

Housing Benefit performance standards – a social policy resource for Citizens Advice Bureaux

Extracts from the Department of Work and Pensions HB/CTB performance standards, March 2002.

Citizens Advice, January 2003

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How to use this document

As part of its strategy to work with local authorities to improve standards of HB administration, the DWP published in March 2002 a comprehensive set of performance standards for housing benefit and council tax benefit. The full standards are available on the website: www.bfi.gov.uk, click on performance standards. They are designed to be comprehensive and therefore it is inevitably a lengthy document.

The purpose of this document therefore, is to bring together those extracts likely to be most relevant to the common problems facing CAB clients. As such this is not, and is not intended to be, a balanced summary of the full document.

The full DWP document is divided into seven functional areas:

- strategic management – having clear stated aims and action, resources and monitoring to deliver them, with effective training and IT.
- customer services – providing an efficient and prompt service that meets the needs of all claimants and persons with a legitimate interest in a claim
- processing claims – speedy and accurate claims processing with effective verification
- working with landlords – to give private landlords the confidence to let to claimants, and to support delivery of social housing
- overpayments – preventing, identifying and recovering overpayments
- internal security – preventing internal fraud
- counter fraud – deterring, preventing, detecting and pursuing fraud.

Extracts from only four of the above areas are included here – **customer services, processing claims, working with landlords and overpayments.**

The DWP document uses a standard format within each area:

- **Introduction**, highlighting why the topic is important
- **Levels of performance**, giving a set of bullets which define what constitutes performing “at standard” and “above standard”

- **Risk and impact**, which details the consequences of not performing at standard
- **Good practices** – a set of bullets with practices which should help achieve the standards

Local authorities are expected to assess themselves against the various standards. Whilst they are not expected to achieve these overnight, they are the standards to which they should aspire. The standards are not currently linked to any financial incentives or penalties, but they will help local authorities in dealing with inspections from the Audit Commission and Benefit Fraud Inspectorate. There is also some DWP funding available to help local authorities implement the standards. So work to meet the standards should have a high priority within housing benefit departments. However the standards are not currently compulsory, and individual local authorities may have good policy or financial reasons for doing things differently.

You may find the performance standards useful to refer to when engaging in local social policy work around HB administration issues, building on the partnership approach advocated in ***Everyone Benefits – a guide to promoting partnerships between Local Authority Housing Benefit Services and Citizens Advice Bureaux***. For example:

- if you are repeatedly dealing with clients facing possession action where rent arrears are due to housing benefit delays, then it may be worth making reference to paragraph 5.44 in the **Working with landlords** section
- if clients have difficulty in travelling to the HB office because of age, illness or disability, then the reference to the provision of home visits in paragraph 3.59 in the **Customer services** section may be useful
- if clients repeatedly report documents being lost or mislaid in the HB office, then you may wish to raise the reference to providing receipts in paragraph 3.16 in **Customer Services** section.

Where you are involved in HB liaison groups, it may be useful to have a standing item on the agenda on how the HB department is working to implement the performance standards and which standards should be prioritised for early action. Alternatively you may wish to arrange a specific meeting to discuss which are the most important areas for claimants in terms of improving the quality of the service locally.

Please note that the rest of this guide consists entirely of extracts from the DWP HB/CTB Performance Standards document. The wording has not been altered or added to in any way. The DWP headings and original paragraph numbers have also been left in place so that you can identify them on the full version and see them in their wider context, should you be planning a detailed piece of social policy work.

Customer services

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Clear, simple, accessible claim forms

Introduction

- 3.10 This standard is about 'getting it right first time'. Clear HB/CTB claim forms can help reduce the need for requests for further information from the claimant and reduce the risk of claimant confusion or fraud. Clear advice at the time of the claim can reinforce messages about the need to provide evidence of identity and income, and resolve concerns of those with limited documentation.

Levels of performance

- 3.13 You are performing **at standard** if the LA:
- has arrangements for ensuring the accessibility of HB/CTB claim forms, using a range of appropriate outlets including council enquiry points, local housing offices and local offices of Registered Social Landlords (RSLs) which are clearly advertised
 - has a claim form which meets the standards as set out in the Benefit Fraud Inspectorate (BFI) model claim form
 - has procedures to ensure all claims are completed in writing on an approved form, meeting requirements of HB Reg. 72 and CTB Reg. 62.
- 3.14 You are performing **above standard** if, in addition to above, the LA:
- has conducted recent market research to test the clarity, usefulness and accessibility of the form with focus groups and users including people with disabilities and representatives of key local ethnic minority groups (see standard for service for claimants with specific needs)
 - makes the claim form available on its website, to allow it to be completed on a PC and printed off for signing and return to a designated local authority office.

