East Renfrewshire Council

Audit of housing benefit

Risk assessment report
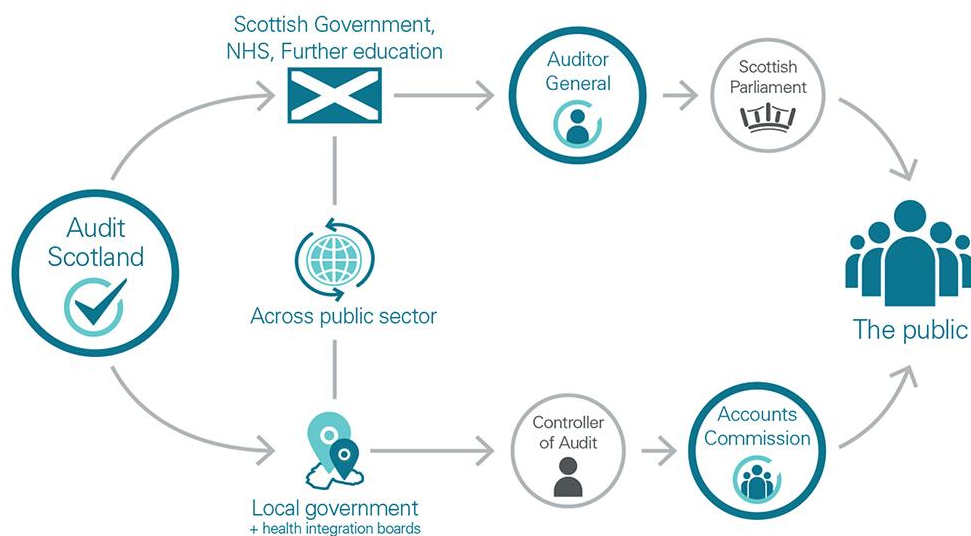
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- carrying out relevant and timely audits of the way the public sector manages and spends money

- reporting our findings and conclusions in public

- identifying risks, making clear and relevant recommendations.

Contents

Introduction

1. This risk assessment was completed as part of Audit Scotland's housing benefit (HB) risk assessment programme. It does not represent a full audit of East Renfrewshire Council's benefit service.

2. The Local Government in Scotland Act 2003 introduced new statutory duties relating to Best Value and Community Planning. The key objective of the risk assessment is to determine the extent to which the benefit service is meeting its obligations to achieve continuous improvement in all its activities.

3. Specifically, the risk assessment considers the effectiveness of the benefit service in meeting national and local priorities, business planning and reporting, and delivering outcomes.

4. Information for this risk assessment was gathered from a range of sources including:

   - the self-assessment, supporting evidence, and updated action plan provided by the council
   - Department for Work and Pensions (DWP) indicators, and other performance measures
   - scrutiny of internal and external audit reports
   - discussions with the appointed external auditor and the council's internal auditor
   - discussions with senior officers in the council during our site visit in July 2018.

Risks identified

5. The key risks identified during our audit are highlighted within each section of the report. An action plan will be agreed with management and progress will be monitored as part of future benefit performance audits.

6. Any weaknesses identified represent those that have come to our attention during the course of normal audit work and therefore are not necessarily all the weaknesses that may exist. It is the responsibility of management to decide on the extent of the internal control system appropriate to East Renfrewshire Council.

7. The contents of this report have been discussed with relevant officers to confirm factual accuracy. The co-operation and assistance we received during the course of our audit is gratefully acknowledged

Executive summary

8.   A risk assessment was previously carried out on the council's benefit service in July 2016 when Audit Scotland identified three risks that were outstanding from the previous risk assessment carried out in 2014 and three new risks to continuous improvement. This was reported to the Chief Executive in July 2016 and, in response, the council submitted an action plan in August 2016 to address the risks.

9.   Since our last audit there has been some significant changes within the council. In October 2017 the council's benefit service merged with its Scottish Welfare Fund team to form the Benefits and Discretionary Payments Team. This new team is responsible for processing claims for HB, Council Tax Reduction, Scottish Welfare Fund applications, and discretionary housing payments.

10. In making this change the council aims to provide job security for staff, while ensuring that It delivers an efficient, effective and resilient benefits and discretionary payments service to customers at a time when budgets are being reduced and full-service Universal Credit (UC) is being rolled out.

