

# Decision Pathway – Report Template



**PURPOSE:** Key decision

**MEETING:** Cabinet

**DATE:** 01 September 2020

<b>TITLE</b>	Housing Benefit and Council Tax Reduction evidence requirements		
<b>Ward(s)</b>	All wards		
<b>Author:</b> Matthew Kendall	<b>Job title:</b> Benefits Technical Manager		
<b>Cabinet lead:</b> Cllr Craig Cheney	<b>Executive Director lead:</b> Mike Jackson		
<b>Proposal origin:</b> <i>Other</i>			
<b>Decision maker:</b> Cabinet Member <b>Decision forum:</b> <i>Cabinet</i>			
<b>Purpose of Report:</b> To approve the new information and evidence requirements to assess applications and changes for Housing Benefit and Council Tax Reduction claims from 1 <sup>st</sup> September 2020, when the current Risk Based Verification approach and software licences expires.			
<b>Evidence Base:</b> This report proposes changes to the verification of Housing Benefit (HB) and Council Tax Reduction (CTR) claims, by ceasing to operate a Risk Based Verification (RBV) scheme. The RBV currently operates for new HB/CTR claims only, with the new process aligning to the existing evidence requirements for changes to circumstance to existing HB/CTR claims.  The legislative requirements to provide HB evidence are as follows and similarly in section 113 of the Council's CTR scheme;  <i>'...a person who makes a claim, or a person to whom housing benefit has been awarded, shall furnish such certificates, documents, information and evidence in connection with the claim or the award, or any question arising out of the claim or the award, as may reasonably be required by the relevant authority in order to determine that person's entitlement to, or continuing entitlement to...'</i>  Currently when a claimant applies for HB/CTR the extent of the need to provide evidence to substantiate their claim is currently graded by using a scheme of Risk Based Verification (RBV). RBV was introduced in October 2014 to reduce the burden for those considered to pose a low risk of fraud and error. In contrast it requires an enhanced level of evidence for those considered to pose a high risk. With the introduction of Universal Credit, removing access to Housing Benefit for most working age claimants, and increased data sharing with government departments, this approach has outlived its usefulness.  The Department for Work and Pensions required that any council adopting RBV must have a local policy in place approved by members. In recognition of the intention to remove RBV it is appropriate to bring the request to cease the use of RBV back to Cabinet.  This report reviews the alternatives to RBV and recommends that the Council reverts to a standard requirement for verification for all cases from September 2020 with the potential for a more streamlined approach to the provision of evidence for claimants of HB/CTR.  1. Appendix A.1 Review and rationale for replacement of RBV 2. Appendix A.2 New HB/CTR evidence requirement scheme (September 2020)			

3. Appendix A.3 RBV policy (existing)

**Cabinet Member / Officer Recommendations:**

That Cabinet;

1. Approves the recommendation to cease to use Risk Based Verification in the administration of Housing Benefit and Council Tax Support from 1<sup>st</sup> September 2020.
2. Approves the newly recommendation verification standards, not aligned to Risk Based Verification, but meet DWP requirements for Housing Benefit cases and associated Council Tax Reduction cases.

**Corporate Strategy alignment:**

Improving and simplifying the Benefits evidence standards and therefore uptake and successful award of HB/CTR claims thus assisting with reducing homelessness.

**City Benefits:**

Improved and simplified, streamlined, electronic and automated processes.

Reduces the need for low income Bristol residents to have to travel to Temple St CSP to provide original documentation.

**Consultation Details:** None

**Background Documents:**

1. [HB legislative information and evidence requirements](#)
2. [Bristol City Council Council Tax Reduction information and evidence requirements \(s113\)](#)
3. [DWP guidance circular on HB/CTR verification claims guidance](#)
4. [HB guidance manual \(s2.350\)](#)

<b>Revenue Cost</b>	£ NA	<b>Source of Revenue Funding</b>	NA
<b>Capital Cost</b>	£ NA	<b>Source of Capital Funding</b>	NA
<b>One off cost</b> <input type="checkbox"/>	<b>Ongoing cost</b> <input type="checkbox"/>	<b>Saving Proposal</b> <input type="checkbox"/>	<b>Income generation proposal</b> <input type="checkbox"/>

**Required information to be completed by Financial/Legal/ICT/ HR partners:**

**1. Finance Advice:** There are no anticipated financial implications as the claims will continue to be backdated to the date of the claim. Staff time previously spent verifying the evidence provided for high risk claims will be fully utilised in verifying all claims using accessible data sources.

**Finance Business Partner:** Wendy Welsh, Finance Manager, 10<sup>th</sup> July 2020

**2. Legal Advice:** There is no legal requirement to use the Risk Based Verification System. Regulation 86 of the Housing Benefit Regulations 2006 and Regulation 72 of the Council Tax Benefit Regulations do not impose specific requirements on authorities in relation to what information and evidence they should obtain from a claimant to enable accurate determination of claimants' entitlements.

Legal Team Leader:

Sarah Sharland Team Leader Litigation Regulatory and Community Team 9<sup>th</sup> July 2020

**3. Implications on IT:** No anticipated impact on IT Services.

**IT Team Leader:** Simon Oliver, 7<sup>th</sup> July 2020

**4. HR Advice:** Given new technologies, the ability to cross-reference data from other sources and lower evidence requirements in some cases, this will off-set the need for higher evidence requirements in other cases. In addition, Universal Credit takes over the overall issue of evidence requirements for new claims. Therefore there are no HR/resource implications likely.

**HR Partner:** James Brereton (People & Culture Manager), 7<sup>th</sup> July 2020

<b>EDM Sign-off</b>	Mike Jackson	15 Jul 2020
<b>Cabinet Member sign-off</b>	Cllr Craig Cheney	20 Jul 2020
<b>For Key Decisions - Mayor's Office sign-off</b>	Mayor's Office	04 Aug 2020

<b>Appendix A – Further essential background / detail on the proposal</b> 1. Appendix A.1 Review and rationale for replacement of RBV 2. Appendix A.2 New HB/CTR evidence requirement scheme (September 2020) 3. Appendix A.3 RBV policy (existing)	<b>YES</b>
<b>Appendix B – Details of consultation carried out - internal and external</b>	<b>NO</b>
<b>Appendix C – Summary of any engagement with scrutiny</b>	<b>NO</b>
<b>Appendix D – Risk assessment</b>	<b>NO</b>
<b>Appendix E – Equalities screening / impact assessment of proposal</b>	<b>YES</b>
<b>Appendix F – Eco-impact screening/ impact assessment of proposal</b> The proposal is likely to reduce the number of customer journeys to the Temple Street Citizen Service Point, but not significantly. No Eco-Impact Assessment Checklist has been considered necessary for this proposal, as it is not anticipated to have any significant direct environmental impacts. Giles Liddell 1 <sup>st</sup> July 2020	<b>YES</b>
<b>Appendix G – Financial Advice</b>	<b>NO</b>
<b>Appendix H – Legal Advice</b>	<b>NO</b>
<b>Appendix I – Exempt Information</b>	<b>NO</b>
<b>Appendix J – HR advice</b>	<b>NO</b>
<b>Appendix K – ICT</b>	<b>NO</b>
<b>Appendix L – Procurement</b>	<b>NO</b>