

Crisis and Resilience Fund Housing Payments Policy 2026-27

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1. Introduction, National Framework and CRF Outcomes

- 1.1 This following policy establishes the formal framework through which Gravesham Borough Council (“the Council”) will administer the Housing Payment element of the Crisis and Resilience Fund (“CRF”) for the financial year 2026-27.
- 1.2 The CRF replaces Discretionary Housing Payments (DHPs) from 1 April 2026 and is delivered as a consolidated Section 31 grant under the Local Government Act 2003.
- 1.3 The Housing Payment strand forms part of a broader CRF model, which also includes Crisis Payments, Resilience Services and Community Coordination. The Council recognises that Housing Payments contribute primarily to:
 - Outcome 1 – Provision of effective crisis support
 - Outcome 2 – Improving financial resilience
 - Outcome 3 – Strengthening the local support landscape
- 1.4 While Housing Payments address rental shortfalls, they must operate in a way that supports all three outcomes, including referral into wider support services.
- 1.5 The Council will operate a **No Wrong Door model**, ensuring that applicants presenting through any Council service are appropriately directed to the correct CRF element.

2. Phased Transition and Funding Structure

- 2.1 The former DHP scheme ceased on 31 March 2026. Under the CRF transition framework for the financial years ending March 2027 and March 2028, the Council will continue to receive Housing Payment allocation reflecting historic DHP funding levels.
- 2.2 The Council may supplement Housing Payment funding with locally determined resources.
- 2.3 All funding is subject to the annual Grant Determination Letter and Section 31 conditions. The Council will comply fully with those requirements.

3. Legal Basis and Nature of Discretion

- 3.1 Housing Payments are made under the CRF guidance which sets out the objectives, framework and required collaboration between the Department for Work and Pensions (DWP) and County Councils, District Councils and Unitary Authorities (including Metropolitan Councils and London Boroughs) to successfully meet the policy intent. It also provides the framework that Authorities need to work within the arrangements for distribution of funding and reporting requirements.

Housing Payments

- 3.2 Housing payments can only be awarded where the following conditions are met:
- (a) The applicant must be entitled to either Housing Benefit or Universal Credit housing element;
 - (b) Any amount awarded must not exceed the level of eligible housing costs supported by Housing Benefit or Universal Credit;
 - (c) No amount can be awarded to those applicants have no recourse to public funds; and
 - (d) All payments made must be recorded and dealt with independently from statutory Housing Benefit payments.
- 3.3 The scheme is cash-limited and financial constraint is a legitimate factor in determining prioritisation and award duration.

Guidance and Management Information Requirements

- 3.4 The Council will have regard to guidance issued by the Department for Work and Pensions (DWP) and relevant case law in interpreting discretion lawfully. The Council will monitor Housing Payment expenditure monthly and management information will be captured in accordance with CRF reporting requirements.
- 3.5 The Council will provide all required data returns under Annex D of the CRF Guidance and a clear audit distinction will be maintained between Housing Payment and Housing Benefit payments

4. Core Delivery Principles

- 4.1 Housing Payments will be delivered in accordance with CRF principles and delivery will be:
- Person-centred, recognising the dignity and autonomy of applicants;
 - Needs-based, focusing on underlying causes of housing instability;
 - Holistic, linking applicants to appropriate resilience support;
 - Trauma-informed, acknowledging the impact of crisis, abuse or hardship; and
 - Accessible, with multiple application routes available.
- 4.2 The Council's approach is that the CRF principles will support the Council's overall corporate objectives and to;
- Help alleviate poverty;
 - Prevent homelessness and support people to keep their tenancies;
 - Support vulnerable groups in the community; and
 - Help applicants through personal and difficult events.
- 4.3 Housing Payments will be available throughout the financial year and the Council will not operate a first-come, first-served allocation model. Each case will be treated strictly on its merits and all applicants will be treated equally and fairly.

- 4.4 Responsibility for day-to-day operation of the policy will lie with the Revenues and Benefits Service who will work with the Council's Housing Service and the Housing Options team in particular, to ensure applicants can be helped and supported.
- 4.5 The Revenues and Benefits Service will liaise with local Citizens Advice and other advice agencies to promote the scheme and all staff within the service will be aware of the scheme and be able to give advice on applying for it.

