

National Traveller Money Advice and Budgeting Service - NTMABS

**Discontinuation of the
Lough Payment Scheme
for MABS clients nationwide**

**Position Paper
September 2014**



Background

The Household Budget Scheme (HHB) is facilitated by An Post in partnership with the Department of Social Protection. The facility is used to pay local authority rents and utility companies such as Bord Gáis, Electric Ireland, Airtricity and Eircom. The facility is free and is available to anyone who is in **receipt of a social welfare payment**. Money is deducted at source and sent by the Department of Social Protection to the elected service provider. It is an excellent way of managing on a low income and managing your weekly household budget.¹

The Lough Payment Scheme and the Money Advice and Budgeting Service (MABS)

In 1997, the HHB Scheme was extended to include the **Lough Payment Scheme**². The Lough Payment Scheme, jointly managed by Lough Credit Union and Cork MABS, was established to facilitate MABS clients nationwide to pay additional creditors other than the Local Authority and utility companies.

Deductions are taken at source and directed through the Lough Payment Scheme via the An Post HHB scheme to pay creditors. The facility is offered to MABS clients who would be classified as **financially excluded**³ or vulnerable- for example, they may have health difficulties or they may be on such a low income that they struggle to hold on to money long enough to pay bills.

In early 2014, Approximately 25 MABS services supported over 400 clients to pay debts via the Lough payment Scheme. Examples of debts being paid via the Lough Payment Scheme include credit union loans and Garda fines⁴.

The Lough Payment Scheme is a positive example of a joint attempt by MABS, the Lough Credit Union and An Post to address the issue of financial exclusion in Ireland.

Financial exclusion in Ireland

Levels of financial exclusion are significantly higher in Ireland than in 12 of the EU 15 countries.

In March 2011, the Minister for Finance agreed to address the issue of financial exclusion as part of its decision to restructure the Irish banking system.

¹ More information on the HHB scheme can be found here - <https://www.anpost.ie/AnPost/MainContent/Personal+Customers/Social+Welfare/household+budget.htm>

² Also known as **MABSLink** and **Cork MABS Household Budget**

³ 'Financial exclusion is defined by the European Commission as "a process whereby people encounter difficulties accessing and/or using financial services or products in the mainstream market that are appropriate to their needs and enable them to lead a normal social life in the society in which they belong"

⁴ Please see Appendix 3 - case studies from a number of local MABS

The Government's Financial Inclusion Strategy which followed, committed to substantially reduce the level of financial exclusion in Ireland by 2015, in line with the commitment agreed with the European Commission.

As part of this strategy, a Basic Payment Account was piloted in 2011 in a number of geographical areas in Ireland. The pilot failed to attract participants as it did not meet the needs of the target group. According to Caroline Corr⁵, people choose to operate in cash as it allows greater control of money. They choose not to use current accounts due to the "lack of control" and because current accounts are "unnecessary to manage on a low income".

In March 2014, the EU parliament agreed that a basic payment account must be offered by all credit institutions or by a sufficient number of them to guarantee access for all consumers in any given EU country to basic banking services. To date, however, Ireland has no definitive plan on how it will fulfil this obligation and ensure the successful implementation of its Financial Inclusion Strategy.

Alternative Loan schemes availing of the Lough Payment Scheme

National Traveller MABS (NTMABS) is part of the national Money Advice and Budgeting Service. It is a Traveller dedicated organisation which works to promote financial inclusion in Ireland. It aims to address over indebtedness and strives to develop and promote sustainable and suitable financial solutions for the Traveller community.

Over the last 10 years, in an attempt to promote access to legal financial services and reduce the reliance of many on illegal moneylenders, NTMABS has promoted the use of the Lough Payment Scheme. NTMABS has worked extensively with a number of partner organisations – local MABS, Clann Credo, Dublin City Council, Wicklow County Council and the Parish of the Travelling People - to provide small loan and loan guarantee schemes in an attempt to provide alternatives to the illegal moneylender for members of the Traveller community. All of the loan and loan guarantee schemes use the Lough Payment System as a method of repaying loans.