Risk and Impact

3.15 The risk and impact of the LA not performing **at standard** is:

Risk	Impact
Claimants may find it difficult to obtain and complete the claim form	<p>Increased administration costs</p> <p>Resources diverted from claim form</p> <p>Claimants lose out if they delay making a claim</p>
Claimants may not include relevant information with original claim or provide necessary documentation	<p>Claimants can inadvertently provide incorrect information or further information has to be requested, delaying processing times, causing poor performance against Best Value Performance (BVPIs) targets</p> <p>Claimants need to return to the office and face added stress and frustration</p>

Good practices

3.16 Good practices include:

- providing the claim form in a range of appropriate languages and help to claimants to complete the form (see standard on accessible, quality service for claimants with specific needs)
- obtaining Plain English accreditation for the claim form, or making use of the Plain English BFI model claim form
- monitoring the reasons for incorrectly completed forms, using the information to help future claimants with completing forms
- monitoring why requests for further information have to be made to claimants and identifying ways of improving the initial supply of information to reduce such requests
- making claim forms available at local advice agencies, such as Citizens' Advice Bureaux (CAB)
- providing a receipt for the claim form and documents to the claimant immediately on receipt. The receipt can be in the form of a tear-off slip
- providing information to the claimant on what to do if they do not receive a receipt for postal claims within 7 days of postage

- ensuring that all literature including forms, leaflets, decision notices and other non-standard letters is in Arial font, of at least size 12 but preferably 14 and that the pages are not cluttered
- When communicating with people who suffer from visual impairment it is necessary to produce alternative formats. These include large print, usually a font size of between 16 and 22, Braille, audio tapes, disk, e-mail and websites (see *Accessible, quality service for claimants with specific needs*) as recommended by the Royal National Institute for the Blind (RNIB), see *paragraph 3.62*. For more information visit the RNIB website at www.rnib.org.uk/seeitright.

Timely, helpful response to public enquiries

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Introduction

- 3.20 This section is about what happens when a claimant or potential claimant calls into an office, rings up the LA, or sends a letter or e-mail. So far as possible, standards are drafted in terms of what the customer should expect when they make an enquiry.
- 3.21 It is not only about quantitative measures, such as opening hours and speed of response, but also about the quality of service that is provided.

Levels of performance

- 3.25 With any of the standards listed below, the LA can mark "Yes", even if it does not meet the exact requirements of the standard, provided:
- for that particular standard, it provides a service that is at least as good as the standard we have set, and
 - it can demonstrate that any adjustment to the standard of service is based on the particular needs and wants of local customers.
- 3.26 You are performing **at standard** if the LA:
- has telephone enquiry lines to help with claim queries that:
 - is open and staffed a minimum of 36 hours a week except during public holidays
 - is staffed by a team that is able to respond to detailed enquiries
 - answers 80% of phone callers with an officer during enquiry hours within 10 rings for a non queue system and within 5 minutes for a queue system

- ensures at least one main office is open a minimum of 36 hours a week, except during public holidays, available to provide face to face help with claim queries on a drop in basis for all categories of claimants, or delivers a service which provides an equivalent level of access in rural areas, when there may be a need to provide a larger number of offices open for shorter periods
- ensures 80% of members of the public calling in at HB/CTB offices during opening hours, without an appointment, are seen within 15 minutes of their arrival at the office, by a person at least competent to deal with basic queries and able to allocate appointment times
- ensures 80% of members of the public calling in at HB/CTB offices during opening hours requesting on-the-spot help, can, within 30 minutes of their arrival at the office:
 - have their enquiry resolved, or
 - see a competent benefits assessor, or person able to assist with more complicated problems such as queries regarding assessment and entitlement, or
 - in the case of claimants requesting help with completing a claim:
 - ◆ are seen by a person competent to provide that help, or as a fall back
 - ◆ have their claim form date-stamped to ensure that their claim is valid from the date they came in and are issued with a receipt
- ensures 80% of those arriving with an appointment are seen within 15 minutes of their appointment time by a person competent to conduct the interview
- has the facilities to arrange private interviews for those who request it
- has arrangements which ensure that claimants can book an appointment over the phone, with an appointment time that is normally 14 calendar days or less after the phone call
- provides and monitors supply of clearly advertised leaflets covering the following areas:
 - who can apply, covering potential claimants including information for students, persons from abroad and those in work
 - how to apply including the renewal process and the need to notify changes in circumstance

