

MEETING OF THE NEIGHBOURHOOD SERVICES SCRUTINY COMMISSION

DATE: WEDNESDAY, 4 SEPTEMBER 2019

TIME: 5:30 pm

PLACE: Meeting Room G.01 - City Hall, 115 Charles Street, Leicester,

LE1 1FZ

Members of the Committee

Councillor Khote (Chair)
Councillor Thalukdar (Vice-Chair)

Councillors Ali, Aqbany, Govind, Joshi and Solanki (1 unallocated non-grouped place)

For Monitoring Officer

Officer contacts:

Anita Patel (Scrutiny Policy Officer)
Aqil Sarang (Democratic Support Officer),
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Leicester City Council, 115 Charles Street, Leicester, LE1 1FZ

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- ✓ to ensure that the sound on any device is fully muted and intrusive lighting avoided;
- ✓ where filming, to only focus on those people actively participating in the meeting;
- ✓ where filming, to (via the Chair of the meeting) ensure that those present are aware that they
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Further information

If you have any queries about any of the above or the business to be discussed, please contact **Aqil Sarang, Democratic Support Officer on 0116 454 5591**. Alternatively, email Aqil.Sarang@leicester.gov.uk, or call in at City Hall.

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PUBLIC SESSION

AGENDA

FIRE / EMERGENCY EVACUATION

If the emergency alarm sounds, you must evacuate the building immediately by the nearest available fire exit and proceed to the area outside the Ramada Encore Hotel on Charles Street as directed by Democratic Services staff. Further instructions will then be given.

1. APOLOGIES FOR ABSENCE

2. DECLARATIONS OF INTEREST

Members are asked to declare any interests they may have in the business to be discussed.

3. MINUTES OF THE PREVIOUS MEETING

Appendix A

The minutes of the meeting of the Neighbourhood Services Scrutiny Commission held on 3 July 2019 are attached and Members are asked to confirm them as a correct record.

4. PETITIONS

The Monitoring Officer to report on the receipt of any petitions submitted in accordance with the Council's procedures.

5. QUESTIONS, REPRESENTATIONS AND STATEMENTS OF CASE

The Monitoring Officer to report on the receipt of any questions, representations and statements of case submitted in accordance with the Council's procedures.

6. LIBRARY SERVICES - READING PROGRAMMES

The Head of Neighbourhood Services will deliver a presentation of an overview of the Library Services Provision.

The presentation will include an outline of the key interventions aimed at promoting a love of reading to improve outcomes for residents of all ages and from all communities across Leicester. Programmes covered include:

Book Start – books and reading activities for babies, toddlers and young

children

- Our Best Book in partnership with Leicester Primary Schools
- Summer Reading Challenge aimed at children aged 0-12yrs to boost the reading habit over the summer period
- Everybody's Reading Festival Support Leicester's reading festival in our neighbourhoods
- Adult reading groups and author events promoting a lifelong love of reading

The presentation will also highlight the importance of partnership working to add value to regular reading programmes and to deliver targeted cultural projects in neighbourhood settings.

The Commission is recommended to receive the presentation and pass comments to the Head of Neighbourhood Services for consideration.

Members of the Children, Young People and Schools Scrutiny Commission have received an invitation to attend and participate in the consideration of this item.

7. UNIVERSAL CREDIT IMPACTS - ONE YEAR ON Appendix B

The Director of Finance will submit a report updating the Commission on Universal Credit and its impact, one year on.

The Commission is recommended to receive the report and pass comments to the Director of Finance for consideration.

8. DRAFT SCOPE PROPOSAL FOR NEW REVIEW Appendix C TOPIC: "THE VIABILITY OF A COMMUNITY LOTTERY FOR LEICESTER"

The Chair of the Neighbourhood Services Scrutiny Commission will submit a draft scope proposal for a new review topic.

The Commission is recommended to receive the draft scope and pass comments to the Chair for consideration.

9. WORK PROGRAMME Appendix D

The current work programme for the Commission is attached.

The Commission is asked to consider this and make comments and/or amendments as it considers necessary.

10. ANY OTHER URGENT BUSINESS	
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APPENDIX A



Minutes of the Meeting of the NEIGHBOURHOOD SERVICES SCRUTINY COMMISSION

Held: WEDNESDAY, 3 JULY 2019 at 5:30 pm

PRESENT:

Councillor Khote (Chair)
Councillor Thalukdar (Vice-Chair)

In Attendance:

Councillor Ali Councillor Govind Councillor Aqbany Councillor Joshi

Councillor Solanki

Also Present:
Councillor Clair and Councillor Malik

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1. APOLOGIES FOR ABSENCE

There were no apologies for absence received.

2. DECLARATIONS OF INTEREST

Members were asked to declare any interest they may have in the business to be discussed.

Councillor Solanki declared that she worked in a food and retail environment but would be participating in the discussions with an open mind.

3. MINUTES OF THE PREVIOUS MEETING

The Commission received the minutes of the meeting held on 20 March 2019.

It was requested that Minute 60. Apologies for Absence be amended to record Councillor Aqbany's apologies as those were passed to the Vice Chair prior to the meeting.

AGREED:

That the minutes of the meeting held 20 March 2019 be agreed as a correct record subject to the above amendment.

4. TERMS OF REFERENCE

NOTED:

The Terms of Reference of the Neighbourhood Services Scrutiny Commission be noted.

5. MEMBERSHIP OF THE COMMISSION 2019/20

NOTED:

The Membership of the Neighbourhood Services Scrutiny Commission for the 2019/20 municipal year as follows:

Councillor Khote (Chair)

Councillor Thalakdur (Vice Chair)

Councillor Ali

Councillor Agbany

Councillor Govind

Councillor Joshi

Councillor Solanki

(1 unallocated non-grouped place).

6. DATES OF COMMISSION MEETINGS 2019/20

NOTED:

The dates of the Neighbourhood Services Scrutiny Commission for the 2019/20 municipal year as follows:

Wednesday 3 July 2019

Wednesday 4 September 2019

Wednesday 30 October 2019

Wednesday 15 January 2020

Wednesday 4 March 2020

Wednesday 22 April 2020

7. PETITIONS

The Monitoring Officer reported that no petitions had been received.

8. QUESTIONS, REPRESENTATIONS AND STATEMENTS OF CASE

The Monitoring Officer reported that there were no questions, representations or statements of case received.

9. PORTFOLIO OVERVIEW

The Director of Neighbourhoods and Environmental Services and the Director of Finance delivered an overview of the key areas and services relating to the

Neighbourhood Services Scrutiny Commission portfolio.

Members noted the presentation on Neighborhood and Environmental Services and verbal update on the aspects of the Finance Division which related to this Commission. The work areas were noted, which would help them to set the Commission's Work Programme for the forthcoming year.

Members discussed various portfolio areas which included the following points:

Members praised officers for the swift responses with traveller issues and on illegal sites at hot spots in the city. Members suggested that railings or grass verges/soil bunds could be used to deter unauthorised encampments. Officers confirmed target hardening is used where appropriate. Members were reassured that the Council had robust systems to deal with these issues across the city.

Officers from the service were praised for the work carried out on Melton Road where footways had been cleaned and prompt action had been taken to tackle Pan spitting.

Concerns were raised about anti-social behaviour issues in the city's parks and when this occurs the impact this can have on families and vulnerable people that use the parks. Members suggested that the Council should explore solutions for this as it was a city-wide problem. The safety of parks was noted and that measures to provide reassurance and to tackle any issues were in place including the employment of parks officers, work with the police if required and use of security as appropriate. Officers asked Members to highlight any particular concerns and they will follow up.

Members reported issues regarding maintenance around the Courtyards on the St Peters and St Matthews Housing Estate and suggested a visit. Officers said they would support and link in with Housing colleagues.

Members enquired about the use of the Love Leicester app and the impact it had on the service. Officers agreed to provide details to Members.

Members referred to the CCTV System and the recent £1.2 million investment. A question was asked about the use of and access to mobile CCTV cameras. It was confirmed that the investment included purchase of additional mobile cameras. Camera deployment was supported by a risk-based assessment so that cameras were placed in locations with the most need at the time. It was noted that there tended to be a high demand for cameras sometimes fuelled by the perception of crime or community safety concerns as opposed to actual crime being known to take place in an area.

Members raised questions about the service delivered by Biffa and environmental impacts of waste disposal. Officers confirmed that the City Council had a contract with waste management company, Biffa Leicester, and confirmed the disposal routes available including the recycling of waste and at Gypsum Close Household Waste Recycling Centre the available reuse shop

that is run by local charity LOROS. It was noted some waste did go abroad but there were strict regulations governing that, that Biffa Leicester were required to adhere to.

Members discussed littering associated with legal highs and enquired about the Council's policy to prevent the issue escalating further. It was noted that the Council had introduced a Public Space Protection Order for New Psychoactive Substances and the action available under the PSPO, including the ongoing role of the Police and also use of dispersal orders.

Members were asked to raise any specific ward issues outside of the meeting.

Members noted that the major challenge to services and all Councils was the reduction in funding. However, despite this, good outcomes were being achieved such as reduction in fly tipping and improvements in Food Safety Standards. To further improve the delivery and access to services, Officers were looking at for example, smart technologies to improve customer contact. The Director of Finance advised that customers were encouraged to access services independently and hubs were available in libraries and community centres around the city. Information was available online and Officers agreed to sign post Members and highlight these facilities, so Members can share details with constituents.

Members were informed that the Council were developing plans for consultation in the future for a Selective Licensing scheme in areas where there was a high density of privately rented accommodation. Initially locations such as parts of Braunstone Park and Rowley Fields, Castle, Fosse, Saffron, Stoneygate and Westcotes wards.

Members enquired about business rates and it was noted that the Valuation Office determined this and that the Council were only responsible for billing and collecting the business rates.

Agreed:

- 1) That an option of joint working with Housing Scrutiny Commission on "Universal Credit" to be added to the work programme.
- 2) That the Director of Finance circulate details of multi hub locations through the Members Bulletin to all members.
- 3) That the Director of Neighbourhood and Environmental Services be requested to progress and action the priorities for the service mentioned in his presentation.

10. REGULATION OF LEICESTER'S FOOD BUSINESS SECTOR - THE SERVICE PLAN 2019/20

The Director of Neighbourhoods and Environmental Services submitted a report introducing the draft Food Services Plan 2019/20.

Deputy City Mayor Clair introduced the report and Members were asked to

note the report.

The Food Safety Manager delivered a presentation supporting the report.

Members of the Commission discussed various areas, which included the following points:

Members shared their concerns with pan masala packets that are imported and sold. Members enquired whether there were any licensing policies to monitor the sale of this product. It was noted that the Food Standards Agency were responsible for testing significant quantities of food imports and if poor products were identified authorities were then notified. Imported products that were sold under the counter were products that were problematic as they would not be declared correctly.

It was noted that planned Food Safety inspections took place periodically and as appropriate dependent on the potential risk posed by an establishment and the products it sells.

Members suggested that a forum, similar to the Food and Drink Forum launched recently, where information could be shared by regulators would be a means of keeping both people and businesses informed.

Members shared their concerns about private catering businesses and those that were advertised online via social media. Officers advised that all food businesses should be registered with the service and if they came across any that had not previously been detected they would take the appropriate action. It was noted that festivals with stalls did have to meet hygiene standards.

Members of the commission welcomed the report and praised the Food Safety Team for the work they do in ensuring the public felt reassured with the standard of food businesses in the city. Displaying the hygiene rating and information was helpful however it was noted that it was the view of the committee that, the display of the hygiene rating that is displayed in many of the Food outlets should be made mandatory. Officers informed the Commission that the Food Standards Agency were keen to do this but there had been delays due to Brexit.

Members of the Commission were informed on the plans the Food Safety Service had with the Public Health Team to launch Health Food takeaways.

Members noted the Service were also looking into apprenticeship options to give young people the opportunity to be introduced to and work within Environmental Health/Safety.

Agreed:

- 1) That the Food Safety Team be commended for the great work they carry out and;
- 2) That the Food Safety team consider reaching out to young people in the city to raise awareness of food safety issues and the impact this

can have.

11. DRAFT WORK PROGRAMME 2019/20

The current work programme was received. Members of the Commission were invited to submit suggestions for items for inclusion on the work programme to the Chair or Scrutiny Policy Officer.

