but they do have an internal policy, which outlines specific circumstances in which a DHP should be awarded. |
| Edinburgh | ✓ | Edinburgh's policy emphasises the fund's role in meeting rental shortfalls for those with a chronic disability, parents without full custody hit by the 'bedroom tax', those needing to move to be closer to support networks, to facilitate a move to smaller accommodation. ³⁰ It also explains the decision review process, monitoring policy and the level and period of awards. |

²⁶ Dundee City Council, Discretionary Housing Payment Policy, March 2013

<http://www.dundee.gov.uk/publication/discretionary-housing-payments-policy-101kb-pdf>

²⁷ East Ayrshire Council, Discretionary Housing Payments, <http://www.east-ayrshire.gov.uk/CouncilAndGovernment/Benefits/HousingBenefit/DiscretionaryHousingPayments.aspx> (last accessed 4 March 2014)

²⁸ East Dunbartonshire, Discretionary Housing Payments, http://www.eastdunbarton.gov.uk/content/council_and_government/benefits_and_grants/wr_benefits_are_changing/discretionary_housing_payments.aspx (last accessed 4 March 2014)

²⁹ East Lothian Council, Discretionary Housing Payments, http://www.eastlothian.gov.uk/info/200254/welfare_reform/1504/welfare_reform/3 (last accessed 4 March 2014)

³⁰ City of Edinburgh Council, Discretionary Housing Payments Policy, http://www.edinburgh.gov.uk/downloads/file/10640/city_of_edinburgh_council_discretionary_housing_payment_policy

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|---------------------------|---|---|
| Comhairle nan Eilean Siar | ✓ | Eilean Siar's policy focuses on those facing homelessness, vulnerable claimants, those trying to help themselves, targeting those in greatest need. ³¹ It has a comprehensive explanation of the various circumstances which impact on decision-making, including ability to move to a smaller property. |
| Falkirk | ✓ | Falkirk council's policy focuses on those in significantly adapted houses, foster carers hit by the 'bedroom tax', those impacted by the benefits cap or loss of disability living allowance. ³² Flexible payment options are available. There is also a section on publicity which mentions CABs, social landlords and voluntary organisations. |
| Fife | ✓ | Fife council's policy outlines specific circumstances when an award will be given, along with level and length of the award. ³³ |
| Glasgow | ✗ | Glasgow have guidance information alongside the application form on their website. ³⁴ General examples of who may wish to apply, but no further information. |
| Highland | ✗ | Highland have a 'quick guide' to DHPs on their website. This outlines what DHPs can cover, and what the council will take into account when considering an application. ³⁵ |
| Inverclyde | ✓ | While Inverclyde do not have a published policy as such, they do have a very clear DHP 'budget priorities' document on their website. ³⁶ There are three categories of priority set out, with associated levels and durations of award, along with the supporting evidence required. |
| Midlothian | ✗ | No information beyond the information asked for on the application form available on Midlothian council's website. |

³¹ Comhairle nan Eilean Siar, Discretionary Housing Payment Policy, March 2013 <http://www.cne-siar.gov.uk/benefits/discretionary.asp>

³² Falkirk Council, Discretionary Housing Payments Policy, May 2013 http://www.falkirk.gov.uk/services/chief_executive/finance/revenues/policies_and_agreements.aspx

³³ Fife Council, Discretionary Housing Payments Policy, October 2013 <http://www.fifedirect.org.uk/publications/index.cfm?fuseaction=publication.pop&pubid=9292A01B-AA7D-83A0-80B667D6318A4B7C>

³⁴ Glasgow City Council, Discretionary Housing Payments, <http://www.glasgow.gov.uk/index.aspx?articleid=5374> (last accessed 4 March 2014)

³⁵ Highland Council, 'Quick Guide to Discretionary Housing Payment', September 2013 <http://www.highland.gov.uk/yourcouncil/counciltax/benefits-housingandcounciltax/>

³⁶ Inverclyde Council, Discretionary Housing Payment – Priorities, November 2013 <http://www.inverclyde.gov.uk/advice-and-benefits/housing-benefit-and-council-tax-reduction/discretionary-housing-payment/discretionary-housing-payment-priorities/>

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|-------------------|---|--|
| Moray | ✓ | Moray council's internal policy can be found via a search on their website. It refers to groups hit by welfare reforms such as Universal Credit, benefit cap and the bedroom tax. ³⁷ It also states the circumstances in which a DHP cannot be paid, such as loss of income through benefit sanctions, and has clear information on the formal process of DHP applications. |
| North Ayrshire | ✗ | North Ayrshire council have a general outline on the application process for DHPs, including income, savings and the possibility of 'rearranging finances or accommodation'. ³⁸ |
| North Lanarkshire | ✗ | North Lanarkshire Council have a guide alongside the application form on their website. It highlights that foster parents who need of a spare room, disabled people living in significantly adapted accommodation, and social housing tenants affected by under occupancy can apply. ³⁹ |
| Orkney | ✓ | Orkney Islands Council's policy is based on DWP regulations for 'qualifying criteria' e.g. claimant must be in receipt of housing benefit or Universal Credit, with most information referring to the formal processes of the application. ⁴⁰ |
| Perth and Kinross | ✗ | Perth and Kinross provide information on DHPs on their website. ⁴¹ This is clear and comprehensive, with a set of priorities including those living in an adapted house, foster/kinship carers, those waiting for a change in circumstances (such as moving to a smaller property or increasing working hours), and vulnerable people. |
| Renfrewshire | ✓ | Renfrewshire Council's DHP policy emphasises the flexibility of the payments and the fund's discretionary nature, incorporating it into wider welfare solutions. It also has a 'publicising' section. ⁴² |

