

Report by the Benefit Fraud  
Inspectorate

***Processing of claims – Breckland  
District Council***

January 2005



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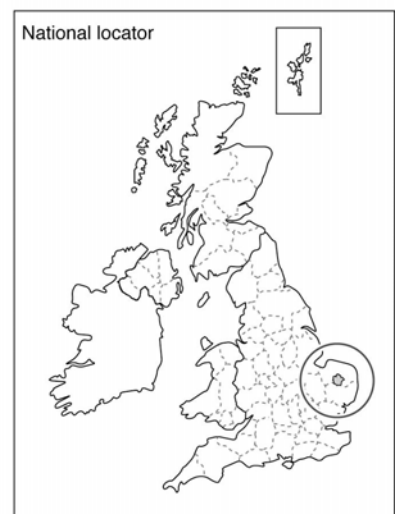
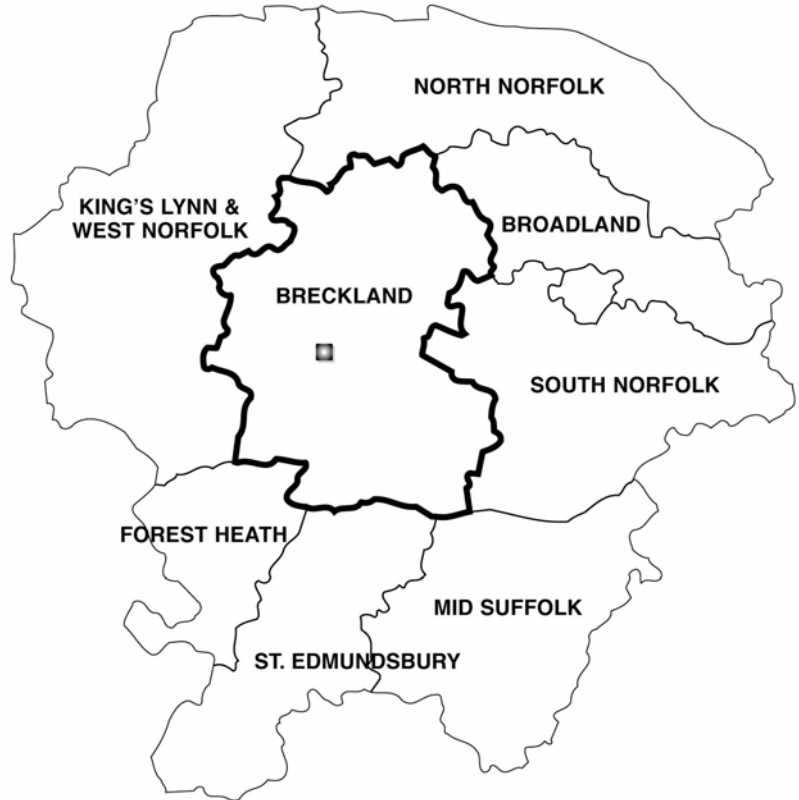
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The maps on this page show the area covered by Breckland District Council in relation to neighbouring authorities, and its geographical location in the country.

-  Administrative centre
-  Local Authority boundary
-  Other Authority boundaries
-  Council Control boundaries



# Abbreviations

All abbreviations used in this report are written in full when they are first used. For easy reference the more commonly used abbreviations are listed below.

<b>BFI</b>	Benefit Fraud Inspectorate
<b>CTB</b>	Council Tax Benefit
<b>the Department</b>	Department for Work and Pensions
<b>HB</b>	Housing Benefit
<b>IS</b>	Income Support
<b>JSA(IB)</b>	Income-based Jobseeker's Allowance



# Preface

Over the past two years the Breckland Benefits service has introduced an agenda of modernisation to meet stringent targets for improvement.

It is a pleasure to welcome the BFI to examine our service and acknowledge the success of our change programme. The inspection team reports the good news that payments are now made to our residents within 25 days, recognising that progress has been achieved through excellent management, innovation, and strategic direction.

We are very proud of the rapid improvement in performance that has resulted from the introduction of innovative working practices through the Anglia Revenues Partnership, a unique service delivery partnership with our neighbours Forest Heath District Council.

I welcome this opportunity to publicly praise the efforts of our Benefits team to move from the bottom to the top quartile in one year, an exceptional progress.

I also thank the BFI for a fair and enjoyable inspection. I look forward to working with them to disseminate good practice. I know that we will continue to learn through the good work of the BFI, and I hope that we can assist others to promote excellence and efficiency in service provision through our own examples and experience of innovation and management of change.

**Becky Hellard**

Acting Chief Executive

Breckland Council



# Executive summary

## Introduction

**1.1** The role of the Benefit Fraud Inspectorate (BFI) is to inspect benefits administration and counter-fraud activity within councils, the Department for Work and Pensions (the Department) and its agencies. The findings from our inspections are reported to the Secretary of State.

**1.2** Housing Benefit (HB) and Council Tax Benefit (CTB) are important contributions to many household budgets. Just under 4 million people receive HB, including many pensioners and families with children. It helps one in 6 households meet the cost of their housing at an annual cost of £12.1 billion. There are over 4.6 million people in receipt of CTB, at a cost of over £2.8 billion.

**1.3** In its response to the *Housing Green Paper* of November 2000, the Department agreed to develop a performance framework for HB. BFI played a major role and the HB and CTB Performance Standards were launched and published in April 2002. They are standards the Department expects councils to aspire to and achieve in time. Every local authority has received a copy of the Standards and receives amendments when changes are introduced. Councils are encouraged to complete a self-assessment against them.

**1.4** The Performance Standards allow councils to make a comprehensive self-assessment of whether they deliver benefit effectively and securely. While the Department has chosen to consider the full picture of what constitutes an effective and secure Benefits service that meets wider strategic objectives, this does not preclude inspections of specific aspects of HB and CTB administration.

**1.5** This report assesses Breckland District Council's performance for its processing of new HB and CTB claims. We have limited the scope of this inspection to those elements of *Strategic management*, *Processing of claims* and *Customer services* that have a direct impact on Breckland District Council's reported performance against the Best Value performance indicator for processing new claims.

**1.6** Announced by the Minister of State in January 2004, focused inspections are designed to provide for quick improvements in performance in specific areas of benefits administration. Breckland District Council was selected for a focused inspection because, for the quarter ending 31 December 2003, it reported that it was taking on average 23 days to process new HB and CTB claims. This reported performance was in the top quartile for councils in the United Kingdom and within the Standard of 36 days.

1.7 The aim of our inspection was to:

- examine reported performance against the new claims Best Value performance indicator and identify any factors that were contributing to the speed of claims processing
- identify areas of good practice.

1.8 As part of this process, we:

- analysed a sample of 30 new claims for the period January 2004 to August 2004
- supplemented our quantitative analysis of claims data with qualitative information from interviews and workshops with managers, staff and key stakeholders.

1.9 We would like to thank the management and staff of Breckland District Council for their help and support during this inspection and particularly during the on-site phase of the inspection that took place in September and October 2004.

## Background

1.10 Breckland District Council had formed a partnership with Forest Heath District Council from 6 August 2003 to deliver a Revenues and Benefits Service to customers of both council's. The partnership was called the Anglia Revenues and Benefits Partnership.

1.11 The Partnership was formed as a result of the Best Value Reviews of both Breckland and Forest Heath councils, where it was shown that the authorities should modernise and improve their approach to the delivery of Benefits. The desired outcomes of the Partnership were to provide:

- *an efficient and excellent service,*
- *economies of scale with an ability to absorb change*
- *improved customer satisfaction*
- *the promotion of electronic service delivery.*

1.12 In addition, the Partnership had a key joint target to achieve top quartile performance in the Best Value performance indicator for new claims processing by April 2005.

## Summary

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**From a poor average of 122 days in 2002/03, new claims were being processed within an impressive 25 days at the time of our inspection in September 2004.**

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**1.13** During the 2 years before our inspection Breckland District Council had demonstrated the capacity to steadily improve its performance for processing new claims. From a poor average of 122 days in 2002/03, new claims were being processed within an impressive 25 days at the time of our inspection in September 2004. The foundation for this dramatic improvement was an innovative approach to the delivery of its Benefits service.

**1.14** New claims processing improvement was sustained through a major change programme that included the co-location of Forest Heath and Breckland Benefits staff. This was successfully managed to ensure output performance did not suffer.

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**The Benefits Service had a clear corporate vision and objectives which had been translated successfully into paying claims quickly and accurately.**

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**1.15** The Benefits Service had a clear corporate vision and objectives which had been translated successfully into paying claims quickly and accurately. This report identifies a number of good practices in the areas of management checking, target setting and monitoring.

**1.16** These good practices underpinned Breckland District Council's planning and control of the claims process. Feedback from the performance of individuals and teams

provided the means for continuous improvement through ongoing support.

**1.17** The quality of claims processing was found to be consistently to a very high standard, particularly for gathering all required evidence and undertaking verification.

**1.18** We identified a need and make recommendations for Breckland District Council to produce comprehensive procedural guidance and for Rent Officer referrals to be made more quickly. Payments on account were not being systematically considered and this needs to be remedied to comply with statutory obligations.

## Strategic management

**1.19** Breckland District Council had a clear direction set within its vision and corporate aims. Explicit policies and objectives for Benefits were endorsed by Members and linked to corporate priorities through the *Anglia Revenues and Benefits Partnership Work Programme 2004/05*.

**1.20** Comprehensive documented plans for delivery of Benefits had been developed through its work programme, which contained detailed targets, aimed at ensuring continuous improvements through controlled step changes and milestones. These targets were comprehensive and included all relevant national Best Value performance indicators as well as local aims. Plans were endorsed and supported by Members and Senior officers, with resources being targeted at meeting prioritised objectives.

**1.21** Performance targets were reflected in team and individual's work objectives and we found these had been effectively communicated to staff at all levels and were clearly understood by management and staff.

**1.22** The organisational structure of Benefits allowed for the most efficient use of resources to meet priority targets set. Clear lines of communication had been established with roles and responsibilities of individual officers clearly defined.

**1.23** Performance was effectively monitored against the Service targets set and management information reports were provided to Members at regular agreed intervals.

**1.24** There was evidence of the effective use of management information reports generated by the Benefits IT system and collated from the results of management checks undertaken. This management information was used to identify system and user errors, informing training needs.

**1.25** However several areas for further improvement were identified. Breckland District Council needs to introduce a single source of documented procedures and ensure that there is a process to update these procedures to reflect changes.