The Chair suggested a possible task group topic which was a community lottery, this would give the Commission to look at advantages and disadvantages. Members were asked to pass any comments or other suggestions to the Scrutiny Policy Officer.

AGREED:

That the work programme be noted.

12. ANY OTHER URGENT BUSINESS

19/07/2019

Neighbourhood and Environmental Services - Overview

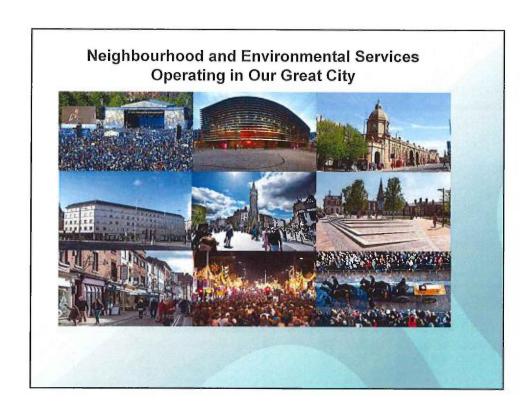
Neighbourhood Services
Scrutiny Commission 3rd July 2019



John Leach
Director of Neighbourhood and Environmental Services

Overview

- Neighbourhood and Environmental Services
 Operating in our Great City
- Services Areas
- Priorities A Snapshot
- Contact Details





Service Areas – Waste Management



- Contract with Biffa Leicester until 2028 covering collection and disposal of domestic waste.
- Maintenance of an effective waste and recycling collection service with over 13 million collections per year
- Garden waste service delivered and expanded to 4,300 customers; over 1,100 tonnes collected and composted
- Two Household Waste Recycling Centres (HWRCs) and a network of bring banks
- Reuse Shop and Trade Waste facility on Gypsum Close HWRC
- Policy Work National Government Resources and Waste Strategy

Service Areas - Community Safety and Protection



- Safer Leicester Partnership (Community Safety Partnership)
- Crime and Anti-Social Behaviour Unit (Crasbu)
- Domestic and Sexual Violence
- Prevent
- Private Sector Housing Tackling Rogue Landlords and promoting good ones!
- Work to embed a multi-agency response to Street Lifestyle issues in Leicester.

Service Areas - Standards and Development



- · CCTV £1.2 Million of Investment
- Allotments*
- City Wardens
- Pest and Dog Control
- Play Facilities*
- Public Realm projects such as Victoria Park Centenary Walk*
- Performance and Intelligence Unit
- * Heritage, Culture, Leisure and Sport Scrutiny Commission

Service Areas- Neighbourhood Services



Neighbourhood Services

- 16 library service points and 16 centres offering room hire and 2 book buses
- · 9 Multi-Service Centres
- · Ward Meetings and Ward Funding
- Events and activities including the Summer Reading Challenge!
- Last year:-
 - 2.3 million visits to Neighbourhood facilities
 - 170,000 hours access to public computers, and 100,000 Wi-Fi accesses!
 - Delivery of Our Best Book, Reading Rampage & Black History programmes
 - "Museum of the Moon" installation at Belgrave Neighbourhood Centre
 - Community Asset Transfers of Northfields Neighbourhood Centre, Braunstone Grove, and Mayfield Centre
 - Installed Customer Self-Service facilities at the Belgrave, St Barnabas and Hamilton Libraries, together with Universal Credit support and signposting arrangements at Neighbourhood facilities.
 - 658 Ward Funding applications assessed

Service Areas – Regulatory Services



- Food Safety The Food Safety Team inspect over 3100 food establishments in order to seek to ensure they meet legal food safety requirements (taking action where required).
- Public Safety delivers the Council's statutory duties under a range of public safety related legislation such as the Health & Safety at Work Act 1974 and the Safety of Sports Grounds Act 1975,
- Trading Standards Team work to protect consumers and support legitimate business.
- Noise and Pollution Control deal with a range of statutory nuisances and are responsible for petroleum licensing; monitoring and coordinating action on controlling emissions from industrial processes and dealing with contaminated land.
- Licensing licence a range of activities (sale of alcohol, entertainment, gambling etc) and their duties include developing and implementing licensing policies, processing and issuing licences, promoting best practice, ensuring compliance with licensing requirements and enforcement where it is deemed necessary.
- Building Control seek to protect the safety of the public from dangerous structures and demolitions

Service Areas - Parks and Open Spaces



- The majority of this portfolio of services is covered through the Heritage, Culture, Leisure and Sport Scrutiny Commission. For example Parks Services, Bereavement Services, Trees and Woodlands Service.
- However this Commission includes City Cleansing Services Over 600 miles of city streets receive cleansing services
- Removal of graffiti from 2,637 sites in 2018/19
- Emptied 3,200 litter bins every week inc 354 daily in the City Centre.
- 3,097 tonnes of waste collected from the highway and recycled (excleaf litter).
- Removal of over 8,000 fly-tips
- Fleet of 9 Footway Sweepers and in the last year we have procured two street hot washers working in neighbourhoods and the City Centre.

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Priorities – A Snapshot

Community Safety and Protection

- Establish a private landlord licensing scheme to better regulate landlords in the parts of the city where there is the greatest concentration of private rented homes – a process that is already under way
- Work with partners to establish a city-wide knife crime strategy

Waste Management

- Continue to deliver an effective and efficient waste collection service for a growing city, including addressing any problem areas
- Engage with and respond to government consultations in 2019 on the proposals outlined in the government's new Resources and Waste Strategy

Priorities – A Snapshot

Regulatory Services

- Completion of the 2019/20 food establishment inspection program
- Development of a Taxi (and PHV) Strategy for Leicester (with refresh/update of all related policies)

Standards and Development

- Purchase, introduction, and management of corporate body worn video for City Warden Service
- Continue to target fly tipping in the City

Priorities - A Snapshot

Parks and Open Spaces

Introduce and embed a programme of street (hot) washing

Neighbourhood Services

- Expand our reading projects Our Best Book, Reading Rampage and the Summer Reading Challenge
- Expand and promote online library resources to deliver a wider range of e-books and e-audio resources which are easier to find and use.

Contact Details

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Head of Regulatory Services nicola.preston@leicester.gov.uk

Head of Community Safety and Protection daxa.pancholi@leicester.gov.uk

Head of Waste Management geoff.soden@leicester.gov.uk

Head of Neighbourhood Services lee.warner@leicester.gov.uk

Head of Standards and Development bob.mullins@leicester.gov.uk

Head of Parks and Open Spaces stewart.doughty@leicester.gov.uk

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REGULATION OF LEICESTER'S FOOD BUSINESS SECTOR Food Service Plan 2019/20

3rd July 2019





Purpose of the Presentation

- Brief the Scrutiny Committee on the work of the Food Safety Team.
- ▶ Brief the Scrutiny Committee on the proposed Food Safety Team Service Plan 2019/20
- Inform the Scrutiny Committee of Future Themes and Challenges to food hygiene and standards.





About our Food Sector

Establishment Type	2015	2016	2017	2018	2019
Primary producers	0	0	0	0	1
manufacturers & distributers	73	81	90	93	100
importers/exporters	6	6	9	7	17
distributors/transporters	77	82	87	94	95
retailers	730	773	782	795	821
restaurants & caterers	1942	2000	2028	1991	2079
totals	2828	2942	2996	2980	3113

- · 3113 Food Establishments in total
- Growth overall
- · Significant turn over approx. 550 new registrations a year.
- · Approx 50% subject to inspection in any given year





About Our Food Sector

c. 3,100 registered food businesses and of these

- Significant diversity in the range of food businesses
- Significant number of NEW entrants into the Food Sector
- English is often not first or main language of communication
- A reputation for producing culturally specific foods, e.g. Paneer, Polish dumplings, Asian sweets

Key features of the Food Sector are:

- Increase forecast in line with Leicester City Economic Strategy and LLEP
- 25% Increase in food manufacturers since 2013
- Highly competitive market/low profit margins
- High turnover in 'restaurants and catering' sub-sector.
- 13.5% increase in compliant food businesses since 2014





Why regulate business conduct?

- Leicester City Council as a Food Authority has a Statutory Duty.
- Our aims are:
 - Prevent ill-health and potential death.
 - Ensure the supply of good quality, safe food.
 - Prevent and detect food fraud
 - Assist Leicester's food businesses to comply with food law.
- In order to protect:
 - Public Health
 - Consumers Purse and Choice
 - Good Businesses from Unfair/Unlawful competition
 - Our country's export markets





Food Regulation

- As a Unitary Authority the FST Regulates both Food Hygiene and Food Standards
- Hygiene safe handling and preparation of food
- Standards labelling, claims, misleading
- Advice and support for new businesses
- ▶ Risk Based Inspection Plan 5 categories of inspection A to E.
- Graduated enforcement.



Our Food Safety Team



- Food Safety Team Management
 - 1.5 FTE
 - Oversight of inspection program, monitoring of standards, supervision of officers, support/review of enforcement actions
- Food Safety Team
 - 11 Officers (10.6 FTE)
- · Close working relationship with Internal services
 - Trading Standards
 - City Wardens
 - Licensing
 - · Public Safety Team
- · Liaison with national and regional organisations
 - · Leicestershire Food Group
 - Food Standards Agency
 - · Trading Standards East Midlands
 - Public Health England
 - · National Food Crime Unit



Review of 2018/19



- Notable Incidents and events
 - Withdrawal of Approval status from a Meat Products Manufacturer
 - Primary Authority Arrangement between LCC and Navitas/ESB Ltd confirmed the first for LCC.
 - $^{\circ}\,$ Prosecution of FBO of Big Wang Welford Road. Guilty to 11 charges £6306.40.
 - Food incident Joint exercise with NFCU on illegal Chinese imports
 - Promotion of 5 Rated Establishments
 - Dave Howard voted in as Vice Chair of the National Food Hygiene Focus Group

FST Performance

- 1675 (1663) Food hygiene inspections
- 87 overdue inspections (carried forward to 2019/20)
- 1571 (1290) Compliance checks
- Since 2014 we have seen a 13.5% rise in the level of broadly compliant food establishments (71.5% to 85%).





Future Challenges

Regulating Our Future

- FSA strategic review of food law enforcement ongoing.
- Key areas
 - · Centralised Online Registration
 - Intervention based on risk assessment by segmentation
 - · Nationally set bespoke inspection programmes for big businesses

FSA review of Food Standards

Food law and enforcement has become more complex – eg allergen control crosses Food hygiene and Food standards requirements

EU exit

- · Particular challenges for import and export of food.
- Movement/employment of food handlers
- · Sharing of intelligence information
- Management of cross border incidents





Service Plan 2019/20 - Key Priorities

- Completion of Planned Interventions 1749 inspections due
- Advice and Support Sustainable food businesses
- Targeted Graduated Enforcement
- Preparing for the future (ROF and BREXIT)
 - Keeping our food businesses are informed
 - Ensuring senior management is informed
 - Liaison with other internal and external regulators
 - Adapting internal arrangements in anticipation of changed regulatory regime
 - Associated officer training to ensure effective implementation of any changes.
- Engage with The Food Plan and Public Health Agenda



Appendix B

Neighbourhood Services Scrutiny Commission

The DWP's Universal Credit: Leicester's First Year

Date of Meeting: 4th September 2019

Lead Member: Cllr Kirk Master

Lead Director: Alison Greenhill



Useful Information

Ward(s) affected: All

Report author: Caroline Jackson, Head of Revenues & Customer Support

Author contact
 0116 454 2501/37 2501

details: <u>Caroline.jackson@leicester.gov.uk</u>

1. Purpose of Report

1.1 The purpose of this report is to provide an update on the impact of the first year of the government's Universal Credit (UC) scheme as administered by the Department for Work & Pensions (DWP), which went live in Leicester on 13th June 2018.

2. Summary

2.1 The government is introducing UC administered by the DWP to replace several existing benefits, including Housing Benefit as currently administered by the Council. Over 12,000 individuals now receive it in Leicester, over half of whom rely on it to pay rent. This figure is expected to increase to over 20,000 by 2021. Online-only claims, five weeks plus waiting times and direct lump sum payments to claimants present ongoing service challenges. Vulnerable households including lone parents, people with disabilities and persons from abroad face reduced or ended entitlement due to both benefit design and accessibility issues.

