REPORT TO: POLICY & RESOURCES COMMITTEE

REPORT ON: CHANGES TO HOUSING BENEFIT & WELFARE REFORM

REPORT BY: DIRECTOR OF FINANCE

REPORT NO: 118-2012

1. PURPOSE OF REPORT

1.1 The purpose of this report is to give Members an update on the effects of the UK Government's changes to Housing Benefit and the steps taken to inform tenants and landlords of the impacts of these HB changes, together with an assessment of some of the wider impacts of the Welfare Reforms on the citizens of Dundee and the measures being planned to ameliorate their worst impacts

2. RECOMMENDATIONS

2.1 It is recommended that the committee note:

2.2 The effect of the changes to HB contained in this report.

2.3 That in addition to the letters previously issued, approximately 500 further letters have been issued in December 2011 to claimants identified as being affected by these changes and 6500 landlords were notified by email of the potential changes to the HB entitlement of existing and future tenants.

A copy of the information recently issued to landlords is enclosed. Appendix 1

2.4 That further letters will be issued to existing Benefit claimants to provide more information to those who are currently protected from these changes.

2.5 The outline of some of the wider impacts of the welfare reforms set out in this report and the actions underway to assist and support people in Dundee to cope with these impacts.

3. FINANCIAL IMPLICATIONS

3.1 This report summarises the impact of the changes in Benefits administration and welfare reform announced by the UK Government and the financial effect these changes have on the claimants of Dundee. It is estimated that people in Dundee will lose approximately £27.5 million annually. *(figures based on UK government statistics used by Rights Advice Scotland in September 2010 and a Citizens* Advice Scotland report released February 2012)

4. UPDATE ON HB CHANGES - APRIL 2011

4.1 Withdrawal of the £15 per week Local Housing Allowance (LHA) excess.

Previously, claimants whose contractual rent was less than the LHA rate, received up to £15 per week of the difference between their contractual rent and the LHA rate.

This change came into effect from April 2011 and affected new claimants and existing claimants who changed address immediately. All other existing claimants will be affected at their anniversary date. An anniversary date is set 12 months from the date of application for benefit to review the LHA rate and subsequent entitlement; i.e. if a claimant applied for benefit on 1st November 2010, their anniversary date was 1st November 2011.

Although this change does not impact on a claimant's ability to pay their rent, some claimants will have received this excess for 3 years and it will detrimentally impact on their household income. It will also have a detrimental impact on landlords as the excess is being used to reduce outstanding rent arrears in many of these cases.

Currently, 160 claimants continue to receive an excess of up to £15 per week however, their excess will come to an end at various dates between 24th January 2012 and now and 31st March 2012.

A sample letter recently issued to these claimants is enclosed. Appendix 2

4.2 LHA rate capped at the four bedroom rate.

A claimant's LHA rate is determined by a size criterion and is based on the number of people in the claimant's household.

This change affected new claimants and existing claimants who changed address immediately. All other existing claimants had up to 9 months transitional protection from their anniversary date, although if there was a change in their household and they were entitled to a smaller category of dwelling, the change applied immediately.

Currently, 6 claimants continue to be protected from this change. Due to the claimants anniversary dates being in advance, it is not possible to advise all individuals exactly how they will be affected.

To give an indication of the potential effect however, in one of these cases, the claimant's rent charge is £219.23 per week. The claimant's HB entitlement is based on the 5 bedroom LHA rate of £219.23 per week and the claimant is entitled to full HB. This claimant's anniversary date is 10th March 2012 and the current LHA rate is protected until 10th December 2012. At that time, HB entitlement will be based on the 4 bedroom LHA rate that applies in March 2012. The 4 bedroom LHA rate for January 2012 is £184.62 per week. If the 4 bedroom rate does not change before March 2012, this claimant's HB entitlement will reduce by £34.61 per week.

Transitional protection will end for these claimants between October and December 2012.

A sample letter recently issued to these claimants is enclosed. Appendix 3

4.3 LHA rates reduced from median to 30th percentile

LHA rates were set by the Rent Service using the median rent for private properties. The 30th percentile has been used from April 2011. Benefit claimants now only have 30% of the private rental market available to them, as opposed to the current 50%.

This change affected new claimants and existing claimants who changed address immediately. All other existing claimants have up to 9 months transitional protection from their anniversary date, although if there was a change in their household and they were entitled to a smaller category of dwelling, the change applied immediately.

To give an indication of the effect of this change, detailed below are the LHA rates that applied in March 2011 and in January 2012:

Size	LHA Rate March 2011	LHA Rate January 2012	Weekly Difference
Shared room:	£58.85	£57.69	£1.16
1 bedroom:	£80.77	£75.00	£5.77

2 Bedroom:	£115.38	£103.85	£11.53
3 Bedroom:	£150.00	£137.31	£12.69
4 Bedroom:	£196.15	£184.62	£11.53

Transitional protection will end for these claimants at various dates until the beginning of January 2013.

A sample letter recently issued to these claimants is enclosed. Appendix 4

4.4 Cap on LHA rates for all property sizes

Dundee's existing LHA rates are already significantly lower than the new cap levels and this change did not in itself affect claimants benefit entitlement.

4.5 Increase in rate of non-dependant deductions

Non-dependant deductions apply to a claimant's Housing Benefit and Council Tax Benefit entitlement, depending on the age and circumstances of the non-dependant.

These deductions had not been increased since April 2000. They were increased by approximately 27% for Housing Benefit and 24% for Council Tax Benefit from April 2011 to bring the rates to the levels they would have been, had they been increased annually from April 2000. These deductions are being increased once again from April 2012 by approximately 22% for Housing Benefit and 15% for Council Tax Benefit.

The difference between Housing Benefit non-dependant deductions that applied prior to April 2011 and that will apply from April 2012 is as follows:

Amount pre April 2011	Amount from April 2011	Amount from April 2012
£7.40	£9.40	£11.45
£17.00	£21.55	£26.25
£23.35	£29.60	£36.10
£38.20	£48.45	£59.05
£43.50	£55.20	£67.25
£47.75	£60.60	£73.85

It should be noted that for Council tenants, the above deductions are converted to a 48 week figure to reflect the rent charge being calculated over a 48 week basis.

