

REPORT TO: POLICY & RESOURCES COMMITTEE – 21 APRIL 2014

REPORT ON: WELFARE REFORM UPDATE

REPORT BY: DIRECTOR OF CORPORATE SERVICES

REPORT NO: 146-2014

1.0 PURPOSE OF REPORT

1.1 The purpose of this report is to update Members on the work being undertaken by the Council to mitigate the risks and prepare individuals for the Welfare Reform changes.

2.0 RECOMMENDATIONS

2.1 It recommended that the Policy and Resources Committee:

- Note the update on the work streams which have been identified to assist in preparing for the Welfare Reform changes.
- Note the continued work and progress being undertaken to engage and communicate with those impacted by the Welfare Reform changes.
- Note the implications in terms of increased debt, potential increases in homelessness and demand for advice services from various services and the voluntary sector.
- Note the new projects which have been established due to the successful external funding applications.

3.0 FINANCIAL IMPLICATIONS

3.1 The full financial impact of Welfare Reform for the City cannot yet be quantified. However, a report published by the Scottish Government on 11 April 2013 titled “The Impact of Welfare Reform in Scotland” and carried out by Sheffield Hallam University noted that the impact of Welfare Reform on Dundee’s economy would result in an estimated annual loss of £58m.

4.0 BACKGROUND

4.1 The Welfare Reform changes being introduced by the UK Government, as outlined in Report No. 438-2012 (P&R Committee 10 December 2012) and Report No. 301-2013 (P&R Committee 24 June 2013), are currently being or are due to be implemented. The original timescale for the reassessment of Disability Living Allowance to Personal Independence Payment has slipped with most claimants not being affected until 2015 or later. The timescale for implementation of Universal Credit in Dundee is not yet known at this time.

5.0 UPDATE FROM WELFARE REFORM GROUP

5.1 Projects 1 and 2 – Universal Credit and Council Tax Reduction Scheme

As noted in Report No. 301-2013 (P&R Committee 24 June 2013), Dundee City Council was successful and awarded £60,050 from the Scottish Government to participate in a pilot programme prior to the implementation of Universal Credit. The initial pilot project ran from April 2013 to September 2013, however, further funding of £16,500 from the Scottish Government allowed for the project to run for a further

three months to December 2013 and also allowed for additional IT resources to be made available within the Central Library Opportunities Room.

The project involved front line staff within Dundee House, East District Housing Office and four Libraries (Central, Coldside, Fintry and Lochee), completing a set of questions with customers around their current circumstances, resulting in a Welfare Reform Action Plan being introduced with appropriate referrals made to the following services:

- Housing Options.
- Employability.
- Welfare Rights/Brooksbank.
- Dundee Foodbank.

The project aimed to highlight clients in receipt of Benefits who might be considered for referrals to specialist services offering access to supported employment options and to provide basic budgeting skills to clients to prepare them for the introduction of Universal Credit.

Over 450 individuals participated in the project with key outcomes including the following:-

- 75% of customers who completed an action plan were offered further assistance with budgeting support and income maximisation through direct contact from the specialist partnership agency connected to the pilot.
- All customers who participated in the project have an awareness of Welfare Reform and know the agencies that can provide support and advice.
- 12 people gained employment through direct referrals to the employability pipeline or action on help provided by the employability programme support worker.
- Staff knowledge and awareness has increased around the Welfare Reform changes.

The pilot project is now concluded, however, front line staff are still offering the action plans where appropriate. An evaluation of the project is currently being finalised and will be report to the Scottish Government.

In a written Ministerial statement on 5 December 2013, the Secretary of State for Work and Pensions (Mr Iain Duncan Smith MP) announced conclusions from the Universal Credit pathfinder work which noted:-

- The Department for Work and Pensions will further develop the work started by the Government Digital Services to test and implement an enhanced online digital service, which will be capable of delivering the full scope of Universal Credit and make provision for all claimant types
- The current pathfinder service will be expanded and develop functionality so that from summer 2014 claims for Universal Credit from couples can be taken and in the autumn from families. Once safely tested in the live Universal Credit areas, the roll-out will continue to cover more of the North West of England, and will enable the Department for Work and Pensions to learn from the live running of Universal Credit at scale and for more claimant types, including the more vulnerable and complex.
- The current planning assumption is that Universal Credit service will be fully available in each part of the UK during 2016, having closed down new claims to the legacy benefits it replaced; with the majority of the remaining legacy caseload moving to Universal Credit during 2016 and 2017. The final decision on these elements of the programme will be informed by the development of the enhanced digital solution.