3. Recommendations

- 3.1 The Commission is asked to note and comment on the following:
 - a) Impact analysis;
 - b) The UC Strategy 2017-2020 (Appendix 1);
 - c) Equality Impact Assessment (Appendix 2); and
 - d) Risk log (Appendix 3)

4. Overview of the impact of Universal Credit

- 4.1 The Department for Work and Pension's (DWP) aim in relation to UC is to ensure a smooth transition between welfare and work, at the same time as promoting financial and digital inclusion.
- 4.2 UC replaces six existing working age benefits which are:
 - Income-based Jobseeker's Allowance,
 - Income-related Employment and Support Allowance
 - Income Support

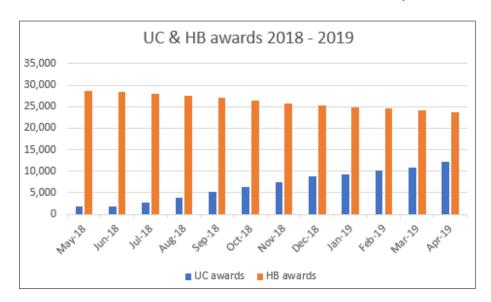
- Child Tax Credits
- Working Tax Credits
- Housing Benefit (HB).
- 4.3 UC represents a significant change from the benefits it replaces, presenting both practical and financial challenges to the Council during implementation. Applications are predominantly made online, with an expectation that claimants will continue to manage their claim online. For a minority this is the first time they have had to use a PC and many lack the necessary skills.
- 4.4 Payment is made monthly in arrears, with a minimum five week wait for a first payment, which in most cases is paid directly to the claimant, the implications of which are increased importance of money management and the need to prioritise key expenditure such as rent. Options are also available to request more frequent payments and payment of the Housing Cost element directly to landlords.
- 4.5 The impact of UC on household income is complex for those in employment UC is financially beneficial, as benefits are withdrawn at a slightly lower rate for increased earned income. UC allowances for some groups are less generous:
 - Disabled households see a sharp reduction in income on UC as additional disability premiums do not exist – the most severe of these are now able to remain on Housing Benefit if they have not already migrated to UC;
 - Lone parents and second earners also receive less generous income disregards;
 - Large families affected by the Benefit Cap moving onto UC are no longer protected by a minimum award of Housing Benefit, instead facing further reductions in their living costs —Some households have been left without Housing Costs, after a UC claim has been made and HB has ended, due to failing Persons from Abroad tests and/or DWP incorrectly identifying claimants as living in Supported Accommodation.
- 4.6 Since the rollout of UC the council has worked closely with the DWP, departmental and external stakeholders to identify and mitigate risks. Key Performance Indicators (KPI) are collected monitored monthly to identify trends referred to in Sections 7 to 9.

5. Universal Credit implementation to date

- 5.1 UC was first introduced for working age claimants in Leicester in January 2016, on a limited basis for single, childless claimants. 2,300 claimants were receiving UC by December 2017, of which a third were receiving the Housing Costs Element, potentially having responsibility to pay their rent directly for the first time.
- 5.2 From 13th June 2018, UC replaced new claims for heritage benefits, with the exception of pension-age claimants, families with three or more children, or those living in temporary or supported accommodation, significantly increasing the number of households eligible for UC.
- 5.3 By the end of May 2019, the DWP stated that there were 12,196 claimants receiving UC, in Leicester, with approximately half understood to rely on the Housing Element for rent payments. The Council is unable to determine whether this matched DWP

expectations as they have published very little local information relating to the take up and roll out of UC.

5.4 As can be seen below, natural migration to UC had begun to slow to under 1,000 households per month, but increased from 1st February 2019, as an additional 4,500 households, with three or more children, have become eligible to claim UC and transfer from HB to UC as changes in their household circumstances occur. Over the past twelve months, the Housing Benefit caseload has decreased by just under 5,000 households, whilst UC cases have increased by over 10,000.

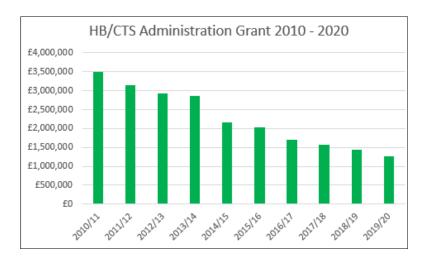


- 5.5 New legislation effective from 15th May 2019 also means that most working-age HB households will be unable to migrate onto pension-age HB; they will instead need to claim UC until the younger partner is also of pension age.
- 5.6 Full migration of the HB caseload is expected to start nationally in 2021 and completed by 2024. Over the next two years at Leicester we expect natural migration to UC to mean 5,000 fewer HB claimants. The overall UC caseload is expected to increase by 20,000 over the same period.
- 5.7 Pension-age claimants, households receiving a Severe Disability Premium and those in temporary or supported accommodation (including Hostels and Bed & Breakfast) are expected to continue to be eligible to claim HB for the foreseeable future.
- 5.8 UC full service rollout was completed nationwide in December 2018 and the overall caseload has now exceeded 1.4 million. Processing times of the DWP have improved, with 86% of new claims being paid in full on time compared to 78% in December 2017.

6. <u>Impact upon the HB caseload</u>

6.1 As anticipated, the working-age HB caseload has declined by 4,565 from 21,412 to 16,847 (approximately 400-500 households per month) whilst the number of new claims received has reduced from 220 to under 100 per week. Council Tax Support however has seen a significant increase in the volume of changes being reported,

- particularly those related to UC. Since June 2018, the service has received an additional 50,124 UC related notifications requiring an additional 4,663 hours of officer time to process, the cost of which is not fully funded by the DWP.
- 6.2 It is anticipated the HB caseload will continue to fall at a steadily reducing rate over the coming months, with new claims remaining at their current level and unless the DWP respond to local authority concerns the administrative and financial burden of UC notifications will become increasingly significant for Leicester.
- 6.3 In response to these concerns, the DWP stated in the National Audit Report on the 'Roll out of UC so far' report "Universal Credit is creating additional costs for local organisations that help administer Universal Credit and support claimants. Local authorities (LAs) told us that they have faced additional burdens during the development of Universal Credit, such as through increased administration for processing Housing Benefit stop notices. The Department... told us that it will pay for additional costs if authorities can prove them. The Department places the burden of proof on authorities, uses its discretion in assessing claims, and has not sought to systematically collect data on these wider costs. However, these extra costs are not included in the Department's estimates of the programme's costs." This demonstrates the DWP's failure to recognise the administrative burden and associated financial implications for LA's.
- 6.4 The DWP informed us in February 2019 that the HB and CTS Administration Grant would be reduced from £1,429,272 to £1,263,825 for 2019/20. Grant funding has not met HB administration costs for some years, having already reduced by over 50% between 2012 and 2018. Councils nationally are struggling to reduce administration costs and maintain services. Resources within the Revenues & Customer Support Service have reduced by 18% but are now faced with a further delay in managed migration, further impacting on strategic planning.



- 6.5 The Council has shared our experience within our core cities benchmarking group, who in turn have raised these issues directly with the national Practitioners' Operational Group. Also, written on two occasions, over the past year, to the Housing Benefit Delivery Division of the DWP raising our concerns over this additional burden. We will continue to monitor and raise this issue both locally and nationally.
- 6.6 Confirmation that tenants in Specified, Supported and Temporary Accommodation will remain part of the HB scheme has provided some administrative certainty, although concerns remain as to whether HB can be relied on to continue long-term to cover the lifetime costs of capital investment. The complex nature of these cases

also presents a high risk from a subsidy audit perspective, are administratively burdensome, and add to funding pressures as they are only partially subsidized by central government.

7. <u>Impacts on income collection</u>

- 7.1 A number of financial impacts have already been identified as a result of UC implementation, and these are likely to continue to have an effect across the city and for the Council in particular tenants, and clients who are financially vulnerable, including households with children. The most notable impacts to date are issues with rent and council tax collection, benefit overpayment recovery and demand for crisis grants.
- 7.2 The declining proportion of weekly HB being credited into rent accounts for Council properties has, as anticipated, had a negative impact on rent collection arrangements and cash flow. Prior to rollout Housing Services put in place a number of proactive measures and strategies to mitigate the impact pilot areas have seen. This included the appointment of 3 Rent Management Officers, for a two-year period, who will work with those tenants moving onto UC They will work directly with these households; to support them through the initial process and to empower them to manage the process going forward.
- 7.3 In addition, provision of signposting, advice and shared learning delivered between income management officers and Local Jobcentre Plus Front-line Officers is in place at the Charles St and New Walk Job Centres. Originally, this took place at three locations, but it was felt the initiative had more impact being delivered from two locations. This offer is currently under review; however, it is planned to site Housing Options officers within the 2 main JCP sites to support tenants, from any tenure, but particularly those from the private rented sector.
- 7.4 Where rent arrears already exist, or are compounded by payment waiting times, the Council as landlord, with its Trusted Partner status; enables alternative payment arrangements (APA's) to be put in place, without an additional sanction by the DWP. This means the payment of the housing cost element of UC is paid directly to a landlord, for a limited timeframe. This 3rd strategy has again lessened the negative impact upon our rent collection position.
- 7.5 By the end of Quarter 4 a total of 1,678 Council tenants were receiving UC under the new claim system, equating to 8.33% of all council tenants. Total rent arrears for LCC UC tenants as of 31st March 2019 was £444,000, compared to all LCC tenants; which was £1.627m. The proactive intervention by Housing Services for Leicester's tenants, on UC, has meant their arrears position for 2018/19 is on average £236 per tenant, compared to a national average for 2017/18 of £772¹. 23% of Council tenants on UC have no rent arrears, comparable the national picture of 27%².
- 7.6 CTS claims have reduced by 5.9% (30,650 to 28,836), in part due to the requirement for a separate application to be made with the Council for UC claimants. Previously, this would have been a dual claim with HB. This presents a challenge, although active take up promotion and successful engagement with

.

¹National Federation of Arm's-Length Management Organisations (NFA) and the Association of Retained Council Housing (ARCH)

² CA, Rent Arrears: Causes and Consequences for Clients (October 2018)

- Housing Services and JCP colleagues has kept the reduction in CTS cases due to UC migration to a minimum and helped to maintain Council Tax collection.
- 7.7 We have identified that while UC claimant await their first payment of UC, which is a minimum of 5 weeks wait, there will be some households where there are insufficient funds in the bank account to pay DD or pay instalments by Paypoint. This missed payment will have resulted in some households being subject to recovery action to collect unpaid council tax. Where further recovery activity has taken place, we know of 130 who have subsequently been able to successfully reestablish payment arrangements before recovery action has taken place. Between June 2018 and April 2019, 591 Council Tax Discretionary Relief applications from UC claimants were awarded, relieving some of the financial pressure of transition on households and contributing to a record CTDR expenditure of £380,000, although still below the nominal budget figure of £500,000 per annum.
- 7.8 It is too early to fully understand the impact on the collection of Council Tax however, there are indications collection (where we are able to track recovery) from UC CTS claimants remains lower than the wider CTS caseload. This is significant although comparable to previous welfare reform impacts when Council Tax Benefit was abolished, and our local scheme introduced, requiring Council Tax payment for the first time, 42.5% of those previously entitled to maximum benefit were subject to recovery action. Overall, the collection of council tax for the LA remains on target as only a low percentage of charge payers are on UC, however as UC rolls out this may become a significant problem for Leicester if the payment behaviour cannot be influenced. We are limited within the statistical information we can obtain as we are not able to report on the number of Households in receipt of UC.
- 7.9 Income collection is becoming a challenge for the LA. A relatively high proportion of claimants who migrate onto UC have outstanding HB overpayments (HBOP), typically being recovered through deductions to ongoing HB entitlement. Currently the authority has £3.75m of HBOP being recovered through ongoing deductions. For Leicester, the current overall outstanding HB overpayment debt is £15.37m. Whilst the working-age HB caseload has reduced by 12.3%, the number of claims with HB deductions has already fallen by 17% reducing from 4,123 in June 2018 to 3,420 in January 2019. In principle, the recovery of this debt *could and should* continue from UC entitlement.
- 7.10 The collection of HB is a low DWP priority within their list of priority debts and where the claimant has multiple primary debts to be collected via attachment to a UC award it is highly unlikely a HB overpayment will be deducted. This leaves the council with a huge debt and collection challenge. Less than 0.5% of HB debt referred for a DWP attachment has been recovered since June 2018, with over £1m awaiting referral to DWP.

