
Policy Briefing Paper:

Financial Inclusion and Housing Debt in NI

1.0 Introduction

Rising personal debt and the threat of repossession of homes are serious problems in the current economic situation. In the last 5 years Housing Rights Service has witnessed an overwhelming increase in demand for specialist housing debt advice and representation in Northern Ireland. This policy paper has been produced as part of our Preventing Possession Initiative which focuses on preventing home loss as a consequence of debt related possession. The paper explores the problem of debt and proposes possible responses to this crisis. It is hoped its content will help inform debate around the problems associated with accessing affordable credit and the wider issue of financial exclusion.

2.0 Context of briefing

- Housing Rights Service statistics indicate that in 2008/09 there was more than a 500% increase in the number of clients represented in possession proceedings compared to the previous year.
- Northern Ireland Court Service statistics show that in 2008 3628 repossession actions were taken by lenders representing a 64% increase from the previous year. ¹ Approximately one third of the cases resulted in an outright possession order being granted.²
- During 2008/09 the NI Housing Executive statistics record eviction proceedings for rent arrears in 2936 cases, 49 actual evictions took place and 56 tenants left voluntarily. (There are no comparable statistics available for housing associations in Northern Ireland.)

¹ http://www.courtsni.gov.uk/NR/rdonlyres/5EA2ECDE-0B54-4AA0-A6AD-E3A9DAA44497/0/p_pm_pr200904.doc

² It should be noted that not all outright possession orders granted can lead to enforcement, but can lead to people leaving voluntarily.

- Statistics published by the Department for Social Development (DSD) indicate that in 2007/08 rent arrears in the social rented sector represented around 6% of total rent collectable which equates to over £20m.

3.0 Government responses to financial exclusion

Financial exclusion is the lack of access to financial products such as banking, savings, investments, assets, insurance and affordable credit. Amongst those who are more likely to be financially excluded are social housing tenants, lone parents, the unemployed, disabled persons, sick persons and ethnic minority groups. The Labour Government has identified financial exclusion as a key priority and has published a number of reports to combat financial exclusion. The key elements of the UK Government's priorities are access to banking, advice and affordable credit.

The devolved administrations in Scotland and Wales have also prioritised the issue of financial exclusion. The Scottish Government launched a Financial Inclusion Action Plan in 2005 setting out how the Government and its partners could tackle financial exclusion. The main emphasis in the plan was around three strands, namely money advice, financial capability and access to financial services such as affordable credit.³ Recently, the Welsh Assembly Government consulted on a Financial Inclusion Strategy for Wales. The proposed strategy set out how the Welsh Government would work with stakeholders such as housing providers, banks, credit unions, utility companies and advice providers to combat financial exclusion. The aim of this proposed strategy was to explore issues of access to mainstream financial services, affordable credit, savings, and advice and income maximisation.⁴ In contrast, there is no single strategy focusing on tackling financial exclusion in Northern Ireland.

The Northern Ireland devolved administration published a Strategy in 2006 to tackle poverty and social exclusion. "Lifetime Opportunities" contains measures to tackle financial hardship for example through supporting the provision of debt advice.⁵ However the Strategy does not go far enough to tackle financial exclusion as issues such as promoting access to affordable credit or mainstream financial services are not included. A recent research report on measuring financial exclusion in Northern Ireland shows that approximately 13% of adults do not have a bank account, that nearly 17% are in fuel poverty and that 60% of households do not have any savings.⁶ Consumer Council (NI) reports that people in Northern Ireland are less financially knowledgeable than anywhere else in the UK.⁷ Financial exclusion is a very serious problem locally and tackling it must be a priority for the Northern Ireland Assembly.