The difference between Council Tax Benefit non-dependant deductions that applied prior to April 2011 and that will apply from April 2012 is as follows:

Amount pre April 2011	Amount from April 2011	Amount from April 2012
£2.30	£2.85	£3.30
£4.60	£5.70	£6.55
£5.80	£7.20	£8.25
£6.95	£8.60	£9.90

It should also be noted that several claimants will have more than one non-dependant deduction applied to both their Benefit.

597 claimants have both a Housing Benefit and Council Tax Benefit deduction, 10 claimants have only a Housing Benefit deduction and 190 claimants have only a Council Tax Benefit deduction.

4.6 Additional bedroom for overnight carers

Previously, when determining the Local Housing Allowance rate, no allowance was made where the claimant or partner was disabled and required a carer to provide overnight care. From April 2011, an additional room is allowed when determining the Local Housing Allowance rate in the above circumstances.

Currently, 4 claimants are benefiting from this change. In 2 cases, Housing Benefit entitlement is being based on the 2 bedroom LHA rate of £ 103.85 per week instead of the 1 bedroom LHA rate of £76.15 per week. In the other 2 cases, Housing Benefit entitlement is being based on the actual contractual rent, rather than the lower 1 bedroom LHA rate.

4.7 Increase in Discretionary Housing Payment (DHP) funding

The UK Government increased both the Council's DHP funding and the overall permitted total that the Council can spend by way of DHPs to allow Local Authorities to assist claimants in managing their rental commitments in the face of the reductions in benefit caused by the April 2011 changes.

For the financial year 2011/12, Dundee was allocated funding of £69,850 from the UK Government and was permitted to spend £174,625. Many claimants are still protected from these changes however, at the end of December 2011, approximately £54,700 of the funding provided has been allocated for spend.

It should be noted that although the Council is permitted to spend in excess of the funding received up to the permitted total, there is no specific budget to cover any spending in excess of the funding allocated. It is anticipated that the funding will be insufficient in comparison with the number of applications expected once transitional protection ends for all claimants.

4.8 Temporary extension to direct payments safeguard provisions

Safeguard provisions are in place to allow a claimant's Housing Benefit entitlement to be paid directly to the landlord. These provisions include circumstances where a claimant either cannot or will not manage their financial affairs.

The measures introduced by the UK Government to reduce Local Housing Allowance rates are intended to exert a downward pressure on rents within the private rented sector.

To support this intention, the UK Government has temporarily extended the direct payments safeguard provisions to give Local Authorities wider discretion to make direct payments to landlords.

This discretion is limited to situations where:
1. a landlord is prepared to reduce a rent to a level that is affordable for a tenant, or;
2. a direct payment will assist an individual in securing or retaining a tenancy and the landlord is prepared to reduce a rent to a level that is affordable for a tenant.

5.0 UPDATE ON CHANGES - JANUARY 2012

5.1 Shared room rate extended from under 25s to under 35s

Previously, single claimants under 25 had their benefit restricted to the shared room rate rather than the 1 bedroom equivalent. Originally, the UK Government intended to introduce this change from April 2012 however, to coincide with the end of transitional protection for some claimants, the change was brought forward to take affect from January 2012. New claimants and existing claimants who changed address were affected immediately. All other existing claimants will be affected at either their anniversary date or at the annual re-referral of their eligible rent to the Rent Service.

An exercise has been carried out to identify all claimants affected and letters have been issued to advise these claimants of the change. Where a claimant's anniversary date is in the future, it is not possible to advise exactly how the claimant will be affected. It is planned to issue further letters at the appropriate time to better advise these claimants.

Transitional protection will end for these claimants at various dates until the beginning of January 2013.

Sample letters recently issued to these claimants are enclosed. Appendix 5 & 6

6 UPDATE ON CHANGES - APRIL 2012

6.1 Increase in DHP funding

To further allow Local Authorities to assist claimants in managing their rental commitments in the face of the reductions in benefit caused by the April 2011 changes, the UK Government plans to increase both the Council's DHP funding and the overall permitted total that the Council can spend by way of DHPs.

For the financial year 2012/13, Dundee has been allocated £114,767 and is permitted to spend £286,918. This is an increase of £44,917 in allocation and £112,293 in permitted spend.

It should be noted that although the Council is permitted to spend in excess of the funding received up to the permitted total, there is no specific budget to cover any spending in excess of the funding allocated. It is anticipated that the funding will be insufficient in comparison with the number of applications expected once transitional protection ends for all claimants.

7.0 UPDATE ON CHANGES - APRIL 2013

7.1 Size criteria for working age claimants in social housing

A restriction on benefit will apply to those claimants occupying a larger property than their household size and structure warrants. This will apply to both Housing Association and Council tenants.

No further details are currently available on how the size criteria will be applied.

Steps have been taken to identify HB claimants who currently have their entitlement paid direct to their Housing Association. It is intended to inform Housing Associations of the number of rooms these claimants would be entitled to under current LHA rules. This will allow Housing Associations to estimate which of their tenants may be affected by this change.

A similar exercise will be carried out in respect of Council tenants.

7.2 Introduction of Universal Credit

All new claims for benefit will be calculated as Universal Credit and will be administered by the Department for Work & Pensions (DWP). New claims for HB are expected to come to an end from April 2014. Existing Housing Benefit claims are expected to be migrated over to Universal Credits by approx 2017.

It has also been suggested that Local Authorities may have a role in helping administer Universal Credit through local offices, although the intention is that claims will be made on-line or through contact centres. No further details are available on exactly what involvement Local Authorities will have.

No further details are available on the proposal for pensioners to have their housing costs included within Pension Credit.

7.3 Overall cap on Benefit payments for working age claimants

No further details are available on the proposal to introduce an overall cap on Benefit payments made to working age households. It had previously been suggested that the cap would be approx £350 per week for single claimants and £500 per week for couples.

Again, no further details are available on the suggestion that Local Authorities will be tasked with ensuring the overall cap is not exceeded. The implication remains that entitlement to Housing Benefit will be reduced to ensure the total payment to a household will not exceed the cap.

The uncertainty surrounding potential overall caps on Benefit payments makes it difficult for claimants to plan the changes that will be required to be made to their financial budgets.

7.4 Replacement of Council Tax Benefit

The existing Council Tax Benefit scheme is to be replaced by Council Tax discounts and exemptions however, no further information is available at present and no decisions have been made on how this new scheme will operate in Scotland.