8. Help for UC claimants - Universal Support, information & Signposting

8.1 From January 2016 the DWP has funded Personal Budgeting Support (PBS) and Assisted Digital Support (ADS) to support UC claimants with the non-digital claim process. The support includes both budgeting and debt management advice.

- Leicester's provider was Citizens Advice Leicestershire (CITAL) this offer will end for the city from October 2019.
- 8.2 From April 2018 to March 2019, the DWP provided grant funding to the Council to provide ADS support only. This funding was used to promote, coordinate and deliver the existing offer and tailor take-up specifically for UC claimants.
- 8.3 LCC invested in additional ADS support 10 hours a week spread across the city which was a successful initiative coordinated by Leicester Adult Skills and Learning Services (LASALS). Up to November 2018, the scheme has exceeded expectations and the national trend, but not DWP targets; offering over 200 hours of support over 100 sessions to over 70 users, half of whom are identified as having complex needs. The scheme offers weekly support sessions in libraries, JCP sites, the Dawn Centre and the Y centre, and has also referred many customers onto intensive English as a Second Language (ESOL), literacy and numeracy courses.
- 8.4 From April 2019, funded by the DWP Citizens Advice (CA) nationally launched the new Help to Claim service, which replaces ADS and helps UC claimants up to the receipt of their first payment. Support is available face-to-face at all three Jobcentre sites, online and by phone. Once the Help to Claim offer has been completed, referrals are made to our funded advice service (CitAL) where necessary. The LASALS offer will continue and has been reconfigured to offer support to a wider customer base.
- 8.5 In terms of logistical support, the Council continues to provide free access to Wi-Fi and 182 PCs at the Customer Service Centre on Granby Street and through library locations. There are LCC webpages dedicated to Universal Support and how to access this support. There are digital skills courses available, (booked though the libraries, and via the Council website) to support people to get on line and assist them to set up email accounts, building their computer confidence etc. so they are able to apply for and manage their UC claim.
- 8.6 The Council's front of house offer at Granby Street and library locations have been recording contact made in respect of UC. Demand over the phone and face to face, for generalist advice, directly from Customer Services for UC advice has been consistently low. Customers attending the CSC in Granby Street having been making use of the digital space; using the PC's to access DWP websites to make and manage their online claims, particularly to report a change in their circumstances. The LCC website refers them on to the UC claim web page. Online tools, developed by the Council, help to advise claimants whether they should make a new claim for UC. These have been accessed over 30,000 times, since June 2018, and we have received positive feedback about this service
- 8.7 From a Housing perspective, there are now greater challenges to collect rental income with the introduction of UC full service. The housing element of the new benefit is now paid directly to the claimant and therefore tenants are responsible for paying the rent themselves, where previously their housing benefit was paid directly to the council. Other authorities, where this has already been introduced have seen a substantial increase in their level of rent arrears. The Income Management Team are currently focussing and adapting to the recent implementation of UC and how best to support tenants to ease hardship. The team have recruited four specialist Officers to help and support tenants through the transition of this new benefit and mitigate the risks of delayed payments which can result in poverty. The team are co-locating from local JCP sites to meet with tenants

- at the early stages of their new benefit claim to offer any help, support and advice whilst waiting for their first payment. Neighbourhood Housing Officers have also visited over 800 vulnerable tenants, who we believe may move onto UC quickly, to establish whether they have support needs that the Rent Management Advisors can assist with. The DWP has granted the council Trusted Partner status. One of the benefits of this is that we can automatically apply for managed rent payments directly to us, for those tenants that are vulnerable or are likely not to pay their rent.
- 8.8 From the Social Welfare Advice perspective, the Council is committed to ensuring that local residents, who need help to resolve their issues, are able to access the advice they need. We recently procured a new £3m contract for the provision of general and specialist advice, located in both the Customer Service Centre, in Granby Street, and in 9 outreach locations across the city. The new advice service will actively support those people who need help to seek legal justice, such as challenging legal decisions in relation to welfare benefits. Without this support, these issues will have a serious, detrimental impact on their lives.
- 8.9 The service will be provided by CITAL, the Community and Law Service and the Council's in-house specialist welfare benefits service. General advice is available in relation to welfare benefits, housing, debt, employment, community care, immigration and family issues. Specialist advice, including representation at appeals and tribunals is also available in relation to welfare benefits, housing and debt.
- 8.10 During 2017/18, the Council's funded advice providers supported 33,563 people to resolve their issues, many of these cases were complex, with people experiencing multiple issues. The main categories of advice that people sought advice for were welfare benefits (16,780), debt (4,051) and housing (4,044). Providers undertook 535 mandatory reconsiderations of welfare benefit awards and appeals, with an 82% success rate. Funded providers also achieved an additional £2.96m, consisting of both weekly payments and lump sums.
- 8.11 Concerns have also been raised at Children's Centres about clients not having internet accounts, with making an application for UC and to manage that claim on an ongoing basis. This is particularly challenging where there are language barriers. Provision of publicly accessible PC's will be addressed in the coming months and advice on how to set up or get help to set up on line bank accounts distributed. The DWP offer Help to Claim can also address this issue.
- 8.12 The most significant impacts are expected to come with managed migration for ASC clients, but there has been a steady stream of issues due to changes impacting on our time. With regard to specialist welfare casework, there has been a limited number of appeals cases coming through so far because there are still low numbers having to claim. However, the ones that have been received tend to be complex they are typically time-consuming or extremely difficult to resolve. For example, where clients have been misadvised to claim UC and cannot subsequently return to heritage benefits. The Persons from Abroad team have experienced delays in getting claims up and running, leading to the LA having to fund cases for longer than usual. Instances of this happened within the previous benefit schemes, this isn't unfortunately anything new however will continue to be closely monitored to evaluate whether the occurrences within the UC scheme have a greater impact then previous benefit schemes.

9. <u>UC DWP liaison, delivery and planning</u>

- 9.1 Over twelve months the Council has prepared for the rollout of UC, having developed a strategy, programme of work and engagement with key stakeholders to ensure we were fully prepared.
- 9.2 The service has proactively engaged with the DWP, Local Job Centre Plus (JCP) to build experience, knowledge and develop good operational practices within the UC Local Service to prepare for UC. This has culminated in the receipt of a DWP Customer Service Accolade (One Service Certificate) voted by the local DWP Job Centre staff for excellent collaborative working, across departments supporting Universal Credit Full Service Rollout. Particular successes in resolving local issues include the establishment of Single Points of Contact for vulnerable customers such as Care Leavers and those with disabilities, co-location of Council officers at JCP sites to provide advice and assistance, and cross-training on UC, and related matters, delivered both from and to Council and DWP staff.
- 9.3 The Council will continue to work with the DWP despite the challenges ahead to deliver subsequent UC implementation, and continues to meet regularly for resolution of both Operational and Strategic issues.

10. Risks for the City

10.1 The table below summaries the key risks and issues faced by the council and city residents as a result of the roll out of UC. A full breakdown of the risks faced by the council can be found at appendix 3.

Risk or issue identified	Consequential effect	Existing actions	Likelihood of impact	Mitigation of impact
RISK - Ability to respond to legislative changes in a timely manner	The UC scheme is susceptible to change at short notice and provides for limited planning	subject to major change at short notice for some	Medium	Effective engagement with JCP and key stakeholders. Good working relationship with JCP local and strategic managers.
ISSUE -	HB admin grant	Reviewing		Remodel
Direct	insufficient to	service		service to
financial	administer HB.	Revenues &		ensure fit for

	pact upon e Council	Significant investment by LCC to support tenants and minimise rent arrears.		High	purpose in respect of reduced but specialist caseload.
Cu	SK - ustomer cess	Loss of ADS funding from 2019 and PBS from CITAL from October 2019	Re aligning the digital offer to retain elements to support some claimants.	Medium	Provision of Help to Claim Service by CITAL & SWA contracts

11. The next steps

- 11.1 Working with the DWP to develop and enhance the data available from the UC claimant cohort. This is currently significantly inferior to the data that was available to us via Housing Benefit.
- 11.2 Information will continue to be gathered from other Councils and stakeholder groups, so we can share continue to learn from our shared experiences. The project plans and risk logs with be continually monitored by the respective Director of Finance and the Director of Housing and their Lead Members and updated to respond to emerging issues
- 11.3 The communications plan is continually reviewed. Quarterly updates regarding UC welfare reforms are emailed to all Councillors, with additional information and presentations available as and when required. Further training and awareness may be required should further changes be carried out to UC delivery.
- 11.4 It will also be necessary to prepare for the planned migration for those people who will not be affected by UC immediately. Whilst it is currently anticipated that managed migration will not begin until early 2021, vulnerable groups will require additional support during this period, and further action may subsequently be required regarding pension-age and specialist-housed customers.
- 11.5 Continue to collate the additional costs being incurred by the division directly arising from the transfer of benefits to UC.

12. Financial, Legal and other Implications

12.1 <u>Financial Implications</u>

The report sets out potentially significant negative impacts upon income collection and debt management for a number of Council services. In addition, the demand

for personal support from front-line services could increase, as recipients adjust to the new arrangements

Colin Sharpe,

Head of Finance, (x 37 4081)

12.2 <u>Legal Implications</u>

There are not any direct legal implications arising from this report.

Kamal Adatia

City Barrister & Head of Standards Monitoring Officer

12.3 Climate Change and Carbon Reduction Implications

The Universal Credit Delivery Strategy appendix 1 identifies improved digital engagement as a key area. Details are contained in the main report. The use of on-line services by customers should reduce the need to travel and therefore the carbon dioxide emissions associated with travel by car and public transport.

Aidan Davis

Environment Team (x37 2251)

12.4 Equalities Implications

Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which means that, in carrying out their functions, they have a statutory duty to pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation, to advance equality of opportunity between people who share a protected characteristic and those who don't and to foster good relations between people who share a protected characteristic and those who don't.

Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

There are no direct equalities implications arising from the recommendations of the report as it is for noting and comment. However, the impacts Universal Credit will likely continue have a significant effect on people/claimants from across all protected characteristics. As Universal Credit is rolled out more widely it will affect people with physical and mental health conditions, complex circumstances, families with children, and people in vulnerable situations including people who are homeless and people who struggle with addiction amongst others. These groups are likely to continue to require advice and support.

An EIA has been conducted on the roll out of universal credit (Appendix 2). The Public Sector Equality Duty is a continuing duty and therefore the EIA should be updated in line with any risks or issues disproportionately negatively affecting any protected characteristic groups that emerge which were not anticipated. The progress against the action plan should continue to be monitored to ensure that the mitigations identified are effective in reducing or removing the impact.

Hannah Watkins, equalities Manager ext. 37 5811

13.	Other Implications
	N/A.

14. Summary of Appendices

Appendix 1: UC Delivery strategy

Appendix 2: Equality Impact Assessment

Appendix 3: Risk log

15. <u>Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)</u>

No.

16. <u>Is this a "key decision"</u>

No.

17. If a key decision please explain reason

Universal Credit Leicester City Council

Full Service Strategy 2017 - 2020

Strategy author: Caroline Jackson - Revenues & Customer Support Manager

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1. Background - What is Universal Credit?

1.1 Universal Credit (UC) is a benefit which replaces six means-tested social security benefits and tax credits for working-age individuals and families. The roll out of Universal Credit (UC) started in 2013 and is intended to support people who are on a low income or out of work and make them better off in work than on benefits. Universal Credit should give support needed to prepare for work, move into work, or earn more. In return for this support, an applicant is responsible to find work or increase their earnings.