Clann Credo, Dublin City Council and Wicklow County Council have supported a number of MABS clients in accessing caravan loans through their local credit union. The Parish of the Travelling people provided small loans to help Travellers pay for unplanned life events.

1. Clann Credo Loan Guarantee Scheme: Clann Credo provides a loan guarantee scheme to Travellers nationwide wishing to borrow from their local credit union to purchase or repair caravans.
2. Dublin City Council (DCC) and Wicklow County Council funds similar loan guarantee schemes for Travellers living in their area and wishing to borrow from their local credit union to purchase caravans.

⁵ Preliminary findings from research study: Managing a Low Income within the Electronic Economy. Caroline Corr, Social Inclusion Division.

3. The Parish of the Travelling People funds a loan scheme which provides Travellers with small loans to pay for unexpected expenses.

As part of the criteria of each of these schemes, the Lough Payment Scheme was identified as the sole method of repayment by the participating organisations, that is, the Credit Unions, Clann Credo, Dublin City Council and Wicklow County Council and the Parish of the Travelling People.

This payment method is attractive for the borrower as money is deducted at source, therefore, the borrower does not have to worry about meeting weekly repayments. Similar to a direct debit, this facility allows for the borrower to manage their weekly income while knowing that their loan is being paid. For the lender, the repayment method gives some level of assurance regarding regular repayments.

By supporting Travellers in accessing loans, the Clann Credo, Dublin City Council and Wicklow County Council loan guarantee schemes, and the Parish of the Travelling Peoples loan fund, provide access to affordable credit. These schemes have supported many in staying away from illegal moneylenders who primarily prey on financially vulnerable individuals and families. They provide a sustainable long term pathway to financial inclusion. This pathway is at risk if the Lough Payment Scheme is removed.

The discontinuation of the Lough Payment Scheme.

The Social Welfare Act 2012⁶ made changes to the creditors that can be paid under the HHB scheme. It requires An Post to have an agreement in place with all relevant creditors to make deductions from an individual's social welfare payment. Going forward deductions can **only** be made for the following creditors – local authority rent, ESB, Bord Gáis, Eircom and Airtricity. This change impacts on the current MABS arrangements with the Lough Credit Union and the Lough Payment Scheme.

While the HHB is still available to pay local authority rents and utilities, as of March 2014, the Department of Social Protection has notified MABS that the HHB deductions will be discontinued for any MABS client using the Lough Payment Scheme.

National Traveller MABS supports **28** people in using this facility. Additionally, local MABS working closely with National Traveller MABS, currently facilitates **7** Traveller clients with their credit union loan repayments (all for caravan loans and caravan upgrades) while an additional **3** Traveller clients are at loan application stage.

Local MABS services and National Traveller MABS have been working with clients availing of this service, to identify suitable alternative methods of paying creditors. However for many clients who may be isolated due to geography, social and/ or health difficulties, there is often no other suitable alternative. Having a deduction at source ensures creditors are paid and brings peace of mind to the client.

⁶ See Appendix 1 for relevant changes

The following case studies highlight the importance of this scheme.

Common thread –

- **All Clients live on a low income**
- **All clients were financially excluded and were at risk of borrowing from an illegal moneylender**
- **The Lough Payment Scheme provided a pathway to legal sources of credit such as the credit union**