It is expected however that only 90% of current expenditure will be available to each Local Authority. For Dundee, this would amount to a reduction in Council Tax Benefit of approx £1.6m per annum.

8.0 WIDER IMPACTS OF WELFARE REFORMS

8.1 The June 2010 budget announced savings of £11 billion through welfare reforms, and the spending review in October 2010 identified a further £7 billion in savings.

The fact that much emphasis has been placed by the UK Government on cutting the Social Security budget will inevitably mean that many individuals and families will find there incomes reduced under the reforms. Rights Advice Scotland, in a report for the Scottish Local Government Forum against Poverty, has estimated that to mean that Scotland's economy stands to lose up to £614 million, and that is of course a reduction in the incomes of individuals and families who are already among the poorest and more vulnerable in Scotland.

For claimants, the implications of this loss in income include financial hardship, having to move home in order to secure affordable accommodation, increased arrears and indebtedness, potential homelessness and the possibility of child poverty.

8.2 In a Dundee context, that means the following broad impacts -

<u>Housing Benefit</u>

* Dundee claimants will lose approximately £1.6 million annually.

Disability Living Allowance

* A 20% cut in qualifying claimants means they will lose approximately £8.5 million annually.

Incapacity Benefit/Severe Disablement Allowance

* Already migrating to Employment Support Allowance (ESA) stricter criteria will see a reduction in those qualifying and losses in Dundee of between £4.5 and £8.5 million annually.

** It has recently been estimated that this amount will be approximately £14.4 million.

Change from RPI to CPI

* By up-rating benefits in relation to Consumer Price Index instead of Retail Price Index, annual losses to Dundee Residents will be approximately £2.8 million annually.

* (*above figures based on UK government statistics used by Rights Advice Scotland in September 2010*).

** (*above figure based on a report released by Citizens Advice Scotland February 2012*).

A recent report released by Citizens Advise Scotland suggests that Incapacity/Severe Disablement Allowance claimants migrating to Employment Support Allowance this amount could in fact result in losses in Dundee of £14.4million annually.

It can be seen from the figures above that without doubt, these reforms will exacerbate poverty for the most vulnerable individuals and families.

9.0 CASE STUDIES

9.1 To give an indication of the effect on individuals of some of the changes being introduced, 5 case studies are included. The case studies detail how a large family, a low paid working family, a kinship carer and a lone parent and a single blind claimant will be affected. Appendixes 7 - 12

10.0 UNIVERSAL CREDIT

10.1 The key strand of the UK Government's reforms is the introduction of Universal Credit, which will consolidate a number of existing benefits and will merge out-of-work benefits and in-work support. It will be an integrated working-age credit that will provide a basic allowance together with additional elements for children, disability, housing, and caring. It will replace Working Tax Credit, Income Support, income based Job Seekers Allowance, income related Employment Support Allowance, and Housing Benefit.

10.2 The intention is to pay Universal Credit in one monthly payment to one individual in a household. As it will no longer cover all housing costs even for those formerly in receipt of full Housing Benefit, it will present a serious budgeting challenge for people not used to handling one large benefit payment and managing that payment across all household costs for the month.

10.3 The intention to introduce monthly payments of Universal Credit and migrate those currently used to more frequent benefit payments will cause considerable disruption both to those out of work as well as those currently being paid on a weekly or fortnightly basis by their employers. In the case of the latter group it is acknowledged that only 51% of employees earning under £10,000 per year currently receive monthly payments and for a large proportion of Universal Credit claimants the move to monthly payments will not mirror their current situation or what they have formerly been used to in the past while employed.

10.4 As a result it is predicted that a large proportion of Universal Credit recipients will struggle with their household money management once the change is brought in since their current budgeting strategies are based on the current frequency of their benefit or wage payments. Reliance on short term payday loans will no doubt increase as clients struggle to make ends meet until the next payment with resulting levels of debt set to rise as a result. This is likely to mean worsening financial difficulties over the long term and a higher chance of families falling into multiple debt scenarios.

10.5 There are also concerns for particular groups who struggle to manage many ordinary aspects of daily living. Those with severe mental health problems or drug and alcohol addictions are two such examples likely to be significantly affected.

10.6 Many people may have difficulty opening and operating a bank account into which Universal Credit can be paid.

10.7 Paying Universal Credit to one individual may also open up vulnerable adult and gender based issues, while merging of housing and their living costs could make social tenants vulnerable to debt.

10.8 It is also the case that the default method of applying for and managing Universal Credit will be on-line requiring a broadband connection. This will obviously be a challenge for many people who cannot afford a broadband connection or even a computer, and may bring an additional demand for access to such facilities in libraries and community centres. It is hoped that DWP will concede the need for alternative access arrangements for people not able to manage a Universal Credit account themselves, for example due to a mental health condition. The lack of easy access to DWP on a face to face basis, or even by phone, will inevitably result in people turning to the Council and local advice agencies in increasing numbers.

11.0 PRESSURE ON COUNCIL SERVICES

11.1 So far as the COSLA is concerned, it is likely that the steps taken by the UK Government to balance the UK budget will pass hidden costs on to local councils. For example, the 20% cut to working age DLA expenditure will affect the care and mobility support for disabled people and will increase reliance on Council Services. Similarly, changes in Housing Benefit and other welfare reforms will increase demands on the Revenues Division by way of increased queries and requests for advice and in the number of applications made for Discretionary Housing Payments. Housing and the homelessness service will come under severe pressure through increased homeless referrals, arrears control costs and collection costs. Private Sector Services Unit may also face pressures through increased enforcement action, along with potential implications for landlords carrying out expensive common repairs due to lower income levels. There will be a need for the social rented sector to focus on developing early intervention/preventative measures to minimise evictions. Ending the payment of housing related benefits direct to landlords will potentially impact on Social and Private sector income flow and in turn impact on housing investment plans. These are just a few of the ways in which Councils are likely to find themselves affected by the changes.

11.2 As these changes come into effect, it may be necessary to assess impacts on a range of existing Council policies and consider whether they will have to be reviewed.

