

Exeter City Council Welfare Reform Risk Map

APPENDIX B

Key to Risk Ratings:

Likelihood (L)			Impact (I)		Risk Level (likelihood x impact)
Very Likely	(75%+)	4	Very Serious	4	12-16 = High
Probable	(50%+)	3	Major	3	6-9 = Medium
Possible	(10%+)	2	Material	2	1-4 = Low
Unlikely	(<10%)	1	Minor	1	

(NB: risk levels shown INCLUDE existing risk mitigation measures but are assessed BEFORE any proposed additional actions have been implemented)

No.	Risk	Possible consequences	L	I	Risk	Mitigation	Target / review date
1.	New CAPITA system for the Council Tax Support Scheme is not operational by April 2013 (Council Tax)	Exeter City Council will not be able to reduce council tax bills. There will be delays in the collection of information from customers. The expected income stream from council tax will be less than predicted.	2	4	8 (Medium)	Exeter City Council is relying on the software being available. CAPITA are working on the system for every administering authority so the required changes are not unique to Exeter. The risks that they do not deliver on time are minimal. If required, the residual benefits system could be utilised if there are any delays in the software. Assess the Revs and Bens CAPITA system in line with system review principals to establish where the system can be slimmed down and savings made to assist with its smooth running.	Dec 2012 when release available from CAPITA

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2.	Working age clients now required to pay up to 30% of their council tax bill do not pay (Council Tax)	Exeter City Council collect on behalf of Devon County Council, Police and Fire so income from council tax for ECC could be reduced Increased staff resources required to collect council tax from individuals who have never had to pay before. Council Tax collection procedures will need to change to effectively collect smaller amounts	4	3	12 (High)	Revisit and revamp procedures to encourage those who have not had to pay council tax before to pay in line with learning from systems review work. Council tax systems need to be set up to take payments using as many methods as possible.	Start planning Nov 2012
3.	Systems review of benefits is not completed in time to put systems in place for April 2013 (Council Tax)	Exeter City Council will not be prepared for the abolition of council tax benefits	4	3	12 (High)	Anticipate and act to change the processes before the end of the systems review.	Ongoing

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4.	Universal Credit forces claimants to choose between paying their rent or council tax (Council Tax / Universal Credit)	Increased council tax and rent arrears for those who have never had to pay either and for those who are now required to pay a rent and council tax top-up. As of September 2012 there were 2,507 individuals of working age who were on current council tax benefits so will be required to top up and circa 3,202 people who have never had to pay before.	3	2	6 (Medium)	Identify individuals' affected, particularly vulnerable individuals, and provide appropriate help, advice and support to assist them with payments. This may include direct payments. Increase self-service capacity for customers to be able to access accounts online if they choose to do so. Increase availability of direct debit payments for rent and council tax. Proactively help residents to set up payment frequencies which help them pay rent and Council Tax in amounts that residents will be able to make.	Jul 2013 in readiness for UC go live in Oct 2013
5.	Literature for new council tax support systems is not ready in time for April 2013 (Council Tax)	No information to provide the public over the changes from April 2013.	2	2	4 (Low)	Literature and new bills are being developed and should be complete by April 2013.	Dec 2012
6.	The amount required to budget for council tax support is unknown (Council Tax)	Funding runs out and no more council tax support claims can be processed. Increased financial hardship for individuals who would normally receive support.	2	2	4 (Low)	Modelling has allowed for a projected surplus at the end of the first year therefore it is unlikely there will be a deficit in 2013.	Changes announced by Govt on 13.10.2012 require re. modelling of the budget Oct 2012

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7.	Exeter City Council receives successful legal challenges from claimants or advocacy groups acting on the claimants behalf regarding their personal council tax support allocations (Council Tax)	The Council is required to change the individual council tax support offered to the individual in light of a court decision. Increased resources required to deal with appeals. Negative publicity.	3	2	4 (Low)	The Council has already engaged with local advocacy groups through the impact assessment process to ensure the correct information is available and to take their concerns into account. Work with the Job Centre+, registered providers and customer representation groups to assess the needs of vulnerable customers and provide necessary support. Using established Council Tax Benefit Regulations framework for Council Tax Support scheme rules that have been subject to legal challenge from 1992. Using established Council Tax Benefit Regulations framework for Council Tax Support scheme rules that have been subject to legal challenge from 1992.	In place for April 2013
8.	Exeter City Council receives a successful legal challenge over the new council tax support system (Council Tax)	The Council is required to change the scheme in light of a court decision, incurring further administrative costs. Negative publicity.	2	4	8 (Medium)	The Council can evidence robust scheme modelling and audit files and have worked closely with advocacy groups when setting the scheme. Every scheme around the country will be different so case law from other areas should not affect Exeter unless the schemes are identical.	In place for April 2013