- how much HB/CTB will I get, covering eligible/ineligible charges, non-dependant deductions, absence from home, backdating and Discretionary Housing Payments
 - how to complain
 - how to appeal
 - other social security benefits - for example Jobcentre Plus and The Pension Service leaflets
Leaflets should cover both Housing Benefit and Council Tax Benefit.
- replies substantively to 80% of letters within 14 calendar days or an equivalent target
 - ensures if a claimant makes contact asking about their claim, staff or contractors tell them what is happening on their claim and advise them about the actions they need to take for the claim process to be completed
 - ensures when a claimant, or claimants' representative such as CAB, makes a phone enquiry, the person handling the enquiry:
 - accesses the relevant file or appropriate personal information such as notebook entry within three minutes if the claimant is on the phone, or
 - rings back or writes to the claimant within 24 hours, responding substantively to the enquiry or making an appointment and monitors quality of responses and time periods
 - provides an over-the-counter service for claimants presenting completed claim forms and verification evidence, so claimants can avoid sending off key identification documents, and can get an on-the-spot receipt for a claim and confirmation that they have provided adequate verification documentation
 - operates effective record keeping and document management, whether clerical or Document Image Processing (DIP) based, so the claimant needs to present verification documents once only in support of a claim unless further checks are required as part of Verification Framework (VF) visiting. When someone visits an HB office identity checking should not normally require documentary evidence
 - takes active steps to find out what customers want and whether the service delivers this. Carries out customer surveys every three years where this is required by Best Value (BV), covering such issues as helpfulness, clarity, adequacy and timeliness of communication

3.27 You are performing **above standard** if, in addition to the above, the LA:

- has immediate electronic access to claimant claim information, to allow business to be conducted over the phone, such as reporting a change of circumstance that reduces benefit entitlement

Good practices

3.29 Good practices include:

- locating offices that provide HB advice and document verification so that, whatever part of an LA area claimants live in, it is easy for them to reach one of the offices by public transport
- providing waiting areas with toilet and facilities for customers with children
- providing a queuing system at HB offices that indicates how long it will be before a claimant is seen; using queuing and ticketing systems to measure how long people have to wait
- advertising the LA's commitment to customer services standards and time targets for dealing with public enquiries and opening hours
- making effective use of queuing time, when phone lines use a queue-based system, to provide useful information and give claimants the opportunity to find out more, helping reduce the number of abandoned calls
- having clear arrangements for claimant's appointees to have all the necessary information to solve a query, providing the claimant has given written authority
- agreeing with advice agencies who regularly advise claimants that a faxed copy of any consent/authority will be sufficient to allow claimants' details to be discussed
- responding effectively to enquiries by e-mail and fax from claimants/advice agencies/claimant representatives, even if security considerations mean that substantive issues need to be addressed by phone, letter or face to face meetings
- resolving queries on the first point of contact
- having cross-cutting teams of managers and more junior staff working to identify ways of improving customer service, analysing causes of contacts to improve effectiveness of service and initial advice

- monitoring complaints, appeals decisions and ombudsman complaints, analysing the causes, taking early action to resolve the problems when complaints reflect wider failures
- making leaflets available at different outlets, for example advice agencies, public libraries, doctors surgeries and any other appropriate places
- making regular checks to replenish stocks of leaflets at all outlets.

Effective training and development for customer service

Levels of performance

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3.32 You are performing **above standard** if, in addition to above, the LA:

- uses feedback from customer experience to identify opportunities for improved group performance

Good practices

3.34 Good practices include:

- managers encouraging upward feedback from front-line staff on:
 - the kinds of customer needs they have difficulty meeting
 - what types of claimant case they need more training on
- analysing information on customer experiences, complaints, appeals and local government ombudsman (LGO) complaints and using them to feed back into messages for better performance and to identify group and individual training needs
- having a training manual for use by staff that is regularly updated with changes in regulations and processes
- providing training on service delivery to claimants:
 - from ethnic minorities
 - with disabilities
 - with mental health problems
 - who are vulnerable, including a good knowledge of equal opportunities policies, the Disability Discrimination Acts and awareness of the Human Rights Act 1998

- training all front-line staff to inform claimants:
 - they may still be eligible for HB/CTB when they start work
 - about extended payments and fast-tracking
 - of possible eligibility for other social security benefits, the method of claiming and where to get further advice
 - of the role of the Rent Service in determining rent levels for private sector tenants.