Lord Freud reported the ability to remove direct payments to claimants who reach rent arrears triggers and pay directly to landlords will mitigate the risks to rental income.

Universal Credit has been expanded in Scotland to Inverness where new jobseekers are making claims. No update on the implementation is available at this time.

The Council Tax Reduction Scheme has now been implemented with the annual bills issued for 2013/14 and bills for 2014/15 currently being produced, reflecting the Council Tax Reduction where appropriate. The tasks involved in this work stream have now been completed.

5.2 **Project 3 – Scottish Welfare Fund**

The Scottish Welfare Fund commenced from 1 April, 2013. The administration of Crisis Grants and Community Care Grants is now through Local Authorities for an interim period of two years. Report No. 491-2012 (P&R Committee 14 January 2013) set out the local service delivery arrangements for the Fund.

The Council has adopted a number of fulfilment routes for provision of welfare funding. Where furnishings, carpets and white goods are required, local small and medium enterprises, supported business and social enterprises have been engaged in this provision e.g. Dovetail Enterprises and Clean Close Company. This has been developed into a customer interface for the clients of the Welfare Fund with full delivery and installation as part of the process. As a result of this approach, all the organisations that are involved are Dundee based and have seen increased turnover for their respective businesses. Two new employment opportunities have been created as a result of this approach, one Modern Apprentice and one re-employed young person who had been previously made redundant.

Other approaches include the provision of grocery gift cards for the purchase of foodstuffs, support from DEEAP for utility meter top ups, with travel tickets and pre-paid card options being further explored.

Official statistics of the first six months' of the Scottish Welfare Fund were published on the Scottish Government's website on the 11 February 2014. The statistics show that:

- Over 35,000 households in Scotland were helped by the Scottish Welfare Fund in its first six months.
- Over £7.0m has been spent on Community Care Grants which provide support to help people stay in their own homes rather than in institutional care, or families under exceptional pressure. The average award for a Community Care Grant was almost £600.
- A further £2.2m has been spent on Crisis Grants which provide support for people in crisis who have had a disaster or emergency. The average award for a Crisis Payment was £65.
- By the end of September Local Authorities, who are solely responsible for making decisions on assistance, had spent 56% of what might be expected, assuming equal spend every month. As a result of both promotional work by the Scottish Government, and changes made to the guidance to relax the eligibility criteria for applications, the picture since October has been one of significant improvement. Informal monitoring shows Local Authorities are now spending at, or close to, the predicted monthly profile.
- One of the aims of the Scottish Welfare Fund is for Local Authorities to make the most of opportunities to link the new service to the network of local service provision, providing better support for the applicant. Around one in three applications to the Scottish Welfare Fund were referred, or signposted, to another agency. The main organisations' households were referred to were

advocacy services, welfare rights, housing and money management organisations.

Scottish Welfare Fund Dundee

Table 1 provides information as at the 28 March 2014 on the current volume of applications and details on the level of grants which have been granted, refused and withdrawn.

Table 1

<u>CG APPLICATIONS</u>	<u>CCG APPLICATIONS</u>	<u>TOTAL APPLICATIONS</u>
TOTAL CG APPS RECEIVED	TOTAL CCG APPS RECEIVED	RECEIVED
6189	3160	9349
TOTAL CG APPS GRANTED	TOTAL CCG APPS GRANTED	GRANTED
3819	1635	5454
TOTAL CG APPS REFUSED	TOTAL CCG APPS REFUSED	REFUSED
1984	1416	3400
TOTAL CG APPS W/DRAWN	TOTAL CCG APPS W/DRAWN	WITHDRAWN
385	96	481
TOTAL CG APPS OUTSTANDING	TOTAL CCG APPS OUTSTANDING	OUTSTANDING
1	13	14

Table 2 provides information as at the 28 March 2014 on the current budget position relating to the Scottish Welfare Fund.

Table 2

	Average Award £	Actual Spend £	Budget £	Variance £
Crisis Grants	70	267,719	350,457	£82,738
Community Care Grants	587	960,790	986,180	£25,390

The Council anticipates having a small underspend on the fund at the end of the financial year, which is due to the lower spend in earlier months when the fund was being established. The current monthly spend profile indicates a higher monthly spend in line with the available budget.