³ <http://www.scotland.gov.uk/Topics/People/Social-Inclusion/17413/22647>

⁴ <http://wales.gov.uk/consultations/closedconsultations/socialjustice/fiststrategy/?lang=en>

⁵ OFMDFM (2006) Lifetime Opportunities: Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland, Pg 47 www.ofmdfmi.gov.uk

⁶ Measuring and Mapping Financial Exclusion across Northern Ireland: Research for the Community Foundation for Northern Ireland NI. Experian Report, working in Partnership with Charity Bank, Published May 2009, Pg 1. <http://www.communityfoundationni.org/download/1/Financial%20Exclusion%20in%20Northern%20Ireland%20FINAL.pdf>

⁷ "Managing Money-How Does Northern Ireland Add Up? Consumer Council NI http://www.consumercouncil.org.uk/filestore/documents/Financial_Capability_06.09.07.pdf

3.1 Nature and extent of the problem

Research has shown that people on low incomes or the financially excluded are more likely to need credit for essential items such as household appliances; clothing; furniture and to pay bills. For these people, affordable credit is a matter of necessity, not luxury. The problem facing people who are financially excluded is a double one. Not only do they need credit for necessities, but they are very likely to have difficulties accessing affordable credit from mainstream lenders. The result is fewer available options and more people turning to higher interest products from sub-prime lenders (some of whom offer mortgages and secured loans) or alternative credit lenders (such as doorstep lenders, mail order catalogues, pawnbrokers, pay-day loans and illegal money lenders). The majority of these sources of credit can be extremely costly, with APRs ranging anywhere from between 100 to 400%.⁸ Research findings show that people accessing sub-prime lending or non-status lending loans which are secured on property tend to be homeowners who are in financial difficulty. Those borrowing from the alternative credit sector are normally on low-incomes and have dependent children.⁹ In 2007, the National Housing Federation reported that there were 1.6 million social housing tenants who accessed credit through doorstep lenders.¹⁰ Even more serious is the human cost of debt. In these situations many people can experience stress, anxiety, family breakdown and homelessness.¹¹

For these reasons, the Labour Government decided there was a role for not for profit lenders such as credit unions in Britain in delivering affordable credit to those on the margins of financial exclusion. To this end, the Government established a Growth Fund of £42 million to enable credit unions to deliver affordable credit to the financially excluded. Currently credit unions in Northern Ireland are unable to access the Growth Fund. (This may change as the Committee for Enterprise, Trade and Investment has recently published an Inquiry report, recommending that the Growth Fund should be extended to credit unions in NI).¹²

⁸ Collard, S and Kempson E (2005) *Affordable Credit: The Way Forward* Joseph Rowntree Foundation, Policy Press, Bristol, Pg 1.

⁹ Kempson, E., C. Whyley, et al. (2000). *In or Out? Financial Exclusion: A Literature and Research Review*, Financial Services Authority, Pg 42.

¹⁰ Alexander, N (2007) *Credit Where Credit's Due: A Report for the National Housing Federation*, Pg 5, available at the following link:

http://www.housing.org.uk/Uploads/File/Policy%20briefings/CREDIT_WHERE_CREDIT'S_DUE_FINAL_060807.pdf

¹¹ Chartered Institute of Housing (2003) *Breaking Free: Financial Awareness and the Role of Social Landlords*

¹² Committee for Trade, Enterprise and Investment, Report on the Committee's Inquiry into the Role and Potential of Credit Unions in Northern Ireland, available at the following link:

http://www.niassembly.gov.uk/enterprise/2007mandate/reports/report05_08_09r.htm#2

4.0 Profile of Housing Rights Service clients

People in housing debt who contact Housing Rights Service for advice come from different economic backgrounds but generally all have difficulties in accessing affordable credit. Social rented sector tenants have particular difficulties as they are more likely to be on low incomes or in receipt of benefits and do not have their home as an asset. Mainstream lenders therefore often consider them as posing a higher risk of default. This often leads some tenants turning to costlier credit options such as doorstep lenders.

In this difficult economic climate, Housing Rights Service has also seen a huge increase in the number of homeowners in serious financial difficulties. A significant number of these are people who have been unable to access mortgages or loans from mainstream lenders for a variety of reasons, such as poor or no credit history, low incomes or being in receipt of benefits. A number of these borrowers have been targeted by intermediary brokers and sub-prime lenders to take out mortgages or secured loans at high interest rates.

Housing Rights Service has also witnessed a rising number of homeowners who have previously been able to access affordable credit from mainstream lenders but now have fewer affordable credit options available due to becoming over-indebted. Other clients are experiencing debt problems for more “traditional” reasons because of a change in circumstances, such as job loss, ill health or relationship breakdown which has directly impacted on their credit options. Overall, in our experience more people than ever are struggling to access mainstream affordable credit and instead are resorting to higher cost credit alternatives a lot of which is being marketed aggressively.