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9.	Central government funding does not cover the full cost of the Council Tax Support Scheme (Council Tax)	Funding runs out and no more council tax support claims can be processed. Increased financial hardship for individuals who would normally receive support.	1	4	4 (Low)	Full grant figures will be available in November 2012 but the modelling has been based on indicative figures released so far therefore should cover the amount required to subsidise the scheme for 2013.	Changes announced by Govt on 13.10.2012 require re modelling of the budget Oct 2012
10.	Exeter City Council does not take advantage of the changes to council tax discounts and exemptions (Council Tax)	Loss of revenue for Exeter City Council	1	2	2 (Low)	It is anticipated that the Council will take advantage of the changes to Council Tax discounts and exemptions which will increase Council Tax revenue. A report seeking Members' approval will go to Executive.	Jan 2013
11.	Individuals decide to pay their Council Tax over 12 months instead of 10 months (Council Tax)	Income lower than predicted until the end of the year. Reduced income from interest on council tax payments. Any arrears will run into the next year instead of being resolved during the two months at the end of the financial year.	2	2	4 (Low)	There is nothing the Council can do with regard to these issues – legally we will have to offer 12 instalments from 1 April 2013. With regard to arrears we will continue to recover as normal but accept that there will be arrears that may now take longer to collect.	March 2013

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12.	A substantial minority cannot access support and benefit systems electronically through lack of access to the internet or knowledge of information technology (Council Tax / Universal Credit)	Older and more vulnerable clients are disadvantaged. Delays in processing support claims. Increased financial hardship for individuals who would normally receive support. Increased resources required to help individuals access support systems and use the internet	4	2	8 (Medium)	Access to the systems will be provided in the civic centre reception, with customer service advisors on hand to help those who require it. This will be a gradual change where Universal Credit is concerned. ECC are working closely with the Exeter CVS to provide extra support for people who are not confident with computers. Look at setting up community hubs in strategic locations in the community where people can go to access computers and the support systems.	Start work on this now & review at regular frequencies
13.	Increased demand for debt and counselling services (Council Tax / Universal Credit / LHA reforms)	Current service cannot cope with the number of debt referrals. Increased costs for Exeter City Council when resourcing these services. Costs for Homemaker are currently £10,000 per year for a quarter of a post per week.	4	4	16 (High)	Closer working with partners to increase the provision of debt advice and provide pro-active offers of help. Develop a corporate debt policy to consider types of debt, recovery methods and write-off values. Investigate links to credit unions and support people to set up and manage bank accounts. Investigate corporate support available such as mortgage rescue schemes and continue to fund.	Start work on this now and review at regular frequencies

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14.	Increased number of claimants seeking social housing when private sector housing rents in Exeter become unaffordable (LHA reforms)	Decrease in local housing allowance from the 30 th percentile to the Consumer Price Index (CPI) will further contribute to the private sector being unaffordable for individuals on benefits. Increase in numbers on the Devon Home Choice list for Exeter.	2	2	4 (Low)	Exeter City Council has a finite amount of homes available every year, currently around 300 lets per year. The Housing Service will continue to negotiate securing affordable homes in Exeter through private development. Increase number of EXtraLet properties available. Support work incentives and create new working opportunities within Exeter to increase earnings through partnership working with Jobcentre+ etc.	Monthly review
15.	Greater demand for homelessness and housing advice services (LHA reforms / Universal Credit)	Exeter City Council's temporary accommodation costs increase Greater demand on staff resources to assess homelessness and provide housing advice	4	3	12 (High)	Systems review is looking at the housing advice service to increase efficiency and customer focus. Increase number of EXtraLet properties available. Further negotiations with private sector landlords to prevent evictions and advertise service to landlords. Continue to update and maintain staff skills to ensure quality of advice and service. Increase pro-active work to target households likely to be affected. Build on outreach work at JobCentre+ and identify other places where early intervention work can be achieved, e.g. Children's Centres.	Needs monthly review

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16.	Discretionary Housing Payments (DHP) do not meet customer shortfalls (Council Tax / Universal Credit / LHA Reforms)	DHP will no longer apply to council tax therefore more individuals may be threatened with court action. Staffing resource implications for advice and debt counselling	3	2	6 (Medium)	Investigate a bond or guarantee scheme and a social fund and explore the opportunities to administer this in a targeted way. Liaise with other organisations and companies to help maximise claimant's income as opposed to financial payouts. Raise awareness and utilise initiatives such as Wessex Home Improvement loans to help address fuel poverty and energy efficiency.	Start work on Nov/Dec and review at regular frequencies