Universal Credit replaces:

- •Income-based Jobseeker's Allowance
- •Income-related Employment and Support Allowance
- Income Support
- Working Tax Credit
- •Child Tax Credit
- Housing Benefit
- 1.2 Universal Credit is being introduced in stages; "Live service" is currently applied in Leicester and is available to single people. Full Service incorporating a digital application and claim management platform was rolled out in the city from 13th June 2018. New applicants will no longer claim Housing Benefit (HB) and some changes to households on the existing HB caseload will result in a transfer on to UC. This resulted in the HB caseload, currently administered by the Authority, diminishing by an estimated 500 claims.
- 1.3 The introduction of UC affected working age households only, but the changes introduced also impacted on arrangements with landlords to collect rent and increased the need for additional support arrangements.
- 1.4 We are now planning for mass 'managed' migration anticipated from November 2020 and concluding 2024. No details have been released by the DWP

2. Our Vision

- 2.1 The national roll out of UC has been widely publicised. The original time table for its introduction was between October 2013 2017 however due to various issues and the "Test and Learn" method adopted by the DWP the original scheme has been amended during the implementation process and the timetable extended. The current date for the completion of full service roll out to working age applicants is 2024.
- 2.2 In Leicester we planned and identified the key risks for the city before the introduction of UC Full Service, in June 2018. We aimed to ensure measures were put in place to help mitigate the risks to try to prevent some of the negative impacts, as faced by claimants in other areas of the country, who have moved onto the new benefit.

3. The role of the Council

- 3.1 Our role was to ensure the roll out of UC for the City was delivered in collaboration with the DWP Delivery Division and the UC Local Authority Liaison Team. The transfer of claims should be effective with minimum disruption to applicants, claims processing and outcomes.
- 3.2 Claim resilience for the UC claimant remains paramount. The claim and delivery model for UC has channel shifted to a digital platform. This required access to supporting technology and the associated computer skills.
- 3.3 There was growing concern and well documented evidence that some aspects of UC, specifically relating to delays in the first payment of UC is causing financial crisis for applicants and significantly impacting upon the security of household tenure, particularly affecting the social housing sector which is a concerning trend. Nationally this is starting to create major issues including increased presence at food banks, fuel crisis, increasingly high levels of rent arrears, debts and ultimately leading to a rise in homelessness and was by in large mitigated through the Governments budget in November 2018 and October 2018.
- 3.4 A list of our activity to plan for UC Full Service roll out is included in appendix A

4. Strategic Objectives

- 4.1 There are a number of strategic objectives the council should achieve to ensure the managed migration is effectively planning and prepped for. These are:
 - 1. Operational Practices Updated
 - 2. Support and Guidance Identified & Access routes clear
 - 3. Partnership Working
 - 4. Recording /Monitoring/ inform reporting
 - 5. Impact Awareness

5. Identifying Key Areas of planning for managed migration

5.1 It is vital we understand the implications and have the right solutions tried, tested and established by November 2020, which is the earliest date the DWP could ask us to migrate the remainder of the HB caseload across to UC; regardless of potential timetable changes to UC migration. Many of the requirements can be put in place giving us the opportunity to *test and learn* new processes/provisions to ensure they are effective and achieve the outcomes expected before claimant numbers increase dramatically under the planned managed migration.

- 5.2 To enable the Council to understand the impact of this change we will identify the risks and issues:
 - Update the Corporate risk log of the risks that are identified as either an operational or DWP related issue. Accurate risk logs will ensure appropriate risks are recorded, resolutions or solutions are identified. Any lessons learnt from Full Service roll out will help to develop processes for migration. Risks should be raised at the appropriate level with the relevant organisations to seek a solution. Where major risks are identified working groups will be set up, with invites made to appropriate representatives, so that the issue can be fully explored, mitigating actions discussed, options agreed and then communicated to the wider group prior to being sign off through a pre-agreed route.

5.3 To record /monitor/inform the strategy we will

- Regularly model and map the current case load Housing Benefit and the Housing Stock
 to identify those claimants who are likely to remain on Housing Benefit. This will indicate
 the numbers of claimants likely to be affected by migration so that their characteristics can
 be identified and supported through the process. This will be particularly important for
 disabled and vulnerable households. Potential impacts can be measured, strategies
 developed around communication and support requirements.
- Identify criteria where known issues exist, such as tenure type, of those claimants likely to migrate so that appropriate engagement, communication and dialog is established with relevant stakeholders.
- 5.4 To ensure offer appropriate support, advice and guidance and identify clear access routes:
 - Identify potential impacts upon rent and council tax collection and recovery, overpayment debt collection, review take up campaigns for the local Council Tax Support/Council Tax Discretionary Relief schemes and address as required to maximise charge payer's financial resilience enabling work to pay.
 - Identify and map the provision of facilities in the city offering support to access free to use PC's, job clubs and work searches, to support those who can work to find employment.
 - Communication Information booklets, web guides etc. will be reviewed to ensure the
 correct message goes out; recognising that some claimants may encounter problems
 accessing digital services because of a lack of access to the internet and a range of
 difficulties, including reading and writing English. New or revised letters will be created to
 ensure they give supporting information to enable people to help themselves.
 - Review the digital engagement offer and align if necessary with the Assisted Digital Support offer delivered under the national Citizens Advice solution to ensure residents and stakeholders are aware how to access.
 - Review the Personal Budgeting engagement delivered under the national Citizens Advice solution to ensure residents and stakeholders are aware how to access.

- 5.5 To maintain collaborative partnership working we will:
 - Maintain established liaison links with the key stakeholder groups, to share and discuss information & good practice to develop an understanding of issues & concerns to inform the communication strategy to ensure claimants are offered the correct guidance and support throughout the new process.
 - 4.6 To ensure our operational practices are reflective of resources and demand we will: Continue to proactively review of internal administrative processes, including all discretionary policies, to ensure a holistic approach to supporting claimants accessing UC/CTS is taken. This will include clear guidance to define when awards would be supported, an automatic consideration of all discretionary awards administered within the service and an agreed referral route for vulnerable customers and those with complex needs to ensure they get access to the most appropriate support to enable them to manage their own situation in future, with less reliance on discretionary awards.

<u>Version control</u>					
Change	Date	Edit by whom	Distribution	Comments	

Originator Karen Wenlock	08/05/2017	Revenues & Benefits Manager.	Head Revenues & Customer Support.	For comment
VVCIIIOCK		Karen Wenlock	Caroline Jackson	
Revision	25/05/2017	Caroline Jackson	N/A	Returned to KW to include equality considerations.
Revision	11/08/17	Surinder Singh	Delivery, Comms and Political Governance	Equality considerations included KW
Annual revision	27/12/18	Head Revenues & Customer Support. Caroline Jackson	Revenues & Customer Support Housing	
			Delivery, Comms and Political Governance	

Appendix A:

What we did to identify risks with Universal Credit Full Service planning.

- Contacted other councils for advice & good practice
- Researched US outcomes, as reported nationally by the DWP, by our benching marking groups, and the Charter Institute of Public Finance and Accountancy (CIFPA) and other professional associated bodies.
- Liaise with DWP locally to develop good links & support mechanisms for staff and customers
- Liaise with local support and advise services (through Social Welfare Advice Partnership)
 to collect and share information, discuss and agree good practice. (important if the
 organisation is a national service and able to share actual issues/experiences of their
 colleagues in UC areas)
- Liaised with Social and Private Landlords to identify issues and concerns and provide information to help address issues. Where a landlord has properties in UC areas (Especially Registered Social Landlord's) they were encouraged to share information and good practice with us so we could learn from their experiences.
- Reviewed Discretionary Award provisions to ensure that policy and procedures are updated to reflect the potential additional demands on funding expected to ensure the most vulnerable are supported whether in receipt of legacy welfare benefits, or UC.
- Captured a baseline position of key performance indicators both nationally and local to monitor the impact of UC upon the council and city residents

DRAFT - Equality Impact Assessment (EIA) Template: Service Reviews/Service Changes

Title of spending review/service change/proposal	Universal Credit Full Service rollout
Name of division/service	Revenues & Customer Support
Name of lead officer completing this assessment	James Rattenberry, Principal Policy Officer
Date EIA assessment completed	7 January 2019
Decision maker	Director of Finance Alison Greenhill / Head of Service Caroline Jackson
Date decision taken	27 July 2019

EIA sign off on completion:	Signature	Date
Lead officer	James Rattenberry	7 January 2019
Equalities officer	Hannah Watkins	7 January 2019
Divisional director	Alison Greenhill	27 August 2019

Please ensure the following:

(a) That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.

EIA 290616 Page **1** of **19**

- (b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- (c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will current service users' needs continue to be met?

Universal Credit (UC) is a new benefit that is replacing six existing legacy benefits. UC Live Service (UC LS) was introduced from 25 January 2016 in Leicester for single, childless claimants making a new claim and who would otherwise have made a new claim for jobseeker's allowance. All applications for Universal Credit are made online.

Universal Credit Full Service (UC FS) was introduced in Leicester from 13 June 2018 and affects a substantially greater number of working age people – over 7,500 at the end of November 2018.

Universal credit will ultimately replace income based jobseeker's allowance, income related employment and support allowance, income support, working tax credit, child tax credit and housing benefit for working-age claimants. It will not replace contribution-based jobseeker's allowance and employment and support allowance, non-means tested disability benefits such as PIP, and pensioner benefits.

Most working age households, who would otherwise make a new claim for any of the above benefits, or who experience a major change in circumstances such as taking on a new tenancy, will now instead claim UC.

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The only exceptions to this will be households with three or more children, who are anticipated to become eligible from 1 February 2019, and those in Supported Exempt Accommodation. Another exception is expected to be created for heritage benefit claimants receiving a Severe Disability Premium, allowing up to 3,000 households in Leicester to remain ineligible for UC, although legislation for this has yet to be introduced.

Universal Credit entitlement is split between standard living allowances and a housing element to cover rents which is paid monthly – typically directly into a claimant's bank, building society or Post Office account. Household data available to September 2018 indicates that almost 50% of Leicester's UC claimants receive Housing Costs.

From June 2018, this caseload has increased by between 450 to 550 households per month. This is anticipated to continue until at least July 2019, based on the experiences of other Local Authorities who have already implemented UC FS. Thereafter the increase in caseload will slow until managed migration is introduced, this is anticipated to be delayed until 2020.

Households with three or more children will be exempt from applying for UC until 1 February 2019.

Working-age households in Supported Accommodation will continue to receive Housing Benefit and other heritage benefits for the foreseeable future.

Between 2019 and 2024, long-term legacy benefit claimants will migrate onto Universal Credit – the timetable for this phase has not yet been published.

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2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

Eliminate unlawful discrimination, harassment and victimisation

How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic

Is this a relevant consideration?

What issues could arise?

Universal credit will not affect those people who have already reached State Pension Credit age, and the most vulnerable households in supported accommodation will initially be protected.

The primary barrier to access is the 'online only' application route. Those without access or limited computer skills, literacy, numeracy or English skills, or disabilities may be unable to complete UC claims unaided. The Council will continue to provide under the Universal Support Delivery Partnership access to IT facilities with floorwalker support, training and skills through Libraries and Adult Skills, and form-filling services through our contract with Citizens Advice Leicestershire (CITAL).

The DWP have stated in their own EIA on UC that access for disabled claimants will be guaranteed either by phone or face to face interviews, although no arrangements to facilitate this have been announced in the local area. The local authority

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	are able to assist those unable to complete the online form by providing home visits through CITAL.
Advance equality of opportunity between different groups How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).	Universal Credit Full Service will enable remote access and include a dedicated email evidence submission which support workers and agencies can assist with directly. Specialist telephony service provided by the DWP after making their initial claims will help meet equality obligations, particularly for those with literacy, numeracy and disability needs who may struggle with the online format. The Council has been working closely with a range of contracted and voluntary advice and support services to be able to provide assistance to claimants moving onto UC. The DWP state in their own EIA that although some disabled groups may receive less in income, support is targeted towards the most severely disabled and the structure of UC allows for more income through work than under existing disability benefits.
Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?	The DWP intention is to make the support provided by UC more transparent and accessible by combining the awards process so the claimant can move in and out of work, experience changes to their circumstances without having to complete multiple forms for difference organisations. The new assessment process may be considered to be fairer and thus

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more equitable across the city's different communities/protected groups.

The aim of a fair and unified benefit assessment system will aid in fostering good relations between different groups challenging potential perceptions of bias or exclusion.

3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

There are approximately 23,000 Housing Benefit claimant households, (of working age) who are particularly vulnerable as they will become reliant on UC for their housing costs – coping with differing assessment practices, different payment methods and frequency of payment.

There are also approximately other benefit claimants as follows:-

17,000 ESA, 2,460 Job Seekers 4,500 Income Support claimants, 35,800 working /Child Tax Credit recipients.

A large proportion of these claimants will be receiving multiple benefits, and it is not possible to determine a unique number of potentially affected claimants between 2019 – 2024.