**1.26** In addition it recognised that it needed to review internal working arrangements with other parts of the council, in particular to establish formal lines of communication between Benefits and Customer Services. It is important that an effective working relationship is maintained as the claim receipt process and initial evidence gathering could have a considerable impact on the speed of claims processing.

## Processing of claims

**1.27** Clear targets had been set in line with Best Value performance indicators and focused on the Service achieving top quartile performance.

**1.28** Breckland District Council had improved its performance for the processing of new claims from an average of 122 days for 2002/03 to 33 days for 2003/04 exceeding the Standard of 36 days. It also improved its performance for processing the percentage of new claims within 14 days of all information becoming available, from 30% for 2002/03 to 81% for 2003/04.

**1.29** The significant improvement in performance had followed a major organisational re-structure within the council and a review of how Benefits processing work was managed and monitored throughout the process. Processes developed included:

- a comprehensive preview of all new claims and associated evidence received at customer reception points, caller offices and by Registered Social Landlords
- the introduction of a national initiative that allowed Registered Social Landlords to verify claims and validate supporting evidence
- the effective management of incoming work by Team Managers
- a comprehensive pre-payment checking programme to ensure high quality and accuracy of work. Team Managers returned incorrect cases to the original Assessor for re-assessment
- monitoring performance against its own internal targets, Best Value performance indicators and linking individual performance to its performance appraisal system.

**1.30** We found effective management of the Benefits Service, which was demonstrated following the slight deterioration in performance, for a short period, during the merger of its Benefits Service with that of Forest Heath District Council. The impact of this major re-organisation was closely monitored and performance levels were quickly re-established.

**1.31** However, to ensure continuous improvement and the achievement of the challenging targets set, Breckland District Council had recognised it needed to consider the depth and use made of management checking to identify reasons for delays in new claim processing.

**1.32** In addition our sampling of cases identified failures to comply with legislation in the time taken to refer cases to the Rent Officer and to make payments on account in all appropriate cases. Breckland District Council needs to take urgent action to ensure its procedures consistently meet its statutory obligations.

## Good practice summary

**1.33** Our inspection of Breckland District Council identified a number of examples of good practice which had:

- significantly increased the number of locations where claim forms and evidence could be accepted and checked
- ensured that missing evidence in support of claims was identified quickly
- contributed to improvements in the speed of processing new claims
- provided assurance that statistical returns made to the Department were accurate.

**1.34** We have summarised them using the following headings:

- *Evidence gathering and checking*
- *Management checking*
- *Target setting and monitoring*
- *Guidance.*

**1.35** Although these examples of good practice may not be appropriate to all councils they have enabled Breckland District Council to improve and sustain its overall performance.

### *Evidence gathering and checking*

**1.36** Breckland District Council had processes in place to ensure that only original documents were accepted as evidence. Original documents were photocopied and stamped *original seen*, and then signed and dated by the authenticator. Breckland District Council had provided Verification Framework training for all Customer Service staff, Visiting Officers and Registered Social Landlords.

**1.37** Although customers were allowed, by law, 28 days to submit outstanding evidence it was Breckland District Council's practice to request this evidence within 14 days. This was good practice as it encouraged customers to provide any outstanding evidence as soon as possible.

**1.38** Additionally, when a claim form was received a receipt was issued to the customer. This receipt detailed any further information required from the customer to complete the claim and the date, 14 days from receipt, that it should be submitted by. A copy of this checklist was scanned onto the Document Image Processing system, along with the claim form and, if appropriate, after 14 days a Benefits Assessor would issue a reminder letter.

### *Management checking and monitoring*

**1.39** Breckland District Council had a comprehensive checking programme. Team Managers undertook pre-notification checks on a randomly selected 10% of claims processed. In cases where errors were found the claim was returned to the Assessor for correction.

**1.40** Additionally the Financial Control Section checked new claims that had taken over 50 days to process to identify the reasons for delay. It also undertook checks to validate Breckland District Council's performance against the Best Value performance indicators. The Financial Control Section provided feedback informally to Team Managers and the Training Officer.

**1.41** Breckland District Council used its management information to identify the errors made by staff and the reasons for delay. Weekly team meetings were used to provide awareness training to eradicate the common errors and improve processes, which in turn improved the speed of processing and accuracy. Performance was regularly reported to Senior officers and Members.

**1.42** When errors were identified consideration was given to the reason why and whether 100% checking on individual Assessors would be appropriate. Following new entrant training the Training Officer continued to undertake a 100% check on new Benefits Assessors work until their level of performance was judged to be satisfactory.

### *Target setting and monitoring*

**1.43** Targets were derived from those set in its work programme, and were incorporated into staff key work objectives. The Team Managers monitored performance on a daily, weekly and monthly basis. The overall performance of Benefits was discussed at weekly team meetings and individual performance was discussed as part of the appraisal process.

**1.44** Management information produced from performance monitoring provided Senior officers and Members with assurance of the Benefits Service performance against the Best Value performance indicators. Benefits Service staff were regularly informed of performance against targets, and discussions with staff confirmed that discussing performance provided motivation to improve performance.

### *Guidance*

**1.45** Although Breckland District Council had developed a guidance manual that was issued to new entrant staff following training, it did not have a single source of procedural guidance. However, regular awareness sessions were delivered by the Training Officer at the weekly team meetings and these sessions included any changes to HB and CTB.

**1.46** The most common errors found as a result of management checks informed further awareness sessions designed to remind staff of the correct procedures to follow. Periodically a quiz was undertaken to check staff understanding.

**1.47** This method of ensuring that all staff received the same information, at the same time, and backed up by the rest of their understanding, helped to ensure a consistent approach to claim processing.



# **BFI findings**



# Strategic management

## Introduction

**2.1** Benefits administration has to be set within the much broader context of a council's overall strategies and responsibilities towards, for example, neighbourhood regeneration, alleviating poverty, preventing homelessness, helping people into work and enhancing consumer choice.

**2.2** For this focused inspection we have restricted the scope of our analysis to those areas that had a material effect on the processing of new claims for HB and CTB. Consequently the main focus of this report is on the good practices we identified around the speed and accuracy of claims processing in Breckland District Council.

**2.3** It is also important that good practices and performance at an operational level are matched by effective strategic management and support. This provides assurance that good performance can be maintained and that services provided to customers continues to improve.

## The Vision and Policy objectives

**2.4** A statement expressing the vision for the council enables Members, managers and staff to have a clear sense of direction, purpose and focus for their work. It also allows the public to understand where the key priorities for the council lie and how these fit into the overall business aims for delivery.

**2.5** Councils should support the strategic vision with high-level policies and clear objectives for the Benefits service. Together these should:

- eliminate the need for senior managers to make recurring or routine decisions
- provide a systematic way of delegating operational decisions in a manner that will sustain consistency of approach and equity of service
- be linked to its high level strategic and business plans.

**2.6** Breckland District Council had clear links between its vision, corporate priorities and the aims, policies and objectives of its Benefits Service.

**2.7** Breckland District Council set out its vision in its *Corporate Plan 2001 to 2004*. The vision was:

*to make Breckland a better place by listening to people's needs and enable solutions which enhance their quality of life.*

**2.8** This vision was underpinned by 7 stated Council priorities. These were:

- *Economy and Jobs*
- *Environment*
- *Health*
- *Accessibility to Rural Transport*
- *Accessibility to Electronic Information*
- *People and Communities*
- *Finance and Personnel.*

**2.9** The Finance and Personnel priority contained the high level aim:

*To be innovative in the use of the council's resources in order to keep the burden on the taxpayer to a minimum.*

**2.10** In support of this priority, key objectives were set that clearly specified the role of Benefits in achieving the council's vision. These stated its intention to:

- *promote the take-up of Council Tax and Housing Benefits, ensuring those entitled are paid promptly and accurately*
- *take steps to keep fraud to the minimum*
- *introduce innovative means of providing economic and efficient council support services*
- *ensure Breckland staff and members are fully trained, supported in their personal development and operate within a safe working environment.*

**2.11** Breckland District Council had formed a partnership with Forest Heath District Council from 6 August 2003 to deliver a Revenues and Benefits Service to customers of both councils. The partnership was called the Anglia Revenues and Benefits Partnership.

**2.12** The Partnership's 2003/04 work programme detailed the outcomes sought from the Partnership. In addition to the expected added value from shared expertise, innovation and investment. The desired outcomes of the partnership included:

- *greater involvement and improved satisfaction with the services provided*
- *excellence in service and promotion of electronic service delivery*
- *cost advantages to the partnering councils through economies of scale and by developing a service that was robust, flexible and capable of absorbing change.*

**2.13** A Joint Committee was established to discharge the functions of both councils for Revenues and Benefits Services. The Joint Committee was made up of two Members from both Breckland and Forest Heath District Councils. The Joint Committee's terms of reference included responsibilities to:

- *perform and develop the Benefits Service*
- *set progress and performance goals for the Benefits Service*
- *review the progress and performance of the Benefits Service*
- *ratify and amend the operational policies of the Anglia Revenues and Benefits Partnership*
- *approve, modify or amend the draft annual business plan produced by the Operational Board.*

**2.14** Breckland District Council's Benefits Service through the Anglia Revenues and Benefits Partnership had comprehensive policies in place to cover the administration of Benefits. Members of the Joint Committee ratified these policies in July 2004.

**2.15** Interviews with Benefits staff and managers confirmed that Breckland District Council's vision and the aims for the Benefits Service were well understood at all levels of the organisational structure.

## Operational planning

**2.16** Service delivery planning ensures that resources are effectively managed and monitored to deliver service standards and performance targets.

**2.17** An operational plan for administering HB and CTB translates the vision, policies and objectives into practical ways of providing a service. Effective operational plans will allow any changes that are required to improve the HB and CTB service to be managed.

**2.18** Plans can only be effective if they are developed, used, monitored and adapted to meet changing circumstances. Managers and staff need to be convinced that the plans are realistic and achievable.

**2.19** We found Breckland District Council had effective plans that were supported by senior management, endorsed by Members and transformed the objectives and policies of its Benefits Service into workable solutions that provided for continuous improvement in service delivery performance.

**2.20** In its *Business Plan 2004 to 2010* the vision was further supported by 3 priorities underpinned by 7 community objectives.