5.3 Project 4 – Housing Services

The Housing Department, together with Corporate Services Department (Revenues Division), identified Council tenants who are affected by Housing Benefit changes regarding under-occupancy. All tenants have been contacted in person by a member of the Housing Department staff and also issued with correspondence explaining the impact of the under-occupancy charge to them. Table 3 provides details on the number of Council tenants who are impacted by the under-occupancy charges and currently in arrears.

Table 3

	*Total Tenancies with Under-occupancy	*Number In Arrears
14% Reduction	1661	1071
25% Reduction	212	126
Total Tenancies	1873	1197

- As at the 28 March 2014

The value of arrears at 28 March 2014 for those tenants who are currently identified as under-occupying their property is **£441,836**. This total arrears balance may include arrears prior to 31 March 2013.

No case with solely under-occupancy arrears has been moved to legal action. As at the 14th February 2014 1,142 Discretionary Housing Payments (DHPs) had been submitted by Council tenants who are impacted by the under-occupancy reforms. Of these, 837 have been approved, 268 refused and 37 are pending.

All households have been contacted to promote DHPs; however, some tenants have been unwilling to complete an application form even with their current rent account being in arrears. Over the past nine months, the Council has been actively trying to engage with all tenants impacted by the under-occupancy charges. This has involved the following:-

- A dedicated team established to carry out visits to all properties impacted by the under-occupancy charges. This team was established in March 2013 and undertook visits from March to June. The visits allowed for advice to be given to tenants and appropriate referrals to be made to housing options, welfare rights and money advice. Payment cards were also provided to all tenants so payments could be made towards their rent account.
- A minimum of three letters have been sent to tenants who are in arrears and have the under-occupancy flag on their account. From April 2013 all accounts which had a nil balance and under-occupancy were moved into a separate work flow within the rent recovery system. All cases have now been moved back into the mainstream rent recovery process.
- Rent Recovery Officers have undertaken further visits since June 2013 for all tenants in arrears. Visits have provided opportunities to assist with Discretionary Housing Payment applications, housing options, welfare rights and other appropriate referrals.
- A targeted approach for increasing the number of DHPs was implemented from November 2013. This has resulted in over a further 300 DHP applications being submitted.

As reported through the monthly revenue monitoring forecast, the bad debt provision within the Housing Revenue Account has been increased to take account of the increased arrears relating to under-occupancy.

Changes to the amount of rent eligible for Housing Benefit purposes in respect of homeless accommodation, once Universal Credit is implemented, will have an impact on the affordability of Council Temporary Homeless Accommodation. An action plan, including a review of this accommodation, is underway within the Department.

The Housing Incentive Scheme, as agreed in Report No. 50-2013 (Housing Committee 11 February 2013), continues to be promoted and offered to those tenants who are offered rehousing, either through the Council's waiting list or Housing Exchange.

Benefit Cap

The Council continues to work in partnership with the Department for Work and Pensions Job Centre Plus to carry out joint interviews for households impacted by the Benefit Cap. Table 4 outlines the number of households and financial losses for those impacted by the Benefit Cap.

Table 4

Housing Sector	Number of Households Impacted	Reduction per week £	Range of Cap £
Council	19	£2381	£0.24 - £437.34
Housing Associations	2	£67	£5.88 - £61.00
Private Sector	25	£1375	£6.05 - £179.50

As at 31 March 2014

5.4 Project 5 – Supporting Initiatives

To ensure a more consistent approach with recovery of debt within the Council, Policy & Resources Committee approved Report No 511-2013 on the 9 December 2013 to establish a Corporate Debt and Welfare Reform Division.

The Division includes all debt functions within the Council, along with the new Welfare Reform Team, and will allow for a more consolidated customer based approach to recovery of debt.

The Council continues to work with the local credit unions to support and promote their services within the City.

5.5 Project 6 – Employability and Learning

Pipeline Performance

In the year to February 2014, the Dundee Partnership funded Employability Pipeline supported 2,939 people to improve their employability prospects. This included supporting people to address significant barriers preventing access to sustainable work, e.g. money management issues, health problems, employability skills. During this period 1,298 job outcomes were achieved by employability pipeline clients. A further 175 clients left pipeline provision for further/higher education or participation in a national training programme.