Client A was referred to National Traveller MABS (NTMABS) by a local authority social worker in October 2011. A young widow with two young children, she had no caravan to live in but was living in a ‘hut’ or ‘utility shed’ on an official local authority Traveller site. Such “utility Sheds” are purpose built on to support families living in caravans on the site. They consist of a bathroom and kitchen/small living space. Tenants on the site live in their caravan and use the utility shed for washing and cooking. NTMABS spoke to the woman about the possibility of getting a credit union loan to purchase a caravan and she was interested in pursuing this. She signed up to the Lough Payment Scheme to have €25 deducted weekly from her social welfare payment. Client A saved for two months before a loan was applied for. In this time, Client A and NTMABS built up an excellent rapport with the Credit Union and the fact that money was being administered by NTMABS, made the clients lodgements consistent and regular. Additionally, NTMABS put Client A forward as a candidate for the Clann Credo loan guarantee scheme⁷. The Client was successful in obtaining a loan of €4,000 from the credit union, under guarantee from Clann Credo, to purchase a caravan. Since the provision of the loan, Client A has not missed any payments and has also been successful in getting a ‘top up’ loan on her own merit (top up not guaranteed by Clann Credo).

The use of the Lough Payment Scheme as a system of repayment is crucial for this client. The regularity of payment convinced both the lender and the guarantor to commit to supporting the client in borrowing in order to secure accommodation for her family. Like many clients, she is a lone parent with a number of children and no form of private transport. She lives on a Traveller specific site, outside of a town with no public transport. Weekly visits to the credit union to repay her loan would add an additional pressure on her. Her low level of income makes her life a constant struggle, managing bills and expenses and attempting to stay away from the clutches of the illegal moneylender. Knowing that her caravan loan is being deducted from source gives her one less worry.

⁷ Clann Credo the social finance agency began working with National Traveller MABS in 2001. Clann Credo committed €40,000 to a caravan loan guarantee scheme. This scheme provides access to credit through local credit unions, principally for caravans and their improvement. It promotes financial inclusion and ensures Travellers access to legal and affordable credit. NTMABS has managed this fund over the last 10 years and all loans are given through the Credit Union. More info on this scheme can be found on our most recent report - NTMABS: *Clann Credo loan guarantee scheme - progress report*. Dublin, author, 2012, 2013.

Client B was linked into NTMABS in December 2012 by the Parish of the Travelling People (PTP). The PTP, in partnership with NTMABS, had agreed to pilot a small loan project which would support Travellers in accessing small loans for various items such as emergency costs, car insurance and accommodation costs. Client B was granted a loan of €700 to cover the cost of a trip to the UK, where her husband was having medical treatment. The client agreed to repay €15 per week using the Lough Payment Scheme. As of February 2014, Client B has paid off her loan in full.

The option of repayment through the Lough Payment Scheme was essential for this client. Client B had no permanent residence at the time of borrowing. Therefore as she had no address she could not access mainstream financial services including a credit union. As she was transient and living on a low income, repaying her loan through the Lough Payment Scheme supported her in budgeting and ensured she would not fall behind in her loan repayments.

Client C was homeless when he was referred to NTMABS by the Parish of the Travelling People in February 2013. He had learning difficulties, came from a dysfunctional family and was a recovering addict. He was actively working with his caseworker in the homeless services to find appropriate accommodation but he needed a deposit up front if he was to have any luck finding permanent accommodation. The PTP awarded Client C a loan of €900 to use as a deposit for accommodation. Client C was happy to have €10 per week of his social welfare deducted through the Lough Payment Scheme to pay off this loan. It was brought to the attention of NTMABS that Client C was a rarity amongst homeless people – his caseworker informed us that little to no homeless people have the capacity to save or pay back loans while homeless.

The Lough Payment Scheme was critical in moving this person away from a life on the street. The availability of the Lough Payment Scheme provided a means to access affordable credit. In this case this was crucial as it allowed Client C to begin to repay the loan while he looked for permanent accommodation. Using the loan, the client secured accommodation. As of February 2014, Client C has paid off €290 off his loan. The Lough Payment Scheme allows the client to continue paying his loan even though he resides far from the PTP. Living on low income, the Lough Payment Scheme eases the financial concerns of the client as he does not have to worry about setting money aside for this one expense. In securing a permanent address, the client has also been able to join his local credit union, which will provide further financial stability for him in the future.