Clear, informative decision letters

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Introduction

- 3.40 This section is about the quality of decision letters. Letters to claimants and other affected persons need to inform them clearly about decisions made, and explain the decision clearly enough for them to decide whether they might have grounds for appeal.

Levels of performance

- 3.41 You are performing **at standard** if the LA:

- has systems and checks to ensure that the content of decision letters meet the requirements of Schedule 6 to the HB (General) Regulations 1987 and the parallel CTB regulations, and each letter:
 - is addressed to a named person
 - has a date
 - contains contact details, telephone numbers, extensions, etc
 - explains the decision, and the reasons for it, clearly in plain English
 - contains an explanation of the benefit rate and the period of entitlement
 - explains any deductions
 - explains the claimant's rights to have a written statement of reasons for the decision or to have the decision reconsidered or appealed
 - explains the responsibilities of the claimant, for instance to report changes of circumstance.

- 3.42 You are performing **above standard** if, in addition to above, the LA:

- gets a Plain English award for letters
- includes in letters details of how to get independent advice
- has a statement on all letters stating that alternative formats are available on request.

Risk and Impact

3.43 The risk and impact to the LA of not performing at standard is:

Risk	Impact
Letters are unclear, do not explain the reasons for decisions, provide inadequate information and contact details, and do not inform claimants about their rights and responsibilities	<p>More queries from confused and dissatisfied claimants. They do not realise that decisions mean they will have to pay part of the rent themselves</p> <p>Claimants become dissatisfied and are less inclined to report changes of circumstance</p>

Good practices

3.44 Good practices include:

- using appropriate opportunities to provide information on benefits and tax credits in work, to ensure claimants are aware that HB can continue if they get work and that they will be better off in work
- drawing on models of good practice for letters including materials which may be developed by DWP to support this standard
- having procedures that ensure that when more than one letter is produced for a claimant on the same day, those letters are amalgamated into one and any contradictions clarified
- informing claimants that Discretionary Housing Payments may be available for claimants suffering difficulties.

Accessible, quality service for claimants with specific needs

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Introduction

3.51 Services need to be accessible to people with disabilities, people for whom English is a foreign language, people with communication or learning difficulties and other people who are vulnerable because of their age or physical or mental health problems.

Levels of performance

3.59 You are performing **at standard** if the LA:

- has assessed its service against the requirements of the Disability Discrimination Acts 1995 and 1999 and is taking action to meet these requirements
- ensures all public areas in HB offices open to the public are suitable for and accessible to disabled people, following the Corporate Health Best Value Performance Indicator for authority buildings, using the terms accessible, suitable and disabled people as defined in Approved Document M of the Building Regulations 1991. If offices do not meet this standard, ensures that claimants with restricted mobility are offered home visits
- replies to queries and issues decision letters in a format that is suitable for the claimant, for example Braille, audio-cassette tape or computer disk (see *Timely, helpful response to public enquiries* in this booklet) as well as in a format that can be read by an adviser
- provides text-phone facilities for people with speech and hearing difficulties
- arranges a British Sign Language interview, when requested, within three working days in most cases
- provides information on request in different formats including in large print and on audiotape
- monitors and conducts an annual review on all the facilities provided for people with disabilities
- ensures offices handling face to face enquiries are accessible by public transport from large parts of the local authority's area; and addresses the needs of those living in parts of the LA area which do not have regular public transport to an HB office
- offers home visits to claimants who have difficulty reaching the office by public transport because of age, illness or disability, or offers reimbursement of taxi fares when appropriate
- arranges for an interpreter within three working days or accesses a telephone interpreting service immediately for claimants who need an interpreter and cannot readily provide one themselves
- consults customer representative groups including CAB and disability and relevant ethnic minority groups, informing these groups about services provided, and engages the groups in assessing effectiveness of services provided
- monitors and conducts an annual review on all facilities provided for claimants of key ethnic minority groups in the area.