4. Information used to inform the equality impact assessment

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What **data**, **research**, **or trend analysis** have you used? Describe how you have got your information and what it tells you. Are there any gaps or limitations in the information you currently hold, and how you have sought to address this, e.g. proxy data, national trends, etc.

Internal research has been carried out within the Council since 2013, establishing deficiencies within Universal Credit design and pathfinder implementation versus the particular vulnerabilities of Leicester's population and facilities available to enable access and support. Issues identified included likely difficulties with form completion due to poor English, reading, writing and IT skills, particularly in areas of high socio-economic deprivation, financial vulnerability from reduced entitlement due to the cumulative impact of welfare reform income reductions, and the inconsistent availability of quality social welfare advice geographically in the city.

Since April 2017 additional research has been undertaken to identify establish the actual impacts caused by the implementation of UC FS. A number of Local Authorities and key Stakeholder groups operating in full service areas have been contacted to provide information to help us to identify risks and issues which will need to be addressed in our strategic and comms planning

5. Consultation

What **consultation** have you undertaken about the proposal with current service users, potential users and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs?
- How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

Service delivery is the responsibility of central government and the DWP - No consultation has been completed locally in respect of Universal Credit. –The Council's responsibilities relating to Universal Credit are covered in our contractual agreement to

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provide Universal Support services on behalf of the DWP and our statutory duties, both in benefit delivery of legacy and supplementary support income and our obligations to the city's residents to deliver changes in a proportionate and fair manner.

6. Potential equality Impact

Based on your understanding of the service area, any specific evidence you may have on service users and potential service users, and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal <u>because of their protected characteristic(s)</u>. Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially <u>vulnerable groups</u>, are likely to be affected by the proposal. List the relevant that may be affected, along with their likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

Impact of proposal:	Risk of negative impact:	Mitigating actions:

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Protected characteristics	Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal?	How likely is it that people with this protected characteristic will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	For negative impacts, what mitigating actions can be taken to reduce or remove this impact? These should be included in the action plan at the end of this EIA.
Age ¹	All working-age claimants over 18 will be affected – those of state pension credit age are protected. Claimants aged under 22 face additional exclusions under UC FS., although a number of exemptions will apply including where the renter is aged at least 18 but under 22 years old and was a care leaver before reaching the age of 18. We have estimated that up to 50 current HB claimants may be unable to access housing costs under UC	requirements. Reductions in income for large families have already been introduced from January 2017 in respect of new claims for legacy benefits — local support and discretionary award assistance	Recommend that intensive support is offered – through our Income Management Team (IMT)and advice services where possible – to inform and assist affected individuals identifiable though HB caseload. Personal Budgeting Support (PBS) is available to rationalise budgets and make steps towards remunerative work, delivered by the Council through our contract with CITAL. Referrals and communications with DWP assist with maintaining

¹ Age: Indicate which age group is most affected, either specify general age group - children, young people working age people or older people or specific age bands

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	Entitlement to allowances for children are reduced in comparison to legacy Tax Credit and Housing Benefit claims, although families with three or more children will be initially ineligible for the first three months of UC FS rollout.		Alternative Payment Arrangements to secure tenancies. Discretionary awards such as Discretionary Housing Payments (DHPs) are also available from the council for short term emergency situations, although this is a cashlimited fund which is due to reduce from April 2018 onwards. Care leavers under the age of 25
			are due to be offered a 100% exemption from their Council Tax bill from April 2018.
Disability ²	Impacts likely as disabled claimants will be expected to complete applications, provide evidence etc. regardless of health	Likelihood of impact will depend on the level of disability, support available and the skill level of the individual claimant.	The UC claims process does not include non-means tested disability incomes such as DLA and PIP.
	or capacity for work. Large number of disabled claimants in Leicester identified from those currently claiming ESA and HB (over 20,000).	For some people with mobility issues or find it more difficult to travel, making claims and submitting evidence online may present an improvement on the existing paper and appointment based processes. The application	facing services with responsibility

² Disability: if specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness or health condition.

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	High turnover of claimants who will be forced to claim UC in the alternative as reassessment leads to benefit changes. Some disabled claimants will receive a reduced entitlement, particularly those who previously received a severe disability premium. No exceptions apply to the seven waiting day period except for claimants not excepted to live more than six months. No exceptions apply to the minimum six week waiting time or the monthly payment schedule.	claimants with sight issues. Some people with mobility issues may also have difficulties with fine motor skills or cognitive impairments which prevents them from being able to access the	appropriate communication and promotion. If claims are not submitted on time, provisions for backdating claims are limited to one month only with stringent conditions.
Gender Reassignment ³	No impacts identified.		
Marriage and Civil Partnership	No impacts identified.		
Pregnancy and Maternity	No change from treatment from existing benefits, maternity pay etc. not included in UC.		

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³ Gender reassignment: indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected.

Race ⁴	Exclusions on the basis of nationality/residence etc. are unchanged from legacy benefits. Issues of command of English/literacy/numeracy relevant particularly for non-UK nationals, who will be expected to claim and manage their application online.	l	Signposting services to particular ethnic and cultural groups are available. Language line for internal translations available for one-off queries. DWP will provide interpretation service if requested in advance, although this is subsequent to the
Religion or Belief	No impacts identified.		application process. The unification of benefits in an already complex system to a single point of access however may increase take up of benefit entitlement previously from at least three separate providers.

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⁴ Race: given the city's racial diversity it is useful that we collect information on which racial groups are affected by the proposal. Our equalities monitoring form follows ONS general census categories and uses broad categories in the first instance with the opportunity to identify more specific racial groups such as Gypsies/Travellers. Use the most relevant classification for the proposal.

⁵ Religion or Belief: If specific religious or faith groups are affected by the proposal, our equalities monitoring form sets out categories reflective of the city's population. Given the diversity of the city there is always scope to include any group that is not listed.

Sex ⁶	the majority of benefit claimants are female. Additionally, 40% of those requiring financial support with	longer apply, family allowance components and thresholds are reduced and no additional allowances are given for third or subsequent children unless	assessment and payment system to enable more part-time work and
Sexual Orientation ⁷	No impacts identified.		

Summarise why the protected characteristics you have commented on, are relevant to the proposal?

As outlined above, the key protected characteristics with relevance to the proposal are age, race, sex, disability and children in poverty – resulting from potentially unequal access to claim Universal Credit and disproportionately negative impacts from reduced entitlement and an increased need for support.

Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?

No impacts relating to pregnancy and maternity, sexual orientation, religion and belief or gender reassignment have been identified.

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⁶ Sex: Indicate whether this has potential impact on either males or females

⁷ Sexual Orientation: It is important to remember when considering the potential impact of the proposal on LGBT communities, that they are each separate communities with differing needs. Lesbian, gay, bisexual and transgender people should be considered separately and not as one group. The gender reassignment category above considers the needs of trans men and trans women.

	Impact of proposal:	Risk of negative impact:	Mitigating actions:
Other groups	Describe the likely impact of the proposal on children in poverty or any other people who we consider to be vulnerable. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?	How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?	For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA.
Children in poverty	High Over 30,000 children in Housing Benefit households alone will be affected, potentially experienced financial issues during transition . Security of tenure and lowered long-term income is directly affecting life chances and placing people at increased risk of losing their home	Some details quoted nationally state:- "Assuming current official forecasts for wage growth and inflation are correct, there would be 5.1m children living in poverty or 35.7% of the total by 2021-22." And that: "Two-thirds of the children now in poverty are from families where someone is working"	Improve engagement with advice agencies – welfare rights provide assistance in SureStart Centres, provision of assistance to THINK family engagement, care/care leavers teams, and other support services. Availability of DHPs and other discretionary awards to support claimants while in financial crisis to access support

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Other vulnerable groups	Those with chaotic lifestyles, misuse substances / possible dual diagnosis. Former members of the Armed Forces, and family members of former/current members of the Armed Forces.	May struggle with less frequent payments and without stable accommodation.	Engagement through contracted advice services such as SSAFA – The Armed Forces Charity and frontline in-house substance misuse teams.
Other (describe)			

7. Other sources of potential negative impacts

Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include: other proposed changes to council services that would affect the same group of service users; Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents; external economic impacts such as an economic downturn.

No – by March 2018 all previously announced welfare reform changes will have been introduced.

However the future of Supported exempt accommodation (SEA) has not been clarified. A public consultation was held in November 2016 and the Green paper, due out in the spring, has not yet been published.

The proposed changes were to be implemented in April 2019 further delays could lead to negative impacts for that sector re uncertainty over funding and difficulties managing a new system at very short notice.

A consultation on increasing the minimum payment of Council Tax under the CTS scheme has ended and the Executive have determined the existing scheme will be maintained into 2018/19.

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8. Human Rights Implications

Are there any human rights implications which need to be considered (please see the list at the end of the template), if so please complete the Human Rights Template and list the main implications below:

No impacts identified.

9. Monitoring Impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered

Significant improvements have been made to the monitoring data collated around discretionary awards. This will be improved by the online e-form whereby data is automatically uploaded onto a central database. This will ensure we are able to monitor both positive and negative impacts in greater detail and with a much higher degree of certainty regarding the inferences drawn.

Improvements have also been made in relation to spend monitoring and outstanding claim data, which will be reviewed by Senior Management on a weekly basis.

The support grant scheme has designed to be flexible so that amendments can be made with the weighting of awards following feedback and due regard to budgetary constraints.

The service will continue to monitor performance indicators, protected characteristics and demographic elements as part of an ongoing system of renewal and improvement.

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10. EIA action plan

Please list all the equality objectives, actions and targets that result from this Assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Establish and augment monitoring data and corresponding analytical framework	To gather & monitor improved equalities data, adjusting the policy and promotion of the scheme to enable fair and consistent distribution of funds, as necessary and appropriate.	James Hudson	Ongoing
Improved Communication Strategy with advice organisations stakeholders	To continue to develop core interaction with identified stakeholders, e.g. advice organisations and collective action/needs strategy.	Nilkesh Patel	Ongoing
Improved delivery mechanisms from first contact to assessment, all users benefitting from an	Fit for purpose systems developed to meet the needs of all customers, and making	DWP	Ongoing

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accessible and easy to understand service	allowances to reflect need and vulnerability as appropriate.		
Long-term sustainability – short- medium- and long- range planning and strategy reviews	To develop, monitor and update strategies and range plans in line with findings – annual reporting and at regular intervals where appropriate.	Caroline Jackson / James Rattenberry	Ongoing

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Human Rights Articles:

Part 1: The Convention Rights and Freedoms

Article 2: Right to Life

Article 3: Right not to be tortured or treated in an inhuman or degrading way

Article 4: Right not to be subjected to slavery/forced labour

Article 5: Right to liberty and security

Article 6: Right to a fair trial

Article 7: No punishment without law

Article 8: Right to respect for private and family life

Article 9: Right to freedom of thought, conscience and religion

Article 10: Right to freedom of expression

Article 11: Right to freedom of assembly and association

Article 12: Right to marry

Article 14: Right not to be discriminated against

Part 2: First Protocol

Article 1: Protection of property/peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections

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	Completed by (Leicester City Council Universal Credi Risk Register Owner): Caroline Jackson	, , , , , , , , , , , , , , , , , , , ,	7		•	Date updated: Noven	her	2018				
	Completed by (The region of the property of					Date apaated. 110Vell	Target	Score wit				
Business Objective and Strategic	RISK What is the issue:	Consequence /effect: what would occur as a result, how much of a problem would it be	Existing actions/controls	existi		e with sures(Se e Below	Further management actions/controls	ac requ	manageme ctions/cont ired(See S [ables Belo	rols coring	Cost	Risk Owner	Target Date
Priority this impacts on	what is the root cause/problem; what could go wrong	?, to whom and why		Impact	Probability	Risk Rating	required	Impact	Probability	Risk Rating (I x P)			g
	DWP policy changes - Housing Cost element of UC differs from Housing Beneft (HB) awards. Further challenge in 2018/19 - 53 week rent not taken account of by UC calculation, causing a further week's loss in entitlement. DWP policy changes to Housing costs support is not as generous and brings in further restrictions on awards which means less entitlement to housing support.	Rent policy and collection will be challenging (different impact to rent arrears) Housing policies and proceedures will require reviewing Potential need to increase allocated staff resources	~ Housing Service are developing a UC Full Service impact strategy	4	2	8	~Effective and repeatative communication campaign	2	2	6			
L2	DWP policy change - UC first award/payment DWP policy is to assess a UC claim over a longer assessment period. Changes from HB 30 days to UC, calendar month assessment period, first payment made the following week plus any further processing delays. From April 2018, seven 'waiting days' without entitlement removed and two-week 'run on' for HB claimants transferring to UC, providing some mitigation.	~ Rental payments are delayed thus arrears build therefore financial consequenes for the Authority/ Housing Assoication/Private landlord ~ Financial consequences in £millions ~ Reputational damage ~ Demand for Crisis support will increase ~ Demand for Social Welfare Advice will increase ~ Demand for DHP may exceed Government budget allowance.	~ SWA provision currently under review and takes into account projected UC demand. ~ Housing Service are developing a UC Full Service impact strategy ~ DHP fund can support in extreme cases. Policy is under review. ~ Universal Credit Advances will be available up to 100% of indicative entitlement.	5	3	15	~Effective and repeatative communication campaign ~Review Housing tenancy Support ~ Evaluation and preparation with Welfare contracts to plan for increased demand.	4	3	12			
	DWP policy and Administrative change - Ending of weekly housing costs being creditted into rent accounts for LA social landlords The tenant is now responsible for payment their rental liability from UC monthly payment. Direct payments are via Advanced Payment Arrangement (APA's) only. APA's are short term and have engagement with Personal Budegetting Support (PBS) linked to support.	~ Regular credits of housing costs for working age tenants will end ~ Payment management will be more complex ~ Financial consequences in £millions ~ £3.6million for rent arrears (2/3rds of HB award)	~ This is a current working practise for low number of tenants ~Working to implement new systems before the changes ~ Adjusting staffing levels ~ Learning from peer experience where possible ~ PBS is currently direct referral to CiTAL (this may change under Budget Nov 2017 announcement)	8	4	32	~ Good engagement with DWP ~ Effective and repeatative communication campaign Review Housing Tenancy Support (STAR & collection)	6	3	18			
L4	DWP policy and Administrative change - Ending of weekly housing costs entitlement changing to monthly entitlement payment. The tenant and council tax charge payer entitltment is assessed as and when a change occurs. This changes to a monthly real time assessment.	~ Payment management will be more complex ~ Financial consequences in £millions	'~ This is a current working practise for low number of tenants - we are learning from the current issues. ~ Hsg Services will review rent collection arrangements and resources	5	3	15	~ Monitor and review	4	2	8			
	DWP Welfare Reform Policy potentially compromises the affordabilty of Social Housing (SH) in the City	Also a financial risk to the Council with subsidy implications - for incorrectly paid claims and partial subsidy refund on Specified Accommodation over and above Rent Officer Determinations. ~ The burden of of the Homelessness Reduction Act April 2018 increases this risk.	Housing Service are reviewing and developing a Homelessness prevention policy Housing Options are monitoring the occurances of this phenomenon Regular awareness sessions to private rented sector	5	2	10	~ Monitor and review	5	2	10			
L6 Revised detail Dec 2017	Funding for Supported Housing - announced from August 2018 that will remain long-term with Housing Benefit, planned reforms cancelled. Remaining risks are proper categorisation of specified accommodation in HB, duplication/refusal of payment between UC:HC and HB, 'liability gaps' between HB-funded Supported Accommodation and moves into General Needs Housing, information-sharing on when to claim UC/HB, applying for DHP and HB rent overlaps.	Risks to closing existing schemes, redundancies etc now mitigated - there is now an opposite consequence of a large number of schemes being set up in anticipation of HB funding, and existing providers seeking to have existing accommodation recatgorised as Specified Accommodation in order to safeguard income streams.	Consultation to seek clarification on future funding arrangements to plan for services going forward. ~ Aware of the issue therefore local liasion with JCP in place ~ Raised awareness in their in the hsg sector	8	3	24	~ Monitor and review	8	3	24			
L7	Severe Disability Premium claimants - confusion over advice and when to claim UC, particuarly when appealling a Work Capability Assessment Decision. New legislation expected to close gateway until Managed Migration and allow new HB/legacy claims to be made from January 2019.		Advice for staff, frontline services, advice agencies, Welfare Rights and other support groups.	3	7	21	~ Monitor and review	3	7	21			
L8	Potential for Government to issue legislative changes at SHORT NOTICE in legislative changes to policy which impacts on housing costs support. In particular, new gateway for Severe Disability Premium claimants, legislation laid 14 January and implemented 16 January 2019, together with confirmation 3+ child families expected to claim UC from 1 February 2019, and mixed-age pensioner couples from 15 May 2019.	~ Increased work loads and potential for delays ~ Lack of capability within service ~ Potential creation of backlogs ~ Difficult to business plan and to know how the service will look in the future ~ Unable to achieve efficiencies as additional resources required to cope with change	~ This is business as usual for the council ~ Change management processes are in place ~ Response to change demand is quick	4	3	12	~ Monitor and review	8	3	24			
Financial F1	DWP admin grant insuffucient to cover cost of HB adminstration	~ Financial consequences upto £0.5m. ~ Unable to achieve efficiencies as insufficent resource required to cope with increased work demands ~ potential creation of backlogs ~	~ Budget closely reviewed ~ key performnace targets closely monitored ~ Learning from peer experience where possible ~ Review operational proceedures	2	5	10	~ Monitor and review	2	5	10			

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F2	Housing Service & Revenues & Customer Support resources insufficent to meet incease recovery demand.	~ Financial losses, possibly £millions. ~ Income (cashflow) into the council may become compromised. ~ Unable to apply an attachment to benefit to recover debt from UC, other debts have priority ~ £36m for rent arrears (2/3rds of HB award £54m) ~ £3.6m uncollected debt for Council Tax (CT) collection (3% of inyear collectable debt.)	~ Budget closely reviewed	2 5	10	~ Monitor and review ~ Tenancy Support is focussed and has capacity to handle demand post the review ~ Effective and repeatative comms	2	5	10		
F3 Reviewed Dec 2017 CJ	Employability of job seekers There will be a % of job seekers who struggle to find work, thus the DWP deliverable to improve the income status of these households will not be acheived	Barriers to jobs: ~ Work clubs survive on results - job seekers into jobs - funding ceases if this goal fails to happen. ~ There is no drop in facility any longer at work clubs ~ Demand for job clubs is inconsistant across the city due to movitaltional and behavour of residents in communities. ~ ESOL - English for Speakers of Other Languages - demand for these course out strips capacity, understanding a job seeking committment can be compromised, ~ ESOL tutors recruitment is poor ~ Literacy in the city is lower than the national average (Reading age 7yrs) this is across all ethnic backgrounds. Understanding the UC claim process, managing the claim and completing this task on line will be difficult for some. ~ Therefore jobs will be low paid - manual, leisure industry or factory based which are paid the minimum or national living wage. ~ Collection from these households will be resource intensive and intermitant	tenants to ensure sunord is tarretted The city has a work club programme. However this has been reviewed and reduced in 2017 due to funding loss. It is not a flexible delivery model as it is delivered in defined community locations and only a bookable offer. Leicester Colleage have developed independantly a 'comprehensive' UC support package.	3 4	12	~ intelligence from Job Centre Plus could inform potential work club demand. ~ Migrant impact fund 2017/18 could be utilised to run courses on manging UC accounts on line, how to job search, completing journals in JCP settings/locations. ~ additional funding could be sort and tightened to meet the NHS limits	3	3	9		
F4	Income loss - HB overpayments remain collectable by the Council ~ HB overpayments stand at £7.7m June 2017	~ Financial losses, possibly £millions ~ Unable to apply an attachment to benefit to recover debt from UC, other debts have priority ~ LCC bad debt write offs increase ~ Reputational damage seen through failure to recover the debt wasting public money	~ Robust recovery policy in place ~ Dedicated recovery team	2 5	10	~ Pilot to repay overpayment early at a reduced rate. ~ Proactive CTS take up campaign	2	2	4		
Customer Access CA1 Reviewed Dec 2017 CJ	DWP policy change to on-line claim application and management. Perceived lack of digtal capacity and competancy in the city. Where there is vulnerbility management of the UC claim there will be a need for on going support not simply one off support to claim UC.	~ Insufficent access to digital hardware (pc') ~ Residents do not have sufficent IT skills to navigate UC claim package ~ Residents do not read English and therfore are not able to navigate UC claim package ~ Residents with a range of disabilities may find accessing and navigating UC claim package a challenge	~ Free access to 18 PC's Customer Service Centre, 163 bookable PC's in Youth and community locations plus Libraries settings across the city by 2018. ~ Free WiFi available across the city centre, Customer Service Centre and in Libraries ~ JCP have PC available in the centres ~ Access to Digital Support is funded by the DWP and delivered by LCC Adult Learning, Libraries Services and Citizens Advice. ~ Leicester College and other providers are developing a 'comprehensive' UC support package independently, which we are in the process of mapping so provision does not overlap, and we are able to establish consistent access routes.	3 3	9	~ Monitor and review ~ Effective communication plan for where help and support can be accessed ~ Review customer journeys ~ review PC availability take up ~ consider inceasing the number available at high demand locations ~ UC IT champion role to be developed and funding identified. ~ UC IT coordinator has been drafted and approval for recruitment planned for early spring 2017.	3	2	6		
CA2	Welfare and Law Advice Contract Failure of the Citizens Advice LeicesteShire contract to meet increase in demand. Now increased through the additional demands of providing ADS & PBS Universal Support leading up to and unilaterally from April 2019.	~ Advisory staff could be reduced ~ Reputational damage ~ Impact on vulnerable customers ~ Unable to influence or control the outcomes of the review ~ Potential costs to service of £75k (with no approval from Exec) estimated 12.5% lift in welfare bebefit provision ~ Impacts service delivery	~ Some remit to vary the contract conditions ~ Trying to negotiate with CAB to minimise costs	4 4	16		4	4	16		
CA3 Reviewed Dec 2017 CJ	Universal Credit: Social Welfare Advice demand Failure for LCC to procure and provide budgeting advice to service users post live service budget reduction identified/requested by DWP requiring such assistance. Increase demands with UC Full Service roll out must be communicated to ensure provisions are adequate. Risk of DWP & Citizens Advice Bureau (nationally) working in collaboration to provide national offer.	~ Potential reputation damage if advice not given correctly or in a timely manner ~ More people could present for support ~ Expectations need to be managed for service users (culture change, channel shift etc.) ~ National offer announced in Nov Budget 2017. Could remove local self referral provision which LCC use extensively. Therefore the number of PBS falls sigificantly.	~ CiTAL contract varied and robust to meet the required objectives of UC Support. ~ Successful launch of UC Live Service. ~ Comms updated to reflect in-year changes. ~ Positive relationships built with DWP and Jobs & Skills (Adult Learning - Kerry Gray and Jo Ives).	4 4	16		4	4	16		
CA4	Risk of potenial violent attack Mental health of UC claimants is compromised due to financial stress and changes to delivery model from current proceedures and frustration with their failure to comprehen the consequences.	~ increased instances of attack or near misses in all face to face settings ~ heightened concern in locations in the community with no security presence ~ increase in self harm referrals ~ increase in Stress Action Plans and associated resources to support staff ~ increase in staff absence	~ Self harm referral arrangements under review ~ Risk assessments are in place for all community public settings ~ SO2 form must be completed in every case - verbal or physical ~ Staff absence must be monitored, reported upon and action taken.	3 4	12	~ Staff referred to ammica (consulling) ~ Robust HR/H&S review of all SO2 and absence instances	3	3	9		

CA5	Welfare Reforms and the impact upon mental health levels in the city Universal Credit payments being made directly to claimant from DWP might result in more people not paying rent, failing into debt and crisis will result in more people presenting to the council for support.	~ Voluntary sector and advisory agencies are under review - could lose funding which would impact on service availablity to cope increased demand. ~ More depression, suicide, mental health issues generally in the community ~ Increase in vulnerable people.	~ Key contacts are in place with support workers and advisory groups ~ Staff becoming more accustomed to dealing with the vulnerable on a regular basis ~ Teams working well together to support each other ~ Dynamic Risk Assessment ~ staff undertake suicide awareness sessions	5		~ Working to contain the risk rather than reduce at present ~ Situation could get worse if more reforms and changes are rolled out; unknown until after elections	2	5	10	
CA6 NEW OCT 2017	City residents and professional bodies unaware of the impact of UC upon financial resilence Failure of DWP to communicate the policy intention to the claimant, for the claimant to not fully realise their responsibility and commitment to financial self reliance.	~ claimants fail to claim discretionary funding from DWP where entitled. ~ claimants present at CSC/ community settings/GP's/schools in crisis ~ Claimanat present in greater numbers at CSC for assitance as this is their	~ LCC UC and Hsg Comms plan ~ LCC raise these concerns with DWP a regular liaision meetings. ~ Officer awareness training programme in place ~ DWP discretionary leaflet has been developed ~ CSC front of House are UC/IT champions ~ Risk raised at the Cities Fairer Finanace meeting ~ 3 x service-wide events 15 & 19 Dec to raise awareness, with additional if required in January.	5	10	~ Monitor and review once live	2	5	10	

Leicester City Council Scrutiny Review

THE VIABILITY OF A COMMUNITY LOTTERY

A review of the Neighbourhood Services Scrutiny Commission

4th September 2019



Background to scrutiny reviews

Determining the right topics for scrutiny reviews is the first step in making sure scrutiny provides benefits to the Council and the community.