Unfortunately, where possession action is initiated, Northern Ireland borrowers face a second blow when they discover they are not entitled to any legal aid to assist with the legal costs at court. This differs from the position in England and Wales where homeowners facing repossession proceedings are eligible for legal aid for help at Court.¹³ In our experience, without specialist legal representation people facing possession are less likely to keep their home. The following recent Housing Rights Service cases illustrate further the problems faced by our clients.

4.1 Case studies

Case 1: The client is a Housing Executive tenant. She borrowed a loan from a home collected credit company to cover the cost of essential items. She works part-time and has a minimal Housing Benefit entitlement of £10. She is repaying £70 per week on the loan. Her rent is just over £65 per week and the Housing Executive initiated possession proceedings for arrears of over £500 pounds. The Housing Executive secured a Suspended Possession Order on the terms of weekly rental charge plus an additional £5 per month. She seems to view the collector from the lender as a friend she can turn to and cannot cope without.

Case 2: The client has mortgage and secured loan arrears with different lenders. Both lenders initiated possession proceedings. The client did not attend

¹³ Legal Services Commission Press Release 08.02.08
http://www.legalservices.gov.uk/aboutus/press_releases_7749.asp?page=4

one of the hearings and a Possession Order was granted. Housing Rights Service offered to negotiate to have her loan repayments to one of her creditors, a home collected credit company, reduced to minimum payments so that the client could address the issue of arrears. Despite our advice, the client felt she could not save her home. She did not want our Adviser to contact the credit company as she needs to be able to get further loans from them in order to get by.

Case 3: The client is in rent arrears with a housing association and a suspended possession order was granted. She can afford to pay rent but has a number of non priority debts including credit cards and loans. The loans include a loan from a loan shark. She also has a housing benefit overpayment. Housing Rights Service offered to negotiate with her creditors to reduce her payments. In this instance, Housing Rights Service was able to negotiate with some of her creditors to enable her to make contributions towards the arrears but could not negotiate with the loan shark.

5.0 Models of affordable credit

Having outlined the problems in accessing affordable credit we now consider some possible responses. In doing so we can benefit from the work already being carried out in Britain, the Republic of Ireland and locally. This work is often based on partnerships involving not for profit lenders such as credit unions and social housing providers with independent advice agencies.

Before exploring some of these models, it is important to note the situation of credit unions in Northern Ireland. Traditionally the UK Government has not viewed credit unions in Northern Ireland as having a role in tackling financial exclusion and they have not received funding from the Growth Fund to provide affordable credit to the financially excluded.¹⁴ Furthermore, some credit union practices locally can present obstacles. Traditionally, people normally have to build up a savings history before they can borrow. This practice may work to the disadvantage of those who have an immediate or short term need for credit. This may perhaps result in potential borrowers approaching higher cost lenders who do not demand a savings history. Credit union bodies in Northern Ireland have already highlighted that if there was a government backed loan guarantee fund available then credit unions would be able to apply different lending criteria. As mentioned earlier, the Assembly Committee for Enterprise, Trade and Investment has called for the Growth Fund to be extended to credit unions in NI.¹⁵

Bearing in mind some of the barriers facing credit unions in Northern Ireland, the paper will now consider some of the models that have provided access to affordable credit.

5.1 Debt Redemption and Money Advice (DRAMA)- Wales

The Debt Redemption and Money Advice (DRAMA) Scheme was launched in 2003 when the Coalfield Regeneration Trust provided a grant of £115,000 to the Wales

¹⁴ McKillop D.G and Wilson J (2008) *Credit Unions In Scotland* Scottish Government and Social Research, Pg 16

¹⁵ Northern Ireland Assembly Credit Union Inquiry *Report on the Committee's Inquiry into the role and potential of Credit Unions in Northern Ireland* available at the following link:

http://www.niassembly.gov.uk/enterprise/2007mandate/reports/report05_08_09r.htm#2

Co-operative Centre to address issues of over indebtedness in disadvantaged parts of Wales. The scheme now runs a second loan guarantee scheme after receiving £100,000 funding from a charitable source for the purposes of preventing homelessness. The purpose of a DRAMA loan is to pay urgent or pressing debts including council tax, rent arrears, utility bills, court action, debt redemption, furniture, moving costs and family provision such as the arrival of a baby. The average loan size is £739.63 and the maximum loan underwritten by the scheme is £1000. Higher loans can be granted but on a shared risk basis with credit unions. From 2007 to date there have been 181 housing related loans granted, amounting to £136,672.55. The interest rate payable on DRAMA loans is 1% per month (12.68% APR).