12.0 IMPACT ON ADVICE AGENCIES

12.1 Third Sector advice agencies and the Council's own Welfare Rights teams have been under growing pressure for crisis interventions for some time. Job losses and benefit regime changes have seen increasing numbers of people seeking help. Debt advisers have seen both numbers of clients and levels of debt growing. People in work are a growing percentage of those seeking debt advice, and in-work poverty is also a growing problem. The number of benefit appeals has doubled in the past 18 months and is forecast to double again over the next year or two.

12.2 All this is occurring at a time when there is a need to begin to shift emphasis from crisis interventions to improving financial capability and intervening at the earliest possible stage, and both the increasing demand for help and squeezed budgets is adding to those workload pressures.

13.0 COUNCIL STRATEGIES TO MINIMISE THE IMPACTS OF WELFARE REFORM

13.1 Letters continue to be issued to those claimants still protected from the changes being introduced. In an attempt to mitigate the effect of some of these changes, Welfare Rights in conjunction with external agencies intend to offer an income maximisation review to any interested parties. Letters will be issued to those claimants affected by these changes to inform them of who to contact and what assistance can be provided.

13.2 Considerable thought and effort is already being devoted to addressing those challenges. The Dundee Partnership has a Financial Inclusion Strategy in place which is being implemented and monitored by a multi-agency group. The Dundee Partnership is currently consulting on "For Fairness in Dundee", a strategy for challenging poverty and promoting inclusion in Dundee. It is intended to have a 'fairness' action plan in place by July 2012

13.3 In parallel, an internal Council working group has been developing a Corporate Debt Recovery Policy which seeks to maximise the collection of income due to the Council while recognising financial inclusion principles and the Financial Inclusion Strategy. This will require Council debt recovery procedures to assess individual's financial situations and total indebtedness when coming to arrangements about what they can afford to pay towards that indebtedness so that, for example, if possible, they are not made vulnerable to homelessness by being left with insufficient funds to meet rent or mortgage costs.

13.4 Closely linked, is the work of the Welfare Rights Review Group set up under the Changing for the Future Programme. This Group is working to develop plans to maximise the effectiveness of Welfare Rights Services across the City, linking Council teams and external advice agencies. Key aims are to maximise the take up of benefit entitlement, and to reduce levels of debt in Dundee.

13.5 The Welfare Rights Review Group and the Financial Inclusion Strategy Group are working together to maximise the effectiveness of the expertise available in advice projects. The processes being developed under the Corporate Debt Recovery Policy will mean that intervention should become possible at the first signs of problems, not as has all too often been the case in the past, when debts or arrears have developed to a serious level.

13.6 Large numbers of front line Council staff will be trained on how to recognise the signs of financial difficulties, to ascertain the nature of these difficulties, to offer basic advice where possible, and to signpost or directly refer to appropriate advice sector expert support in areas such as income maximisation, debt resolution etc. Information sharing mechanisms and protocols are being explored and a close partnership between public and voluntary sector agencies is developing well.

13.7 The demand for representation at Benefit Appeals Tribunals has stretched available resource to and beyond capacity and waiting times for Tribunal Hearings in Dundee has been among the worst in Scotland. The Financial Inclusion Strategy Group has therefore investigated and identified a solution to increase that resource to cope with steeply escalating numbers of benefit appeals. One of Dundee's voluntary sector agencies, Dundee North Law Centre, will be the focus of that increased response and is currently achieving an appeals success rate of 68%.

13.8 Universal Credit will change the way in which families and individuals receive benefits, and being paid monthly, will bring significant challenges in terms of money management and budgeting. However, the need for improved financial capability in the community has not been lost sight of, and work is in hand to support the Education Department in ensuring that financial education, for which there are key outcomes under Curriculum for Excellence, is integrated into education in Dundee from Early Years all the way through to Secondary. In this way, we can look forward to a more financially aware population in the future, with better understanding of the need for budgeting, saving, and avoiding the pitfalls of a profit oriented and complex financial services industry. There is also work going on with adults to improve financial capability through the various advice projects active in the city, some of which have a specific financial capability focus.

14.0 POLICY IMPLICATIONS

14.1 This report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment, Anti-Poverty and Equality Impact Assessment and risk management.

There are no major issues.

It should be noted that an Equality Impact Assessment will have been carried out by the UK Government.

15.0 CONSULTATIONS

15.1 The Chief Executive, Deputy Chief Executive (Support Services), Assistant Chief Executive and Director of Housing have been consulted in the preparation of this report.

16.0 BACKGROUND PAPERS

16.1 None

Marjory M Stewart 01/03/12
Director of Finance

Appendix 1

Important: Housing Benefit is changing

I am writing to you because the Housing Benefit your current and future tenants receive could be changing.

Shared accommodation rate extending to under 35 year olds:
From 1 January 2012 the Government is extending the age group for single people who get their Housing Benefit calculated on the shared accommodation rate from 25 to 34 year olds. This means that any single person under 35 years of age applying for Housing Benefit from 1st January 2012 will only be entitled to the rate applicable to shared accommodation rather than the 1 bedroom self contained rate. Whilst their circumstances remain unchanged, anyone claiming Housing Benefit prior to 1st January 2012 will continue to receive the same amount of Housing Benefit until the date their claim is due to be reviewed.
You should be aware that there may be a shortfall between your tenant(s) Housing Benefit entitlement and rent, which your tenant(s) will have to meet.

End of transitional protection:
The government introduced changes to the calculation of Local Housing Allowance (LHA) from 1st April 2011. If your tenant(s) were claiming LHA prior to April 2011, they were entitled to 9 months transitional protection from the 1st April 2011 LHA changes. This 9 months transitional protection started from the date their LHA claim was due to be reviewed (anniversary date).

The date the 9 months transitional protection comes to an end will depend on your tenant(s) anniversary date however in some cases, this will be from 2nd January 2012. **You should be aware that there is likely to be a reduction in the amount of LHA your tenant(s) receive.**

If your tenant(s) Housing Benefit is paid directly to you, confirmation of your tenant(s) new Housing Benefit entitlement will be issued to you at the time their transitional protection ends.