Client D was referred to NTMABS in September 2012. At that time, she was living with her parents in a small caravan on an official local authority halting site. The client had reached an age where she needed her own space but, due to the fact that she was on the reduced Job Seekers Allowance of €100 per week and the local authority had discontinued providing caravan loans, she had very little option of accessing affordable credit. After meeting with Client D and undertaking a budget, it was agreed that she would save €20 per week with her local credit union. Client D saved for approximately 8 months before she applied for her loan. She was successful in obtaining a loan of €3,500, guaranteed under the Clann Credo loan guarantee scheme. She committed to repaying her loan using the Lough Payment Scheme.

Client D has been successful in providing accommodation using her own means. She relies on The Lough Payment Scheme for repaying her loan as, managing on a low income, it helps her budget knowing she is fulfilling her obligations to the credit union and maintaining a roof over her head. Her loan is being paid, which Client D sees as a priority. If she did not have access to the Credit Union loan, her only option may have been an illegal moneylender.

Client E has been working with NTMABS since October 2008. At that time, he was looking to access credit to purchase a trailer. He had been granted a bay at a local authority halting site by his local authority but they were not offering caravan loans. His only access to credit was with an illegal moneylender. He was referred to NTMABS by an accommodation worker in his area. After explaining the process to him, he signed up to have €40 per week deducted from his social welfare through the Lough Payment Scheme. Client E saved for 9 months before his loan was applied for. By this stage, he had built up a large amount of shares, by using the Lough Payment Scheme and also by lodging in extra when he had it. His loan of €8,000 was granted in June 2009 and was guaranteed by Clann Credo (50%). Client E continues to pay off his loan.

The Lough Payment Scheme is crucial for this client. He relies heavily on the Lough Payment Scheme as he has now moved to a new halting site in a different part of the city. As the repayments are taken from source, it takes away the worry of one bill, and he is able to manage his weekly expenses using the remaining money. Over the last year, his weekly repayment was reduced to €13 per week. This was due to a change in his family circumstances. However, Client E is committed to repaying his loan and the Credit Union have worked very closely with him and supported him over the last 5 years.

Conclusion

It can be argued that the removal of the Lough Payment Scheme may encourage clients to become more financially independent. MABS clients who had availed of the Lough Payment Scheme would now be responsible for ensuring that their loans are paid weekly, either over the counter at their credit union or by direct debit. However regarding direct debits, many MABS clients do not have bank accounts and would find it difficult to open and/ or maintain a bank account⁸. Additionally, many clients would struggle to make weekly repayments in person – this may be due to low income, prioritising debts and expenses, access to transport or physical and mental health issues.

The Lough Payment Scheme secures the repayment of the legal debt and allows a pathway to future legal borrowing. This may not be the case if an individual cannot avail of this deduction at source. Failure to pay a legal debt may close the door for future legal borrowing for many and may leave

⁸ See Appendix 2 for details from the 4 main banks of the Identification required to open a bank account and the bank charges associated with current accounts.

them with no option but to borrow from an illegal lender or high interest door-to-door credit companies

NTMABS has worked extensively over the last ten years to implement the three loan guarantee schemes and one small loan scheme identified above. The schemes have provided a pathway for participants to legal and affordable credit and have secured accommodation for many. To date, these schemes have been very successful. The main driving force behind their success is the availability of the Lough Payment Scheme as a method of repayment. The Lough Payment System promotes financial inclusion and is a first step for many on the road to financial inclusion.

National Traveller MABS believe that the Lough Payment Scheme should not cease. It has supported the most vulnerable in our society in for example managing their finances and accessing legal credit. This has in many cases kept MABS clients out of prison and out of the grip of an illegal moneylender. The Lough Payment Scheme has helped break a cycle of deprivation and financial exclusion for many families in Ireland.

Recommendation:

The government attempt to promote Financial Inclusion through the provision of a basic bank account has failed. Until there are suitable and affordable saving, credit and payment options available to the financially marginalised members of our society National Traveller MABS submit that s. 290 Social Welfare Consolidation Act 2005 should be amended to allow for the Lough Payment Scheme to be reinstated.