11. During this period of change the council has remained proactive and committed in its efforts to improve service delivery. For example, by:

- working in partnership with an external consultant in October 2017 to carry out a full review of its accuracy checking and overpayment recovery processes. As a result of this collaboration, a new management-checking framework was developed, and an additional £42k of overpayments was recovered in 2017/18 following a full review of overpayments that were being recovered from ongoing deductions of HB

- engaging with the DWPs Performance Development Team (PDT) in December 2017 to establish the reasons for the decline in claims processing performance

- employing temporary and agency staff to provide additional processing resources for the service.

12. In addition, the council introduced an online digital claims facility in February 2017 to allow customers to submit new claims online and, in August 2017, extended the functionality to allow customers to report a change event online.

13. As a relatively small council with a caseload of approximately 3,500 claims, resource management is an important aspect of service delivery. The loss of experienced staff, or high levels of sickness absence can have a significant impact on performance and, despite the council's continued efforts to improve service delivery, resourcing issues have had an adverse effect on claims processing times.

14. These have included significant levels of staff sickness absence and unfilled vacancies. In particular, between 2016/17 and 2017/18, sickness absence increased by 70% from 84 days to 141 days and, in the first three months of 2018/19 the service had lost another 58 days to sickness absence. As a consequence, the time taken to process claims has declined significantly since our last audit. This is discussed in more detail under *Speed of processing* at paragraph 23

15. To prepare for the DWPs roll out of full service UC on 26 September 2018, the council has established a UC Implementation Board chaired by the Head of Business Change & Revenue Services and is well positioned to ensure that it is prepared and ready to assist its customers during the transition to full service UC.

16. Although the council demonstrates awareness of what constitutes an effective, efficient and secure benefit service, there are five new risks arising from this risk assessment, and three risks outstanding from the previous risk assessment. To ensure continuous improvement, the council needs to address these risks. This includes:

- addressing the reasons why the council's cumulative speed of processing performance for new claims, at an average of 31 days in 2017/18, is significantly above the DWPs most recent published Scottish average of 22 days, at 31 December 2017, and why change events performance has declined from an average of five days in 2017/18, to an average of nine days, at 30 June 2018

- ensuring that the level of processing resource within the benefit service is sufficient to improve on current performance levels

- ensuring the accuracy of the recorded time taken to process change events after an internal audit in May 2018 found that, in nine of 15 (60%) claims scrutinised, the actual time taken to process the change was, on average,13 days more than that recorded on the benefit IT system

- addressing the reasons for the significant decline in accuracy performance, and considering a more targeted approach to selecting cases for a management check to ensure the best use of limited resources, and to maximise the potential positive outcomes

- improving the level of performance in respect of all debt recovery, which remains low when compared to other Scottish councils.

- utilising Direct Earnings Attachments as an alternative means of recovering overpaid HB, to help further improve HB debt recovery performance.

Business planning and reporting

17. An effective business plan provides an opportunity for the council to set out the aims and objectives for each service and should contain key deliverables against which performance is measured, monitored and reported.

18. The *Revenues Service Plan 2017/18* is the key strategic document covering the work of the Benefits and Discretionary Payments team and details the service's focus which is to provide an efficient and effective service for the council, and to maximise income streams. Under-pinning this are the service's key activities and performance indicators. Key activities include:

    - continuing to improve online forms so that customers can access the service digitally
    - supporting residents through the changes arising from Welfare Reforms and the rollout of UC
    - developing 'one notification' for council tax and benefit awards.

19. The key indicators for the Benefits and Discretionary Payments team include the:

    - time taken to process claims
    - accuracy of payments
    - time taken to deal with requests for reconsiderations and appeals
    - recovery of HB overpayments.

20. The service plan is updated six monthly by the Operations Manager and progress is reviewed by the Head of Service, Director and the Chief Executive at the mid-year and end-year points. Where key activities or performance are not on target, the Operations Manager is required to provide a detailed explanation.