**2.21** The 3 priorities were:

- *a well-planned place to live which encourages vibrant communities*
- *a safe and healthy environment*
- *a prosperous place to work and live.*

**2.22** The Anglia Revenues and Benefits Partnership 2004/05 work programme included objectives and targets linked to Breckland District Council's vision and corporate priorities. The stated aim of the Anglia Revenues and Benefits Partnership was:

*...to provide a high quality and cost effective service that contributes to the two Councils corporate objectives through the excellent administration of housing benefit, council tax benefit, council tax and non domestic rates*

**2.23** This work programme, agreed by members of the Joint Committee, also set out the resourcing of the Benefits Service. The objectives for the Benefits Service were to:

- *administer an accurate and efficient Housing and Council Tax benefit system, ensuring as far as possible, that those entitled to benefit receive it promptly and that fraud is minimised*
- *promote the accessibility and take up of Housing benefit and Council Tax benefit to ensure those in need receive the assistance that they require and are able to live in decent and affordable housing*
- *consult and consider the needs of the users of the service to provide a relevant, efficient and high quality customer orientated service, embracing the principals of Best Value*
- *embrace the modernising agenda, the principals of e-government and the use of modern technology.*

**2.24** The work programme also included further detail on what action was required to achieve each target, by whom and a measure of success.

## Performance targets and monitoring

**2.25** Performance targets underpin policy objectives and service standards, give staff a clear view of the desired outcome and management clear accountability for providing effective and secure administration.

**2.26** Performance monitoring provides assurance to Members and senior managers that HB and CTB administration is effective and secure. It is important that Members and senior managers receive reports on performance against the vision, objectives and plans to make the accountability process transparent. Performance monitoring can also encourage the development of a culture of continuous improvement.

**2.27** We found clear and unambiguous targets for the Benefits Service that were communicated and understood by staff at all levels. These targets were effectively monitored against the targets in the work programme and also reflected in individual work objectives.

**2.28** The key target for Breckland District Council's Benefits Service was to achieve top quartile performance, and exceed the Standard average of 36 days for the processing of claims. The target for 2003/04 of 33 days was successfully achieved. The 2004/05 work programme showed continuous improvement in the speed of processing of new claims, setting targets for 2005 to 2007 of 30, 28 and 25 days respectively.

**2.29** Performance against the Best Value performance indicator targets in the work programme, including speed of processing, were monitored by the Benefits Manager and Revenues Strategic Manager. At an operational level there were weekly meetings attended by all staff, fortnightly management meetings and the Benefits Manager met monthly with the Team Managers including those from training, appeals and the Finance Control Team.

**2.30** At a corporate level performance was reported to the Breckland District Council's Cabinet every month by the Portfolio Member with responsibility for the Benefits Service. This Portfolio Member also represented Breckland District Council on the Anglia and Revenues Benefits Partnership Joint Committee.

**2.31** Performance was monitored through fortnightly Operational Board meetings that produced a monthly Performance Report for the Joint Committee.

**2.32** Additional monitoring was undertaken at quarterly Performance Clinics, attended by the Chief Executive Officer, Portfolio Member and the Operational Board. The Performance Clinics reviewed the Performance reports and used a traffic light system to highlight issues.

**2.33** Interviews with Benefits staff and managers confirmed that the targets set in the work programme were reflected in individual key work objectives for all Benefits staff.

## Organisational structure

**2.34** Organisational structure plays an important part in the performance of any council administering HB and CTB. It is important that human and other resources are structured in a manner that provides a secure and effective service. Organisational design will obviously be influenced by council-wide policy on issues such as:

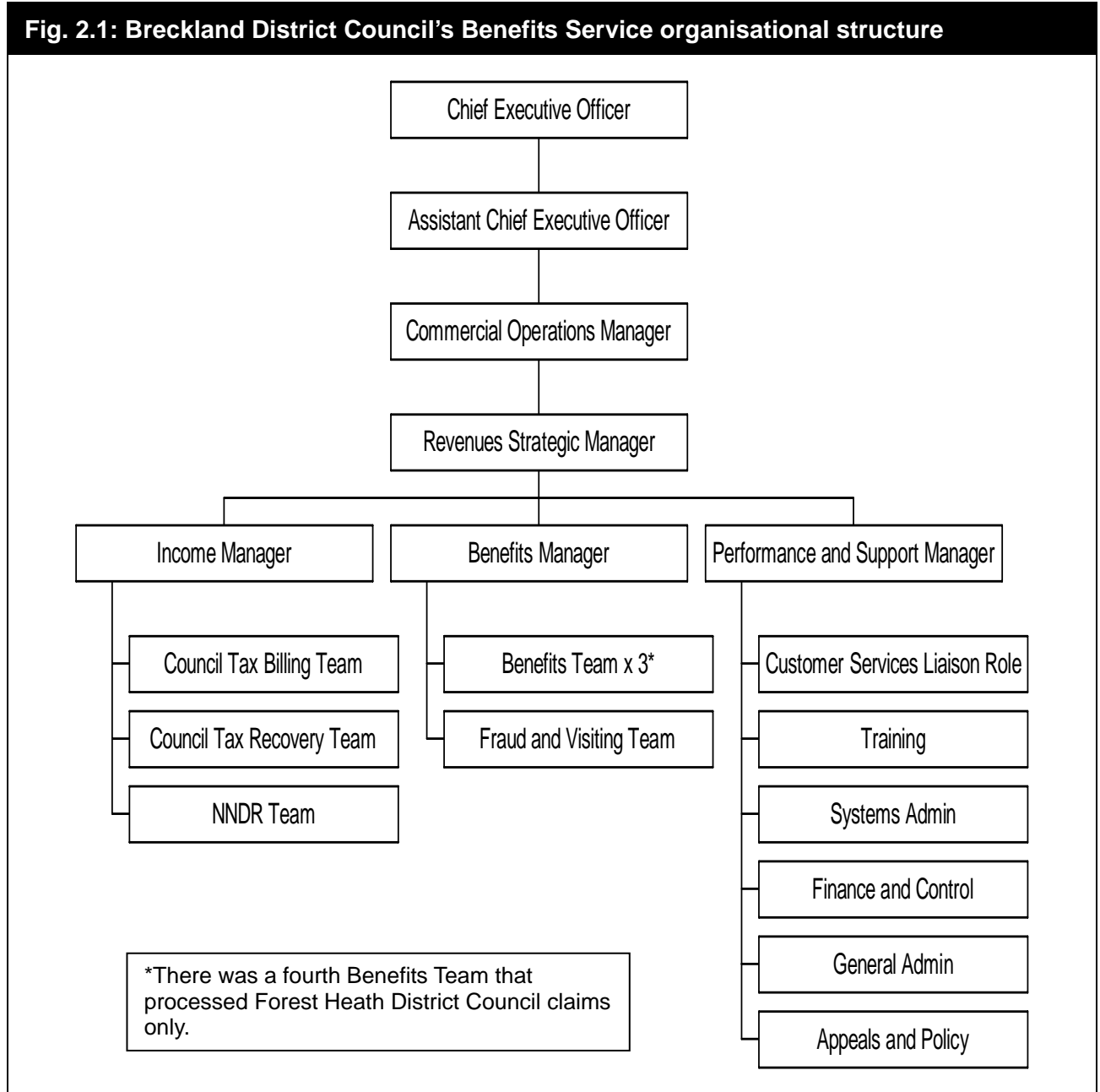
- service centralisation or decentralisation
- outsourcing
- the size and geography of the council
- the siting of benefits and counter-fraud work within Finance or Housing, or a combination within these or other departments.

**2.35** Nevertheless it is an important principle that the organisational structure adopted by the council should not be one that has an adverse impact on the administration of Benefits. To this end, the Institute of Revenues, Rating and Valuation (IRRV) recommends that the Benefits Manager should occupy a senior position within the council with a direct reporting line to the Section 151 Officer or, in Scotland the Section 95 Officer.

**2.36** We found that the organisational structure of the Benefits Service allowed for the most efficient use of resources to meet its priority targets.

**2.37** Observations and interviews with managers and staff confirmed that clear and logical lines of communication were established within the Benefits Service, with the roles and responsibilities of individual officers clearly defined. This helped to ensure that the Service was managed effectively.

2.38 Figure 2.1 shows Breckland District Council's Benefits Service organisational structure.



Source: Breckland District Council

2.39 Breckland District Council had 3 Benefits Teams each comprising of a Team Manager and 7 Benefits Assessors. There was an additional fourth Benefits Team that processed Forest Heath District Council claims only. There was a Benefits Manager who was responsible for the Team Managers and who reported to the Revenues Strategic Manager.

2.40 An Operational Board had been established which comprised of the Revenues Strategic Manager, the Benefits Manager and the Income Manager. The Operational Board with an additional 4 Members, 2 from Breckland District Council and 2 from Forest Heath District Council, made up the Anglia Revenues and Benefits Partnership Joint Committee.

**2.41** Breckland District Council had Customer Services staff based at the main reception point in Thetford, a caller office at Dereham and 3 other Presence offices at Attleborough, Swaffham, and Watton. There was also a dedicated Benefits Telephone Contact Team based in Dereham. Customer Services staff were managed by the Contact Team Manager who was responsible to the (People First) Operations Manager. We discuss the relationship between Customer Services and Benefits further under *Internal working arrangements*.

## Procedural guidance

**2.42** HB and CTB are important components of the national benefits system and it is important that staff and managers responsible for their administration are supported and by procedural guidance.

**2.43** Breckland District Council had recognised that it needed to introduce a single source of documented procedures that reflected current practice. To address this issue Breckland District Council planned to purchase a procedures manual that will meet its business needs.

**2.44** We were told that the Training Officer had developed a guidance manual which was given to new entrant staff following training but this guidance was not available to all staff.

**2.45** Although there was no formal procedural guidance in place we found examples of Breckland District Council having provided updates on legislative and technical changes to Benefits through:

- the provision of summaries that detailed changes as notified in Departmental circulars
- regular awareness sessions that explained the changes and included practical examples for reference.

**2.46** Interviews with staff confirmed that they were aware they could contact the Training Officer for procedural advice.

**2.47** However, Breckland District Council needed to ensure that procedural guidance is available to all its staff and that the guidance:

- includes HB and CTB delivery procedures that covers all aspects of the Benefits Service and includes legislative requirements and Departmental good practice and advice
- provides an accurate and up-to-date account of actual practice
- details Benefits procedures that are understood by both staff and managers
- is written in plain English.

**2.48** In addition Breckland District Council should ensure that it:

- incorporates changes and amendments to procedures into its guidance within 10 days of receipt
- has a formal management control process in place for developing and changing local procedure.

