

LONDON BOROUGH OF BRENT

**Meeting of the Executive
Monday 15th November 2004**

Report from Director of Finance

For action

Wards affected:
ALL

Report Title: Housing Benefit Verification Framework

Forward Plan ref: BFS-04/05-85

1.0 SUMMARY

- 1.1 This report recommends implementation of the Housing Benefit Verification Framework and provides details of the likely impact for the Benefit service. The recommendations are based on information obtained from Department for Work and Pensions (DWP) guidance, a detailed meeting with the Department of Work and Pensions and information obtained from other Local Authorities already operating the scheme successfully.

2.0 RECOMMENDATIONS

- 2.1 That an in principle decision to implement the Verification Framework is agreed.
- 2.2 That the timetable for implementation as shown at Appendix A is adopted subject to development of a detailed project plan. This will involve the implementation of the Visiting and Reviews Modules in July 2005 and further cost modeling to determine the feasibility of implementing the New Claims Module in July 2006.
- 2.3 That the growth requirement identified at paragraph 4.1 is agreed in principle with a final decision to be made by Full Council as part of the overall budget setting.

3.0 DETAIL

Rational for implementation

3.1 The following paragraphs provide information about the Verification Framework and the recommended approach for implementation in Brent, should the recommendation to go live be agreed. By way of summary there are 4 pressing reasons for recommending implementation:

- The abolition of benefit periods between October 2003 and April 2004 means that Local Authorities can no longer rely on the annual renewal of a claim by customers, to ensure that Housing benefit awards remain valid. Whether or not Brent decides to formally adopt the Verification framework, measures will need to be taken to mitigate the risk of overpayment and fraud, through proactive in claim checking. It is clear that claims cannot be allowed to run indefinitely without some form of checking.
- Whilst the implementation of the Verification framework will require budget growth, there is significant funding available from the Department of Work and Pensions (DWP) to Councils that formally adopt the scheme. For Brent this represents a total of £ 326,082 set up costs (for all 3 modules) and £631,953 annual running costs. These sums will not be payable if Brent decides to operate “in claim” checks within locally defined policies as opposed to the Verification Framework standards.
- The funding available from DWP for setting up the framework, is not guaranteed beyond 2005/06. Whilst the DWP do not currently plan to make changes to these amounts, it is possible in future years that it may be reduced.
- The benefits service has just been awarded a CPA score of 3 and is due to be inspected again in the summer of 2005. Significant progress in stabilising workloads and eradicating backlogs place the service in the best position it has ever been to adopt the Verification framework. The recommended timetable for implementation allows for a go live date before the next BFI inspection and this will enhance the Council’s ability to obtain a maximum score of 4 in 2005. Implementation of the Verification Framework is a long outstanding Best Value and Benefit Fraud Inspectorate recommendation.

Background to the Verification Framework

3.2 The Verification Framework was introduced in 1998 by the Department for Work and Pensions (DWP). The purpose of the framework is to apply additional checks and measures to the administration of Housing Benefit claim processing in order to minimise fraud and overpayments. There is no legal requirement for Local Authorities to introduce the scheme but the DWP strongly recommend its adoption and adherence to it is integral to the ‘Performance Framework’ which determines the benefits scoring for Comprehensive Performance Assessment (CPA) purposes. There is funding available to assist Authorities with both the set up costs and ongoing costs of implementation. The funding available is detailed in Section 4 of this report.

- 3.3 The DWP are working with Authorities to encourage the introduction of the VF scheme as a high priority and there is a clear Ministerial commitment to introduce the scheme nationally. The scheme is in operation either partially or fully in 376 Local Authorities, Brent being one of only 33 Authorities nationally not currently operating the scheme. The DWP and The Benefits Fraud Inspectorate (BFI who inspect Benefit services for CPA and Best Value purposes on behalf of the Audit Commission) have expressed concern that Brent is not operating the scheme and recommendations to implement this remain outstanding. Brent is the eleventh highest spending Authority nationally for Housing Benefit and Council Tax Benefit and the VF scheme is viewed as the most effective way of securing the gateway to these public funds by preventing fraud from entering the Benefit system.