21. In addition to the high-level review of the service plan, there is regular detailed reporting of HB performance at an operational level. This includes:

    - weekly focus meetings between the Head of Revenues and Business Change, the Revenues and Business Support Manager and the Operations Manager
    - fortnightly meetings between the Operations Manager and the Senior Revenues Officer
    - monthly 1-2-1 meetings between the Senior Revenues Officer and the Team Leader
    - monthly Revenues Management, Senior Management and Departmental Management team meetings
    - bi-monthly 1-2-1 meetings between the Benefits and Discretionary Payments Team Leader and team members.

22. The council also makes good use of an online performance management tool, which is updated six monthly by the Operations Manager and contains all the service's key performance indicators.

Delivering outcomes

23. Effective operational processes and IT systems, along with skilled staff, help benefit services deliver sound performance and continuous improvement. The council has a number of management arrangements in place to support this.

Speed of processing

24. When customers claim benefit, it is a time of financial uncertainty for them and, as such, it is essential that the service has sufficiently trained and effective benefit processors in place that can make informed decisions on complex benefit claims and pay benefit promptly.

25. Exhibit 1 illustrates the council's current and previous performance.

Exhibit 1: Speed of processing performance (average number of days)						
	2014/15	**2015/16**	**2016/17**	**2017/18**	**2017/18 Scottish Average (Q3)**	**2018/19 (Apr-Jun)**
New claims	27 days	24 days	32 days	31 days	22 days	31 days
Change events	7 days	4 days	5 days	5 days	9 days	9 days

Source: East Renfrewshire Council & DWP

26. Since our last audit, the council has been very proactive in its efforts to improve performance levels and has worked internally, and with key partners, to introduce a number of new initiatives and changes to processes and procedures. These include:

- introducing a generic approach to claims processing in 2016/17 by training HB staff to process claims from the public and private sector. Since the creation of the Benefits and Discretionary Payments team in October 2017 further cross training has been given to staff to provide more resilience and flexibility to the team and to provide opportunities for improvements in claims processing times

- utilising external agents and temporary appointments to assist in the processing of new claims and change events. Throughout 2017/18 the service utilised a FTE agency processor, an additional FTE agency processor on an ad-hoc basis, and a FTE temporary processor. These contracts ended on the 31st March 2018. However, the council has secured the services of 2x FTE processors on a temporary contract until 31st March 2019, to help the service transition through the rollout of full service UC in September 2018

- introducing a digital online claims facility in February 2017 for new claims and extending the functionality in August 2017 to allow customers to report change events online. At the time of our audit, further functionality allowed customers to upload evidence in support of a change event, and the council advised that it was trialling the same upload functionality for new claims, with a view to offering customers a fully digital claims process

- working with the DWPs PDT team in December 2017. The PDT scrutinised 18 new claims and reported no issues with processes or procedures, but concluded that a lack of resource was the main factor for the decline in the council's speed of processing performance

- implementing the DWPs Verify Earnings and Pensions (VEP) service in 2017 and signing up to the enhanced alerts service which was due to go live in July 2018. The VEP service provides councils with:

    - real-time access to Her Majesty's Revenues and Customs (HMRC) records to verify a customer's earnings/pension details which should help reduce the time taken to establish a customer's income

    - real-time alerts to notify when a customer's income details have changed to ensure that a change can be processed timeously, therefore ensuring payment accuracy and reducing the potential for an overpayment to arise.

27. In addition, the council makes good use of the DWPs Automated Transfer to Local Authority Systems (ATLAS) service to automate approximately 77% of change event notifications received and advised that it was prioritising its workload to process new claims received with all information available, and claims that have been outstanding the longest, with the aim to clearing the current backlog of work.

28. As a relatively small council with a caseload of approximately 3,500 claims, resource management is an important aspect of service delivery. The loss of experienced staff, or high levels of sickness absence can have a significant impact on performance and, despite the council's continued efforts to improve service delivery, resourcing issues have had an adverse effect on claims processing times. These have included significant levels of staff sickness absence and unfilled vacancies. In particular, between 2016/17 and 2017/18, sickness absence increased by 70% from 84 days to 141 days and, in the first three months of 2018/19 the service had lost another 58 days to sickness absence.

29. In 2016/17, new claims processing performance declined significantly from an average of 24 days to an average of 32 days, while the time taken to process change events declined slightly from an average of four days to an average of five days. However, despite a significant increase in sickness absence in 2017/18, new claims performance improved slightly to an average of 31 days, while the time taken to process change events was maintained at an average of five days.