Should you require any further information regarding this change to your tenant(s) HB entitlement, please contact the Revenues Division Customer Services Team by telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street, West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email any enquiry to revenues.division@dundeecity.gov.uk

Appendix 2

Customer Services for personal visits -
Dundee House, 50 North Lindsay Street, Dundee DD1 1NN

for information about Dundee City Council visit our web site:
www.dundeecity.gov.uk

E mail: revenues.division@dundeecity.gov.uk

Finance
Marjory Stewart - Director of Finance

Revenues Division
PO Box 216
Dundee
DD1 3YJ

Fax 01382 431383

Our Ref
Your Ref
Date

Dear

IMPORTANT: YOUR HOUSING BENEFIT IS CHANGING

CLAIM REFERENCE NO:
PROPERTY ADDRESS:

I am writing to you because your Housing Benefit is changing. The government introduced changes to the calculation of Local Housing Allowance from 1st April 2011. One of these changes was the removal of the maximum £15 weekly Local Housing Allowance excess that some people, including yourself, received. Because you claimed Local Housing Allowance before 1st April 2011, you are entitled to continue to receive your Local Housing Allowance excess of £15.00 per week until the date your Local Housing Allowance is due to be reviewed.

I would advise you that your Local Housing Allowance review date is 15 March 2012 and you will no longer receive this excess from the Monday following this date.

Your claim for Local Housing Allowance will therefore be recalculated from 19 March 2012 and a benefit notification letter reflecting this change will be issued to you around that time.

Should you require any further information regarding this matter, please contact my Customer Services Team be telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street; West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email us at revenues.division@dundeecity.gov.uk.

Yours faithfully

Ian Gillanders

I Gillanders
Head of Revenues

Appendix 3

Customer Services for personal visits - Dundee House, 50 North Lindsay Street, Dundee

for information about Dundee City Council visit our web site: www.dundeecity.gov.uk

E mail: revenues.division@dundeecity.gov.uk

Finance

Marjory Stewart - Director of Finance

Revenues Division
PO Box 216
Dundee
DD1 3YJ

Fax 01382 431383

Our Ref
Your Ref
Date

Dear

IMPORTANT: YOUR HOUSING BENEFIT IS CHANGING

CLAIM REFERENCE NO:
PROPERTY ADDRESS:

I am writing to you because your Housing Benefit is changing. The government introduced changes to the calculation of Local Housing Allowance from 1st April 2011, resulting in a **reduction** in the Local Housing Allowance rate on which your entitlement is based. Because you were claiming Local Housing Allowance prior to April 2011, you were entitled to 9 months transitional protection from the 1st April 2011 Local Housing Allowance changes. This 9 months transitional protection started from the date your claim for Local Housing Allowance was due to be reviewed (anniversary date).

Your 9 months transitional protection is due to come to an end on 01 November 2012 and while your circumstances remain unchanged, your current Local Housing Allowance entitlement of £216.35 per week will continue until this date. Your new **reduced** rate of Local Housing Allowance will commence from Monday 05 November 2012 and your new entitlement will be based on the rate applicable at your anniversary date. Because this date falls in the future, I am unable to inform you what your new entitlement will be until nearer that time however, your new entitlement will be **lower** than your current entitlement.

This mean there may be a shortfall in your rent that you will need to pay to your landlord.

I can advise you of the Local Housing Allowance that your current entitlement is based on and the December 2011 rate to give you an indication of the potential shortfall in entitlement:-

Your current LHA rate:	**£216.35**
December 2011 LHA rate*:	**£184.62**

*** This figure is a guide only, because Local Housing Allowance rates vary from month to month**

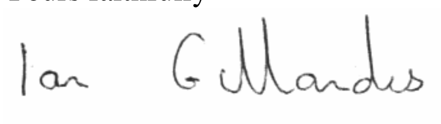
The options available to you are to:-

- make up the shortfall in rent through your own income or savings;
- negotiate a lower rent with your landlord when your tenancy agreement is due for renewal;
- seek alternative more affordable accommodation;
- in the short term, apply for a Discretionary Housing Payment to cover the shortfall in rent until your tenancy agreement comes to an end.

I will write to you again nearer the date your Housing Benefit will be recalculated to remind you of this change to your Housing Benefit entitlement and to advise you of the Local Housing Allowance rate that will apply to you.

Should you require any further information regarding this change to your Housing Benefit entitlement, please contact my Customer Services Team by telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street, West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email us at revenues.division@dundeecity.gov.uk. You can also contact Welfare Rights by telephoning (01382) 431167 or in person at Suite A, Market Mews, Market Street, Dundee.

Yours faithfully



I Gillanders
Head of Revenues

Appendix 4

Customer Services for personal visits - Dundee House,
50 North Lindsay Street, Dundee

for information about Dundee City Council visit our web site:
www.dundeecity.gov.uk

E mail: revenues.division@dundeecity.gov.uk

Finance
Marjory Stewart - Director of Finance

Revenues Division
PO Box 216
Dundee
DD1 3YJ

Fax 01382 431383

Our Ref
Your Ref
Date

Dear

IMPORTANT : YOUR HOUSING BENEFIT IS CHANGING
CLAIM REFERENCE NO:
PROPERTY ADDRESS:

I am writing to you because your Housing Benefit is changing. The government introduced changes to the calculation of Local Housing Allowance from 1st April 2011, resulting in a **reduction** in the Local Housing Allowance rate on which your entitlement is based. Because you were claiming Local Housing Allowance prior to April 2011, you were entitled to 9 months transitional protection from the 1st April 2011 Local Housing Allowance changes. This 9 months transitional protection started from the date your claim for Local Housing Allowance was due to be reviewed.

Your 9 months transitional protection comes to an end on 15 January 2012 and while your circumstances remain unchanged, your current Local Housing Allowance entitlement of £80.77 per week will continue until this date. Your new **reduced** rate of Local Housing Allowance will commence from Monday 16 January 2012 and your new entitlement will be based on a Local Housing Allowance rate of £75.00 per week.

This mean there may be a shortfall in your rent that you will need to pay to your landlord.

The options available to you are to:-

- make up the shortfall in rent through your own income or savings;
- negotiate a lower rent with your landlord when your tenancy agreement is due for renewal;
- seek alternative more affordable accommodation;

- in the short term, apply for a Discretionary Housing Payment to cover the shortfall in rent until your tenancy agreement comes to an end.

You will receive confirmation of your new Local Housing Allowance entitlement at the time your transitional protection comes to an end.

Should you require any further information regarding this change to your HB entitlement, please contact my Customer Services Team by telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street, West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email us at revenues.division@dundeecity.gov.uk.