Employability Pipeline Performance March 2013 – February 2014		
Client Registrations	Job Outcomes Achieved	Training Outcome
2,939	1,298	175

Modern Apprentices/Employer Pledge Campaign

An awareness raising campaign, operated in conjunction with DC Thomson, has been developed to promote Dundee City Council's commitment to Modern Apprentices and to raise awareness amongst other employers of Modern Apprentices programmes and other schemes which enable employers to support young people

and develop their workforces. An eight page supplement was published in the Evening Telegraph on 26 February 2014 showcasing Dundee City Council's commitment to young people, featuring some of the recruits to the Dundee City Council Modern Apprentice Scheme, providing information for employers on incentives they can access to take on young people and encouraging sign up to the Dundee Partnership's Employer Pledge Scheme. A programme of further awareness raising activities will be implemented throughout 2014.

The Council has now completed a refresh of all public access computers in Libraries and Community Centres. The locations and access times for each Centre will be published on the Council's website.

Staff training continues to be provided to Council staff on Literacy and Numeracy Spotter and Referrer training.

The Central Library Opportunities project was established in 2012/13 as a result of a successful application to the Scottish Government Public Libraries Fund and in response to the anticipated new demands on the Library Service to support communities through Welfare Reform changes.

The aim of the project is to create opportunities for benefit claimants and job seekers who are digitally excluded, including the establishment of an Opportunities Hub in Central Library with satellite services in community libraries across the City delivered by a network of staff and trained volunteers.

This project was developed to enable libraries to maximise the use of resources, including IT equipment, staff and locations and to ensure there are adequate numbers of people who are able to deliver training sessions and respond to the demand created by Welfare Reform.

The Opportunities Project has created a dedicated space in Central Library through a refocusing and rebranding of the Reference and Information Centre. It houses a range of services and facilities, including IT equipment, supported access to online resources, comfortable seating areas and space for advice surgeries. Library staff, who were already working closely with local agencies and groups in raising digital awareness, are now part of a team who will shape the experience of people using the service.

Equipment

The Library and Information Service in Dundee has 234 PCs in Libraries across the City, providing free Internet access to all. Through Dundee City Council's Welfare Reform Group, all public access PCs were refreshed in 2013/14 to ensure that Dundee has the hardware infrastructure to respond effectively to customer needs. This equipment is used extensively by individuals and groups, with a number of job clubs and IT training sessions taking place across all local communities. These are delivered by Library staff, Dundee City Council staff, volunteers and agencies working together to provide maximum support and signposting for local people.

Target Audience

The project aims to provide digital access and support to members of the community who are, or will be, affected by the Welfare Reform changes. Specifically, this includes benefit claimants and job seekers, as well as those already in paid employment, who are being encouraged to increase the number of hours worked. As well as the digital participation, the project is examining the importance of health and wellbeing in the lives of the target groups and is providing resources to support this.

In addition, the volunteering element of the project has meant an opportunity is available for people who are looking to extend their own digital skills whilst helping others.

Partnership Working

The success of this project is closely associated with the support and links which have developed with partner agencies through Dundee City Council's Welfare Reform Group, which has representatives from Housing, Welfare Rights, Employability, Adult Literacy and the DWP. This has ensured that we have access to the correct contacts enabling front line Library staff to provide crucial signposting to customers and has made promotion of the supported access to the Internet to benefit claimants and job seekers a simple process.

Volunteers

Currently there are 13 volunteers trained and available to work with customers and a further 10 volunteers at various stages of the recruitment and training process. These numbers fluctuate as several trained volunteers have subsequently found employment and been unable to continue. However, this is a positive part of the process as the volunteers gain digital skills and use them to progress their own lives.

All volunteers are required to attend an introductory training course as well as receiving ongoing support and training. The total number of volunteer hours worked from July to December is 435 hours.

Volunteer Success Stories

A volunteer with the project has recently secured employment with a company carrying out energy price comparison for customers. The volunteer has said the experience he gained in developing and delivering the price comparison website workshop directly led to him securing this job. The volunteer had not been in employment for 2 years prior to volunteering with the Opportunities Project.

Another volunteer was successful in securing employment in December. The volunteer indicated that she used a lot of the experience gained through volunteering with the Opportunities Project in her interview. She felt that her time spent volunteering played a key part in helping her to get the job.