This paper has been endorsed by the following Traveller organisations and individuals- Pavee Point Traveller and Roma Centre, National Traveller Womens Forum, Tallaght Travellers Community Development Group, West Cork Primary Health Care, Cavan Traveller Movement and Fingal Travellers Organisation, Clondalkin Traveller Development Group, Balbriggan Primary Health Care Project (Suzie McCarthy, Lena Lawrence, Winnie Lawrence, Winnie Mc Donagh, Kathleen Mongan, Mary Mc Donnell, Johnny Mc Donnell, Nick Murphy, Margaret Mc Donagh)

Appendix 1:

Extract –

Amended s. 290 of the Social Welfare Consolidation Act 2005

290.—(1) The Minister may make regulations to provide that where a beneficiary consents, an amount of his or her benefit, which is determined by consultation and agreement between the Minister and the beneficiary, may be withheld **subject to section 290B**, and paid separately by the Minister to any specified body designated by the beneficiary.

(2) Regulations made under *subsection (1)* may, in particular and without prejudice to the generality of that subsection, provide for—

- (a) the withdrawal of consent by a beneficiary,
- (b) the time and manner in which the withdrawal shall takeplace, and
- (c) the adjustment of any amount of benefit as a result of that withdrawal.

(3) In this section “a specified body” means—

- (a) a local authority, **other than any functions performed by a local authority under section 23 (amended by section 8 of the Housing (Miscellaneous Provisions) Act 2009) of the Housing (Miscellaneous Provisions) Act 1992**
- (b) any other body established—

- (i) by or under any enactment (other than the Companies Acts 1963 to 2005), or
- (ii) under the Companies Acts 1963 to 2005, in pursuance of powers conferred by or under other enactments, and financed wholly or partly by means of moneys provided or loans made or guaranteed by a Minister of the Government or the issue of shares held by or on behalf of a Minister of the Government and a subsidiary of any such body,

s. 33 of No 8 Act of 2007

“(ba) an authorised undertaking within the meaning of the European Communities (Electronic Communications Networks and Services) (Authorisation) Regulations 2003 ([S.I. No. 306 of 2003](#)),

Social Welfare and Pensions Act 2012

(bb) a person granted a licence to supply electricity in accordance with [section 14](#) (1) of the [Electricity Regulation Act 1999](#),

(bc) a person granted a licence to supply natural gas in accordance with [section 16](#) (1) of

the [Gas \(Interim\) \(Regulation\) Act 2002](#),”

or

(c) any other body that may be prescribed.

(4) On and after the commencement of *section 15* of the *Social Welfare Act 2012*, an amount of benefit under this section shall not be withheld where the purpose of such withholding of benefit is the separate payment, by the Minister, of rent to a local authority pursuant to this section and regulations made under it.

(5) Nothing in subsection (4) shall affect any withholding of benefit under this section where—

(a) the purpose of such withholding of benefit is to provide for the separate payment, by the Minister, of rent to be paid by a beneficiary to a local authority, pursuant to this section and regulations made under it, and

(b) such withholding of benefit and such separate payment has effect immediately before the commencement of *section 15* of the *Social Welfare Act 2012*.

(6) Where—

(a) a beneficiary has consented to the withholding of an amount of benefit under this section before the commencement of *section 15* of the *Social Welfare Act 2012*,

(b) the purpose of such withholding of benefit is to provide for the separate payment, by the Minister, of rent to be paid by a beneficiary to a local authority pursuant to this section and regulations made under it, and

. (c) such withholding of benefit and such separate payment has not taken effect before the commencement of *section 15* of the *Social Welfare Act 2012*,

nothing in subsection (4) shall prevent the taking effect of such withholding of benefit and such separate payment.”.

