

MID SUSSEX DISTRICT COUNCIL

Customer Impact and Needs Assessment

Title of Service: Revenues and Benefits

Division: CenSus

Lead Officer: Tim Delany/Julie Watts/Paul Willard/Morag Freitas/Sarah Smith

Date Assessment completed: December 2012

1. SCOPING

1.1 Aims of the service:

- To levy, administer, collect and recover Council Tax and Non-Domestic Rates
- Assessing liability to pay, the issuing of bills and recovery letters including summonses.
- Entering into payment arrangements, instructing bailiffs and activating other methods of enforcement action.
- Responding to customer queries either in person, over the telephone or in writing.
- Collection of Council Tax and Non-Domestic rates with due regard to discounts and exemptions.
- To pay Housing and Council tax benefit to persons who are entitled in an accurate and timely manner.

1.2 Who the service affects and the main customers (internal or external)

- The public and businesses in Mid Sussex are our main customers as we interact with them and provide information regarding benefits, discounts and exemptions.
- We pay out money from the public in the form of benefits, Council Tax discounts and Council tax and Non-Domestic Rates exemptions. The wider public benefits indirectly as the income collected provides funding for Council services.
- All residents and businesses who have a responsibility to pay amounts due.
- In respect of Benefits, people normally aged 16 or over who are on low incomes, whether in work or not (i.e. sick, retired), who are responsible for payment of rent or Council Tax.
- Internal customers include the Council's Housing Needs Team and Finance. Outside organisations such as the CAB, who provide financial and benefits advice to residents, the Department of Works and Pensions on whose behalf we pay Housing and CT Benefit, Social and commercial landlords.

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

Most of the information available comes from feedback from staff and partner organisations with whom we meet regularly. Formal surveys of users have not been undertaken; we have yet to identify any such survey undertaken that produced meaningful results. In assessing claims, information is available regarding the claimant's age, income and disability but other characteristics such as ethnicity are not currently monitored. Experience in other authorities indicates that the completion rate of such monitoring information in connection with benefit claims such that no meaningful conclusions can be drawn from analysis of this data.

1.4 What does the information tell us about the equality issues associated with the service and implications for the protected groups?

Feedback from users and organisations such as the CAB, suggests that there can be issues with the clarity of the Council's correspondence for all sectors of the community, especially in completing claim forms and in respect of explaining complex benefit calculations. This may mean that additional assistance is required for vulnerable people, especially those with learning difficulties and low skills. Nationally older people are identified as being less likely to claim the benefits to which they are entitled.

1.5 Are contractors or partnerships used to deliver the service?

We outsource work to Rossendales bailiff company and have in place an SLA with them. This sets out our equal opportunities expectations and requires the contractor to monitor its work and outcomes. They also have their own equal opportunities policies which are compliant with national legislation and council policies. There is a protocol in place setting out the bailiff's enforcement procedures, especially in respect of vulnerable people.

2. ASSESSMENT OF IMPACT: ANALYSIS AND ACTION PLANNING

In assessing issues associated with the protected groups, those eligible for Housing and Council Tax benefit are on low incomes and likely to be vulnerable by virtue of disability and age. There may be issues with accessing the service and with ensuring that the Council's letters and forms are easy to understand. Also in encouraging people who are eligible for benefit to claim their entitlement.

There are major changes in train for the service as a consequence of the welfare changes being introduced from April 2013, including reductions in Housing Benefit for social housing tenants under-occupying a property, a Benefit Cap and the replacement of Council Tax Benefit by a localized Council Tax Support scheme. Universal Credit is being introduced for new JSA claimants from October 2013. The under-occupancy rules require the Council to work with Registered Providers to identify those likely to be affected and the assistance available. The DWP contact those affected by the benefit cap.

The new Council Tax Support Scheme will mean that people of working age and able to work, previously in receipt of Council Tax benefit will have to pay Council tax for the first time or pay more than at present. The Council is working to develop initiatives to assist these people into work. The service will need to consider the enforcement action appropriate for debts that arise as a consequence of the new scheme. A separate impact assessment has been completed for the Council Tax support Scheme.

Current measures taken by the service to address issues of the protected groups

The following sets out the current measures that are being taken to address customer service issues for vulnerable people and our preparations for the benefit changes. Issues particularly affect protected groups of disabled people, age the needs of different ethnic groups as well as people with low income/skills and people who live in rural areas.