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17.	Loss of benefits for under-occupation of social housing (LHA Reforms)	Increased rent arrears affecting the repairs, improvements and neighbourhood management programmes. Increased number of tenants seeking to downsize to a smaller home.	4	2	8 (Medium)	Contact the 326 families this affects in ECC properties and explore the issue on a one-two-one basis. Place more emphasis on the downsizing scheme and explore employing a dedicated officer to guide individuals through the process. Explore increases to the downsizing budget. This is currently £50,000 per year and once it is spent the scheme is unavailable until the beginning of the next financial year. Provide additional priority for tenants of working age wishing to downsize. Establish what action will be taken if tenants cannot move to more suitably sized accommodation and begin to build up arrears.	Ongoing review
18.	Registered providers do not provide the data required on the size of their social homes (LHA Reforms)	Staffing resource implications for information collection. Exeter City Council cannot accurately assess the families in the social sector impacted on by welfare changes.	1	2	2 (Low)	Ongoing cooperation and contact with registered providers in Exeter to increase information sharing.	Contact already made and data received from most HAs review Dec 2012

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19.	Universal Credit benefit caps increase homelessness (Universal Credit)	10 families in Exeter City Council stock and 47 Exeter families overall will see increased financial hardship. Increased staff resources required to give housing advice	4	2	8 (Medium)	All affected families have been written to with offers of advice on work and budgeting. The risks for the individual are serious but for Exeter City Council, the numbers are so small that this does not present a significant risk. Mike Hopton will liaise with Chris Hancock over further contact with the 10 Exeter City Council households.	Ongoing review
20.	Larger families not yet housed through Devon Home Choice may not be able to afford 'affordable rent' properties due to benefit caps (Universal Credit)	Larger families may wait longer to be housed, leaving them in overcrowded and unsuitable conditions Larger homes may fall into the E to H council tax bands, making them more expensive to live in	3	3	9 (Medium)	Exeter City Council will seek to charge rent based on the individual's ability to pay. Therefore families in this situation may be assessed for social rent levels. <i>Note: Affordable rent is any figure up to 80% of market rent. Typically though the figures are around 67% of market rent.</i>	Ongoing review
21.	Uncertainty over how many housing benefit cases will switch to Universal Credit (Universal Credit)	Inability to plan staffing levels. As more claimants switch to Universal Credit, staffing levels will need to reduce. This will be a gradual process.	4	1	4 (Low)	If required, explore a similar housing support scheme.	Review DWP updates on progress to Oct 2013

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22.	Lack of access to the new Universal Credit system for Exeter City Council (Universal Credit)	Public service dissatisfaction will increase incrementally as new claims are made. Increased public anxiety over the status of their claims. Possible verbal abuse to staff. Housing no longer able to access the system to assess the levels of tenant debt and offer advice. This will increase as new claimants come forward. Increased staff to cope with the increased number of tenant in arrears and the labour-intensive process this will become without access to benefit systems.	4	4	16 (High)	Limited information will be available from DWP database if tenants are claiming council tax support. Increased need for contact with residents to collect rent and offer debt advice.	Review DWP updates on progress & data sharing to Oct 2013

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23.	Universal Credit payments made direct to the tenant (Universal Credit)	Increased rent arrears for Exeter City Council. 1,414 working age tenants will be expected to pay rent where they have not done so before. Payment dates will not be aligned to rent due dates, which will increase evictions in both the social and private rented sectors Increased staff costs chasing payments.	4	4	16 (High)	Increased negotiations with private rented landlords to prevent evictions. Housing Service to consider charging rent over 52 weeks of the year and not 48 weeks as part of a systems review; abolish the rent free fortnight to cope with arrears.	Review DWP updates on progress to Oct 2013 Review DWP pilot sites feedback
24.	Increased rent collection costs for Exeter City Council (Universal Credit)	£16,000 per year extra collection costs once everyone on benefits has switched to Universal Credit. This will be a gradual change.	4	4	16 (High)	Publicise payment by direct debit, including the use of paperless direct debits and increase the flexibility on processing direct debits. Encourage tenants to set up basic bank accounts. Consider implications on current IT systems and assess changes required.	Ongoing review

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25.	Exeter City Council to administer Community Care Grants and Crisis Loans	The crisis service may deal with more chaotic individuals. This increases staff protection issues. Staff resource implications as the service will require a 24 hour on call availability.	3	3	9 (Medium)	No cash would be handled on the premises, crisis payments would be offered through vouchers for services e.g. food. Or potential for payments into bank accounts or use of credit unions. Administering this fund ourselves would give us better identification of customers to understand whether currently duplicate payments are being made from DWP and ECC to same customers – so potential for savings to be made. Additional savings to be made on void costs / temporary accommodation costs as this fund will allow us to expedite moves into more suitable accommodation by covering removals / furniture costs.	Devon Leaders and Chief Executive meeting on 19 October 2012
26.	Loss of in-house staff with the introduction of the Single Fraud Investigation Service	No in-house capacity to check for fraud.	1	2	2 (Low)	The scheme has slipped and it is unlikely that any impact will be seen until April 2014. Fraud investigations for the Council Tax Support Scheme will not be included in the service; therefore the current support will remain in place for at least the first year.	Review information & updates from SFIS

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