The Abolition of benefit periods

- 3.4 Although there are financial implications arising from the implementation of VF, there are risks associated with any decision not to do so. These relate to both the control of Housing Benefit expenditure (approximately £130 M in Brent annually) and the risk of future changes to DWP funding for VF implementation. There is even greater impetus to implement the VF scheme since the abolition of benefit periods between October 2003 and April 2004. Under previous arrangements customers were required to renew their claim, at least every 60 weeks. This involved completing and submitting a renewal claim form which prompted customers to report changes to their circumstances. If renewal claim forms were not returned, Benefit automatically stopped.
- 3.5 Customers are no longer required to renew their claim annually under new arrangements and benefit payments are now paid continuously unless customers report changes to their circumstances. We have conducted wide ranging publicity for need to report such changes and developed a change of circumstances form which is available at all public outlets within the Borough. However this will not be sufficient to prevent the risk of overpayments of Benefit. Whether or not Brent adopts the Verification Framework, measures will need to be taken to proactively carry out checks during the life of claims to ensure that benefit payments remain valid. Local Authorities have a clear fiduciary responsibility to ensure that public funds are administered appropriately under the Housing benefit scheme. These checks would have to be entirely funded by the Council if the Verification Framework is not adopted. In practice this would mean either diverting staff resource from processing duties or seeking additional funding through a growth bid. The adoption of the Verification framework would have the benefit of DWP funding and the adoption of recognised best practice is managing the risk of overpayment and fraud. It is also worth noting that DWP funding for the Verification Framework is subject to change and the existing funds available for set up are not guaranteed beyond 2005/06.

Service stability

- 3.6 There has been a long standing, in principled decision to implement the Verification Framework in Brent and this was a recommendation arising from the 2001 Best Value Inspection of the service. Whilst Brent has a good reputation for fraud detection, lack of stability within administration of the service and prohibitive costs have previously prevented us from implementing the VF scheme. With backlogs now clear and the workload stabilised since April 2004, we are now in the best position we have been in, to implement the VF scheme with minimal disruption to customers.

C.P.A Inspection and scoring

- 3.7 The Performance Framework sets a framework for minimum standards of administering the Benefit service. There are seven modules within the Performance Framework including Strategic Management, Claims Processing, Working with Landlords, Overpayment Recovery, Customer Services, Counter Fraud and Internal Security. Within the seven modules there are approximately 850 individual measures. Different weightings apply for each measure, with particular emphasis being placed on hard performance measures such as claim processing times and overpayment recovery levels. Brent currently has overall compliance of 81% against the individual standards. However compliance is only 43% in the Claims Processing module which includes standards for the evidencing of claims and for proactively preventing fraud. In order to improve our compliance in this area we will need to introduce the Verification Framework scheme. Ultimately our ability to achieve an 'excellent' CPA score will be affected if we do not do so.

Impact of The Verification Framework Requirements

- 3.8 There are three modules within the VF scheme; "Reviews" (or in claim checks), "Visits" and "New Claims". Local Authorities are able to introduce one or all of these modules in any order it deems suitable to meet local requirements. Funding from DWP is made progressively available as each module is implemented. Appendix C details what is required under each module along with the current practice in Brent to give an indication of what steps we will need to take to introduce the scheme. The following paragraphs summarise the impact of these requirements.
- 3.9 The Visiting module is aimed at ensuring that Authorities are proactive at identifying changes in circumstances and at encouraging customers to report changes. It is also intended that Authorities use visits to ensure that Benefit entitlement is maximized by ensuring that the right person gets the right level of Benefit. If the verification framework is implemented we intend to include welfare visits within the scope of the work of the visiting team. The welfare visits will be partly funded in 2005/06 from a pump priming award submitted under the Local Public Service Agreement (LPSA). The primary purpose of welfare visits will be to speed up claims processing times by conducting visits to vulnerable customers who fail to respond to information requests. Our experience is that many vulnerable customers struggle to respond promptly to requests for evidence to support their claim and this does directly affect our speed of processing performance. It is proposed that Verification visiting staff

will be generic and will conduct all types of visits (although they will not be trained to conduct in depth welfare rights advice or advocacy).