**2.49** Although the scope of the inspection did not include Counter-fraud and Overpayments, without detailed procedural guidance on all aspects of Benefits administration, the actions by staff may be inconsistent and potentially not compliant with HB and CTB regulations.

**2.50** Procedural guidance would allow management and staff to be clear about the processes to be applied and what is expected of them. This will lead to improved consistency and assurance that the administration of HB and CTB is undertaken securely and in accordance with regulations.

## **Recommendations**

### **We recommend that Breckland District Council:**

- **provides procedural guidance for all its staff that:**
  - **includes HB and CTB delivery procedures that covers all aspects of the Benefits Service and includes legislative requirements and Departmental good practice and advice**
  - **provides an accurate and up-to date account of actual practice**
  - **details Benefits procedures that are understood by both staff and managers**
  - **is written in plain English**
- **incorporates changes and amendments to procedures into its guidance within 10 days of receipt**
- **introduces a formal management control process for developing and changing local procedure.**

## **Management information and assurance**

**2.51** Management information provides a sound basis for managers to evaluate the effectiveness and security of the Benefits system and is a useful tool for management to make informed decisions on the day-to-day running of their sections and to keep Members informed of performance. It should not be used simply to generate a council's current set of performance indicators.

**2.52** As outlined earlier in the report, in the section on *Performance targets and monitoring*, Members and Senior officers showed an active interest and provided support for the Benefits Service, the Joint Committee set its targets and received full reports on a monthly basis on its performance.

**2.53** Breckland District Council had in place a comprehensive pre-notification checking programme undertaken by the Benefit Service Team Managers and the Financial Control Section. Checking was undertaken on a daily, weekly and monthly basis and formed the basis of the management information which was used to report on the number and accuracy of claims processed by each Benefits Assessor.

**2.54** This information enabled Breckland District Council to evaluate individual, team and Benefits Service performance. Staff received feedback on the team and Benefits Service's overall performance against its targets at the weekly team meeting. Staff received individual feedback on performance on an ongoing basis and through the appraisal system.

**2.55** The Financial Control Section had responsibility to monitor the Benefits Service's performance. Information reports produced by the Benefits IT system, along with additional sampling randomly selected from the Benefits IT system, were used. This monitoring was undertaken on a daily basis to validate the accuracy of processing and identify any errors. Additional checks were also undertaken on cases which had taken over 50 days to process, to identify reasons for the delay and identify any system or procedural errors.

**2.56** Results of this monitoring were used by the Financial Control Section to validate the information produced by the Benefits IT system and to help ensure that statistical information returned to the Department was accurate.

**2.57** We found that Breckland District Council used the management information collected in a formal and structured way, it was a standing agenda item at all operational meetings that enabled informed management decisions to be made.

**2.58** Breckland District Council used the management information that it collected to enable it to:

- identify trends
- adjust work priorities and resource allocations
- identify system and user errors
- identify the causes and deviations from plans and targets.

**2.59** Breckland District Council also undertook specific pieces of work which it used alongside information collected from its programme of checks to:

- identify procedural weaknesses
- identify individual training and development needs
- monitor individual performance against targets and feed into performance appraisal discussions.

**2.60** Reports to Members and Senior officers were based on the management information gathered at an operational level.

## Training and development

**2.61** Effective and secure delivery of HB and CTB depends on staff performance. The administration of these benefits is complex and staff retention and recruitment are major issues for managers. Councils should offer effective training, career and personal development activities.

**2.62** Investment in the training and development of staff, plays a key role in:

- attracting new recruits
- retaining staff
- offering a career path for potential managers
- developing the management skills of more senior staff.

**2.63** Investment in performance management can:

- bring greater consistency and fairness to the management of staff
- highlight where individuals need to develop or improve performance
- ensure that career advancement is based on demonstrable delivery of results and competence to take on greater responsibility.

**2.64** We found Breckland District Council had a comprehensive training and development programme in place that recognised the different needs of Benefits Service staff. In addition there were evaluation procedures in place that allowed training material to be reviewed and revised and provided assurance of the trainees level of understanding.

**2.65** Breckland District Council provided training for both Benefits and Customer Services staff. It provided induction and new entrant training plus refresher courses and tailored awareness sessions for all staff. We observed that staff contacted the Training Officer for advice on specific cases.

**2.66** The Training Officer had established informal links with other councils and we saw evidence that they contacted each other for advice.

**2.67** New entrant staff received formal induction training followed by a 13-week Benefits training programme that used both system and theory work to cover key areas of benefits administration. The trainees worked on live cases which were subject to a 100% pre-notification check by the Training Officer.

**2.68** Trainees were required to complete a checklist to confirm that they had received and understood the training for each subject area.

**2.69** After a period of 100% monitoring Team Managers could decide if extended monitoring was required or if the level of checking for new trainees could be reduced to 10% in line with the percentage check for other Benefits Assessors. If further monitoring was appropriate the 100% check continued to be the responsibility of the Training Officer.

**2.70** We were told the outcomes of all types of management checks performed were fed back into the *Training Plan*. The Training Officer in liaison with the Team Managers used these results to consider where awareness or refresher training was required.

**2.71** Training course evaluation questionnaires were used to inform where amendments or improvements to the training material could be made. We found evidence that this evaluation was used to enhance a training course as a result of the feedback received.

**2.72** In addition a training needs analysis for Benefits staff had been undertaken during 2003. Some training identified had been delivered and a programme of further training was ongoing.

**2.73** Breckland District Council held weekly awareness sessions for Benefits staff. The Training Officer attended these sessions and used them to update staff on changes to regulations and procedures. In addition the Training Officer monitored all Departmental circulars received and produced summaries detailing the key messages. The summaries were e-mailed to Benefits and Customer Services staff and formed the basis for the training updates delivered during the awareness sessions.

**2.74** In addition to providing effective ongoing training for the Benefits Assessors, Breckland District Council provided Customer Services staff with refresher training in key areas of Benefits delivery. We were provided with training records that detailed the training received by Customer Services staff from March 2004 to date. The areas covered were:

- Benefits overview
- Verification Framework training
- Benefits system training.

**2.75** Although Customer Services staff had received some training they had not attended the weekly awareness sessions since the management of Benefits and Customer Services was split between Anglia Revenues and Benefits Partnership and Breckland District Council.

**2.76** Breckland District Council should re-instate the practice of Customer Services staff attending the weekly awareness sessions operated by the Benefits Service.

**2.77** In doing so Breckland District Council would ensure that its staff were aware of changes to legislation and procedures and able to handle customer enquiries consistently. This would reduce the potential for delays in new claims caused by Customer Services staff not requesting or collecting all required evidence from customers in support of their claim.

## Recommendations

**We recommend that Breckland District Council introduces a formal process to provide assurance that Customer Service staff receive the same regular updates as Benefits Service staff.**

## Internal audit

**2.78** Internal audit provides assurance to senior managers and Members about the effectiveness and security of HB and CTB administration.

**2.79** We found that Breckland District Council's internal audit work programme was risk based and as the Benefits Service was regarded as a 'high risk' it was audited annually.

**2.80** However, internal audit had not provided any specific audit days to look at improving the new claims process. This was as a result of previous audit exercises that had not identified any major weaknesses in the current arrangements.

## Internal working arrangements

**2.81** Councils need to manage their internal partnerships and relationships to support short and longer-term policy objectives. Such management includes ensuring that common goals are set for an effective and secure HB and CTB administration.

**2.82** Breckland District Council had identified the Council Tax Section and Customer Services as the 2 main sections within the council that were involved and had an impact on the speed of processing new claims.

**2.83** We were told during interviews that the Benefits Service and Council Tax Section had an effective working relationship and that issues and queries were easily resolved by personal contact. To support this, meetings between the Revenues and Benefits Managers along with the Revenues Strategic Manager took place on a weekly basis.

**2.84** Requests for new Council Tax accounts were usually received by either e-mail or telephone but only occasionally by a hand written request. We were told that requests were dealt with as a priority to minimise delays in cases where a claim for CTB had also been received. From our sampling we found that in one out of the 30 cases the assessment had been delayed while the Council Tax account was setup.

**2.85** No similar arrangements were in place between Benefits and Customer Services and no regular formal meetings were taking place.

**2.86** Breckland District Council told us it had identified that Customer Services could have a considerable impact on its speed of claims processing. Customer Services received, checked and verified claim forms and associated documentary evidence from customers, they also scanned and indexed these documents.

**2.87** It is important that the Benefits Service maintains an effective working relationship with Customer Services. As Customer Services was managed through a separate management structure to Benefits it is vital that lines of communication and working arrangements are formally established. This should also include training and Benefits updates with particular reference to refresher Verification Framework training and the use of ultraviolet scanners.

**2.88** Breckland District Council had acknowledged that the lack of a formalised process needed to be addressed and were considering the best way of formalising the process whilst we were on-site.

## Recommendations

**We recommend that Breckland District Council establishes formal lines of communication between Benefits and Customer Services at a strategic and operational level.**

## External working arrangements

**2.89** Councils function within their own network of relationships with customers, stakeholders and other bodies in their communities. Effective partnerships with these organisations will provide mutual benefits through savings in administrative costs and benefit expenditure and reduce the amount of fraud and error. Some stakeholders such as Jobcentre Plus, The Pension Service and the Rent Service play a key part in handling HB and CTB claims effectively and securely.

**2.90** We confirmed during interviews with these 3 agencies that they had named contact points and designated direct line telephone numbers to enable easy access to Breckland District Council. All 3 agencies told us that over the past 2 or 3 years there had been a significant improvement in liaison and working arrangements and the ease with which issues could be raised and resolved.

**2.91** Breckland District Council had signed and agreed service level agreements based on the national models with Jobcentre Plus, The Pension Service and the Rent Service. Breckland District Council monitored and reviewed its service level agreements with both Jobcentre Plus and The Pension Service through quarterly minuted meetings. Monitoring reports were discussed and action taken to improve performance levels.

**2.92** However, we found that performance against the service level agreement with the Rent Service was not being effectively monitored. We discuss this in more detail under *Requirement to refer to the Rent Officer* in the *Processing of claims* section of this report.

**2.93** During interviews with staff in the Citizens Advice Bureau offices who had regular contact with Breckland District Council, we heard similar reports to those from Jobcentre Plus, The Pension Service and the Rent Service. We were told that there had been a significant improvement in liaison and working relationships not only within the Benefits Service, but throughout the council. We found that the Citizens Advice Bureau had named contact points and designated direct line telephone numbers. They found the council to be easily accessible with a culture to provide as much information and assistance as possible within its regulatory requirements.