Equality Act 2010 and Public Sector Equality Duty

- 4.7 The Council will exercise its discretion under this policy in accordance with the Equality Act 2010, including the Public Sector Equality Duty ("PSED") set out in section 149 of that Act.
- 4.8 In determining any application for a Housing Payment, the Council will have due regard to the need to:
- Eliminate unlawful discrimination, harassment and victimisation;
 - Advance equality of opportunity between persons who share a relevant protected characteristic and those who do not; and
 - Foster good relations between persons who share a protected characteristic and those who do not.
- 4.9 Protected characteristics include age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
- 4.10 Particular regard will be given, where relevant, to:
- The impact of disability on housing costs and tenancy sustainability;
 - The needs of households with dependent children;
 - The circumstances of victims of domestic abuse or other forms of violence;
 - The position of carers and those with caring responsibilities;
 - The cumulative impact of welfare reform measures on vulnerable households.
- 4.11 Decision makers will ensure that equality considerations are integrated into the assessment process and that any relevant protected characteristic is actively considered as part of the exercise of discretion.
- 4.12 Where appropriate, reasonable adjustments will be made to ensure that disabled applicants are not placed at a substantial disadvantage in accessing the scheme.

5. Applications for Housing Payments

- 5.1 Applications may be made by the person entitled to Housing Benefit or Universal Credit Housing Element, an appointee, advocate or authorised representative.
- 5.2 In order that all applications are treated equally all persons who wish to apply for a Housing Payment will be required to complete a claim form, either online on the link

below, which is available on the Councils' website, or in paper form by contacting the Service.

<https://www.gravesham.gov.uk/benefits>

- 5.3 If an applicant has problems completing a claim form, whether online or by paper form, advice will normally be given over the phone. An officer may arrange a face to face visit to provide assistance when appropriate to do so. Applicants may be referred to the local Citizens Advice Bureau or other voluntary organisations for help with completing the form.
- 5.4 The process for making an application is as follows;
- (a) An initial application for Housing Payment should be made in writing, either on-line, by email, or via the Housing Payment application form;
 - (b) Unless submitted on line, the application form must be returned to the Council within one month of issue;
 - (c) The application must include details of income, expenditure, assets and the circumstances that require a Housing Payment;
 - (d) If further information is required, the Council will contact the applicant as appropriate setting out the information requested;
 - (e) If, after 14 days, the information has not been received, the applicant will be reminded and a further 14 days will be allowed for the information to be provided;
 - (f) If the information is not provided or there is no contact with the Council within 28 days of the initial request, the application will be deemed to be withdrawn.

6. Eligibility Conditions

- 6.1 To qualify, an applicant must be entitled to Housing Benefit or Universal Credit including housing costs towards rental liability. Entitlement includes cases where payment has not yet been issued but eligibility has been established.
- 6.2 Housing payments are not payments of Housing benefit or Universal Credit. Any payment made is discretionary and there is no statutory right to a payment.
- 6.3 Housing Payments should be seen as short term however in exceptional circumstances they can be used to provide longer term support.
- 6.4 Applicants receiving only Council Tax Reduction are not eligible for a Housing Payment under the CRF but may apply for additional support under the Council's Financial Support Payment scheme.
- 6.5 If a Housing Payment cannot be awarded, the Council will look to signpost the applicant to other forms of assistance available either by the Council or other organisations where appropriate.

7. Definition of Housing Costs and Exclusions

- 7.1 There is no statutory definition of the phrase ‘further financial assistance’ in law. To claim a Housing Payment the applicant will need to demonstrate that they are unable to meet housing costs from their available income or that they have a shortfall as a result of the welfare reforms. The types of shortfalls can include:
- (a) where the benefit cap has been applied;
 - (b) the removal of spare room subsidy in the social rented sector (RSRS);
 - (c) as a result of local housing allowance restrictions;
 - (d) rent officer restrictions such as local reference rent or shared room rate;
 - (e) non-dependant deductions or housing cost contributions;
 - (f) rent shortfalls to prevent a household becoming homeless whilst the housing authority explores alternative options;
 - (g) reductions due to income tapers; or
 - (h) any other policy change that limits the amount of HB payable,
- 7.2 Further financial assistance towards housing costs may also be payable for rent in advance, deposits, or other lump sum costs, for example, removal costs. If the application for a Housing Payment is to help with a deposit or rent in advance the Council will also consider whether;
- the property is affordable for the tenant;
 - the tenant has a valid reason to move; and
 - the deposit or rent in advance is reasonable
- 7.3 If an applicant experiences a gap in the provision for their housing costs if they move into temporary accommodation (homelessness) and are required to make a new claim for Housing benefit, housing payments can be considered, if appropriate.
- 7.4 Housing Payments may be awarded in circumstances where a claimant is liable for two properties, including cases of temporary absence, subject to the time limits and conditions set out in Housing Benefit and Universal Credit regulations. This may also include cases involving domestic abuse where safety requires temporary relocation.
- 7.5 If a Housing Payment is claimed because of a restriction by the Valuation Office Agency (Rent Officer) on the amount of rent that can be taken into account in the applicant’s housing benefit claim, the applicant will be advised to make an appeal against that decision if we believe it to be incorrect. In some instances, the Council may request a substitute decision from the Valuation Office Agency directly
- 7.6 Housing Payments will not be awarded in respect of:
- Ineligible charges as defined under Housing Benefit 2006 or Housing Benefit (Persons who have attained the age for State Pension Credit) Regulations 2006 or Universal Credit Regulation and Universal Credit Regulations 2013;
 - Support or personal related charges
 - Rent increases imposed to recover arrears;
 - Sanctions applied to any benefit under the Social Security Act 2012;

- Overpayment recovery deductions from any benefit;
- Benefit suspensions arising from failure to provide required information; or
- Council Tax liability.