- 3.10 Previous experience of counter fraud visiting at Brent, indicates that it will be necessary for a percentage of visits to be carried out in pairs. Its difficult to accurately estimate the extent to which this will be necessary for all visits however it is anticipated that up to 50% of visits will require paired officers. Costs will also be affected by the timing of available wireless technology and the need for visiting staff to carry out desk based activities such as the uploading of data. Under the Verification Framework scheme we will be required to successful visit approximately 6,000 claims each year. These visits are prenotified and as such we have estimated that 70 % of first visits will be successful. This means that the remaining 30% of customers will require repeat visits. These estimates will need to be evaluated for accuracy after a period of live running.
- 3.11 There are two elements to the “Reviews” module : “Housing Benefit Matching Service “(HBMS) matches and ‘interventions’. HBMS is a service whereby DWP compare social security data against the data from the Local Authority and identify mismatches for investigation. The Local Authority needs to resolve any discrepancies identified by the matching. We are currently reviewing approximately 150 of these matches each month.
- 3.12 Interventions are identified through a DWP risk assessment. The criteria for this is detailed under section 6 of this report. Authorities are required to conduct a review of identified cases by telephone, post or visit. If a review is conducted by a visit, this will counts towards the targets for visits as well. For this reason we are proposing that the visits and reviews modules are implemented simultaneously. Under the scheme we are required to conduct 15,000 reviews annually. If we introduce the visiting module at the same time as the reviews module this means that we will have to conduct 9,000 reviews through HBMS and postal reviews. As already indicated we already experience difficulty in obtaining information from customers when requested by post and we therefore estimate that we will need to conduct visits to around 50% of the reviews which are initiated by post.
- 3.13 For both Visits and Reviews it is only necessary to verify any changes since the new claim or last renewal claim, so this does not currently involve a full review and verification of all of the customers circumstances.
- 3.14 There are no timescales for resolving an intervention but Authorities must pay due regard to primary legislation in deciding how to deal with non response from customers. Authorities are advised to give somewhere in the region of two months for claimants who do not respond to an intervention or visit before deciding to suspend or cancel Benefit. There are wide discretions in this area and we would have to develop policy and guidance locally, balancing the welfare of the customer and the risk of fraud. If we act too quickly in suspending payments we will attract unnecessary work at the One Stop Shops and the Call Centre. Previous experience in the Audit and Investigations Team has shown that this can cause substantial reworking on claims.

- 3.15 All information and evidence needs to be verified and recorded but it is not necessary to have copies of originals. It is possible to record identifying factors of the evidence along with dates and amounts and details of the Officer who checked the evidence. Wireless technology and hardware is increasingly becoming available and our current software suppliers advise that they can provide wireless devices that would enable a Visiting Officer to record changes, upload any changes into the core processing system (IWorld), photograph evidence and upload images to the Document Management system (Viewstar). We have planned to visit Authorities using this technology to understand the impact of its use. However, we do not anticipate that it will be available in January 2005 when we would like to start a small pilot of the Visiting Module. We are also cautious about assuming that this technology will be available when we wish to be fully compliant with the Visiting Module in July 2005. If this technology is not available there will be a need for Visiting Officers to spend proportion of their time going to the Office to upload data. This double handling of data will have implications on the resource requirements.
- 3.16 The New Claims module is likely to be resource intensive and to have the greatest customer impact. There is a requirement to verify all aspects of the claim by the 'authentication' of original documents and cross referencing of all available information, including the rent, council tax and electoral register data bases. This is likely to impact at the One Stop Shops in the length of time taken to receive evidence of claims and in the length of time assessments take. At the present time we have discretion to pay Benefit when evidence is not available and whilst there will continue to be some provision for this within the Benefit Regulations it will be less flexible. Given the abolition of benefit periods, we believe that the Reviews and Visiting modules of the VF should be implemented first. This will mitigate the risk of overpayment for existing claims and allow for the implementation of the new Document Image system in June 2005, before making major changes to new claim processing.
- 3.17 The DWP are discouraging Authorities from allowing Registered Social Landlords (RSL's) and Arms Length Management Organisations (ALMO's) to verify new claims and in one instance have refused set up funding to an Authority who intended to implement this practice during the early stages of implementation of the New Claims Module. There are provisions for this within the VF scheme but DWP would prefer Authorities to control the process in the early implementation of the Module. This would have major implications for Brent as BHP and the RSL's play a major role in this regard. We will need to assess the impact of not being able to verify claims in this way. The DWP may have changed their view on this by the time we wish to implement this module. If RSL's and ALMO's are allowed to verify claims under VF this will impact on training requirements. At this stage it is difficult to project costs of implementing this module and it is necessary to pilot this in order to estimate costs and the impact on speed of claims processing.