The Scheme works by developing partnerships between credit unions, providers of free face to face money advice, private and social landlords and homelessness organisations. Individuals are referred to a specialist money adviser who will conduct and draw up a budgeting plan and financial statement. Some of the outcomes of the interview include negotiation of a repayment plan, budgeting advice, signposting to other advice providers e.g. CAB/Shelter for a benefits check or referral to the credit union for a DRAMA loan. A DRAMA loan would not be recommended if there is a lower cost alternative available such as the Social Fund and the client must have surplus income to enable them to repay the loan. If a loan is recommended, the application will be processed through the participating credit union's standard policies and procedures. It should be noted that the funding for the advice element of the Scheme is due to run out in March 2009 and the Scheme is currently in negotiations with participating housing providers to draw up service level agreements to pay for this element of the scheme.¹⁶

5.2 Money and Budgeting Advice Service (MABS) - Republic of Ireland

MABS was established in 1992 in response to a report by Combat Poverty entitled "Money-Lending and Low Income Families." The service aims to help those over-indebted to moneylenders, to regain control of their finances and gain access to affordable credit. The mission statement of MABS sets out a number of priorities including prevention of homelessness, fuel poverty and loss of essential goods and services.¹⁷

The emphasis is on money advice and budgeting, however the Scheme also works in partnership with credit unions. A MABS Advisor will conduct a financial assessment, prioritise debts and negotiate with creditors. The client will be referred by MABS to a local credit union to open a 'special' account. The purpose of this account is to enable clients to repay debts (which are paid to the creditor through MABS) and to save small amounts. MABS also provides a Loan Guarantee Scheme. It does not provide loans directly; these are provided by credit unions and are for small amounts for immediate pressing needs, usually no more than £300. It has not been possible to ascertain the exact default rates on MABS loans; however in a research report on loan guarantee schemes, a MABS Co-ordinator has highlighted

¹⁶ Information obtained with thanks from Angela Jones, Training and Development Officer, Wales Co-operative Centre Cardiff

¹⁷ Edwards, L (2004) *Money Advice and Budgeting Service*, Pg 2, available at the following link: www.peer-social-inclusion.net.

that default rates on MABS loans are low as money advisers do not refer individuals for loans unless they are sure of the clients capacity to repay.¹⁸

5.3 Enterprise Credit Union – England¹⁹

Enterprise Credit Union is situated in Knowsley in Liverpool which is amongst the top ten most deprived areas in the country and many of the members can be described as ‘financially excluded’. The credit union traditionally had a practice of providing loans to members with a savings record of 20 weeks and was unable to help those who were in need. The Board of Directors recognised a need within the community but was reluctant to provide loans to high risk borrowers. The credit union was given a donation which enabled it to provide instant access to loans. Subsequently in 2006, Enterprise Credit Union was successful in obtaining a contract with the DWP Growth Fund. Since July 2006, Enterprise Credit Unions has provided 5,440 loans worth over £2.7 million and has saved these borrowers over £1.62 million of interest had they obtained loans from doorstep lenders. Ninety-three per cent were using other forms of credit such as doorstep credit, interest rates on loans provided is 25.68% Apr. Sixty-seven per cent now have savings accounts with Enterprise Credit Union. There has been a 5% default on instant loans.

Borrowers either self refer or have been referred by other organisations such as the Citizens Advice Bureau, Knowsley Housing Trust or cross agency referrals. The Credit Union carries out credit checks to assess capacity to pay back loans. First Loans are usually a maximum of £500. Other financial products offered include savings accounts, loan accounts, Christmas savings, and budget accounts for bill paying services which enable creditors to be paid through this account. Other products include family protection plans, and junior savers. Enterprise Credit Union has also integrated a Money Advice and Budgeting Service into one of the range of services they provide (which differs from the Republic of Ireland MABS). The Department of Business, Enterprise and Regulatory Reform (formerly known as DTI) funds this element of their service provision. Advice is an optional service and loans granted are not conditional on having obtained advice.