Appendix 2

Below please see information from each of the 4 main banks in Ireland identifying:

- *Fees and charges on current accounts with main Irish Banks*
- *ID required to open a current account*

Bank of Ireland:

Fees and charges on current account:

1. No Standard Bank Account
2. No free banking
3. No specific income needed to open account
4. 20c charge for all electronic transactions
5. 40c charge for all teller assisted banking
6. €5 maintenance fee per quarter
7. €12.70 charge per DD etc not met

Identification needed to open account with BOI:

You must make an appointment with the branch if you want to open an account. Documents needed

- Proof of address -1 Utility bill or bank statement OR Registration of voters OR Notification of Tax Credits⁹
- Photo Identification—passport or drivers licence **ONLY**
- ***There is confusion as to whether Bank of Ireland accepts the ML10 form. Some branches say No and some say they do***
- Proof of PPS number

⁹ Anyone in employment can request this from the local tax office. A letter detailing tax credits will be sent to your address.

AIB

Fees and charges on current accounts

1. No Standard Bank Account
2. No free banking except for 1) students 2) over 60 3) over 2,500 in account at all times
3. No specific income necessary to open account
4. 35c charge per ATM transaction
5. 20 c charge for all electronic transactions such as Laser and DD and SO's
6. €4.50 quarterly charge
7. €10 charge if DD or SO payments not met

Identification needed to open account with AIB

- Proof of address¹⁰ - Utility Bill, Correspondence from a Regulated financial institution (insurance/assurance co., bank, building society, credit card co.), Correspondence from a government department/body¹¹
- Photo Identification— Current Valid signed Passport or Current Valid Driving Licence - must contain photograph (Irish Provisional accepted) Current EU National Identity Card
Alternatives such as the ML10 form, Temporary residence card, Age ID card, Employee ID card, Public Service Card¹² with photo will be considered ... check with the bank branch
- Proof of PPS number

¹⁰ Non Residents wishing to open an account must provide 2 documents as proof of address

¹² P60, P45, P21 Balancing Statement, Payslip (where employer is identified by name or tax number), Drug payment scheme card, European health insurance card, Tax Assessment, Tax Return Form, PAYE Notice of Tax Credits, Child Benefit Award Letter /Book, Pension Book, Social Services card. (See Appendix for more information on Public Services Card and confirmation of tax credits)

PTSB

Fees and charges on current accounts

1. No Standard Bank Account
2. Free banking only if in excess of €1500 lodged monthly ...If not following fees apply
3. €12.00 quarterly charge
4. €10 charge if DD or SO payments not met
5. Online and phone banking can help people manage payments if DD not ideal

Identification needed to open account with PTSB:

- Proof of address – A¹³ utility bill (dated within the last 6 months) for example, gas, electricity or phone, A bank or building society statement issued within the last 6 months, notification of Determination of Tax Credits for the current year¹⁴, original household/health or motor insurance documents (must be less than 12 months old)¹⁵.
- Photo Identification¹⁶—current valid passport, current valid Irish, UK or European drivers licence (with photo), EU National Identity Card¹⁷.
- Proof of PPS number¹⁸

¹³ There is some confusion here as some branches may require 2 documents as proof of address

¹⁴ Anyone in employment can request this from the local tax office. A letter detailing tax credits will be sent to your address.

¹⁵ Alternatives include car, home or health insurance documents

¹⁶ PTSB have been advised that the ML10 forms are no longer being issued.

¹⁷ Alternatives will be considered such as Dept. of SP free travel card, Valid Travel documents, Age ID card (UP to 25), birth cert with other form of photo ID such as College ID card, Public service card from Dept. of SP. Contact your nearest PTSB branch

¹⁸ P60, P45, P21 Balancing Statement, Payslip (where employer is identified by name or tax number), Drug payment scheme card, European health insurance card, Tax Assessment, Tax Return Form, PAYE Notice of Tax Credits, Child Benefit Award Letter /Book, Pension Book, Social Services card

Ulster Bank

Fees and charges on current accounts

1. No Standard Bank Account
2. €4.00 **monthly** charge. This can be waived only if.....
3. Lodge a total of €3,000 into your Account between the first day and the last business day of each calendar month
Or
4. Keep a minimum cleared balance of €3,000 in your Account for each charging cycle
5. €12.70 charge if DD or SO payments not met
6. €4.44 charge if account goes into unauthorised overdraft