You can also contact Welfare Rights by telephoning (01382) 431167 or in person at Suite A, Market Mews, Market Street, Dundee

Yours faithfully

Ian Gillanders

I Gillanders
Head of Revenues

Appendix 5

Customer Services for personal visits -
Dundee House, 50 North Lindsay Street, Dundee DD1 1NN

for information about Dundee City Council visit our web site:
www.dundeecity.gov.uk

E mail: revenues.division@dundeecity.gov.uk

Finance
Marjory Stewart - Director of Finance

Revenues Division
PO Box 216
Dundee
DD1 3YJ

Fax 01382 431383

Our Ref DO
Your Ref
Date

Dear

CLAIM REFERENCE NUMBER:
PROPERTY ADDRESS:

Important: Housing Benefit is changing if you are single and under 35

I am writing to you because your Housing Benefit is changing. At present, your Local Housing Allowance is based on the one bedroom self-contained rate. This is because you are single and aged 25 or over. Single people under 25 years of age have their Local Housing Allowance based on the shared accommodation rate **which is considerably lower** than the one bedroom self-contained rate.

From 1st January 2012, the government is changing the age group to which these rates apply and the lower shared accommodation rate will apply to anyone who is single and under 35 years of age.

This means you may only be entitled to the lower rate of Local Housing Allowance for a room in shared accommodation if all of the following apply:

- You remain a single person
- You are occupying one bedroom self-contained accommodation in the private rented sector
- Your HB is due to be reviewed after 1 January 2012
- At the date of the review you will be aged 25 or over but under 35 years, and
- You are not covered by any of the limited exemptions from the shared accommodation rate. (Please complete and return the attached form to claim a possible exemption.)

Because you are currently receiving Local Housing Allowance based on the one bedroom self-contained rate, the change to the lower shared accommodation rate does not affect you until your review date. The date your Local Housing Allowance is due to be reviewed is 19 October 2012 therefore, while your circumstances remain unchanged, your current rate of Local Housing Allowance will continue until this date. Your **reduced** new entitled will commence from Monday 22 October 2012.

This may mean you will need to pay any shortfall in rent to your landlord.

I will not be able to inform you of your reduced entitlement until around the middle of September 2012. I can however, advise you of your current rate of Local Housing Allowance and the shared accommodation rate for December 2011, to give you an indication of the potential shortfall in entitlement:

Your current LHA rate:	**£76.15 per week**
Shared accommodation rate for Dec 2011	**£56.14 per week**

*** This figure is a guide only, because Local Housing Allowance rates vary from month to month**

The options available to you are to:

- make up the shortfall in rent through your own income or savings;
- negotiate a lower rent with your landlord when your tenancy agreement is due for renewal;
- seek alternative shared accommodation within the private rented sector;
- seek alternative accommodation with either the Council or a Housing Association;
- in the short term, apply for a Discretionary Housing Payment to cover the shortfall in rent until your tenancy agreement comes to an end.

I will write to you again nearer the date your Housing Benefit will be recalculated to remind you of this change to your entitlement and to advise you of the shared room rate that will now apply to you.

Should you require any further information regarding this change to your HB entitlement, please contact my Customer Services Team by telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street, West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email me at revenues.division@dundeecity.gov.uk. You can also contact Welfare Rights by telephoning (01382) 431167 or in person at Suite A, Market Mews, Market Street,
Dundee.

Yours faithfully

Ian Gillanders

I Gillanders
Head of Revenues

Appendix 6

Customer Services for personal visits - Dundee House, 50 North Lindsay Street, Dundee

for information about Dundee City Council visit our web site: www.dundeecity.gov.uk

E mail: revenues.division@dundeecity.gov.uk

Finance

Marjory Stewart - Director of Finance

Revenues Division
PO Box 216
Dundee
DD1 3YJ

Fax 01382 431383

Our Ref
Your Ref
Date

Dear

CLAIM REFERENCE NO:
PROPERTY ADDRESS:

IMPORTANT: HOUSING BENEFIT IS CHANGING IF YOU ARE SINGLE AND UNDER 35

I am writing to you because your Housing Benefit is changing. At present your eligible rent is based on the one bedroom self-contained rate. This is because you are single and aged 25 or over. Single people under 25 years of age have their Housing Benefit based on the shared accommodation rate **which is considerably lower** than one bedroom self-contained rate.

From 1 January 2012 the Government is changing the age group to which these rates apply and the lower shared accommodation rate will now apply to anyone who is single and under 35 years of age.

This means your eligible rent will be based on the lower shared accommodation rate if all of the following apply:-

- You remain a single person
- You are occupying one bedroom self-contained accommodation in the private rented sector
- Your Housing Benefit is due to be reviewed after 1 January 2012
- At the date of the review you will be aged 25 or over but under 35 years; and
- You are not covered by any of the limited exemptions from the shared accommodation rate. (Please complete and return the attached form to claim a possible exemption.)

Because you are currently receiving Housing Benefit, the change to the shared accommodation rate does not affect you until your review date. The date your Housing Benefit is due to be reviewed is 02 July 2012 therefore, while your circumstances remain unchanged, your current rate of Housing Benefit will continue until this date. Your new **reduced** entitlement will commence from Monday 02 July 2012.

The shared accommodation rate is considerably lower, **which may mean you will need to pay any shortfall in rent to your landlord**.

It is the Rent Service that decides the eligible rent for Housing Benefit purposes and their decision usually last for 1 year. At the end of that period, your rent is referred to them for a new decision. I will therefore not be able to inform you of your revised entitlement until your claim is due to be reviewed. I can however, advise you of your current eligible rent based on the one bedroom self-contained accommodation rate and the shared accommodation rate for December 2011, to give you an indication of the potential shortfall in entitlement:-

Your current eligible rent:	**£86.00 per week**
Shared accommodation rate for Dec 2011*:	**£57.12 per week**

*** This figure is a guide only, because Rent Service decisions vary from month to month**

The options available to you are to:-

- make up the shortfall in rent through your own income or savings;
- negotiate a lower rent with your landlord when your tenancy agreement is due for renewal;
- seek alternative shared accommodation within the private rented sector;
- seek alternative accommodation with either the Council or a Housing Association;
- in the short term, apply for a Discretionary Housing Payment to cover the shortfall in rent until your tenancy agreement comes to an end.