5.4 Lurgan Credit Union – Northern Ireland

Lurgan Credit Union offers among its range of services, a Scheme which offers access to affordable credit to those over-indebted due to borrowing from high cost doorstep lenders. This Scheme came about through discussion with St Vincent De Paul, Craigavon Conference, and the joint effort in response to combating this issue. A Loan Guarantee Fund has been provided by St Vincent De Paul, Craigavon Conference, which has enabled Lurgan Credit Union to depart from its traditional practice of lending to borrowers who have an established savings and loan record in order to help those in need without compromising member funds. This initiative is only undertaken by the Craigavon Conference of St Vincent De Paul at present; each conference of St Vincent De Paul is autonomous and decides as individuals the Schemes which they will operate.

¹⁸ Information obtained on the following from Jones, P. “*Credit Unions and Loan Guarantee Schemes*” Liverpool John Moores University, Pgs 30-32

¹⁹ Information obtained from a presentation given by Karen Bennett and Lynn Farrell from Enterprise Credit Union for the Promoting Financial Inclusion Course at Liverpool John Moores University, 06/03/09

The scheme has assisted existing members of Lurgan Credit Union and has also encouraged the introduction of new members. St Vincent De Paul, Craigavon Conference, does not publicise the scheme widely, but makes referrals to the Credit Union on a selective basis, by identifying individuals, in the course of their visitation work in the community, who would benefit from this form of assistance. Lurgan Credit Union does not carry out a credit check, however carries out a judgments check and assesses capacity to repay. Loans can be granted for any purpose such as paying off doorstep loan, consolidation, purchasing furniture, etc and interest rates on all loans is 7.5% APR. There has been a 75% success rate with the scheme with loans granted in the region of £400,000. It has been estimated that between 80 and 90 beneficiaries have been assisted by the scheme over the past four years. Many of those assisted by this scheme are now accessing other financial services through the credit union. Other services provided include: savings, Paypoint, direct debit facility, facility to receive social security benefits, credit transfer facility and online account facility. Lurgan Credit Union also operates an Easy share account, which helps members to budget for utility bills, Christmas or holidays, an alternative option to loans. Lurgan Credit Union has not integrated advice as part of its services; however, St Vincent De Paul, Craigavon Conference, operates an advisory service.

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5.5 South West Pound - England

Formerly known as Devon Pound, South West Pound is a community banking partnership established in 2006 to tackle rural poverty in Devon. Partners in this initiative include seven housing associations and five credit unions. The services offered by the partnership include advice, banking and affordable credit. Start up funding was provided by a number of organisations including, Devon City Council, Friends Provident, local housing associations and funding agencies. Growth Funding from the Department of Work and Pensions and investment from other sources has also been secured. The investment requirement for five years to enable the initiative to operate is £3.5 million.

The initiative has provided a number of benefits for tenants, it has been estimated that 900 tenants have been supported by the scheme. This service has granted between 60 and 70 new affordable loans every month. Tenants can access three hours of information, advice and support. Advice is provided by independent advice agencies; however, housing association staff are also trained to provide money advice. The Scheme has impacted positively in the reduction of rent arrears. One of the housing associations involved in the partnership, Devon Homes has reported a reduction in their rent arrears from 5.7% to 1.7% over 24 months.²¹

6.0 Conclusions and recommendations

Given its impact on families, Housing Rights Service believes it is timely to have a wider debate on the issue of financial exclusion and how it affects peoples housing status. An Anti-Poverty Strategy is in place in Northern Ireland, however it does not

²⁰ Information obtained with thanks from Fiona Clarke, General Manager of Lurgan Credit Union, 12/06/09

²¹ Information obtained from Conaty, P et al (2008) *Financial Inclusion in Social Housing: Policy into Practice* National Housing Federation, London, Pg 66 and Alexander, N (2007) *Credit where Credits Due* National Housing Federation, Pg 30.

contain measures to promote access to affordable credit nor reflect the current economic climate. Since the publication of this strategy, important research has been done to inform the debate locally. Such work includes:

- research by the Consumer Council on how people in Northern Ireland are managing their money affairs compared to their counterparts in Britain;
- a recent mapping and measuring exercise which has identified levels of financial exclusion locally and
- a NI Assembly Committee reported on the potential role of Credit Unions locally.