3.60 You are performing **above standard** if, in addition to the above, the LA:

- has a documented procedure for liaison with Social Services when:
 - Social Services act on the claimant's behalf
 - benefit is being withdrawn from a vulnerable client
- has procedures in place to recognise when a claim is from someone vulnerable or with a disability and ensure that the claim is dealt with appropriately
- uses translation services for written communication with claimants who do not read English.

Risk and impact

3.61 The risk and impact of the LA not performing **at standard** is:

Risk	Impact
<p>Failure to assess the specific needs of some categories of claimant and provide services that meet those needs</p>	<p>Claimants receive and inconsistent level of service</p> <p>Eligible people do not claim</p> <p>Increased poverty among potentially vulnerable individuals, increasing existing problems of debt and ill health in some individuals</p> <p>Claiming benefit is made more difficult and more stressful for individuals who are already vulnerable or facing difficulties</p>

Good practices

3.62 Good practices include:

- easing access to the service through:
 - home visits
 - telephone call centres
 - providing interviewing cubicles with disabled access and fitted with an induction loop
 - providing induction loop facilities in other areas such as initial reception points and giving waiting rooms disabled persons' access doors
 - ◆ providing low counters for wheelchair users
 - ◆ having sight and sound customer queuing systems

- ◆ making sure mainstream leaflets and forms are optimal for the sight impaired
- ◆ recruiting and developing staff with specific language skills, including sign language
- ◆ providing access to lipspeaker or palantypist services
- providing awareness training for staff dealing with claimants who may be mentally ill, suffering from clinical depression, have learning difficulties or are otherwise vulnerable, who may not reply to correspondence, and may appear uninterested in their claim, and who may require a more supportive face to face approach
- monitoring inadequately completed claim forms to identify claimants who may need additional support through the claiming process.
- making staff aware that not all disabilities are visible, and that not everyone can read or write
- providing disability awareness training for all staff
- providing joint working and training with Social Services staff, for instance training Social Services money management staff in HB/CTB verification requirements and how to fill in a claim form effectively
- operating effective procedures for recording and acting on information that a person has a mental health problem or is otherwise vulnerable, ensuring that markings are accurate, relevant, not excessive and up to date
- addressing the needs of customers with mental health problems in procedures. For instance, DWP internal guidance on dealing with customers with mental health problems is that when withdrawal of benefit is being considered, and the customer is known to have a mental health problem, staff should refer the case upwards, and if the more senior officer has concerns about withdrawing benefits then consider a high priority visit.
- providing independent welfare rights advice, particularly if claimants experience difficulties accessing benefit, or referral to welfare rights organisations
- making provision when requested for women-only interviews where appropriate, for example for those escaping domestic violence or for religious reasons

- providing clear signage in all public areas, good lighting and use good contrast in colour to assist the visually impaired and other vulnerable people, as recommended by the RNIB
- having contracts with the Royal National Institute for Deaf People (RNID) Communication Service Department to provide local communication services, where appropriate. More information can be found on their website www.rnid.org.uk/html/services-home.htm
- making use of RNIB guidance on producing documents in alternative formats, see *paragraph 3.16*

Accessible, quality service for those in work

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Introduction

- 3.70 If people are working, they may have very limited opportunities to contact the LA, particularly if face-to-face or telephone conversation is needed. Those in work may also have particularly complex claims, for instance if their earnings fluctuate from week to week, or if they take temporary work interspersed by short periods of unemployment.
- 3.74 It is important the LA ensures that HB claimants who start work and make a new claim are fast-tracked, given extended payments and have new claims put in payment before extended payments run out, smoothing the transition to work.

Levels of performance

- 3.76 You are performing **at standard** if the LA:
- has assessed the service needs of in-work claimants
 - provides a service which it considers meets these needs
 - has clear systems, that it can demonstrate are working, to act on information received from Jobcentre Plus to make extended payments and to fast-track claims of those who get a job
 - has systems which ensure the LA invites a reclaim promptly when a claimant's claim ceases because IS/JSA(IB) has ended
 - has routine, rapid arrangements for providing a certificate of earnings form for the employer to complete, allowing the claim to be processed rapidly, with safeguards to prevent fraud.