# Processing of claims

## Introduction

**3.1** The scope of this focused inspection was to analyse those areas of administration that had a material effect on the processing of new claims for HB and CTB.

**3.2** To set this in context we report from 3 different perspectives, which are:

- Actual performance
  - 14-day performance
  - 36-day performance
  - Exception reporting
- Factors that affect reported performance
  - Work flow management
  - Remote Access Terminal usage
  - Benefits IT system
  - Verification policies and procedures
  - Registered Social Landlords
  - Requirement to refer to Rent Officer
  - Payments on account
  - Customer services
- How performance is validated
  - Management checking and assurance
  - Pre-payment checks
  - Post-notification checks.

## Actual performance

**3.3** This section outlines the Best Value performance indicators that Breckland District Council reports to the Department. This data is useful both to give an overall picture of progress, over time of the Benefits Service, and to provide the means for detailed analysis of potential delays or blockages in the process. By using the data and information provided, Councils can effectively monitor and improve performance.

**3.4** Regulation 76(3) of the Housing Benefit (General) Regulations 1987 states that every claim for HB shall be decided within 14 days of the relevant information having been received, or as soon as is reasonably practicable thereafter. There is a similar provision for CTB at regulation 66(3) of the Council Tax Benefit (General) Regulations 1992, which also requires the first payment of any CTB to be made within 14 days of receipt of the claim or as soon as reasonably practicable thereafter.

**3.5** In addition to the statutory requirements, the Best Value regime also requires councils to measure and report the average time for processing new claims and sets a target of 36 calendar days.

**3.6** HB and CTB are vital payments made to help people on low incomes and their claims should be dealt with quickly and accurately to avoid potential hardship.

**3.7** Figure 3.1 shows Breckland District Council's reported performance against the Best Value performance indicators for the past 2 years. Breckland District Council had reported a significant improvement in its average time to process new claims, this had reduced from an average of 122 days in 2002/03 to 33 days in 2003/04. It had also reported an improved performance in the percentage of new claims decided within 14 days of all information becoming available, increasing from 30% in 2002/03 to 81% in 2003/04.

**Fig. 3.1: Breckland Borough Council's reported new claims performance for the period April 02 – March 04**

Performance indicator	Description	Standard/Top quartile	Performance 2002/03	Performance 2003/04
<b>BV78a</b>	Average time for processing new claims (days)	36 days	122 days	33 days
<b>BV79a</b>	% cases processed accurately	98	98	97
<b>Department quarterly return</b>	% new claims decided in 14 days	90	30	81

Source: The Department

**3.8** We examined data, provided to us by Breckland District Council from its Benefits IT system, for the period January 2004 to the end of August 2004. The data included all claims determined in that period.

**3.9** To establish the effectiveness and accuracy of claims processing we randomly selected 30 new claims to be sampled. However we were unable to use all of the 30 claims selected as a number had been incorrectly categorised on the Benefits IT system as new claims. These claims were in fact continuous claims involving changes of circumstances, free benefit weeks and case re-working. Because there were insufficient new claims we added a further 5 cases to our original list, to complete our sample.

## 14-day performance

**3.10** For year ending 2002/03 Breckland District Council reported to the Department that 30% of new claims were decided within 14 days of all information becoming available. Reported performance for 2003/04 was 81%.

**3.11** Figure 3.2 details Breckland District Council's reported performance for the percentage of new claims processed. The table shows a significant improvement from 28% in 2002/03 to 81% in 2003/04 and 77% for the period April 2004 to 30 September 2004.

<b>Fig. 3.2: New claims decided within 14 days</b>			
	<b>2002/03</b>	<b>2003/04</b>	<b>2004/05 – 30/09/04</b>
<b>Percentage</b>	28	81	77

Source: the Department.

**3.12** We obtained more detailed information from the Department and Figure 3.3 shows Breckland District Council's performance over the last 2 quarters of 2003/04 and the first 2 quarters of 2004/05.

<b>Fig. 3.3: Quarterly performance 2003/04 and 2004/05</b>				
	<b>Qtr 3 2003/04</b>	<b>Qtr 4 2003/04</b>	<b>Qtr 1 2004/05</b>	<b>Qtr 2 2004/05</b>
<b>Percentage</b>	88	88	66	74

Source: the Department.

**3.13** We were told that the deterioration in performance shown for the first quarter of 2004/05 as 66% of new claims processed within 14 days of all information becoming available was a direct result of the relocation of Forest Heath Benefits Service to shared accommodation at Breckland.

**3.14** Figure 3.4 provides the monthly breakdown of its performance from April 2004 to September 2004 for the percentage of new claims decided within 14 days of all information becoming available.

<b>Fig. 3.4: Monthly performance – April 2004 – September 2004</b>						
	<b>April 2004</b>	<b>May 2004</b>	<b>June 2004</b>	<b>July 2004</b>	<b>August 2004</b>	<b>September 2004</b>
<b>Percentage</b>	63	67	69	69	70	80

Source: Breckland District council.

**3.15** The merger of the Benefits Services took place in April 2004 and the impact of the merger was reflected in the reported 63% of new claims processed for April 2004. However, a steady return to its former performance was shown in a reported 67% for May 2004 steadily increasing to 80% for September 2004. This information demonstrates Breckland District Council's managed recovery to a sustained level of performance.

**3.16** To establish the extent of delays we analysed the 30 new claims used in the sample to assess the range of days for those new claims decided outside the 14-day target. Figure 3.5 provides our findings.

**Fig. 3.5: Analysis of sampling – time taken from date all information available to date of determination – January 2004 – August 2004**

Time taken to decide	Number	%
0 – 15 days	22	74
16 – 25 days	7	23
26 – 36 days	1	3
<b>Total</b>	<b>30</b>	<b>100</b>

Source: BFI analysis.

**3.17** We found that 22 (74%) out of the 30 new claims examined had been decided within 14 days of all information becoming available. However, in 6 of the 8 claims that were not processed within 14 days we found unnecessary delays in processing the information once received.

**3.18** In the other 2 claims an incorrect date had been recorded for all information received on the Benefits IT system. In these cases the correct date should have been the date the Rent Officer determination was received, not the date that further evidence requested had been received. For both of these cases the Rent Officer referral had been the last action taken following receipt of further evidence requested.

**3.19** The sample was selected from new claims processed between January 2004 and August 2004. The findings of 74% of new claims processed within 14 days of all information becoming available support Breckland District Council's reported Best Value performance indicator for 2004/05 and the continuing trend for improvement.

### *36-day performance*

**3.20** Figure 3.6 shows Breckland District Council's reported performance against the new claims Best Value performance indicator for the past 2 years and first 2 quarters of 2004/05. Breckland District Council had reported a significant improvement in its average time to process new claims, this had reduced from an average of 122 days in 2002/03 to 33 days in 2003/04 and from April 2004 to October 2004.

**Fig. 3.6: Average number of days to process new claims**

	2002/03	2003/04	2004/05 up to 1/10/04
<b>Days</b>	122	33	33

Source: Breckland District Council.

**3.21** During the inspection Breckland District Council provided further performance information which confirmed it was achieving above the Standard of 36 days. Figure 3.7 shows the last 2 quarters of 2003/04 and the first 2 quarters of 2004/05. Although Breckland District Council's performance showed a deterioration in the first quarter of 2004/05 it regained its performance in the second quarter. We discuss the reason for this later in this section.

<b>Fig. 3.7: Quarterly performance 2003/04 and 2004/05</b>				
	<b>Qtr 3 2003/04</b>	<b>Qtr 4 2003/04</b>	<b>Qtr 1 2004/05</b>	<b>Qtr 2 2004/05</b>
<b>Days</b>	23	25	36	29

Source: Breckland District Council.

**3.22** Figure 3.8 provides the monthly performance breakdown from April 2004 to September 2004 for the average number of days to process new claims.

<b>Fig. 3.8: Monthly performance – April 2004 – September 2004</b>						
	<b>April 2004</b>	<b>May 2004</b>	<b>June 2004</b>	<b>July 2004</b>	<b>August 2004</b>	<b>September 2004</b>
<b>Days</b>	34	34	40	34	29	25

Source: Breckland District council.

**3.23** We were told that the slight deterioration in performance to an average of 40 days in June 2004 (and for first quarter of 2004/05) was a direct result of the relocation of Forest Heath Benefits Service to shared accommodation at Breckland. At the time of the inspection we found that the impact of this relocation had been effectively managed and performance levels had not only been re-established but had improved to an average of 29 days for August and 25 days for September. This confirmed a controlled and sustained improvement in Best Value indicator performance.

**3.24** Figure 3.9 provides details from our sample of 30 new claims. It shows that 21 of the 30 claims sampled (70%) were assessed and a decision made within the Standard of 36 days from date of receipt of the claim. However 9 cases (30%) had taken over 36 days, of these 2 had taken over 60 days, the longest taking 111 days.

**3.25** Our analysis found that the 3 longest cases both required referral to the Rent Officer, and in both cases referral had not been made until all evidence had been received and the case ready for assessment. However, it was the delay in obtaining information from the customer that was the issue although the late referral to the Rent Officer had added further to the delay. For example in the claim which took 111 days to process, the customer had delayed in providing clarification of the information provided on the claim form and for the tenancy agreement that had been submitted. The customer had provided the information late despite reminders issued by the Benefits Service, the customer had said that a family emergency was the cause for the delay and the Assessor had decided to treat the case as a continuous

claim. This confirmed Breckland District Council needed to identify reasons for delay and ensure the correct procedures and working practices were in place to support continuous improvement and meet its targets.

**Fig. 3.9: Analysis of sampling – time taken from receipt to date of decision for new claims processed between January 2004 – August 2004**

Time taken to decide	Number	%
0 – 15 days	11	36
16 – 25 days	5	17
26 – 35 days	5	17
Over 36 days	9	30
<b>Total</b>	<b>30</b>	<b>100</b>

Source: BFI analysis

**3.26** Figure 3.10 shows further analysis of our new claims sample, and illustrates the average number of days for each stage of the new claims process.

**Fig. 3.10: New claims processing – days taken for each stage in the process**

Work steps	Average days	Range of days
Date of receipt (at designated office) to date of first action	14	1 – 50
Date of first action to all information or evidence available	15	1 – 102
Date of all information or evidence available to date of decision	9	1 – 36
Date of receipt (at designated office) to date of decision	30	1 – 111
Date of assessment or decision to date of first payment	6	2 – 23
<b>Total days from claim received to first payment</b>	<b>36</b>	<b>5 – 127</b>

Source: BFI analysis

**3.27** Our findings supported Breckland District Council's reported performance against the Best Value performance indicators for processing claims. However, the range of days showed that in some cases Breckland District Council needed to monitor the reasons for delay to further improve its performance levels.