7.7 The Council would not normally award any Housing Payment in cases where the need for financial assistance arises because of;

- Significant overcharging by a landlord;
- Failure of non-dependants to make a contribution towards housing costs where they have the means to do so;
- Claimed inadequacy of disability benefits to cover the costs of disability;
- Unwillingness of the applicant to use other available resources or apply for other forms of assistance; or
- A move from social housing to unaffordable private housing.

8. Financial Assessment

8.1 On receipt of any application, the Council will undertake a full assessment of the household's financial position.

8.2 The following factors will be taken into account when considering whether the applicant is in need of further financial assistance;

- The extent of any shortfall between the Housing Benefit award/Universal Credit Housing Element and rental liability;
- Any steps taken by the applicant to reduce their rental liability;
- The income and expenditure of the applicant, their partner and any dependants or other occupants of the applicant's home;
- Any savings or capital held by the applicant or their family;
- The financial, medical, caring and educational circumstances of the applicant, their partner and any other occupants of the applicant's home;
- Whether the applicant or any member of their family is at risk due to domestic violence;
- The risk of eviction because of the shortfall and whether the landlord would accept a reduced rent payment;
- Whether the applicant could reduce other outgoings and thus alleviate the hardship themselves;
- Whether the applicant has made every effort to maximise their benefit or other income;
- The possible impact of not awarding a Housing Payment, for example, loss of employment;
- Any other special circumstances the applicant brings to the Council's attention.
- The amount available in the CRF Housing Payment budget.

8.3 Disability Living Allowance, Personal Independence Payments, Armed Forces Independence Payments and Attendance Allowance will not be taken into account as income when calculating any Housing Payment.

- 8.4 The Council will assess whether an award would realistically prevent eviction or homelessness and whether the tenancy is sustainable. Particular weight will be given to cases where an award would prevent homelessness under Part VII of the Housing Act 1996.
- 8.5 In addition to the above the Council will also consider the household's expenditure to see whether it would be practical for them to reduce their spending although it should be noted that the Council will not provide individual financial advice but will refer the applicants to recognised free advice providers.
- 8.6 It would however be reasonable for the Council to expect households who apply for assistance to reduce the costs of non-essential expenditure or where expenditure generally is considered excessive.
- 8.7 Where anyone is struggling financially or has high levels of debt, the Council will advise them to seek advice from recognised free advice agencies if they have not already done so.
- 8.8 In determining any application, the decision maker will identify and record the outcomes in relation to the Management Information requirements.

9. Backdating

- 9.1 Housing Payments may be backdated at the discretion of the Council where a good reason is demonstrated and backdating will only be considered for periods during which Housing Benefit or Universal Credit housing element was payable.

10. Change of Circumstances

- 10.1 Recipients of any Housing Payment must inform the Council promptly and no later than 1 calendar month of any relevant change in circumstances, including changes in income, household composition, rental liability or benefit entitlement.
- 10.2 Failure to report changes may result in revision, recovery or termination of award.

11. Decision Making and Governance

Decision making and payment

- 11.1 There will be no restriction on the number of people who can claim a Housing Payment. However, it must be noted that the available annual budget is cash-limited by the Government.
- 11.2 All applications for Housing Payments will be considered by an officer of the Revenues and Benefits Service and all decisions will be made, within one month of receiving the application and any supporting evidence or as soon as practicable.