For the following remaining protected groups, no issues or barriers to service delivery have been identified:

- The needs of faith groups and faith issues
- The needs of gay men, lesbians, bisexual and heterosexual people
- The needs of men and women

- The needs of transgender communities
- Issues from pregnancy and maternity
- Issues from marriage and civil partnership

Customer services

- Access: there is a range of ways to access the service, with home visits provided to vulnerable people. Staff link with support workers for vulnerable people. There are also regular benefits surgeries at the Help-Points in Burgess Hill and East Grinstead, for those unable to attend in person at the Council offices in Haywards Heath. More use is being made of information provided on the Council's website and electronic forms. Electronic access to benefits accounts for claimants and landlords is being provided through the introduction of Connect.
- Communications- the CAB advise on the Council's standard letters and forms to assist with their clarity. The development and consequent benefits of an on-line benefit application form are being considered. This could simplify the application process, as it would eliminate those parts of the form that are not relevant to the person completing it, and thereby shorten the process. It also has the potential to provide the applicant with an instant, provisional, assessment of entitlement. Regular meetings take place with the CAB to ensure that they are aware of changes that might affect the advice they provide to their customers and for the service to receive feedback on any issues about which the CAB have concerns.
- Staff training: all receive equalities training and are aware of safeguarding; front-line and visiting staff have received structured safeguarding training. Mystery shopping is used to test the quality of advice provided and the complaints are monitored.
- Service Level Agreement with bailiffs- this and the enforcement protocol ensure that recovery action takes into account the circumstances of vulnerable people. Rossendales have liaison meetings with the CAB and have a Welfare team.

Preparations for the benefits changes

- Communicating the benefit changes- detailed letters have been sent out to those potentially affected by the under occupancy rules we have signposted where customers may seek advice. We are working with Social Housing providers and debt advice agencies such as the CAB to maximise the availability of advice. Our website is regularly updated with information about the benefit changes, sources of financial advice and help in getting into employment.
- Reviewing our enforcement policies- we are working with our bailiffs on a new enforcement process for people affected by the new Council Tax Support Scheme. This could involve agreeing payment plans without first obtaining a summons which would incur additional court costs.

Gaps in service and issues that need to be addressed

Further work is underway to improve the clarity and accessibility of the services' communications from the perspective of the vulnerable groups. Advice on standard letters and forms has and will continue to be sought from the Council's Communications Team and/or other non-specialists to ensure they are as clear as possible.

Preparations will continue for the upcoming benefits changes to ensure that those who will be affected are identified and advised of their options to enable and support them in planning ahead. This will involve further work with Registered Providers, and agencies such as the CAB. Also, working with the

Council's Housing Services team to develop a policy for best use of increased Discretionary Housing Payments funding, aimed at vulnerable people.

An enforcement policy will be developed for those unable to pay the extra Council Tax arising from the new Council Tax Support Scheme being implemented from April 2013.

The Action Plan shown below is intended to demonstrate how the issues identified in this assessment can be addressed.

Action Plan

Action	Lead Officer	Timescale
Customer service and take up of benefits		
Identify and roll out appropriate means to test people's access to and experience of services and how to communicate with them- e.g. through a customer survey, focus group and/or through agencies representing service users,	Tim Delany	31 January 2013
Get feedback on standard letters and forms from outside services such as the CAB to make sure they are as clear as IT systems will permit.	Tim Delany	April 2013
Consider the implementation of an on-line benefit application form	Tim Delany	By June 2013
Preparing for the benefits changes		
Continue work with Registered Providers re the benefits changes, especially tenants affected by the bedroom tax to make sure that everyone is informed and can plan ahead..	Morag Freitas	December 12 to April 13
Undertake further training on the benefit changes with CAB and other agencies.	Morag Freitas	December 12 onwards
Review Discretionary Housing Payments Policy in the light of benefit changes and having regard to vulnerable people.	Tim Delany/Lynne Standing	By March 2013
Adopt an enforcement protocol for people affected by the introduction of the local Council Tax Support scheme.	Tim Delany	From April 2013

Tim Delaney
 Head of Census Revenues and Benefits
 December 2012