**3.28** To improve performance levels Breckland District Council had undertaken a number of exercises to identify common errors and reasons for delay and produced a short report and recommendations. Its most recent report was produced in September 2004, it found that common errors included:

- requests for information that were not required
- not all information was requested when the first action was taken

- the issue of application forms when they were not appropriate
- late referral of cases to the Rent Service.

**3.29** The report provided recommendations to address the errors found, the recommendations had been introduced using the team meetings to provide remedial training and awareness sessions. Team Managers undertook targeted checks to ensure these types of errors were no longer being made.

**3.30** We found evidence in our sample of 30 new claims that supported these findings as the following delays were identified:

- 4 cases where further information requests had been delayed
- 2 cases where the Rent Officer referral should have been made earlier.
- 1 case where a further claim form had been incorrectly issued.

### *Exception reporting*

**3.31** Breckland District Council made effective use of the management information produced from its Benefits IT system and the 10% pre-notification checks undertaken. Further checks were made by the Financial Control Section to validate reported performance against the Best Value performance indicators, to identify reasons for processing delays and possible training requirements. We discuss the management checks undertaken in more detail in *Management checking and assurance*.

## Factors that affect reported performance

**3.32** From the date a claim to benefit is received there are a number of factors that can influence both the speed and accuracy of putting that claim into payment. Factors that can affect both speed and accuracy include:

- effective management of incoming work
- effective use of the Remote Access Terminal
- the accuracy and integrity of the Benefits IT system
- the effectiveness of verification procedures
- referring cases to the Rent Officer
- making payment on account when appropriate
- providing Customer services that meet the needs of the customers, including a clear, concise claim form and access to visiting officers.

### *Workflow management*

**3.33** Effectively managing the flow of work is a key element in ensuring that avoidable delays are minimised. It is important that all new claims are directed as soon as possible to the first step of the process to ensure that the first course of action can be taken.

**3.34** Breckland District Council had a number of processes in place to effectively manage the flow of work. We were told that all claim forms and information received at reception were checked using a locally produced checklist completed by Customer Services staff.

**3.35** Breckland District Council reported that all documents received were immediately scanned onto the Document Image Processing system and depending on staff availability they would also be indexed by Customer Service staff. If Customer Services staff were not available indexing was undertaken by Benefits Service staff, we discuss this process further in *Customer services*.

**3.36** Breckland District Council did not use its Document Image Processing system to manage and monitor its workflow. Team Managers undertook this role receiving all post and checking that the image had been correctly scanned onto the Document Image Processing system. Incoming post was then sifted into 4 different work types:

- *urgents*
- *changes of circumstances*
- *new claims*
- *interventions*.

**3.37** Work was then stored on the Benefits Section in 4 clearly marked piles and Assessors took their daily workload directly from a pile depending on the priorities set, although *urgents* were always dealt with as a priority.

**3.38** Team Managers monitored individual Assessors work through 10% pre-notification checks. Additional checks were undertaken by the Financial Control Section, these were typically on cases taking 50 days or over to identify reasons for processing delays. We detail these checks further in *Management and accuracy checking*.

### *Remote Access Terminal usage*

**3.39** Obtaining evidence of IS or JSA(IB) through the Remote Access Terminal, rather than the customer being asked to provide documents from Jobcentre Plus is good practice, because it gives the best evidence and reduces the time needed to get it.

**3.40** Breckland District Council had a system in place that provided maximum flexibility for its use of the Remote Access Terminal. It had 8 Benefit Assessors trained in its use and a daily rota system was in place for its operation.

**3.41** Successful Remote Access Terminal checks were scanned and indexed onto the Document Image Processing system. If a check could not be fully undertaken a request was made to the Department for the information and the Benefits IT system was noted.

**3.42** Our sampling confirmed that in 19 cases with IS or JSA(IB) in payment evidence was obtained through the use of the Remote Access Terminal. In addition interviews confirmed that the use of the Remote Access Terminal helped to speed up the processing of new claims.

## *Benefits IT system*

**3.43** The most should be made of available information technology to support an effective and secure benefits administration, and the technology deployed should assist the council in making progress against the *E-government* agenda.

**3.44** Automation of processes should enable greater efficiency. Reliable and timely management information enables managers to monitor performance and make informed management decisions.

**3.45** From sampling and interviews we found that Breckland District Council's Benefits IT system provided effective support for deciding all types of HB and CTB claims and making benefit payments. We also found that appropriate management checks were in place to validate management information produced by the Benefits IT system and the reported performance against the Best Value performance indicators. We detail this further under *Management information and assurance* in the *Strategic management* section of this report.

**3.46** The Benefits IT system had the facility to allow Assessors to set and use diary dates, daily reports were produced and these were used to manage and control work. Our sampling confirmed that Assessors also used the note pad facility to record all action taken to support the diary date recorded.

**3.47** Assessors told us that although diary dates were set on its Benefits IT system, Assessors also used a *pending system* to monitor the response from customers to requests for information. However, Breckland District Council told us that management checks had identified an issue where some claims had been left in the pending file until the diary date was due although all information had been received prior to this date.

### **Recommendations**

**We recommend that Breckland District Council develops a formalised and documented process for the use of the pending system to ensure that information received is actioned as soon as possible and unnecessary delays are avoided.**

## *Verification policies and procedures*

**3.48** The scope of this focused inspection was to inspect and report on the issues that have a material influence on the speed of processing performance for new claims for Housing Benefit and Council Tax Benefit by Breckland District Council. The speed of processing a new HB and CTB claim was only one part of the picture.

**3.49** Local authorities must verify information supplied by customers to decide entitlement to benefit. This is an essential part of securing the gateway to the HB and CTB systems. Regulation 73(1) of the Housing Benefit (General) Regulations 1987 requires that:

*...a person who makes a claim...shall furnish such certificates, documents, information and evidence in connection with the claim...as may be reasonably required by the appropriate authority in order to determine that person's entitlement to...housing benefit...*

**3.50** There is a similar provision in regulation 63(1) of the Council Tax Benefit (General) Regulations 1992.

**3.51** Breckland District Council had up-to-date written verification procedures and practices to ensure that:

- customers provided all relevant certificates, documents and information required in support of their HB and CTB claim
- all documents were original
- photocopies of original documents were stamped and certified as such
- assessment staff were trained on the latest Verification Framework evidence requirements
- any discrepancies identified through crosschecking of information were followed up, resolved and recorded
- pre-notification management checks were undertaken to assure the quality of claims verification.

**3.52** Interviews confirmed that all staff involved in Benefits work had received initial Verification Framework training and that assessment staff received regular awareness training for all changes to HB and CTB at team meetings.

**3.53** However, at the time of the inspection Customer Service staff did not attend these meetings and as a result were not fully aware of changes to HB and CTB processes. We detail this further under *Internal working arrangements* in the Strategic management section of this report.

**3.54** Assessors told us that all claims were checked on receipt to ensure all evidence required was available before the claim was assessed. If further information was required the Assessor would write out at this stage, detailing the information required and the date that it should be returned by. These claims were then held in a pending file and if a response had not been received after 14 days a reminder was usually issued to the customer. We found this to be an effective process which prompted the customer to return the required information for the claim to be assessed, thereby speeding up the overall claim processing time.

**3.55** Our sampling found that in all cases a Verification Framework control checklist had been used to check and record all of the information received. The Benefits IT system provided separate fields to record each area of verification required, fields not completed were easily identifiable and the completeness of verification formed part of the Team Managers' 10% pre-notification checks.

**3.56** Our sampling and interviews found that Breckland District Council had processes in place to ensure that only original documents were accepted as evidence. Original documents were photocopied and stamped *original seen*, and then signed and dated by the authenticator. Additionally, if the claim form was received at either the main reception point or one of the caller or Presence offices a receipt was issued to the customer. This receipt also detailed any further information required from the customer to complete the claim.

**3.57** Figure 3.11 shows the results of our verification sampling of 30 new claims processed between January and August 2004.

**Fig. 3.11: BFI's assessment of Breckland Council's procedures for verifying evidence provided in support of claims**

Verification item	Number requiring verification	Number where sufficient evidence held on file	% verified
National Insurance number – customer	30	30	100
National Insurance number – partner	8	8	100
Identity – customer	29	29	100
Identity – partner	8	8	100
Rent liability	30	30	100
IS/JSA(IB)	19	19	100
Income – customer	30	30	100
Income – partner	6	6	100
Capital – customer	18	18	100
Capital – partner	3	3	100
Non-dependants	2	2	100

Source: BFI sampling

**3.58** Sampling and interviews confirmed that crosschecks were made with information held on the Council Tax IT system and with previous claim information held on its Benefits IT system. The Document Image Processing system provided easy access to previous claim information and supporting documents. The verification checklist completed when a claim was processed recorded details of any crosschecks undertaken

**3.59** We found that Breckland District Council met all of its regulatory requirements and the level of verification was of a high standard meeting the minimum requirements of the Verification Framework.

### *Registered Social Landlords*

**3.60** Breckland District Council had been involved in a pilot exercise which gave Registered Social Landlords the responsibility for verifying documentation and Benefits claim forms to improve customer service. Breckland District Council worked with 20 Registered Social Landlords and 6 of these operated the full Verification Framework scheme. Both the Benefits Manager and Training officer, along with officers from other councils, had provided ongoing training to Registered Social Landlords throughout Norfolk.

**3.61** We were told that formally introducing the scheme had fostered an improved working relationship with landlords and had resulted in improved processing times. Our sampling supported this. Of the 30 cases we sampled, Registered Social Landlords in 20 cases had already checked verification, and in 10 of these 20 cases the first action on receipt by the council was assessment. This initiative had improved processing times for the council and as a result the landlord received payments more quickly.

**3.62** The largest Registered Social Landlord in the area had a dedicated Benefits Assessor post based at their office in Dereham. Although the Registered Social Landlord had funded this post the Assessor remained within the Benefits Service management structure. The Assessors processed all claims for HB and CTB submitted to the Registered Social Landlord including any follow up action needed for claims with evidence outstanding. The Assessor liaised effectively with the Registered Social Landlord staff advising them of what stage a claim was at or what evidence was still outstanding.