Timetable for implementation

- 3.18 The DWP have advised that the reviews module should be implemented first. This is largely because of the risks associated with failure to identify changes in circumstances since the Abolition of Benefit Periods. Our timetable is very tight, in particular for the reviews and visiting modules but is achievable.
- 3.19 It is important to consider the implementation timetable in the context of other change facing the service. We will be implementing a replacement of the Document Management system in the summer of 2005. Preparation for this has been ongoing for two years and whilst there are risks of implementation, these are greatest for the new application module which is wholly dependent on the Document Imaging system and associated workflow. The Reviews and Visiting modules can be more easily managed discreetly from the core service.
- 3.20 The New Claims module has relatively far reaching implications for the service and a wider group of staff will require detailed training and will be involved in its implementation, including One Stop Shop and Call Centre staff. It will be more difficult to roll back implementation and to mitigate risks around implementation than with the Reviews or Visiting Modules. In the experience of other Authorities, having a long lead in time for implementing the New Claims Module has been key to success. There are significant training requirements and good publicity is important in determining the expectations of customers in providing more comprehensive original documents to support their claim.
- 3.21 The DWP are currently piloting a new scheme known as Local Housing Allowance, in nine Authorities nationally. The roll out of this scheme, which is likely to become a legislative requirement, will take place in 2006 at the earliest. The legislation is likely to be significant in terms of implementation and impact for customers. The key changes involve standard rent levels for accommodation and family size as opposed to the current system which takes account of the market rent for the specific accommodation rented. In addition Local Authorities must pay claimants their Benefit directly unless vulnerability of the claimant is evidenced. We currently pay a significant proportion of rent to Landlords. Whilst the timetable for this may overlap with our intention to implement the New Claims Module in July 2006, the proposed timetable gives us a reasonable lead in time for piloting the process and defining costs to establish feasibility. Implementation of the new claims module will depend on our assessment of the risks to service delivery, the risk of fraud and error, the implications of the cost of administration and the timetable of other major change such as the introduction of Local Housing Allowance.
- 3.22 Appendix D identifies the main risks associated with implementation of the verification framework and the actions that will be needed to mitigate this.

