

Leicester City Council Universal Credit (UC)Support (Full Service) High Level Risk log

Completed by (Risk Register Owner): Caroline Jackson				Date updated: November 2018									
Business Objective and Strategic Priority this impacts on	RISK What is the issue: what is the root cause/problem; what could go wrong	Consequence /effect: what would occur as a result, how much of a problem would it be ?, to whom and why	Existing actions/controls	Risk Score with existing measures(See Scoring Table Below)			Further management actions/controls required	Target Score with further management actions/controls required(See Scoring Tables Below)			Cost	Risk Owner	Target Date
				Impact	Probability	Risk Rating (I x P)		Impact	Probability	Risk Rating (I x P)			
Legislation L1	DWP policy changes - Housing Cost element of UC differs from Housing Benefit (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 procedures 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 consequences for the Authority/ Housing Association/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			
L3 Revised Dec 2017 CJ	DWP policy and Administrative change - Ending of weekly housing costs being credited 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 Budegeting 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 entitlement 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			
L5 Revised Dec 2017 CJ	DWP Welfare Reform Policy potentially compromises the affordability 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 occurrences 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 recategorised 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, particularly when appealing 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.	UC eligibility chcker to be amended from January 2019 for three children and SDP.	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 insufficient to cover cost of HB administration	~ Financial consequences upto £0.5m. ~ Unable to achieve efficiencies as insufficient 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 proceeedures	2	5	10	~ Monitor and review	2	5	10			

F2	Housing Service & Revenues & Customer Support resources insufficient to meet increase recovery demand.	<ul style="list-style-type: none"> ~ 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 in-year collectable debt.) 	<ul style="list-style-type: none"> ~ Budget closely reviewed ~ Learning from peer experience where possible ~ Review operational procedures ~ Allocations ensure all new tenants have bank accounts ~ CT undertake annual promotion of DD ~ Robust comms plans in plan literature is being reviewed to strengthen the message to pay ~ Staff resources across Housing and Finance are being reviewed and where possible expanded. ~ Hsg Services will review rent collection arrangements and resources plus Tenancy Support resources for vulnerable tenants to ensure support is targeted. 	2	5	10	<ul style="list-style-type: none"> ~ 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 achieved	Barriers to jobs: <ul style="list-style-type: none"> ~ 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 inconsistent across the city due to motivational and behaviour of residents in communities. ~ ESOL - English for Speakers of Other Languages - demand for these course outstrips capacity, understanding a job seeking commitment 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 intermittent 	<ul style="list-style-type: none"> ~ 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 College have developed independently a 'comprehensive' UC support package. 	3	4	12	<ul style="list-style-type: none"> ~ intelligence from Job Centre Plus could inform potential work club demand. ~ Migrant impact fund 2017/18 could be utilised to run courses on managing 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	<ul style="list-style-type: none"> ~ Financial losses, possibly £millions ~ Unable to apply an attachment to benefit to recover debt from UC, other debts have priority ~ LCC bad debt write off's increase ~ Reputational damage seen through failure to recover the debt.- wasting public money 	<ul style="list-style-type: none"> ~ Robust recovery policy in place ~ Dedicated recovery team 	2	5	10	<ul style="list-style-type: none"> ~ 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 digital capacity and competency in the city. Where there is vulnerability management of the UC claim there will be a need for on going support not simply one off support to claim UC.	<ul style="list-style-type: none"> ~ Insufficient access to digital hardware (pc') ~ Residents do not have sufficient IT skills to navigate UC claim package ~ Residents do not read English and therefore are not able to navigate UC claim package ~ Residents with a range of disabilities may find accessing and navigating UC claim package a challenge 	<ul style="list-style-type: none"> ~ 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	<ul style="list-style-type: none"> ~ Monitor and review ~ Effective communication plan for where help and support can be accessed ~ Review customer journeys ~ review PC availability take up ~ consider increasing 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.	<ul style="list-style-type: none"> ~ 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 benefit provision ~ Impacts service delivery 	<ul style="list-style-type: none"> ~ 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.	<ul style="list-style-type: none"> ~ 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 significantly. 	<ul style="list-style-type: none"> ~ 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 potential violent attack Mental health of UC claimants is compromised due to financial stress and changes to delivery model from current procedures and frustration with their failure to comprehend the consequences.	<ul style="list-style-type: none"> ~ 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 	<ul style="list-style-type: none"> ~ 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	<ul style="list-style-type: none"> ~ Staff referred to ammicca (consulting) ~ Robust HR/H&S review of all SO2 and absence instances 	3	3	9		

CA5	<p>Welfare Reforms and the impact upon mental health levels in the city</p> <p>Universal Credit payments being made directly to claimant from DWP might result in more people not paying rent, falling into debt and crisis will result in more people presenting to the council for support.</p>	<ul style="list-style-type: none"> ~ Increased work loads and potential for delays ~ Voluntary sector and advisory agencies are under review - could lose funding which would impact on service availability to cope increased demand. ~ More depression, suicide, mental health issues generally in the community ~ Increase in vulnerable people. 	<ul style="list-style-type: none"> ~ 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 	2	5	10	<ul style="list-style-type: none"> ~ 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	<p>City residents and professional bodies unaware of the impact of UC upon financial resilience</p> <p>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.</p>	<ul style="list-style-type: none"> ~ claimants fail to realise there is a built in assessment period TWICE as long than HB/JSA assessment period. therefore they fail to appreciate they will not receive their first payment for a minimum of 8 weeks ~ claimants fail to appreciate they are obligated to transact on line. ~ claimants fail to claim discretionary funding from DWP where entitled. ~ claimants present at CSC/ community settings/GP's/schools in crisis ~ Claimant present in greater numbers at CSC for assistance as this is their usual 'assistance point' 	<ul style="list-style-type: none"> ~ LCC UC and Hsg Comms plan ~ LCC raise these concerns with DWP a regular liaison 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 Finance meeting ~ 3 x service-wide events 15 & 19 Dec to raise awareness, with additional if required in January. 	2	5	10	<ul style="list-style-type: none"> ~ Monitor and review once live 	2	5	10			