**3.63** At the time of the inspection the Benefits Assessor post was vacant but the Registered Social Landlord hoped that a member of staff would be in post and fully trained by January 2005.

### *Requirement to refer to Rent Officer*

**3.64** Regulation 12A of the Housing Benefit (General) Regulations 1987 require a local authority to refer certain rent allowance claims to the Rent officer for a determination to be made on the level of rent eligible for HB. Regulation 12A(3) of the Housing Benefit (General) Regulations 1987 require the council to make this referral within 3 working days or as soon as practicable thereafter. The regulations also provide for an application to be made for a pre-tenancy determination.

**3.65** Delays in making referrals to the Rent Officer can result in delays in the time it takes to process a claim.

**3.66** Breckland District Council had written guidance to identify which claims should be referred to the Rent Service but did not have a documented process to detail at what point of the process cases should be identified or how they should be referred. The Benefits Assessors had a target to refer appropriate cases by facsimile within 24 hours of being identified. Team Managers checked if a referral was appropriate as part of the 10% pre-notification checks undertaken.

**3.67** Breckland District Council had a process in place to monitor claims from the point of being referred to the Rent Service to their return. A nominated Assessor had responsibility for this process and made a weekly check. Outstanding referrals that had not been returned by the Rent Officer were investigated to establish the reason for the delay and to ensure an appropriate decision was received.

**3.68** We found that although Breckland District Council monitored referrals sent to, and returned by, the Rent Officer, it did not monitor its own performance against the service level agreement with the Rent Service.

**3.69** Breckland District Council acknowledged this was an area for improvement and told us that it would ensure that staff were made aware that appropriate Rent Officer referral cases should be identified as soon as possible following receipt of the claim. It also acknowledged that closer monitoring of its performance against the service level agreement was required.

**3.70** Figure 3.12 highlights the time taken between the various stages of the process. There were 5 cases in our sample that were appropriate for, and had correctly been referred to the Rent Officer.

<b>Fig. 3.12: Time taken to administer claims referred to the Rent Officer</b>	
	<b>Average number of days taken</b>
<b>Date claim received to date of referral to Rent Officer</b>	34
<b>Date referral received by Rent Officer to date of determination by Rent Officer</b>	9
<b>Date of determination by Rent Officer to date received by council</b>	3
<b>Date received by council to date payment made</b>	10

Source: BFI analysis

**3.71** Our analysis found that the range of days from the date a claim was received to referral was between one and 85, with an average of 34 days. In 2 of the 5 cases the delays were due to enquiries required into discrepancies found between tenancy agreements and information supplied on the claim form. We were told that all enquiries were made prior to the referral being made to ensure the correct information was supplied to the Rent Officer. However, in the 3 remaining cases we found evidence of unnecessary delays.

**3.72** To further investigate the Rent Officer referral process we undertook an additional sample of 12 claims for the period August 2004 to October 2004 where a Rent Officer referral had been made. We found that the average number of days from the date of claim to making a referral was 18, with a range from 2 to 41 days. Our sampling and interviews with staff confirmed that making a referral to the Rent Officer was typically the last action taken before assessment. This confirmed that action was required by the Benefits Service to avoid unnecessary processing delays. To avoid such delays Rent Officer referrals should be made in parallel with other further information gathering.

**3.73** We confirmed that a service level agreement based on the national model was in place and that effective day-to-day liaison with the Rent Service had been established.

## Recommendations

**We recommend that Breckland District Council:**

- **develops a formalised and documented process in line with its own target to refer appropriate cases identified to the Rent Officer within 24 hours of receipt**
- **introduces a check to identify cases that have not been referred to the Rent Officer within its target of 24 hours**
- **monitors its own performance against its service level agreement with the Rent Service.**

### *Payments on account*

**3.74** There may be instances when, despite the best efforts of the council and the customer it is not practicable to make a decision on a claim for rent allowance within the prescribed 14 days. Regulation 91(1) of the Housing Benefit (General) Regulations 1987 requires councils to make a payment on account if that impracticability has not arisen out of the customer's failure to provide the information reasonably required by the council without good cause.

**3.75** Payments on account should only be made when necessary and for as brief a period as possible, as they are not intended as a substitute for making a full decision and correct payment on a claim.

**3.76** Our analysis found 2 claims out of the 30 sampled where a payment on account had been appropriate but had not been made. However staff told us that it was not usual practice to consider a payment on account as work was up-to-date and no backlog of claims existed. This was an area of concern that we raised with Breckland District Council.

**3.77** Breckland District Council acknowledged that making payments on account was a statutory requirement and this was an area for improvement. It planned to ensure staff were made aware of when and how payments on account should be made and to introduce appropriate monitoring procedures.

## Recommendations

**We recommend that Breckland District Council develops procedures to ensure that payments on account are made in all appropriate cases.**

### *Customer services*

**3.78** Customer Service is another important aspect in ensuring that the time taken to process claims is kept to a minimum. Councils should aim to deliver modern, efficient, secure customer focused public services that meet the needs of their customers.

**3.79** We found that Breckland District Council was committed to providing a comprehensive customer service. Customer access to the Benefits Service was gained by a main reception point plus 4 other caller or Presence offices and a telephone contact team available to deal with customer enquiries. The Customer Services staff and telephone contact team were all benefits-trained and had access to the enquiry screens on the Benefits IT system and the Document Image Processing system. These staff were the first point of contact for customers and were able to deal with the majority of enquiries.

**3.80** We comment on the service provided to its customers by Breckland District Council under the following headings:

- Customer Reception point
- Caller and Presence offices
- Handling telephone calls
- The Benefits claim form
- Visiting.

### **Customer Reception point**

**3.81** Breckland District Council provided a main reception service for its customers available for 38.5 hours per week. Customers were seen on arrival and either dealt with immediately or had an appointment made with a Customer Services member of staff or a Benefits Assessor. We were told that appointments were usually available immediately, where this was not possible appointments were made for the following day.

**3.82** The Customer Services staff maintained an appointments book and recorded details of customers names and telephone numbers when they arranged an appointment. Customer Services staff would contact customers to re-schedule appointments if for any reason the appointments needed to be cancelled, for example, if the Benefits IT system was unavailable.

**3.83** Breckland District Council's main ethnic group whose first language was not English, were Portuguese. It had arrangements in place for an interpreter to attend Thetford reception and Dereham caller office at set times each week to deal with its Portuguese customers. The reception staff were aware of when the interpreter was available and would plan appointments accordingly. In addition, 2 of the Customer Services staff were learning to speak Portuguese. Breckland District Council had conducted customer surveys and had confirmed that there were no other ethnic groups in the area that required specific service needs.

**3.84** Access to Benefits has been assessed against the requirements of the Disability Discrimination Act 1995 and 1999. There was disabled access in place at the main reception point in Thetford and the Caller office in Dereham. Facilities for disabled access were also in place at the 3 other Presence offices used by Breckland District Council.



## Handling telephone calls

**3.93** Breckland District Council's telephone service was delivered through a Telephone Contact Team who were trained to deal with Benefits enquiries. At the time of the inspection 2 full-time staff provided this service.

**3.94** Incoming calls went initially to the telephone team and, when the lines were busy, on to 3 additional telephone lines operated on a rota basis by Benefits Service staff.

**3.95** The council had a target for telephone calls to be answered within 3 rings. Although monitoring statistics were not available staff and third parties told us that unanswered telephone calls was not an issue. Breckland District Council was planning to introduce a new call centre operating system that would allow it to monitor calls received and waiting times.

## The Benefits claim form

**3.96** Clear HB and CTB claim forms can help reduce the need for requests for further information from the customer and avoid potential delays. They also reduce the risk of customer confusion, error and fraud. Clear advice at the time of the claim can reinforce messages about the need to provide evidence of identity and income, and resolve concerns of those with limited documentation.

**3.97** We looked at the design, layout and language of Breckland District Council's claim form. A full analysis of the claim form can be found at *Appendix B*.

**3.98** Our analysis showed that the claim form included some of the good practice features of the HCTB1 model claim form including:

- the award of the Clear English Standard from the Plain Language Commission
- the provision of advice on translation services
- instructions on completion of the form and who to contact for help
- advice that delays returning the form could result in reductions to benefit.

**3.99** We also found that claim forms were readily available on request by telephone, from its main reception point, caller and Presence offices, the council's website and Registered Social Landlords.

**3.100** In addition staff at the main reception, caller and Presence offices and Registered Social Landlords:

- advised customers of the need to provide all supporting evidence with the claim form
- issued a receipt for the claim form and detailed supporting documentary evidence outstanding.



## How performance is validated

**3.106** The final area a council needs to consider when looking at speed of processing new claims is what procedures they have in place to ensure that management checks take place and what assurance these provide for them. Although management checking does not of itself improve processing times it is important to know that claims are being processed accurately as well as quickly.

### *Management and accuracy checking*

**3.107** Effective management checks provide information about:

- the integrity and security of benefits processes
- the quality of work such as the evaluation of performance against legislative and other requirements
- training and development needs of staff
- weaknesses in processes.

**3.108** The Audit Commission, in *Countering Housing Benefit Fraud: A Management Handbook*, recommends that councils quality check at least 10% of claims to prevent errors entering the process at the beginning. The check should take place before a decision letter is sent to a person affected.

**3.109** Management checking provides assurance on the effectiveness and security of Benefits administration, it also provides valuable management information on individual performance. This can be used to inform management decision making and subsequent organisational interventions.

**3.110** At an operational level, Breckland District Council had appropriate management and accuracy checks being undertaken before and after the decision letter had been issued.

**3.111** Breckland District Council had reported 98% of cases processed accurately for 2002/03, meeting the Best Value performance indicator for accuracy and achieving Standard. However, its performance for 2003/04 was reported as a slightly reduced 97%. We were told that this was due to minor processing errors which had been addressed through:

- awareness training for all staff on the most common errors
- a quiz to gauge staff knowledge and identify areas of weakness
- individual Assessor refresher training where required.

**3.112** We confirmed that the Financial Control Section continually undertook a sample check of new claims processed and recorded its performance on its accuracy return against the Best Value performance indicator to the Department.

## *Pre-payment checks*

**3.113** We confirmed that Team Managers undertook a 10% pre-payment check of claims randomly selected by the Benefits IT system. Although Team Managers used a high level list of criteria that must be checked, it did not provide lower level detail, for example, had the Rent Officer referral been made within 24 hours of the case being identified.

**3.114** Team Managers recorded the performance of individual Assessors and the specific errors made. Any consequent and training needs were also identified. However, this information was not recorded formally into one central document of common errors. This meant that an opportunity was missed to undertake a full analysis of the types of errors found or establish the baseline from which to monitor improvements.