4.0 FINANCIAL IMPLICATIONS

- 4.1 A detailed cost model has been developed, identifying the estimated cost of implementing the Reviews and Visiting module. A high level summary of this is attached as Appendix B. Growth of up to £ 237,321 to cover set up and running costs will be required for 2005/06 and a further £237,425 growth for running costs will be required in 2006/07. Set up costs incurred between January 2005 to March 2005, will be met from DWP set up funding.
- 4.2 Given the timetable for implementation, there is a risk that set up costs will be incurred before the Full Council decisions on the budget and specifically this growth is obtained in March 2005. In the event that the Full Council meeting does not agree to this growth bid, then any set up funding received from DWP will have to be repaid. It is estimated that less than £50 K expenditure will have been incurred at that point.
- 4.3 It is worth noting that the costings have been based on a range of assumptions that cannot be tested until the visiting team have been set up. The key issues affecting costs are
- the percentage of visits which need to be conducted in pairs,
 - the percentage of reviews that can be successfully conducted by post,
 - the availability and timing of technology which prevents the need for double handling of data loading and the salary scale of Visiting Officer posts.
 - The number of visits that each officer can successfully complete in a day
 - The success rate for first visits
 - The volume of assessment work that will be generated through the proactive identification of change in circumstances
- The resourcing levels and costings will need to be reviewed both as part of the budget process and during 2005/06 to evaluate the accuracy of these estimates.
- 4.4 Resourcing levels and overall costs will need to be reviewed during 2005/06 to ensure that original assumptions were realistic. Set up funding from DWP can be applied for and received 6 months prior to being fully compliant with one or more modules. An Authority has a maximum period of 6 months to pilot and implement the module(s) which it has received funding for. At this stage the Authority will be expected to sign a compliance certificate for submission to the DWP. Ongoing funding will be paid as soon as the compliance certificate is submitted to DWP. If set up or ongoing funding is provided and the Authority is unable to sign the compliance certificate, funding may be jeopardised. It is important that Authorities experiencing difficulties are proactive in working with DWP and providing recovery plans to minimise the risk of subsidy loss. It is also important that Authorities provide the required Management Information Statistics (MIS) to DWP promptly as failure to do so will also jeopardise subsidy payments.
- 4.5 There are separate arrangements for new claims where a 'phasing in' period is permitted, before going live. This means that Authorities can receive set up funding one year in advance of compliance but ongoing funding will be paid retrospectively to a period six months before compliance. In the interim

Authorities can 'phase in' the requirements of the Module as it deems appropriate and could chose to implement one tenure type or one geographical area for this period.

- 4.6 Funding from DWP is paid incrementally for each module implemented. Appendix B indicates the levels of funding available and costs in each year.

5.0 LEGAL IMPLICATIONS

- 5.1 The Benefit service is administered in accordance with the Social Security Administration Act 1992 and the Housing Benefit (General) Regulations 1987. The operation of the Verification Framework scheme is outlined in the DWP Security Manual July 2004 as amended by Circular F10/2004 issued in October 2004. There is no direct requirement to implement the Verification Framework within Benefit legislation although there is a general requirement for the Director of Finance to safeguard public funds under Section 151 responsibilities.

6.0 DIVERSITY IMPLICATIONS

- 6.1 The nature of the Housing Benefit and Council Tax Benefit service means that we are serving some of the most vulnerable members of the community, including those on low incomes, those with disabilities and pensioners. It is important that we assist customers in claiming the correct level of Benefit as un-reported changes in circumstances can lead to high value overpayments. Repaying high debts of this nature can impact on the ability to meet day to day living expenses.
- 6.2 The cases selected for Interventions, HBMS matches and visits are determined by DWP on the basis of risk. The DWP select cases from data provided to them based on risk based formulas. The risks are based on the household composition, working status or receipt of social security benefit, tenure type, whether savings are declared. An overall Impact Assessment for implementation of the VF scheme will be conducted to ensure that the selection of cases does not adversely impact any group in the community on an unfair basis.

7.0 STAFFING IMPLICATIONS

- 7.1 As described in the body of the report it will be necessary to create a new team and appoint a new manager. We have developed costing based on a team of 18 visiting officers, 1 manager, 2 deputy managers and 3 admin staff. These staffing numbers allow for 4000 welfare visits a year, 6130 claim visits for Verification Framework purposes, 7700 interventions and the reassessment of 5000 identified change in circumstances. These staffing numbers assume 50% of visits will be conducted in pairs. Due to the nature of the role and the need to pilot procedures we intend to recruit some mixture of agency staff until we are clear that the processes are working effectively. We will be seeking the advice of the Corporate HR team in terms of the creation of this new team.

8. BACKGROUND PAPERS

DWP Security Manual.

Any person wishing to inspect these documents should contact Jenny Dunne, Head of Benefits, or Margaret Read, Head of Local Taxation and Benefits, Brent Financial Services, 8th Floor, West Wing, Brent House. Tel. 020 8937 1578/020 8937 1521.