30. In the first quarter of 2018/19, while maintaining the time taken to process new claims at an average of 31 days, the time taken to process change events had declined to an average of nine days. This level of performance placed the council 28th in Scotland for the time taken to process new claims and 19th for the time taken to process change events, when compared to the DWP's 2017/18 quarter three published performance statistics.

31. In addition, following an internal audit of the benefit service in May 2018, the auditor reported that, in nine claims (60%) out of a sample of 15 claims selected at random where a change event had been processed, the date on the benefit IT system, used to determine the time taken to process the change, had been incorrectly recorded.

32. Audit Scotland's analysis of this sample established that, had the council recorded the correct date of the change, the time taken to process each of the nine claims would have been, on average, 13 days more than that recorded and subsequently reported to the DWP. In accepting the findings of the internal auditor, the benefit service has reacted promptly to provide remedial training to staff.

33. However, based on the high level of error found in the internal audit sample, the council cannot take assurance that its reported speed of processing performance in respect of change events is accurate until it carries out further work to establish the extent of the problem.

Risks to continuous improvement	
1	The council needs to address the results of the findings of the internal audit in May 2018 to provide assurance that its reported performance in respect of the time taken to process change events is accurate.
2	The level of processing resource within the benefit service might not be sufficient to significantly improve on current below target performance levels.

34. Audit Scotland identified one risk to continuous improvement that was originally carried forward from our audits in 2014 and 2016 in that the council's cumulative new claims speed of processing performance, at an average of 30 days in 2014, and an average of 24 days in 2016, remained above the Scottish average at the time of the audits.

35. In view of the council's current level of new claims processing performance, which at an average of 31 days for new claims in 2017/18 remains well above the Scottish average of 22 days, based on the DWPs 2017/18 quarter three published performance statistics, we consider that this risk remains outstanding.

Accuracy

36. The accurate and secure administration of HB should be a key priority for every council, and to support this, it should have a robust quality assurance framework in place.

37. The council places significant importance on the quality and accuracy of its claims processing activities and historically has delivered a high level of performance in this area. In 2014/15 and 2015/16 the service reported its financial accuracy rate at 99%. However, in 2016/17, accuracy performance declined significantly to 93%.

38. To understand and address the reasons for the decline, in October 2017, the council worked in partnership with an external consultant to carry out a full review of its management checking framework. This review found that the council's focus on targeting many of its checks on new staff and staff that were under-performing was introducing a negative bias which, despite claims being corrected before payment, had resulted in the decline in reported performance.

39. As a result of this review, a new management checking framework was implemented in April 2018 with the aim to ensure that all management checks are selected randomly from the benefit IT system and carried out wherever possible before a payment and notification letter are issued. A new post-payment check of 300 claims per year was also introduced to specifically record the financial accuracy of the live caseload.

40. Management checks are carried out by the Benefits and Discretionary Payments Team Leader and two Lead Officers. This should provide the service with flexibility and resilience to ensure that checks are routinely carried out. On a daily basis the service aims to carry out a pre-payment and pre-notification check on a minimum of 2% of decisions selected randomly from the live HB system.

41. A comprehensive audit check form is used to record the outcomes of these checks and, where an error is identified the officer is advised of the error and asked to correct the claim. When the claim has been amended the checking officer ensures that the appropriate corrective action has been taken before signing off the check on the audit form, which is then retained on the electronic workflow system to ensure a complete audit trail of actions taken.

42. The outcomes from management checks are recorded electronically, summarised and analysed to identify any trends or patterns of error. Where an officer is making recurring errors the Team Manager, or one of the Team Leaders provides guidance and support which could involve assisting in the processing of a similar claim to ensure that the officer is aware of the reasons for the error, and how to correct it. Where there is a pattern of error across the service, the Senior Revenues Officer would provide remedial training as appropriate.

43. In addition to the 2% daily pre-payment checks, new staff are subject to a 100% check of their work which is reduced incrementally until the officer is considered to be competent. There is also a 100% check of all payments in excess of £1500 and, where an error is found, the payment can be recalled before issue to the customer.