Should you require any further information regarding this change to your Housing Benefit entitlement, please contact my Customer Services Team by telephoning (01382) 431205 or calling in person at Dundee House, 50 North Lindsay Street; West Housing Office, 3 Sinclair Street or East Housing Office, 169 Pitkerro Road, Dundee. Alternatively, you can email me at revenues.division@dundeecity.gov.uk. You can also contact Welfare Rights by telephoning (01382) 431167 or in person at Suite A, Market Mews, Market Street, Dundee.

Yours faithfully

I Gillanders
Head of Revenues

encl.

Appendix 6a

NAME:
PROPERTY ADDRESS:
CLAIM REFERENCE NO:

Please tick the Yes or No column for the exemption questions below	**Yes**	**No**
If you get Income Support or Jobseeker's Allowance, do you get the severe disability premium in your applicable amount? **I need to see a letter from the Department for Work and Pensions or the Jobcentre Plus.**		
Do you get the middle or higher rate of the care component of Disability Living Allowance? **I need to see your letter of award.**		
Are you registered blind? **I need to see a letter from your GP or a social worker.**		
Are you aged 25 to 34 and an ex offender subject to Multi Agency Protection Arrangements? **I need to see a letter from your probation service, support worker or similar.**		
Are you aged between 25 and 34 and have been living in homeless hostels for three months or more and have been supported to recover and resettle due to alcohol, substance abuse or mental health problems? **You need to list the hostels you have lived at and for how long below.** **I need to see your support agreement or a letter from your support provider that show the type of support you were offered and accepted.**		
Do you have an overnight carer or team of carers who looks after you due to your physical or mental health issues? **Please confirm that there is a separate room made available as a bedroom for the carer. I need to see a letter from your support provider or social worker confirming the arrangement.**		

<u>Case study of a large family losing out under Welfare Reform</u>

A working age couple in their 40s have 4 children, the youngest of whom has only recently been born. Their eldest is 20 and works full time earning £200 per week. The next two children are aged 16 and 13 and are still in school. The couple also have care of their 13 year old niece who has been placed with them by the Social Work Department for family reasons. They do not get any payments from the Council for the niece. They live in private rented accommodation and the husband works full time earning £280.00 per week.

Welfare Reform Changes Affecting This Family

1. *Removal of the baby element in tax credits:* In 2010/2011 this family would have been entitled to the baby element in tax credits worth £545 per year. This has now been withdrawn.

This represents a one off loss of £545.00 or £10.48 weekly.

2. *Sure Start Maternity Grant*: Due to changes in legislation the family would not get this grant as they have another child under 16 in the family. Prior to April this year they would have been entitled.

This represents a one off loss of £500.

3. *Removal of the Health in Pregnancy Grant: £190 in health benefits will now be lost due to the abolition of this Grant in February 2011*

This represents a one off loss of £190.

4. *Abolition of the five bedroom rate for Local Housing Allowance:* Local Housing Allowance is used to set a specific rate for private tenants who claim Housing Benefit. The rate is dependent on the number of rooms needed based on the make up of a family. If claiming in March 2011 this family would be entitled to the five bedroom rate worth £219.23 per week. If they were claiming in April 2011 the 5 bedroom rate would be abolished and they would get the 4 bedroom rate of £180.00 per week.

This represents an annual loss of £2039.96 or £39.23 weekly.

5. *Increases in non-dependent deductions:* Non-dependent deductions are made from Housing and Council Tax Benefit when a client has a "non-dependent" resident in their household, usually an adult son or daughter. Due to their son’s earnings last year the family would have had £23.35 per week deducted from their Housing Benefit and £4.60 per week from their Council Tax Benefit. From April these deductions rise to £29.60 from their Housing Benefit and £5.70 from their Council Tax Benefit.

This represents an annual loss of £382.20 or £7.35 weekly.

The only recent change which will positively impact upon this couple will be the change in the child element of Child Tax Credit from £2,300 per year to £2,555 per year per child. ***Applied to all 4 children this change gives an annual increase of £1020.00 or £19.61 weekly.***

Cumulatively this family have a total annual loss of £2637.16 or £50.91 per week.

A low paid working family case study

A working age couple in their early 30s have two children aged 2 and 4. The husband's younger brother, aged 22, lives with them. There are no health problems in the family.

The husband works full time earning £10,920 per year (just above the National Minimum Wage). His wife works for 20 hours per week earning £6,240.00 per year. The husband's younger brother works in a call centre for 25 hours per week earning £7,800.00 pa.

This family rent their house from the local council and are in a Band B for their council tax. They have child care costs because they need to put their 2 children into nursery to allow them both to go to work. Both children are in Nursery for 2½ days per week. The nursery charge is £50 per child per day giving them total weekly child care costs of £250.00.

Welfare Reform Changes Affecting This Family

The following changes have impacted directly on the above clients' situation in 2011/12

1. For 2011/2012 this family have lost 10% of their Tax Credit child care costs with 70% taken into account instead of the previously allowed 80% rate.

This represents an annual loss of £1300 or £ 25.00 weekly

2. *Non dependent deductions from the family's Housing and Council Tax Benefit have also increased by £4.55 and £0.55 per week respectively* because of the husband's younger brother's earnings. They now have £21.55 per week deducted from their Housing Benefit and £2.85 deducted from their Council Tax Benefit each week.

This represents an annual loss of £265.20 or £ 5.10 weekly

3. An increase in their Child Tax Credit will offset £510 of the losses suffered

Cumulatively this family have an annual loss of £1,055.20 per year or £20.29 weekly

Both partners working now no longer looks attractive to this family and it may be the case that one partner (most likely the wife due to lower earnings) would give up employment.

Given that the wife's income is only £120.00 per week gross the benefits of working are not significant due to the latest Welfare Reform changes. Up to £250 will be saved in terms of their weekly childcare.

There is also the risk that the increase in non dependent deductions may lead to a rise in rent arrears through both a lack of understanding of the system as well as reduced income.

.

A Welfare Reform and Kinship Carers Case Study

A couple, aged 45 and 58 are kinship carers for their 3 grandchildren (ages 5,7, and 11). The husband has numerous problems with his health (including lung cancer) and has had to stop working. He is now unable to look after himself and cannot be left alone with the children due to their young age. His wife has had to stop working to care for her grandchildren and her husband.