DUNCAN McLEOD
Director of Finance

Contributor
Jenny Dunne
Head of Benefits
Margaret Read
Head of Local Taxation and Benefits

Appendix A

Activity	Target date
Agreement from the Executive Committee.	15 November 2004
Deadline for claiming DWP set up funding for Reviews and Visiting Modules.	15 December 2004
Prepare for recruitment of staff, development of procedures and visiting policy.	November to January 2005
Receive set up funding.	January 2005
Implement procedures for set up period and conduct some piloting of new claims module to assist cost modelling.	January 2005 to July 2005
Live on Reviews and Visiting Modules and receive ongoing funding.	July 2005
Decide feasibility of implementing New Claims Module and if feasible apply for set up funding if no growth.	May/June 2005
If no growth required set up period for new claims module – develop procedures and training and decide phasing in criteria. Receive set up funding.	July 2005 to January 2006
If growth required consultation between Officers / Members.	September to November 2005
If no growth phase in new claims module.	January 2006 to July 2006
Go live on new claims module and receive ongoing funding backdated to phasing in start date i.e. January 2006.	July 2006

Appendix B

Summary - Verification framework implementation costs : Visiting Officers @ Sc 6

Set Up costs:

Salaries	£154,177
Equipment & Software	£107,240
Publicity & Training	£36,200
Other Expense	£36,873

Total Estimated Setup Costs **£334,490**

Funding:

DWP Set Up Funds	(£260,865)
Funding shortfall	£73,625

Annual Running Costs:

Salaries	£695,855
IT Support & Maintenance	£37,255
Other Expense	£120,808

Total Estimated Running costs **£853,918**

Funding:

DWP	(£379,172)
-----	------------

Budget Implications:

Grand Total Running Costs Less DWP Contribution	£474,746
Less initial costs charged to "SET UP" in year 1 (2005/6)	£191,050
Add Set Up Funding Shortfall Year1 (2005/6)	£73,625
Less LPSA funding Year 1	£120,000
Budget Growth Required Year 1(2005/6)	£237,321
Budget Growth Required Year 2 (2006/7)	* £237,425

Summary of total funding available from DWP

* Growth = £191,050 (salaries charged to set up year 1)
 + £120,000 Pump priming grant available only 2005/06
 £311,030
 - £ 73,325
£237,425

Module	Set Up Funding	Ongoing Funding	Total
1	60% £195,649	40% £252,781	£448,430
2	20% £65,216	20% £126,391	£191,607
3	20% £65,216	40% £252,781	£317,997
Total	100% £ 326,082	100% £ 631,953	£958,034

Appendix C

Verification Framework requirements and current practice

VF Module	VF requirement	Current practice
<p>Reviews</p>	<p>Risk based reviews based on % of caseload for Brent 15,000 per year. This is to be made up of:</p> <p>Approx. 150 HBMS matches per month over 12 months to be resolved within 2 months of referral.</p> <p>Remainder of risk based reviews to be made up of interventions 13,200 per year over 10 or 12 months as preferred by the Authority. An intervention can be conducted by phone, in writing, by visiting or at the Council offices.</p>	<p>All matches referred since April 2004 have been resolved within 2 months (highest volume received 380 and lowest 100).</p> <p>No interventions are done at present but we intend to commence a small number of postal interventions and visits from November 2004 (these will be the top 25% of risk cases identified by DWP)</p>
<p>Visiting</p>	<p>Carry out minimum number visits based on % of caseload for Brent 6,130 per year. All changes since the last review or last reported information must be verified but it is NOT a requirement to verify ALL circumstances.</p>	<p>NO visits carried out presently</p> <p>We do not currently verify ALL changes but do require changes in writing.</p>