Identification needed to open account with Ulster Bank:

- Proof of address – 1 Utility bill or bank statement OR Registration of voters¹⁹ OR Notification of Tax Credits²⁰
- Photo Identification—Passport or Drivers Licence. Told by Ulster Bank on 24-3-14 that this was the only form of id they would accept. Then told on 25-3-14 that alternatives would be considered²¹
- ***Very confusing as told by Ulster Bank on 24-3-14 that they DO NOT accept the ML10 form. Then on 25-3-14 told that they will accept the ML10 form. Then told it was at discretion of bank branch. Risk Assessment unit then confirmed on 25-3-2014 that the ML10 form will only be accepted as a last resort and only as evidence of identification and not of address.***
- Proof of PPS number

¹⁹ There are alternatives such as A bank or building society statement issued within the last 6 months, original household/health or motor insurance documents (must be less than 12 months old)

²⁰ Anyone in employment can request this from the local tax office. A letter detailing tax credits will be sent to your address²⁰

²¹ Examples of alternatives Dept. of SP free travel card, Valid Travel documents, Age ID card (UP to 25), birth cert with other form of photo ID such as College ID card, Public service card from Dept. of SP.

Further information on suggested forms of identification:

1 Public Service Card: A new Public Services Card is being introduced which is replacing the Social Services Card used to collect social welfare payments and the Free Travel Pass. It is a card containing the persons photo, name, signature and a chip and pin with personal details.

The Public Services Card is issued, by invitation only. The Department of Social Protection are contacting people who are in receipt of SW directly regarding the issuing of Public Services Card. You cannot choose to apply for a card unless you have been directly contacted.

Having been invited to get a Public Services Card, you must prove your identity with the following

Evidence of identity:

Irish citizens born in Ireland	Current Irish passport or current Irish or UK driving licence or Irish learner driver permit. If you already have your full birth certificate (showing your mother's birth surname) or adoption certificate, please bring it with you
Irish citizens via naturalisation or Foreign Birth Registration	Current Irish passport or Certificate of Naturalisation or Foreign Birth Registration certificate and Irish or UK driving licence or Irish learner driver permit.
UK citizens	Current passport, or your birth or adoption certificate and current driving licence
EU citizens (other than Irish and UK)	Current passport or national identity card
Non-EU citizens	Current passport

If you do not have such forms of identification you will be interviewed to establish that you are who you say you are. You may be asked to bring in other forms of Id such as the medical card etc²². Questions relating to your family and work life will be asked. If the Department is satisfied you will be issued with a card.

More information can be obtained from the DSP Planning Dept - 01 7043000-

²² The following items are not acceptable as proof of identity for the purpose of SAFE registration: Baptismal certificate, work ID card, Garda form ML-10, Garda age card, photo-copied certificates or documents and expired documents generally

2 ML10 form: This is a form of identification issued by the Garda Síochána. The ML10 (Money laundering 10) forms are available from most Garda Stations, but it is up to the individual financial institutions as to whether they will be accepted as a form of identification. Additionally, if a person is not already known to a local Garda station, a Garda cannot always verify the identity of a person and therefore cannot always issue an ML10 form.

3 Statement of Tax Credits: This is a statement issued by Revenue. Revenue will only issue this to people who are employed. Therefore for those on social welfare, this is not an option as proof of address.

Appendix 3 *Case studies from local MABS offices nationwide*

The following case studies were supplied by a MABS based in an urban/ rural setting in the south east of Ireland. As with all MABS it is the policy of this local MABS to only use the Lough Payment Scheme when no other suitable means of bill payment is available. Users tend to be the most vulnerable clients, who lack access to legal and affordable credit, have literacy difficulties, mental health difficulties, addiction problems, physical difficulties and / or are rurally or socially isolated.