Customers

From July 2013 to December 2013 the Opportunities Project has assisted customers on 397 occasions to use IT equipment to job search or apply for welfare benefits. All customers were surveyed following their sessions with the following results:-

- 51% of customers reported increased confidence in using IT after accessing support from the project.
- 49% of customer said their skills in using IT had increased after accessing support from the project.
- 95% of customer stated the support they received from the volunteer was good or excellent

5.6 Discretionary Housing Payments

The Discretionary Housing Payments (DHPs) Policy as agreed in Report No. 72-2013 (P&R Committee 11 March 2013) outlined, where possible, the groups the Council would support through DHP's to remain in their current properties. This included the under-occupancy and Benefit Cap where resources were identified within the DHP budget to offer financial support to those in hardship.

The Scottish Government announced in October 2013 that an additional £20m would be made available to help support those impacted by under-occupancy reforms. Dundee City Council's allocation of this funding was £501,166 which was allocated to the Discretionary Housing Payment Budget. The DWP announced a further £20m would be added to existing DHP funds across the UK. The Council bid for additional funds and was awarded £120,000.

The Council's DHP budget for 2013/14 is currently £963,765, this figure is made up of the maximum allowed expenditure of £843,765, plus the additional £120,000 funding which the Council was awarded.

As at the 28 March 2014, 2,914 DHP applications have been processed, of which 2,005 have been awarded and 909 refused. Only 38 applications remain outstanding the oldest being 28 March 2014. The total committed budget is £836,187.

All tenants who have an approved award to 30 March 2014 are to be contacted to advise that their DHP will be extended into the new financial year. The Revenues Division will review all applications between April 2014 and September 2014 by phone.

The DWP have confirmed that the Council's funding for 2014/15 for DHPs is £484,174. The Scottish Government's 2014/15 Budget identified the continuation of the additional £20m, further funding of £15m was also announced to address the impact of under-occupancy and we are awaiting on guidance on how this funding will be allocated and awarded.

5.7 Pre-1996 Loophole

In January 2014, the Department of Work and Pensions (DWP) advised that there maybe a number of claimants who may be entitled to have their eligible rent calculated pursuant to paragraph 4(1)(a) of Schedule 3 of the Housing Benefit and Council Tax Benefit (Consequential Provisions) Regulations 2006 (Consequential Provision Regulations) rather than the provisions which relate to the Removal of the Spare Room Subsidy (RSRS).

For those claimants the Removal of the Spare Room Subsidy should not be applied if they are under-occupying their property. For claimants to fall under this category, they must have been continuously entitled to Housing Benefit since at least the 1 January 1996 and occupied the same dwelling since that date, save for any period where a fire, flood, explosion or natural catastrophe has rendered the property uninhabitable.

The provision outlined above continues to apply if there has been a break:-

- In entitlement of no more than 4 weeks.
- Of entitlement of no more than 52 weeks, if the claimant or their partner is a welfare to work beneficiary.

A claimant can also inherit the exemption in cases where:-

- The previous tenant's tenancy began prior to 1 January 1996.
- They were continually in receipt of Housing Benefit from that date.

- The current tenant became part of the previous tenant's household prior to that tenancy ending.
- The current tenant applied for Housing Benefit within 4 weeks of taking the tenancy, and
- The current tenant has been continually in receipt of Housing Benefit from that date (with the same provisions to breaks above).

Dundee City Council Revenues Division requested information from all Social Landlords within the City for tenants who have occupied the same dwelling since at least 1 January 1996 and are under-occupying their property.

This information was then used to determine the number of properties where Housing Benefit has been in place using the criteria above. Based on the information available to officers at present, the numbers of households matching the criteria are:-

• Dundee City Council	108
• Abertay Housing Association	20
• Angus Housing Association	5
• Home Group	14
• Hillcrest Housing Association	3
• Bield Housing Association	0
• Sanctuary Housing Association	0
• Caledonia Housing Association	0

Confirmation of the exemption has now been notified to all of the above tenants. Any of the individuals who have been awarded a Discretionary Housing Payment who fall into this category will hold a credit on their rent account. The Council's normal procedure for dealing with credit balances will be followed.

The Council has also used the local press to highlight the pre-1996 criteria so that tenants who believe that they maybe impacted by the exemption and have not been identified during our scan can have their details checked against the criteria.

Legislation has now closed the loophole effective 3 March 2014.

5.8 Funding Sources

The Council continues to seek external funding to support citizens to prepare for the Welfare Reform changes. Two applications which were successful were:-

Big Lottery – Support and Connect Fund £339,237

The Council submitted a successful funding application to the Big Lottery which seeks to address the impacts of Welfare Reform on its most vulnerable individuals and communities, already seriously affected by recession.