Good practices

3.78 Good practices include:

- providing additional ease of access to the service through:
 - appointments outside standard opening hours
 - extended hours phone lines, which experience in some areas shows may be extensively used

Encouraging benefit take-up, reducing poverty

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Introduction

- 3.80 National survey data on incomes and benefit take-up shows overall take-up of HB is slightly higher than take-up for other income-related benefits. Caseload take-up was between 89% and 95% in 1999-2000. This still left between 200,000 and 500,000 entitled non-recipients with a mid range weekly amount unclaimed of almost £23. In 1999-2000 the caseload take-up for CTB was lower at 73% to 80%, which left between 1.28m and 1.86m failing to claim an average weekly amount of £7.
- 3.85 As well as encouraging take-up of HB, LA benefit staff also have a role in encouraging take-up of other benefits - and this work may be most effective as part of a wider anti-poverty strategy of the authority. For example, recent surveys of LA staff carried out for the DWP show that the majority of LAs offer some guidance to pensioners on Minimum Income Guarantee (MIG) and Attendance Allowance (AA). Publicity can either be general, as part of a broader take-up campaign or publicity, or targeted, contacting likely claimants directly or passing details to another department in the LA. Most use general publicity. Some take targeted action to alert potential claimants to MIG/AA. A minority of LA respondents said they did not provide any guidance on MIG/AA.

Levels of performance

- 3.86 You are performing **at standard** if the LA:
- has a written strategy or plan to encourage take-up of HB/CTB that goes beyond the first step of raising awareness, to ensuring that eligible claimants are enabled to make successful claims, addressing issues of customer service, availability of help and advice, and access - addressed in more detail in other parts of this booklet
 - has a strategy that includes work to identify and target information at particular groups, for instance at:
 - underclaiming groups, such as elderly private sector tenants, ethnic minority tenants particularly in the private rented sector,

- lone parents whose entitlement may be seasonal due to childcare costs in the school holidays
 - groups with a high chance of a successful claim, such as disabled and severely disabled tenants, particularly those living alone
 - those who would either increase their entitlement or qualify for the first time if they claimed a carer or disability benefit, such as the carers of household members who get AA/Disability Living Allowance (DLA) who could claim Invalid Care Allowance (ICA)
 - people on low incomes in work
- communicates its policy and strategy to potential claimants and claimant representative groups to encourage the legitimate take-up of benefit
 - provides literature in LA tenancy details and advice on HB/CTB when the council tenant signs up for the tenancy
 - take steps to make Council Tax payers aware of CTB when they receive their bill
 - routinely offers claimants who say they intend starting work or are considering doing so, advice on eligibility for in-work benefits and tax credits, for instance through leaflets or referrals to DWP/Jobcentre Plus advice or local sources of independent welfare rights advice:
 - sends claimants of working age who terminate an out-of-work HB claim, information on claiming in-work HB/CTB as well as the reclaim form
 - displays posters and provides leaflets at key public points in the LA advertising the availability of HB/CTB to tenants on low incomes who are working; and telling claimants about extended payments and fast-tracking.

3.87 You are performing **above standard** if, in addition to the above, the LA:

- identifies and follows up cases of potential hardship or failure to take up benefit, for instance HB applicants who report incomes below the threshold level for IS, within the framework of the Data Protection Act
- analyses reasons why people do not claim, identifying barriers and taking action to remove or reduce them

- works with other LA sections or upper tier LAs and agencies to identify effective joint-working to increase take-up, for instance providing them with specially prepared material to send out to clients in particular groups, such as:
 - Social Services clients using Meals on Wheels or occupational therapist
 - carers
 - NHS clients using the services of a community psychiatric nurse
 - tenants in Category 2 and 2.5 sheltered housing schemes
- works with local DWP offices and with Jobcentre Plus to raise awareness of HB and its availability for in-work claims and provides assistance with making effective better-off calculations for HB either through Jobcentre Plus or direct to claimants
- co-operates with the Pension Service on national campaigns to promote take-up of non-HB/CTB benefits such as MIG
- receives external accreditation for the clarity of posters, leaflets and forms used to publicise HB and CTB schemes, such as Crystal Mark for Plain English.