This scoping template will assist in planning the review by defining the purpose, methodology and resources needed. It should be completed by the Member proposing the review, in liaison with the lead Director and the Scrutiny Manager. Scrutiny Officers can provide support and assistance with this.

In order to be effective, every scrutiny review must be properly project managed to ensure it achieves its aims and delivers measurable outcomes. To achieve this, it is essential that the scope of the review is well defined at the outset. This way the review is less likely to get side-tracked or become overambitious in what it hopes to tackle. The Commission's objectives should, therefore, be as SMART (Specific, Measurable, Achievable, Realistic & Time-bound) as possible.

The scoping document is also a good tool for communicating what the review is about, who is involved and how it will be undertaken to all partners and interested stakeholders.

The form also includes a section on public and media interest in the review which should be completed in conjunction with the Council's Communications Team. This will allow the Commission to be properly prepared for any media interest and to plan the release of any press statements.

Scrutiny reviews will be supported by a Scrutiny Officer.

Evaluation

Reviewing changes that have been made as a result of a scrutiny review is the most common way of assessing the effectiveness. Any scrutiny review should consider whether an on-going monitoring role for the Commission is appropriate in relation to the topic under review.

For further information please contact the Scrutiny Team on 0116 4546340

	To be completed by the Member proposing the review				
1.	Title of the proposed scrutiny review	Scrutiny Review of 'The Viability of a local Community Lottery'			
2.	Proposed by	Cllr Jean Khote, Chair of Neighbourhood Services Scrutiny Commission			
3.	Rationale Why do you want to undertake this review?	As budget pressures continue to grow on all aspects of the council's work, there will continue to be an impact on the funding available for the voluntary & community sector in Leicester. Therefore, new funding and income generation options need to be considered for the future. Many other councils are now operating or in the process of setting up a local Community Lottery as a means of accessing a new funding stream to support local good causes. Leicester City Council may want to consider the viability of a local Community Lottery as one option to raise funds for good causes.			
4.	Purpose and aims of the review What question(s) do you want to answer and what do you want to achieve? (Outcomes?)	The purpose of this review is to highlight the potential risks, the benefits and the impacts involved for Leicester City Council in considering the option of a local community lottery. It is hoped that the following outcomes would be achieved: • Understanding of what a Community Lottery is • Consider what the impact a Community Lottery would have on a Leicester's communities, including moral and social implications as well as equalities implications • Understand what the resource implications for setting up and maintaining the Lottery are • Consider how current Council strategies and funding support for the VCS would impact having such a lottery system			

E	Links with somewate	This review tonic links into the augment for the site's
5.	Links with corporate aims / priorities How does the review link to corporate aims and priorities?	This review topic links into the support for the city's neighbourhoods and communities. Consideration to be given to: The council's commitment to anti-poverty and the current work to develop an Anti-Poverty Strategy The recent Scrutiny review into 'The Impact of Gambling on Vulnerable Communities' Existing support for the voluntary and community sector for example via Crowdfund Leicester
6.	Scope Set out what is included in the scope of the review and what is not. For example which services it does and does not cover.	The review will include: the financial aspects and impacts the moral and social implications the resource implications the risks and benefits to the council and the community The review will not: set out a methodology of how to implement a community lottery, it will only consider the viability of having one.
7.	Methodology Describe the methods you will use to undertake the review. How will you undertake the review, what evidence will need to be gathered from members, officers and key stakeholders, including partners and external organisations and experts? Witnesses Set out who you want to gather evidence from and how you will plan to do	 The review evidence gathering will include: Best practice and experience of other councils Relevant supporting research reports and documents Views of councillors re: impacts to wards LCC Financial and Community Services lead directors LCC Lead Executive Members (e.g. Cllr Clair, Cllr Russell) Council's regulatory responsibilities and impacts – lead
	this	 directors Council support for VCS – lead officers Evidence from other councils
8.	Timescales	Two months
	How long is the review expected to take to complete?	
	expected to take to	October 2019

9.	Resources / staffing requirements Scrutiny reviews are facilitated by Scrutiny Officers and it is important to estimate the amount of their time, in weeks, that will be required in order to manage the review Project Plan effectively.	The review can be conducted within the resources of the scrutiny team. It is estimated a total of three weeks of collective time over the proposed period will be required to support the review and prepare the report.
	Do you anticipate any further resources will be required e.g. site visits or independent technical advice? If so, please provide details.	No outside technical advice is envisaged to be needed.
10.	Review recommendations and findings To whom will the recommendations be addressed? E.g. Executive / External Partner?	ALL recommendations will be directed to the City Mayor and Executive.
11.	Likely publicity arising from the review - Is this topic likely to be of high interest to the media? Please explain.	It is expected that this review will generate medium media interest and the Lead Directors, the Executive lead and the council's communications team will be kept aware of any issues that may arise of public interest.
12.	Publicising the review and its findings and recommendations How will these be published / advertised?	There will be a review report that will be published as part of the commission's papers on the council's website.
13.	How will this review add value to policy development or service improvement?	The review hopes to set out clearly the potential impacts, the risks and the possible benefits of a local community lottery option.

	To be completed by the Executive Lead				
14.	Executive Lead's Comments The Executive Lead is responsible for the portfolio so it is important to seek and understand their views and ensure they are engaged in the process so that Scrutiny's recommendations can be taken on board where appropriate.	I am happy to be part of this review taken up by the Neighbourhood Services Scrutiny Commission Councillor Piara Singh Clair, Deputy City Mayor			
	To be comp	oleted by the Divisional Lead Director			
15.	Scrutiny's role is to influence others to take action and it is important that Scrutiny Commissions seek and understand the views of the Divisional Director.	Local lottery schemes have attracted significant negative media elsewhere in the country. Careful consideration needs to be given to align with the Council's key strategic priorities, particularly anti-poverty.			
16.	Are there any potential risks to undertaking this scrutiny review? E.g. are there any similar reviews being undertaken, ongoing work or changes in policy which would supersede the need for this review?	Negative publicity, conflict with gambling scrutiny review and conflict with the emerging anti-poverty strategy.			
17.	Are you able to assist with the proposed review? If not please explain why. In terms of agreement / supporting documentation / resource availability?	Yes, research resource will be available			
	Name Alison Greenhill				
	Role	Director of Finance 22 August 2019			
	Date				

	To be completed by the Scrutiny Support Manager				
18.	Will the proposed scrutiny review / timescales negatively impact on other work within the Scrutiny Team? (Conflicts with other work commitments)	It is anticipated that there will no adverse impact on the scrutiny team's work, to support this review but it must be anticipated that there may need to be some prioritising of work done during the time of this review.			
	Do you have available staffing resources to facilitate this scrutiny review? If not, please provide details.	The review can be adequately support by the Scrutiny Team as per my comments above.			
	Name	Kalvaran Sandhu, Scrutiny Support Manager			
	Date	21/08/19			

Meeting date	Meeting items	Actions Arising	Progress
3 July 2019	 Portfolio Overview by lead directors (to include structure chart and Q&A session). Food safety service plan 2019/20 – presentation slides and report. Draft Work programme 2019/20 – work in progress – members to consider and suggest items. 	 Item 1 agreed: That an option of joint working with Housing Scrutiny Commission on "Universal Credit" to be added to the work programme. That the Director of Finance circulate details of multi hub locations through the Members Bulletin to all members. That the Director of Neighbourhood and Environmental Services be requested to progress and action the priorities for the service mentioned in his presentation. Item 2 agreed: That the Food Safety Team be commended for the great work they carry out and; That the Food Safety team consider reaching out to young people in the city to raise awareness of food safety issues and the impact this can have. Item 3 agreed: to note the work programme as work in progress. 	

4 September 2019	Library services provision - reading projects / schemes across the city to improve literacy for children (lead director John Leach) – CYPS invited for joint scrutiny of this item	
	2. Universal credit impacts - one year on - report (lead officer Alison Greenhill)	
	3. Work Programme a) Proposal for new review topic: 'The Viability of a Community Lottery for Leicester' – draft scope (Lead: Chair/Anita)	
30 October 2019	 Waste and Recycling service provision Discretionary Payment (hardship fund) – (possible item tbc). 	
15 January 2020	1. Council budget	
4 March 2020		
22 April 2020		

FORWARD PLAN / SUGGESTED ITEMS				
Topic	Detail	Proposed Date		
KEY DECISIONS & NON-KEY DECISIONS	WATCHING BRIEF – members to consider relevant items to this commission, from the councils Corporate Plan of Key & Non-Key Decisions	Ongoing / watching brief		
CONSULTATIONS	WATCHING BRIEF – members to consider relevant items to this commission from planned or live consultations to provide scrutiny comments and views	Ongoing / watching brief		
COUNCIL BUDGET	WATCHING BRIEF – members to consider any budget impacts relevant to this commission, as necessary.	Ongoing / watching brief		
Neighbourhood services Asset Transfer Update (lead director Matt Wallace / John Leach)	Commission to receive a report	Tbc		
Community Safety Plan, including:	To receive report on actions and progress.	Tbc		
 a) Tackling hate crime e.g. through schools and communities (lead directors John Leach / Paul Tinsley) b) Tackling knife crime e.g. a city-wide 	To consider Joint work with other scrutiny commissions? where necessary			
strategy (lead director John Leach)				
Food Safety Service Plan 2019/20 (lead director John Leach)	Annual update on a key area of public protection within the city	July 2019		
Library services provision:	To receive a report on actions / progress To invite CYPS for joint scrutiny of this item	Sept 2019		
Reading projects / schemes across the city e.g. to improve literacy for children (lead director John Leach)				
Adult Education services provision (lead director Mike Dalzell)	To receive a report on actions and progress To consider joint scrutiny for this item.	tbc		
Waste and recycling service provision – report update (lead director John Leach)	To receive a report on actions and progress	October 2019		

Discretionary payment - hardship fund (lead director Alison Greenhill)	To receive a report on actions and progress	October 2019
Universal Credit and Welfare advice service provision (lead director Alison Greenhill)	To receive report on actions and progress To consider inviting chair of OSC for this item on universal credit (scrutiny comments to inform OSC)	Tbc
Improving Neighbourhoods – possible topics to scrutinise tbc – for example:	To receive reports on actions and progress	Tbc
a) Ward funding provision and community grant opportunities (Lead Directors: Alison Greenhill / John Leach / Miranda Cannon)	To consider joint scrutiny for items relevant to other scrutiny commissions?	
b) Community Lottery options and viability – task group review? (Lead Directors: Alison Greenhill / Miranda Cannon)		
c) Shop front improvement projects -tbc (Lead Director Andrew L Smith)		
Neighbourhoods Services Supporting Digital Inclusion (Lead Directors John Leach / Miranda Cannon)	To receive report on actions and progress	Tbc
Regulatory Services (lead director John Leach) – such as: a) Private Sector Housing e.g. tackling	To receive reports on actions and progress	Tbc
rouge landlords and licensing scheme for private sector homes b) Food Safety and Environmental Health	To consider joint scrutiny for items relevant to other scrutiny commissions?	
c) Licensing and Trading Standardsd) Public Safetye) Noise and Pollution controlf) Building Control		