44. The service regularly reports accuracy performance to staff and senior management through:
   - bi-monthly 1-2-1 meetings between the Team Leader and team members

- the Revenues Service Plan, which is updated six-monthly and reviewed by the Head of Service, Director and Chief Executive

- the council's online performance management framework, which is available to view by senior management and updated six-monthly by the Operations Manager.

45. Exhibit 2 illustrates the council's current and previous accuracy performance.

Exhibit 2: Financial accuracy performance		
	Internal Target	**Achieved**
2013/14	98%	99%
2014/15	97%	99%
2015/16	98%	99%
2016/17	98%	93%
2017/18	100%	77%
2018/19 (at 30 Sep 2018)	100%	90%

Source: East Renfrewshire Council

46. Although the council had been proactive in its efforts to address the decline in accuracy in 2016/17, the council advised that accuracy performance declined significantly in 2017/18 as a result of the underperformance of some members of staff.

47. Although the decline in performance is of concern, it highlights the importance of targeted checks over random checks as the service had been focussing its resources on staff that were causing most errors and seeking to resolve this by providing additional support and guidance.

48. If the council decides to fully adopt the random checking approach as detailed in the new management checking framework, we consider that there is an increased likelihood that under-performing staff might avoid checks of their work, and that checks could be carried out on low-risk claims that have been passported from the DWP.

49. Passported claims are where the customer's entitlement to HB is provided by entitlement to a qualifying DWP benefit. As these claims are considered to be less complex, it could be reasonably assumed that the DWP has carried out the necessary checks on their customer's entitlement to the qualifying benefit and therefore more beneficial for the benefit service to carry out management checks on more complex claim types where recurring errors are most found.

50. Audit Scotland identified the following risks to continuous improvement during our previous audit in 2016 in that:

    - the council needed to review and recommence its programme of management checks as soon as possible and have robust arrangements in place to ensure that management checks were routinely carried out to minimise the potential for fraud and error to enter the system.

    - there was limited analysis of management check outcomes and therefore the council was missing an opportunity to identify trends and patterns of error that could help identify areas for learning and development of staff and the service.

51. We consider that both these issues have been addressed as the council has recommenced its management checks, carries out detailed analysis of the outcomes, and worked in partnership with an external consultant in October 2017 to carry out a full review of its processes and procedures.

Risks to continuous improvement	
3	The council needs to address the reasons for the decline in accuracy performance.
4	The council should consider a more targeted approach to selecting cases for a management check to ensure the best use of limited resources and to maximise the potential for positive outcomes.

Interventions

52. To minimise error in the caseload, councils must encourage customers to report change events on time and have a robust intervention programme to identify changes and take appropriate corrective action.

53. To support this, the benefit service notification letters remind customers of the requirement to report any change event. In addition, the council's website provides customers with details of office opening hours, information on how to contact the benefit service by telephone, letter, or e-mail, and an online change event form that is fully automated.

54. The council also actively participates in the DWP's Housing Benefit Matching Service, Audit Scotland's National Fraud Initiative, the DWP's Real Time Information (RTI) and optional RTI data matching services, and more recently the DWP's VEP service. These should all help to identify possible unreported change events that require further investigation.

55. On a daily basis the service makes good use of the benefit IT system diary facility to highlight claims where future changes are expected or known, which could affect the customer's entitlement to benefit, for example, a significant birthday or a change in household details.

56. Exhibit 3 below details the outcomes from the council's normal interventions activity.

Exhibit 3: Interventions performance				
	Number of completed interventions	Number of decreases in HB identified	Number of increases in HB identified	% resulting in a change to benefit
2015/16	480	100	35	28%
2016/17	16	10	1	68%
2017/18	77	40	8	62%
2018/19 (at July 2018)	61	27	8	57%

Source: East Renfrewshire Council

57. Since our last audit there has been a significant reduction in the number of proactive interventions carried out. However, in 2016/17, with limited resources and a decline in claims processing performance, a decision was taken to reduce proactive interventions activity and focus resources on improving claims processing times.

58. Since 2016/17, proactive interventions activity has focussed on an annual review of customers in receipt of a work/private pension. In the most recent exercise carried out in May 2018, 121 review forms were issued, and, at the time of our audit, 61 forms had been returned and fully reviewed.