- A number of our clients live in remote areas, one is disabled. They have no means of transport and to pay to come to town it would cost on average €15 each way. The Lough Payment Scheme offers an affordable and secure means of bill payment.
- A number of our clients are in different stages of addiction recovery. 2 have suicidal tendencies, while 3 came from homeless situations. They use the Lough Payment Scheme to pay their rent. If it is not deducted at source, there is a strong possibility that they will go back into arrears and the private landlords will not tolerate this and they risk becoming homeless again. None of the clients in questions have a bank account due to poor credit ratings and literacy difficulties. Referral of these clients came from Social Workers, Mental Health Service and Homeless and Addiction Agency. Supporting them in establishing a method of suitable bill payment is part of the process to give them quality of life in Independent Living

The following has been supplied by a Dublin MABS office. Once more it highlights the vulnerability of the clients using the Lough Payment Scheme.

- Client A is a lone parent who had debts of 3,052.64 including 4 court fines, outstanding debts with two different credit unions and another debt being collected by a debt collector. We suggested she use the Lough Payment Scheme to clear the fines, which are now fully paid. The reason this lady is paying the two credit unions and debt collector is that she has a total of 10.00 per week to pay all three, both credit unions are a bus journey away. It would cost €10.60 to visit them weekly in bus fare. The debts now due are €889.44 in total.
- Client B has completed a residential drugs treatment programme. He has a partner and three children. The outstanding debts are from his days as an active user. He is currently unemployed but wishes to make amends, he is paying €15.00 per week between three creditors. He owes less than €20,000. We have explored the option of him applying for a DRN. He does not want to proceed with this option as he wishes to repay all his debt. He also currently has a credit union loan and sees this as his only option for future credit for times such as Christmas, as he has a bad credit rating.
- Client C is a single man, living in local authority housing. He lost his job due to his ongoing mental health problems. He is currently attending a local mental health center. His total debt- €36,186.87- owed to eight creditors include two credit unions, debts collectors, banks and solicitors. He is paying €10.00 per week pro rata between

the eight. These creditors have accepted repayments between 33c to €4.05 per week. Ideally he could apply for a DRN but his debts are over the limit.

- Client D is a separated woman with a debt of €23,205.18 now being collected by a solicitor. We have since 2008 tried to arrange repayments of this debt by MABS Special Account and arranging for her to pay the creditor directly. She has come and gone from the service and is unable to keep to any payment arrangement to date. When she returned to the service in 2013, it was agreed based on her SFS that she would repay €5.00 per week toward this debt. This payment has stopped court action.
- Client E is unemployed. He is repaying €10.00 per week to three creditors- total balance due €61,788.60. He cannot use the normal MABS Special Account as the credit union is one of the debtors he defaulted on. One creditor is accepting €1.00 per month and this is impossible to pay directly using the bank or post office.

The Case study below has been supplied by a MABS in the south west of the country. The difficulties some of the most marginalised in our society will face with the ending of the Lough Payment Scheme is evident below.

- Client X was referred to MABS by support workers in a hostel for homeless men. He was living in private rented accommodation but unfortunately he had fallen into arrears with his rent. He was receiving Disability Allowance but is now receiving Old Age Pension. He is originally from Dublin city but has settled elsewhere despite his family still living in Dublin. After negotiating with his Landlord we set him up on the Lough Payment Scheme-his rent plus an agreed amount of arrears is taken from his social welfare payment and paid directly to his landlord. He is now up to date with his rent and is saving the extra amount he was paying to arrears for emergencies etc. In fact these savings were used in April 2014 to allow our client attend his daughter's funeral. This greatly reduced the stress involved around this particular time when he could so easily have gone back to his addiction. Taking away this scheme from such a client who does not have banking facilities and has limited literacy competencies and previous addictions problems will more than likely leave him more vulnerable to reverting to addictions and incurring rent arrears and becoming homeless once again. After speaking with him he is extremely fearful that withdrawing this support from MABS he may not be able to cope.