They live in a private rented 3 bedroom house costing £600 pcm. Council tax is £148 per month. Since last year their income has been affected in the following ways

Welfare Reform & Local Payment Changes Affecting This Family

1. *Kinship carers payment from Dundee City Council for the 3 children* have increased by £14.28 per week

This change is a DCC payment and not Welfare Reform related

2. *Child Benefit has been frozen*, losing them approximately 70p per week

This represents an annual loss of £36.40 annually or £ 0.70 weekly

3. *Employment & Support Allowance for a couple* has increased in line with the CPI rather than RPI losing then approximately £2.29 per week

This represents an annual loss of £119.08 annually or £ 2.29 weekly

4. *Disability Living Allowance for the husband* has increased with CPI instead of RPI losing them approximately £1.15 per week

This represents an annual loss of £59.80 annually or £ 1.15 weekly

5. *Local Housing Allowance* has been reduced significantly for them. Rate reductions and loss of the LHA top up payments means that they will lose £27.48 per week in extra help with their rent.

This represents an annual loss of £1428.96 annually or £ 27.48 weekly

6. **Council Tax Benefit** does not change due to Council Tax freeze

No Change

Benefits lost to this family through Welfare Reform measures amount to **£31.62 per week, which equates to £1644.24 per year.**

Only their payments from the Council's Social Work Department increase significantly enough to mitigate some of this lost benefit. £742.56 is given back to the family through these payments

Making the overall loss to this family £17.34 per week or £901.68 per year.

A Lone Parent Casestudy

A young lone parent aged 17 receiving income support has a young child aged 1 and a new baby just born. She privately rents a 2 bed roomed house costing £500 per calendar month.

Welfare Reform Changes Affecting This Family

1. *Child Benefit* has been frozen, losing her approximately 70p per week

This represents an annual loss of £ 36.40 annually or £ 0.70 weekly

2. *Income Support has increased in line with the CPI rather than RPI* losing her approximately 90p per week

This represents an annual loss of £ 46.80 annually or £ 0.90 weekly

3. *Local Housing Allowance has been reduced significantly* for her with rate reductions meaning that she will lose £11.53 per week in extra help with her rent.

This represents an annual loss of £ 599.56 annually or £ 11.53 weekly

4. Sure Start Maternity Grant of £500 is lost for the year equating to £9.61 per week if spread out over 52 weeks

This represents a one off loss of £ 500

5. Health in Pregnancy Grant of £190 is lost for the year equating to £3.65 per week if spread out over 52 weeks

This represents a one off loss of £ 190

Cumulatively this lone parent has an annual loss of £ 1372.28 per year or £ 26.39 weekly

The main difference here is that this mother will be expected to contribute towards her rent when previously she would be receiving full benefit. This will be a challenge due to her already conflicting priorities. The risk of rent arrears is significantly more likely this year than last.

A Shared Accommodation Casestudy

This example concerns a single, blind 30 year old claimant who is currently renting a 2 bedroom property at a cost of £115.38 per week.

Having worked in the past he is currently entitled to contribution based Employment Support Allowance of £67.50 per week as well as lower rate Disability Living Allowance Care and Mobility Components (both paid at £19.55 per week)

He first claimed Housing Benefit on 9th May 2011 and since then his entitlement is in the process of being progressively reduced due to the impact of Welfare Reform measures. Since he was able to pay his rent before applying, entitlement was initially calculated on the contractual rent for the first 13 weeks of his claim. This meant that for a short time he received benefit to meet the full cost of his rent.

Welfare Reform Changes Affecting This Family

1. *Housing Benefit was recalculated after the 13 week period ended* and as a result, since it was then based on the 1 bedroom Local Housing Allowance, it was reduced to £76.15 per week

This represents an annual loss of £ 2039.96 annually or £ 39.23 weekly

2. *Housing Benefit will further reduce on 7th May 2012 following his anniversary date*. At this point his entitlement will reduce as a result of the shared accommodation rate being extended to those under 35 (formerly 25). Although the new rates have not been released at this point, going on current rates it is estimated that his entitlement will drop to a figure close to £57.69

This represents an annual loss of £ 945.88 annually or £ 18.19 weekly

The total loss to this disabled claimant through Welfare Reform measures amounts to £57.42 per week, which equates to £2985.84 per annum from 7th May 2012 onwards.

Normally in such a case discretionary housing payments would be considered, to allow the claimant a reasonable length of time to find suitable alternative and affordable accommodation.

In this case however he has insisted on residing in a 2 bedroom property with a garden in order to allow him regular access to his children. He has also restricted the area in which alternative accommodation would be considered, again because of his family commitments. As a result a discretionary housing payment is likely to be refused in such circumstances especially given the fact that he will be unlikely to find a smaller property likely to meet his needs in the short term.

As can be seen this individual faces a shortfall in his Housing Benefit which will in turn force him to meet over 50% of his weekly rent from his Employment and Support Allowance and Disability Living Allowance. His only other option is to move to smaller, less practical accommodation for his needs.

Appendix 12

A Pensioner Couple Case study

An older couple currently live in council accommodation have their son, aged 44, living at home with them. Husband and wife both have retirement pensions as well as small occupational pensions, but still rely on benefits to meet their weekly rent and Council Tax. As a result of saving for their retirement they receive Pension Savings Credit of £21.46.

Their son works full-time earning £ 250 per week.

Welfare Reform Changes Affecting This Family

1. *Pension Savings Credit Rates have been frozen as a result of Welfare Reform, meaning that this couple cannot expect to see a rise in their Pension Savings Credit.*

In this couple's case this represents an annual loss of £57.72 or £1.11 weekly

2. *Non dependent deductions from their Housing and Council Tax Benefit have increased by £10.25 and £1.10 per week respectively because of* their son's earnings. They now have £48.45 per week deducted from their Housing Benefit and £5.70 deducted from their Council Tax Benefit each week.

This represents an annual loss of £590.20 or £11.35 weekly

In cases such as this if the couple are unable to recoup the non-dependent deduction from their son, they will likely soon accrue rent arrears. Increases of non-dependent deduction rates are more likely to make this money more difficult to recoup.

Cumulatively this family have a total annual loss of £ 647.92 or £12.46 per week.