In response to growing hardship, The CONNECT (Community Outreach Neighbourhood Networkers Encouraging Change Team) will work in local communities to address the key issues people face. The Team has seven Welfare Reform Assistants who have been allocated specific geographical areas within the City and is led by a Welfare Reform Team Leader. The team work and support existing welfare and benefit advice staff within the Council and the voluntary sector.

The project aims include:-

- Work in Dundee's most deprived communities, basing an officer in each LCPP area with 15% most deprived SIMD datazones.
- Provide face to face advice services in local communities.
- Raise awareness of the implications of Welfare Reform, encouraging people to seek help before they reach crisis point.
- Engage those not currently accessing advice services.
- Create a network of public, voluntary and grassroots support organisations in communities to provide effective and holistic solutions to need for individuals.
- Work with grassroots organisations to provide support people using their services, e.g. food banks, identifying the cause of crisis and creating a package of support to mitigate its effects.
- Assess needs and provide basic advice on benefits/benefit changes, budgeting, employability, fuel poverty, etc.
- Undertake basic form filling with individuals.
- Signpost people to existing advice/support agencies where required. Could include money advice services, food banks, Scottish Welfare Fund, social prescribing digital literacy, etc.
- Capacity building in grassroots community groups to create volunteers with skills necessary to provide support to communities post project, e.g. budgeting skills training, digital literacy support.

The funding from the Big Lottery is up to the end of March 2015.

DWP Flexible Support Fund - £39,908

The Council was successful its bid for funding from the Department for Work and Pensions' Flexible Support Fund to develop the delivery of digital employability inclusion skills targeted to individuals who are not IT literate and have restricted internet access. The IT 4 Work project is currently being delivered in local community venues to people who are in receipt of benefits and will result in them gaining the necessary IT competency to seek work and engage with the changing Welfare System, this responds to the Government's intention for the reformed Welfare System to be "digital by default".

IT Co-ordinators are working with individuals to develop the skills that they need to:-

- Access vacancies.
- Apply for jobs online.
- Engage with employers.
- Use the Universal Jobmatch.
- Claim benefits online.
- Engage with DWP using IT.
- Gain IT skills for employability.
- Independently use IT.

The estimated number of referrals for the life span of the project was 300, however, in the first two months the project has received 94 referrals. The IT 4 Work programme is funded up to the end of June 2014.

Other Funding Opportunities

The Scottish Government has recently announced a further funding stream for 2014-15 Building Resilience for Welfare Reform, and is seeking bids from Local Council's for projects which help people respond to the current programme of Welfare Reform changes and the increases in child poverty resulting from Welfare Reform. The Council has expressed an interest in applying to this fund and a group of officers,

who are members of the Council's Corporate Welfare Reform Group, will work together on the possibly funding options.

In a recent Scottish Government Press Release launching the funding for the 2014-15 Building Resilience for Welfare Reform Fund, The Council's Welfare Reform Action Plan Project funded by the Scottish Government as outlined in paragraph 5.1, was noted as an innovative project which aimed at mitigating the effects of Welfare Reform within the City.

5.9 Local Support Services Framework

The Council, along with five other Local Authorities in Scotland, participated in a study with COSLA to undertake scoping work on the increased capacity required to deliver Local Support Services (LSS) for Universal Credit. The study was undertaken by Consultants Rock Science Limited through funding from the Scottish Government.

Financial projections and assumptions were made to estimate the overall costs to Scottish Local Authorities and their partners of implementing a particular range of services within the Universal Credit Local Support Services Framework.

The final report was issued and sent to Lord Freud from COSLA.

6.0 POLICY IMPLICATIONS

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

Impact Assessment and Equality Impact Assessment on the Welfare Reform Act 2012 have been carried out by the Department for Work and Pensions.

<https://www.gov.uk/government/organisations/department-for-work-pensions/series/welfare-reform-act-2012-impact-assessments>

7.0 CONSULTATIONS

- 7.1 The Chief Executive, Head of Democratic and Legal Services, Director of Housing and all other Chief Officers have been consulted on the preparation of this report. No concerns were expressed.

8.0 BACKGROUND PAPERS

None.

MARJORY STEWART
DIRECTOR OF CORPORATE SERVICES

APRIL 2014