- 11.3 In order for a Housing Payment application to be considered there must be;
- (a) entitlement to Housing Benefit or Universal Credit that includes a housing element towards rental liability; and
 - (b) a shortfall between the weekly benefit payable and the weekly eligible rent, or;
 - (c) there is no weekly shortfall but a one off payment is to be considered, for example, towards moving costs.
- 11.4 Where any shortfall is so high that the Council considers that the Housing Payment would be deemed unreasonable, the Council will need to determine whether such an award would:
- allow the retention of the accommodation;
 - whether eviction would be likely anyway;
 - whether the applicant has pursued all other options; and
 - the remaining Housing Payment budget.
- 11.5 Awards of Housing Payment will usually be at a weekly amount for a fixed period unless a one off payment is granted. The period of award will be decided according to the particular circumstances of each case but will not normally exceed 12 months. Awards of weekly payments will normally commence from the Monday following the date of claim for a Housing Payment, or the date on which entitlement to Universal Credit commenced (providing the application for a Housing Payment is received within one calendar month of the claim being decided).
- 11.6 Where an applicant is in receipt of Universal Credit, the maximum Housing Payment award will be determined using information provided by the Department for Work and Pensions.
- 11.7 Housing Payments will usually be made to the applicant. In the case of a person receiving rent rebate, the payment will be credited to their rent account. However, the Council, may pay someone other than the applicant, such as their agent, an appointee or a landlord where appropriate.
- 11.8 An applicant may apply for a further Housing Payment after any existing payment has ended although it should be noted that the Council will give no guarantees that any further payment will be awarded.

Notification

- 11.9 Decisions on any application will be notified in writing or email as appropriate and set out the reason for the decision. Where successful the applicant will be informed of;
- The weekly amount;
 - The period of the award;
 - The reason for the award;
 - The method of payment;
 - Conditionality's where appropriate (i.e. where the applicant is required to undertake certain activities); and

- The need to report changes in circumstances.

11.10 Where unsuccessful an explanation for the decision will be given to the applicant, together with notification of their rights for a further review.

Requests for review

11.11 Housing Payments are **not** a payment of state benefit and therefore there is no statutory right of appeal through the statutory appeals system. However, if the applicant is dissatisfied with the decision made, they can request a review. Such requests must be made in writing within one month of the date of the decision letter and may include any additional information the customer wishes to be considered.

11.12 The review will be considered normally within 14 days of receipt of the request or as soon as practicable, and the decision will be notified in writing. If the applicant remains dissatisfied with the outcome of the review, they may make a complaint using the Council's complaints process.

12. Overpayments

12.1 Where any Housing Payment is deemed to be overpaid the Council will look to recover the amount from either the applicant or from whoever the payment has been made unless the overpayment is a result of a mistake made by the Council or where the applicant could not have reasonably known that an error occurred. Decisions about recovery will be decided on the merits of each case taking account of the level of debt and any hardship that might arise.

12.2 Any overpayment of Housing Payment will be recovered by means of an invoice and normal recovery processes. If the overpayment arises as a result of a change in circumstances but the applicant remains entitled to a lower amount of Housing Payment, any overpayment may be offset against the revised award.

13. Fraud

13.1 The Council is committed to protecting public funds and ensuring that Housing Payments are correctly made. Any applicant who tries to obtain or increase a Housing Payment by falsely declaring their circumstances, providing a false statement or evidence in support of their application, may have committed an offence under The Fraud Act 2006.

13.2 Where the Council suspects that such a fraud may have been committed, this matter will be investigated as appropriate and may lead to criminal proceedings being instigated.

14. Wraparound Support and Resilience Services

14.1 Housing Payments under the Crisis and Resilience Fund are designed to operate as a gateway to wider Resilience Services. Where appropriate, applicants will be offered referral to:

- Debt advice providers;
- Income maximisation support;
- Budgeting services;
- Employment support; and
- Energy advice services.

14.2 All referrals are voluntary and will not be imposed as a condition of award unless necessary to safeguard tenancy sustainability. Delayed referral may be used where immediate crisis resolution is the priority.

15. Proactive Targeting, Data Use and out of area.

15.1 The Council may use data from DWP, Housing Providers and internal systems to proactively identify households at risk of rental shortfall. Targeted outreach may be undertaken in partnership with advice agencies and housing providers.

15.2 Housing Payments do not replace duties of the Council under Part VII Housing Act 1996.

Out of area

15.3 Responsibility for the administration of a Housing Payment rests with the local authority that is responsible for administering Housing Benefit or, in the case of Universal Credit claimants, the authority in whose area the claimant resides at the time of application.

15.4 Where an applicant moves into or out of the Council's area, responsibility for any ongoing Housing Payment application will normally transfer to the authority covering the area in which the claimant is residing and liable for rent at the time of application.

15.5 The Council may liaise with neighbouring authorities to ensure continuity of support where appropriate. However, there shall be no automatic entitlement to continuation of an award following a change of address outside the Council's area.

16. Review of Policy

16.1 This policy will be reviewed annually or sooner if required by changes in legislation, funding or CRF guidance. The Council's Section 151 Officer, in consultation with the Portfolio Holder, may make amendments to ensure compliance.

17. Delegated Powers

- 17.1 This policy for the Housing Payments has been approved by the Council. However, the Council's Section 151 Officer in consultation with the Portfolio Holder is authorised to make technical amendments to ensure it meets the criteria set by government and the Council.