**3.115** Errors found on claims were e-mailed back to the Assessor to re-assess within 24 hours, these cases were returned to the Team Manager to be checked again prior to payment. Whilst we were on-site consideration was being given to the introduction of a new performance related scheme linking individual performance to pay scales.

**3.116** We were told that when poor performance was identified consideration was given to the reason why and whether 100% checking was appropriate. Following new entrant training the Training Officer continued to undertake a 100% check on new Benefits Assessors work until their level of performance was judged to be satisfactory. This was a good practice.

**3.117** We found that the results of the pre-notification checks undertaken by the Team Managers were forwarded to the Financial Control Section. As part of its monitoring function, it looked at the extent and reasons for delays and common errors found.

## *Post-notification checks*

**3.118** The Financial Control Section had the responsibility to validate the accuracy of the information produced by the Benefits IT system to establish Breckland District Council's performance against the Best Value performance indicators. In addition to receiving the outcomes of the 10% pre-payment check performed by the Team Managers this section performed a number of checks to identify delays, user and system errors.

**3.119** We found that cases were randomly selected by the Benefits IT system which produced a number of reports for this purpose. Cases were checked to identify common errors and reasons for delay in cases that had taken in excess of 50 days to assess.

**3.120** Although its performance against the Best Value performance indicators were recorded into a *Performance Indicator Summary* report the reasons for delay and common errors were not recorded in a central report to summarise findings. This was a lost opportunity to identify trends or where common failings were occurring. We were told that this information was informally recorded and discussed at management meetings and was fed into planned awareness sessions for team meetings.

**3.121** Although we have acknowledged Breckland District Council's management checking and exception reporting programme was comprehensive, to secure the further improvements planned for the Benefits Service it needs to further enhance its analysis of management information obtained through management checking and Benefits IT system reports. Breckland District Council acknowledged the need to consider the depth of its management checking and performance monitoring to ensure that reasons for processing delays could be identified and addressed.

### **Recommendations**

**We recommend that Breckland District Council considers the depth of management checks to identify reasons for claims processing delays and introduces a process to formally collate this information.**



# Appendices

<i>Appendix A: Summary of Recommendations</i>	<b>51</b>
<i>Appendix B: Analysis of Claim Form</i>	<b>53</b>



# Appendix A: Summary of Recommendations

Below is a summary of our recommendations for Breckland District Council.

## Strategic management

<b>Recommendations</b>	
<b>We recommend that Breckland District Council:</b>	<b>Paragraph</b>
<ul style="list-style-type: none"> <li>• <b>provides procedural guidance for all its staff that:</b> <ul style="list-style-type: none"> <li>– <b>includes HB and CTB delivery procedures that covers all aspects of the Benefits Service and includes legislative requirements and Departmental good practice and advice</b></li> <li>– <b>provides an accurate and up-to date account of actual practice</b></li> <li>– <b>details Benefits procedures that are understood by both staff and managers</b></li> <li>– <b>is written in plain English</b></li> </ul> </li> <li>• <b>incorporates changes and amendments to procedures into its guidance within 10 days of receipt</b></li> <li>• <b>introduces a formal management control process for developing and changing local procedure.</b></li> </ul>	<b>2.50</b>
<ul style="list-style-type: none"> <li>• <b>introduces a formal process to provide assurance that Customer Service staff receive the same regular updates as Benefits Service staff.</b></li> </ul>	<b>2.77</b>
<ul style="list-style-type: none"> <li>• <b>establishes formal lines of communication between Benefits and Customer Services at a strategic and operational level.</b></li> </ul>	<b>2.88</b>



# Appendix B: Analysis of Claim Form

Clear HB and CTB claim forms can help reduce the need for requests for further information from the customer. They can also reduce the risk of customer confusion or fraud. Clear advice at the time of the claim can:

- reinforce messages about the need to provide evidence of identity and income
- resolve concerns of those with limited documentation
- reduce delays in the time taken to process claims.

**Fig B.1: Analysis of Breckland Borough Council's claim form against good practice**

Good practice	Good Practice present? Yes/No/Partial	BFI comment
Combined HB and CTB claim form.	Y	
Each update of the form is readily identifiable. This will ensure that only current versions of the form are used. It will also help in any claims for backdating.	N	Did not have a date of print or a version number.
Providing advice on translation services and issuing forms in other languages.	Y	
Large print claim form for partially sighted customers.	Y	Did not mention the availability of a large print claim form for partially sighted customers. However interviews with staff confirmed the claim form is available both in large print and Braille.
Explanation of what happens when the local authority receives the form.	P	There was no explanation, although the claim form receipt does state the customer should contact the council if they have not heard anything within 21 days.
Details of changes of circumstances that must be reported.	Y	Included a declaration for the customer to sign that stated the customer understood all changes of circumstances must be reported.
Clear instructions on how to fill in the form and who to contact for help.	Y	

**Appendix B: Analysis of Claim form**

Good practice	Good Practice present? Yes/No/Partial	BFI comment
<p>An explanation that delays in returning the form could result in reductions to benefit.</p> <p>Plain English, no jargon. Easy to read.</p> <p>Clear layout, effectively using a grid pattern, white space and navigation to allow customers to complete the form quickly and confidently. Use of type colour that contrasts with the background colour.</p> <p>Answer boxes that require the customer to make a conscious decision, for example <i>No</i> or <i>Yes</i> boxes.</p> <p>An explanation of payment choices and the validation the customer will be required to produce. For example, a bank statement showing the customer's current address is essential for payment by credit transfer through direct credit.</p> <p>Specific spaces for customers to provide further relevant information if they need to.</p> <p>Clear statements of the customer's obligations and duties.</p> <p>Statement as to potential use to which information supplied might be put, such as take-up campaigns.</p> <p>Place for the customer and partner to sign and date.</p> <p>Place for anyone else who filled in the form to sign and date.</p>	<p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p> <p>Y</p>	<p>Had been awarded the Clear English Standard from the Plain Language Commission.</p> <p>Stated payment would be by direct credit and included advice on opening a bank account. It also stated that customers who were unable to open a bank account could be paid by cheque.</p> <p>Had space for the customer to provide additional information and stated customers could continue on separate sheets if necessary. There was also a box for customers to state how many additional sheets they had included.</p> <p>Stated that the information supplied would be used to process the claim and any other claim made for social security benefits. It also stated that the information could be given to other government organisations where the law allowed.</p>





Good practice	Good Practice present? Yes/No/Partial	BFI comment
<ul style="list-style-type: none"> <li>• method of payment (for example, Automated Credit Transfer, cash, cheque)</li> <li>• request for evidence of earnings. State that if the evidence requested is not provided, the local authority may contact the employer to confirm the details</li> <li>• if known, the date of the next expected increase in pay</li> <li>• the type of work the customer and partner does for the employer. This will help the assessment officer to decide whether the declared earnings, hours worked and so on are consistent with the type of work stated</li> <li>• customer's and partner's employee number or payroll number</li> <li>• details of any deductions from the gross pay for any private pension scheme, superannuation or employee contributions to a company pension scheme</li> <li>• certificate of earnings direct to employer</li> <li>• details of any Statutory Maternity Pay or Statutory Sick Pay included in the gross pay</li> <li>• details of any expenses for child minding. The name of the registered childminder must be crosschecked with the local authority's records.</li> </ul> <p><b>Self-employed earned income</b></p> <p>Although the local authority needs all the information listed here, it need not be requested on the main claim form. Instead, the local authority can use a supplementary claim form. This can be combined with the self-employed earnings information sheet.</p> <p>The form must collect:</p> <ul style="list-style-type: none"> <li>• if the customer or partner is self-employed, details of the business and the type of work undertaken (for example, window cleaner, taxi driver)</li> <li>• whether self-employment is the only employment for the customer or partner. (It is possible for a person to be both self-employed and an employee)</li> <li>• whether the customer or partner are sole traders or partners in the business. If they are partners, details of the partnership and their share in the business</li> </ul>	<p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">N</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p> <p style="text-align: center;">Y</p>	<p>Stated that the certificate of earnings could be provided if the customer could not provide evidence of earnings.</p> <p>Had separate sections for self-employment and any other employment.</p>

Good practice	Good Practice present? Yes/No/Partial	BFI comment
<ul style="list-style-type: none"> <li>• details of any government business allowances or grants</li> <li>• details of income. Where the customer cannot produce audited accounts, they must also complete a self-employed earnings certificate</li> <li>• the name and address of the business.</li> </ul>	<p>Y</p> <p>Y</p> <p>Y</p>	<p>Asked for specific information about a Business Start-up Allowance plus a further question about any other money from the Government.</p>
<p><b>Benefit income</b></p> <p>The form must collect:</p> <ul style="list-style-type: none"> <li>• details of all benefits in payment to the customer, partner or their dependants. The form must have a box for each individual benefit and the name of the person who payment is made to</li> <li>• the gross amount of benefit in payment. It is possible for deductions to be made from many benefits to recover overpayments. The local authority must ensure that it uses the gross figure</li> </ul>	<p>Y</p> <p>P</p>	<p>Asked if Social Fund loans or overpayments were being repaid from any of the benefits in payment but did not ask about other deductions such as direct payments to utility companies.</p>
<ul style="list-style-type: none"> <li>• how often benefit is paid (for example, weekly, 4-weekly, annually)</li> <li>• the method of payment for each of the benefits (for example, order book, girocheque, direct to bank or building society)</li> <li>• details of any benefits, which have been claimed but not yet received.</li> </ul>	<p>Y</p> <p>N</p> <p>Y</p>	<p>Did not ask for the methods of payment.</p>
<p><b>Other income</b></p> <p>The form must collect:</p> <ul style="list-style-type: none"> <li>• details of <b>all</b> other income received by the customer, partner and dependants. The claim form should tell the customer that certain types of income attract a disregard, although it does not need to give specific details. It might also note that payments received from the Eileen Trust, the Independent Living Fund or the Macfarlane Trust need not be declared</li> <li>• the different types of income (for example, maintenance payments, private pension, occupational pension, annuity, student grant)</li> <li>• how much income is received and how often</li> <li>• whether the income is regularly increased and if so, the date the next increase is due</li> </ul>	<p>P</p> <p>Y</p> <p>Y</p> <p>P</p>	<p>Did not state that certain types of income attract a disregard.</p> <p>Did ask when an increase was due but not if this increase was regular.</p>