59. Of these, 57% had resulted in a change to the amount of HB paid, which indicates that the council is effectively targeting cases where the customer has not declared a change in their circumstances. This activity also helps the council to identify overpayments that may otherwise have gone undetected, and to ensure that customers that are entitled to more benefit receive their correct entitlement.

60. While the outcomes from interventions are recorded on the benefit IT system, the system can only record whether there has been an increase, decrease, or no change to benefit. As such, it was not possible for the council to fully analyse the outcomes of interventions in order to inform the scope and focus of future intervention campaigns.

61. Audit Scotland identified one risk to continuous improvement that was carried forward from our audit in 2014 in that:

- the council did not have a formalised interventions strategy and had not recorded or analysed the outcomes from its interventions activity since 2011/12. In order to ensure that resources are being used to best effect, and to help inform future intervention

strategies, the council should fully document its interventions approach, and link intervention outcomes to the value of overpayments/underpayments identified.

62.   The council told us that it had engaged with its benefit IT system supplier with a view to improving the level of intervention information that can be recorded on the system, however at the time of our audit it had been unable to progress this satisfactorily due to the supplier's other business priorities and commitments.

63.   In view of this, and as the council does not have an intervention strategy, was not fully documenting its approach, and was not linking interventions outcomes to the value of overpayments/underpayments identified, we consider that this risk remains outstanding.

Overpayments

64.   To protect public funds, councils should take appropriate steps to ensure that benefit overpayments are minimised and that, when they do occur, they are correctly classified and rigorously recovered.

65.   The *Corporate Debt Policy,* approved by members in June 2016, details the council's approach to the recovery of outstanding debt and has a stated commitment to maximise the collection of debts owed, minimise write offs, and wherever possible assist customers by minimising any additional recovery costs.

66.   The policy aims include:

- developing a council wide approach to debt collection
- ensuring a professional, timely, and consistent approach to recovery action
- reducing the levels of debt owed to the council
- treating customers consistently and fairly and ensuring that their rights are protected.

67.   To minimise HB overpayments, the benefit service prioritises change events that could lead to an overpayment, uses benefit IT system reports to predict changes, and reminds customers wherever possible of the need to report any changes. In addition, the council checks the output from the DWPs ATLAS system daily and prioritises claims where an overpayment could arise.

68.   This proactive approach has helped minimise the number of local authority (LA) /administrative error overpayments that can arise as a result of processing delays. This is particularly important as a council can lose subsidy where its LA/administrative error rate exceeds 0.48% of all HB payments made. Since 2014/15, the council has been well below this threshold, which is commendable.

69.   Where it is not possible to recover an overpayment from ongoing benefit entitlement, the debt is passed to the Corporate Debt Recovery team (CDRT) who issue an invoice to the

customer, followed by a reminder, and a final notice. Where no response is received after the final notice stage, the debt recovery team makes good use of all available recovery options including:

- utilising the DWP's Payment Deduction Programme to automate the recovery of HB overpayments from DWP benefits, where appropriate

- using the DWP's Customer Information System to trace customers who are no longer resident within the local authority area

- working in partnership with other councils to recover an overpayment from ongoing benefit received by the customer in another council area

- utilising Sheriff's Officers for difficult to recover debt.

70. Exhibit 4 illustrates the council's current and previous recovery performance.

Exhibit 4: Overpayment levels and recovery performance				
	2014/15	**2015/16**	**2016/17**	**2017/18**
Total HB overpayments carried forward	£1,189,729	£1,232,391	£1,451,055	£1,550,356
Total overpayments identified in-year	£395,284	£442,902	£398,230	£376,760
Total value of HB debt	£1,585,013	£1,675,293	£1,849,285	£1,927,116
Total value of HB debt recovered	£230,512	£224,238	£228,103	£268,000
% of in-year debt recovered	58%	51%	57%	71%
% of total HB debt recovered	15%	13%	12%	14%

71. Historically, the council's level of debt recovery has been low when compared to other Scottish councils where Audit Scotland regularly sees all debt recovery rates in excess of 20% and in-year recovery rates in excess of 60%.