Housing Rights Service believes that following on from this work, the NI Assembly should be doing more to combat financial exclusion in Northern Ireland and therefore make the following recommendations.

- 1. The development of an overarching Government strategy on Financial Inclusion in Northern Ireland.** Devolved administrations in Scotland and Wales have developed (or are in the process of developing) financial inclusion action plans and strategies. To implement this strategy, a loan guarantee scheme such as the Growth Fund should be made available to credit unions to underwrite loans, thereby enabling them to provide instant access to affordable credit to people who have an immediate credit need, for example to stop possession action.
- 2. The role of social housing providers in tackling financial exclusion in Northern Ireland should be further developed and encouraged.** Social housing providers are in an excellent position to tackle financial exclusion in the communities they serve. Research and practice in other jurisdictions highlights that by assisting tenants into financial inclusion social housing providers can help maximise their personal incomes, decrease personal debt and assist with personal advancement and well being. Communities also benefit from a lower resident churn and stronger social cohesion. By offering financial inclusion support for tenants this will contribute to cutting rent arrears, reducing evictions and helping produce settled and sustainable communities.
- 3. The development of a range of affordable credit options. This paper has highlighted the problems facing tenants and struggling homeowners in obtaining affordable credit.** Having considered models elsewhere, we believe an affordable credit service linking social housing providers, credit unions and independent advice may be one way of addressing the problems and could help prevent home loss. We have identified a number of key elements of an

affordable credit service as a matter of good practice which are set out in Appendix 2.

- 4. The problem of not being able to access legal aid to finance court representation for possession action needs to be addressed.** In our experience people are more likely to keep their homes when they have access to good quality legal representation. People facing possession do not normally have the resources to fund this work themselves. In Britain legal aid is available for these types of cases. However this is currently not the case in Northern Ireland.

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Appendices

Appendix 1 - Background

Housing Rights Service was established in 1964 and is the leading provider of independent specialist housing advice services in Northern Ireland. We believe everyone has the right to a decent safe affordable home. Our services include:

- Providing a housing advice line
- Undertaking advocacy and legal representation on behalf of people with housing problems
- Providing online advice through our award winning website www.housingadviceNI.org and an email advice service
- Providing a specialist housing advice service within the prisons
- Delivering a skills and knowledge based training programme
- Producing information resources materials
- Supporting (In partnership with Citizens Advice and AdviceNI) generalist advice agencies to deliver high quality housing in their local communities
- Providing client based commitment to influence the development of relevant public policy and legislation

Overall, we work to achieve positive change by protecting and promoting the rights of people who are in housing need in Northern Ireland. Our policy work is based on the experience of our clients and our work actively supports current government policy commitments in the broader areas of:

- Tackling Poverty and Promoting Social Inclusion
- Promoting Access to Social Justice
- Preventing Homelessness and Meeting Housing Need
- Promoting Equality and Better Relations
- Working in Partnership with the Voluntary Sector

In response to the difficulties faced by homeowners and tenants in the current economic climate, Housing Rights Service has secured funding from mainly charitable sources to initiate a project called the Preventing Possession Initiative. This initiative aims to prevent homelessness as a consequence of debt related possession action using a two pronged approach: by providing high quality advice, support and representation to those who are facing imminent threat of repossession; and through our policy agenda with social housing providers and lenders.

Appendix 2 – Key elements of an affordable credit service

Loan Guarantee Fund

A Loan Guarantee Fund would enable credit unions to relax their lending criteria and provide instant access to affordable loans to those at imminent threat of homelessness due to arrears.

Referrals System

Providing debt on housing advice is extremely specialised. Referrals to an independent free advice service should be made where it is identified that tenants are in difficulties. A referral to an independent advice agency would enable a benefits check to maximise income and where appropriate a referral from the housing association to a credit union for an affordable loan.

Eligibility

Access to affordable loan provided by the service should only be possible if no lower cost alternative such as the social fund is available. To be eligible for a loan, a potential borrower should have surplus income.

A Budgeting and Bill Payment service

A budgeting and bill payment service as part of the affordable loan service provided by credit unions could provide a holistic approach in combating financial exclusion. This service would enable borrowers to budget rather than borrow for regular bills.

If a loan is to be used to buy out debt or to pay off arrears then it should be paid directly to the creditor. For example, a loan to cover rent arrears should be paid directly to the housing provider.