³⁷ Moray Council, Discretionary Housing Payments Policy, October 2013

³⁸ North Ayrshire Council, Discretionary Housing Payments, <http://www.north-ayrshire.gov.uk/resident/benefits/housing-benefits/discretionary-housing-payments.aspx> (last accessed 4 March 2014)

³⁹ North Lanarkshire Council, Discretionary Housing Payments, <http://www.northlanarkshire.gov.uk/index.aspx?articleid=28697> (last accessed 4 March 2014)

⁴⁰ Orkney Islands Council, Discretionary Housing Payments Policy, February 2013 http://www.orkney.gov.uk/Service-Directory/D/Discretionary-Housing-Payments_2.htm

⁴¹ Perth and Kinross Council, Discretionary Housing Payments, <http://www.pkc.gov.uk/DHP> (last accessed 4 March 2014)

⁴² Renfrewshire Council, Discretionary Housing Payments Policy, <http://www.renfrewshire.gov.uk/webcontent/home/Services/Council+and+government/Council+tax+benefit+and+housing+benefit/Help+with+your+housing+costs/> (last accessed 4 March 2014)

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| Scottish Borders | ✗ | Scottish Borders Council's information on DHPs is on their website. ⁴³ On this they have clearly ranked priority groups (amended 31st October 2013). |
| Shetland | ✗ | Shetland Islands Council have a very clear scoring system on their application form. ⁴⁴ This is based upon the combination of the applicant's personal status (family, recipient of care) and their circumstance (carer, fleeing domestic violence). This determines the level of payment to be received. However, it assumes prior knowledge of DHPs, mentioning the need for a system of priorities due to limited funds and increased demand. |
| South Ayrshire | ✗ | South Ayrshire Council provide their information on DHPs by way of a FAQs section on their website. ⁴⁵ They have no online application form, or statement of who DHPs are aimed at beyond housing benefit recipients. Their internal policy does however give clear examples of circumstances in which DHPs should be awarded e.g. foster carers. |
| South Lanarkshire | ✓ | South Lanarkshire Council's policy covers the circumstances in which DHP applications can be awarded, along with length of award, method of payment and process for review. ⁴⁶ |
| Stirling | ✗ | Stirling Council has an online DHP application form, but no published policy. ⁴⁷ Their internal policy emphasises the transitional nature of the fund and restates DWP objectives. It also gives 'examples' of circumstances in which DHPs can be awarded, but does not present them as priorities. |
| West Dunbartonshire | ✗ | West Dunbartonshire's information on DHP is held on their website. ⁴⁸ Claimants can fill out the application form online. The form is very open – potentially encouraging claimants to apply. Their internal policy restates DWP objectives and gives specific |

⁴³ Scottish Borders Council, Discretionary Housing Payments, http://www.scotborders.gov.uk/info/633/housing_and_council_tax_benefits/1059/discretionary_housing_payments/2 (last accessed 4 March 2014)

⁴⁴ Shetland Islands Council, Discretionary Housing Payments Application Form, http://www.shetland.gov.uk/about_benefits/DiscretionaryHousingPayments.asp (last accessed 4 March 2014)

⁴⁵ South Ayrshire Council, Discretionary Housing Payments, <http://www.south-ayrshire.gov.uk/welfarereform/housingpayments.aspx> (last accessed 4 March 2014)

⁴⁶ South Lanarkshire Council, Discretionary Housing Payments Policy, April 2013 http://www.southlanarkshire.gov.uk/downloads/file/7465/discretionary_housing_payment_policy-april_2013

⁴⁷ Stirling Council, Discretionary Housing Payment Scheme, <http://www.stirling.gov.uk/services/council-and-government/benefits/housing-benefit/dicretionary-housing-payment> (last accessed 4 March 2014)

⁴⁸ West Dunbartonshire Council, Discretionary Housing Payments, <https://www.west-dunbarton.gov.uk/dhp> (last accessed 4 March 2014)

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| | | guidance on the role DHPs play in responding to each welfare reform. The policy also states that they will review demand on a month by month basis. |
| West Lothian | ✓ | West Lothian Council provide information on DHPs via a leaflet and a published policy. ⁴⁹ This details that DHPs will be allocated according to need, and emphasises a joined up approach to the distribution of DHPs. |

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⁴⁹ West Lothian Council, Discretionary Housing Payment Policy, November 2013
<http://www.westlothian.gov.uk/Community-life-and-leisure/Welfarereform/DHPF>