72. The council recognised this as an area for improvement and, in October 2017, worked in partnership with an external consultant to carry out a full review of its overpayments processes and procedures. The review was concluded in February 2018 and resulted in a number of changes designed to improve recovery rates supported by a set of protocols developed by the council in January 2017 to standardise its approach.

73. The *HB Debt Protocol* underpins the *Corporate Debt Policy* and is a set of 11 protocols setting out the council's approach to recovering HB overpayments. These include:

  • legal compliance - in all respects the council's approach must always be legally compliant

  • assertive transparency - ensuring the debtor is aware that recovering debt helps to fund public services while highlighting to the debtor the potential consequences of defaulting on payments or not engaging with the council

  • optimal rate of recovery - ensuring that the maximum recovery rate is set in all cases, except those that could result in financial hardship for the customer

  • fairness - treating all customers fairly and equitably

  • full asset utilisation - making good use of all available resources and technology to aid in the recovery of debt.

74. As part of the review by the external consultant, the council analysed 380 claims where the overpayment of HB was being recovered from ongoing deductions of benefit. This analysis found that 315 (83%) customers had been repaying their debt at less than the maximum allowed rate of £11.10, with an average weekly repayment rate of £5.75 and, in 254 of the 380 cases (67%), the weekly recovery rate was less than £5.75.

75. The council took immediate action to address this by contacting affected customers and advising that recovery rates would be increased to £11.10 per week. Customers were also advised at this time that due consideration, and advice and assistance would be available if the proposed increase would cause hardship.

76. As a result of this action, the council improved its in-year and all debt recovery performance by recovering an additional £42,000 of overpaid benefit in 2017/18.

77. To help further improve recovery rates, the council has signed up to the recently launched DWP HB Debt Service project. This service allows councils to send up to 1,200 dormant HB overpayments per month to the DWP to match with real time HMRC employment and pension data.

78. At the time of our audit, the council had sent an initial batch of 77 cases for matching and was reviewing the 34 cases that had been returned. Although it is too early to assess how successful this will be, it is another aspect of the recovery process that the council can fully utilise to help deliver further improvements in recovery performance.

79. Audit Scotland identified one risk from our previous audit in 2016, and one risk carried forward from our 2014 audit in that:

   - the information in respect of benefit overpayment recovery performance that is provided by the CDRT to senior management does not provide sufficient information for the council to determine the effectiveness of its approach or provide assurance that it is meeting its debt recovery policy aims

   - with the exception of in-year recovery performance for 2014/15, the council's performance in respect of recovering benefit debt is considered well below normal recovery rates.

80. We consider that the first risk has now been addressed as the benefit service receives monthly reports from the CDRT providing a breakdown of payments received and debts outstanding. However, despite an improved recovery performance in 2017/18, the council's level of performance in respect of all debt recovery remains low when compared to other Scottish councils and therefore we consider that this risk remains outstanding.

Risk to continuous improvement	
5	The council is not utilising Direct Earnings Attachments as a means of recovering overpaid HB and is therefore missing an opportunity to further improve its debt recovery performance.

Appendix A

Progress against action plan agreed after previous benefit audit in 2016, as at March 2018	
The council needs to review and recommence its programme of management checks as soon as possible and have robust arrangements in place to ensure that management checks are routinely carried out to minimise the potential for fraud and error to enter the system.	Completed
There is limited analysis of management check outcomes and therefore the council is missing an opportunity to identify trends and patterns of error that could help identify areas for learning and development of staff and the service.	Completed
The information in respect of benefit overpayment recovery performance that is provided by the CDRT to senior management does not provide sufficient information for the council to determine the effectiveness of its approach or provide assurance that it is meeting its debt recovery policy aims.	Completed
With the exception of in-year recovery performance for 2014/15, the council's performance in respect of recovering benefit debt is considered well below normal recovery rates.	Outstanding
The council's cumulative speed of processing performance for new claims and change events remains higher than the Scottish average time taken, at 31 October 2014.	Outstanding
The council does not have a formalised interventions strategy and has not recorded or analysed the outcomes from its interventions activity since 2011/12. In order to ensure that resources are being used to best effect, and to help inform future intervention strategies, the council should fully document its interventions approach, and link intervention outcomes to the value of overpayments/underpayments identified.	Outstanding