<p>New claims</p>	<p>Original documents received by post to be returned by secure method i.e. recorded delivery</p> <p>Original documents received by post to be authenticated by Scanning Officer</p> <p>Original documents accepted as evidence and those received by the Council via OSS or Housing Department must be authenticated</p> <p>Original documents accepted by RSL / ALMO representative to be authenticated.</p> <p>Proof needed is:</p> <p>Proof of residency i.e. utility bills, driving license</p> <p>Proof of liability to pay rent and breakdown of rent charges</p> <p>Confirmation of landlord full name and business address</p> <p>Cross check all rent and council tax</p>	<p>Only documents sent to us by recorded delivery are returned by recorded delivery.</p> <p>We do not insist on original documents. Approximately 10% of OSS / landlord provided evidence is original.</p> <p>Staff are not trained on how to identify original documents and we do no authentication at present.</p> <p>AS above.</p> <p>This is currently requested of all claimants as part of the legislative requirements of Section 19 of the Social Security Act.</p> <p>This is currently requested but photocopies accepted.</p> <p>This is requested on the claim form but not followed up if not supplied or cross checked against other data.</p> <p>Very little checking of Council Tax and Rent Accounts takes place.</p>
--------------------------	---	---

	<p>liability records against HB/CTB claim so checking council tax and housing rent system records against HB/CTB claim. Query discrepancy i.e. HB/CTB show claimant as lone parent but no single person discount claimed for council tax.</p> <p>Proof of identity for partners, non-dependents, dependents as for the claimant. Acceptable proof for dependents and non dependents is proof of Child Benefit or other Social Security income. Proof of non-dependent income needed if lower non-dependent deductions apply.</p> <p>Single person / lone parent must be checked against council tax records.</p> <p>If appropriate Housing systems, Rent Office records or electoral register can be used to check household composition. This would normally be to check on discrepancies.</p> <p>Proof of earnings should be related to the period immediately prior to the claim. For weekly paid the last 5 weeks, fortnightly the last 6 weeks and monthly the last 2 months.</p>	<p>The only item of this checked is proof of non-dependents earnings if they qualify for a lower non-dependent deduction.</p> <p>This is not currently checked.</p> <p>This would only normally be checked if a blatant discrepancy arises.</p> <p>This is currently requested but photocopies are accepted.</p>
--	--	--

	<p>If evidence shows wages paid into a bank account evidence of transactions and balance of the account.</p> <p>Any handwritten evidence should be checked against the claimants hand writing. Also if handwritten evidence provided further checks should be carried out i.e. telephone call or cross check other available records.</p> <p>Social Security benefits and Pension Credits can be checked by RAT or original document from the claimant. If underlying entitlement to a Social Security exists but not claimed this should be queried.</p> <p>Self employed earnings need to be verified based on information the claimant states is available. LA's need to use discretion on what is acceptable based on the individual merits of the case.</p> <p>Any other income should be verified based on the information and evidence available – LA's need to use discretion.</p> <p>All capital declared needs to be verified.</p>	<p>This is not currently checked.</p> <p>This is not currently checked.</p> <p>The RAT is currently used. If evidence provided by the claimant photocopies accepted.</p> <p>This is the current practice but photocopies of relevant documents accepted.</p> <p>Photocopies accepted.</p> <p>Capital currently verified if between £3,000 and £16,000 and photocopies accepted.</p> <p>This level of cross checking does not happen consistently.</p>
--	--	---

	<p>In all cases review previous circumstances to show if any discrepancies exist with the current claim. If there are discrepancies they should be queried and resolved.</p>	
--	--	--

Appendix D

Verification Framework : Executive 15 November 2004

<u>RISK</u>	<u>PROBABILITY</u>	<u>IMPACT</u>	<u>ACTION</u>
DWP withhold funding because standards not met – Budget overspent	LOW	HIGH	Robust resource planning and project management
Wireless technology not available at go live	LOW	Medium	Plans to incorporate manual loading of data for first 6 months
Assault on staff	Medium	High	Health & Safety Assessment and Visiting Policy
Difficulties in recruiting – high turn over	Medium	High	Utilise temporary staff – specialist agency research other LA practice
Resources not sufficient to achieve targets	LOW	Medium	Monitoring performance closely and revise policy and procedure if necessary
Insufficient accommodation	High	Medium	Identify offsite accommodation and maximise use of wireless technology
DWP targets change	Medium	High	Lobby DWP for additional funding through ALG Review policy / procedure