Good practices

3.89 Good practices include:

- ensuring that officers undertaking home visits, including VF visiting officers, are adequately trained to be able to identify claimants who may not be claiming other social security benefits to which they are entitled such, as IS and AA, and can tell the claimant where they can get independent advice
- where the claimant has a period not covered by benefit and it appears from the details available that the claimant may be entitled to a backdated award, taking steps to inform the claimant of that possibility
- identifying claimants, both from current caseload and from new claims, who may have specific needs such as visual impairment or an appointee, and ensuring that all communications are made in the most appropriate manner
- revising procedures, against criteria set to measure the risk and impact, to overcome any failings identified in verification work which may deter legitimate claimants
- including HB/CTB information in general council publicity

- providing cheque encashment facilities for claimants without a bank account
- where appropriate, ensuring that literature is translated into key written languages of local ethnic minority communities and aiming advertising campaigns at the black and ethnic press
- working with the ICA Unit or the local Disability Benefit Centre when targeting ICA/AA/DLA
- ensuring other LA departments provide information on HB/CTB to any customers in arrears with Council Tax or council rents
- market testing literature involving all claimant types including disabled people through focus/user groups, questionnaires etc
- working with RNID, RNIB or local blind associations and making use of talking newspapers and local radio
- working with representatives of key disability groups to increase take-up.

Addressing complaints about the service effectively [Top](#)

Introduction

3.100 When a claimant or affected person makes a complaint about the service, it is important their complaint is dealt with promptly, and the claimant is given an explanation, information, an apology and rectification if appropriate.

3.101 This section is about the effectiveness of:

- handling complaints
- monitoring the substance of complaints, to ensure that when complaints reflect wider failures these are picked up and problems resolved.

Levels of performance

3.102 You are performing **at standard** if the LA:

- operates clear procedures and sets targets for dealing with complaints
- has mechanisms for monitoring the progress of complaints.

3.103 You are performing **above standard** if, in addition to the above, the LA:

- sets public targets for handling complaints that include speed of response
- takes effective remedial action to address and reduce the causes of complaints.

Good practices

3.105 Good practices include:

- advertising the rights of the claimant to complain, for example by posters in public areas
- making readily available information on how to complain for example leaflets and complaint forms
- analysing the reasons for complaints to identify management and training needs and instigate remedial action.

3.106 BA's Customer Charter says "*.. If you are not satisfied with the service you receive and complain to one of our offices, we aim to contact you about it within 7 working days.*" LAs may wish to consider similar policies.

Dealing with requests for reconsideration and appeals referrals effectively

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Levels of performance

3.112 You are performing **at standard** if the LA:

- has clearly identified individuals as responsible for handling queries, dispute, requests for reconsideration and appeals referrals
- ensures that letters to claimants notifying them of decisions informs them of their rights to reconsideration and appeal, and either use the wording provided by the HB/CTB appeals project or wording of the same standard
- has systems in place for monitoring the standards of appeal submissions, ensuring that they are correct in law and in the format required by The Appeals Service
- implements decisions from appeals tribunals as quickly as possible.

3.113 You are performing **above standard** if, in addition to the above, the LA:

- tells claimants where they can get independent advice
- sets public targets for handling appeals, that include speed of response.

Good practices

3.115 Good practices include:

- analysing the reasons for requests for reconsideration and appeals
- identifying training needs and instigating remedial action
- setting targets for dealing with reconsideration requests and appeal referrals
- reporting to senior managers on outcomes against targets and on implementation of appeal decisions.

Processing of claims

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New claims - speed of processing

Introduction

- 4.10 Housing Benefit (General) Regulations 1987 (HB (General) Regulations), Reg. 76(3) states that every claim must be decided within 14 days of the relevant information having been received or as soon as is reasonably practicable thereafter. There is a similar provision in respect 88(3) also requires first payment of any HB to be made within 14 days of receipt of the claim or as soon as reasonably practicable thereafter.
- 4.11 The time taken to process claims is of concern to claimants and other affected persons, and therefore Local Authorities (LAs) should also be concerned with the overall time taken to process and pay HB and CTB claims. In addition, to the statutory requirements the Best Value (BV) regime also requires LAs to measure and report the average time for processing new claims.

Levels of performance

- 4.12 You are performing **at standard** if the LA:
- decides 90% of all claims within 14 calendar days of receiving all information
 - processes claims, on average, within 36 working days or less
 - uses exception reports, containing at least the length of time since receipt of claim and the reasons for delay, to monitor the performance of those claims not meeting the standard.
- 4.13 You are performing **above standard** if, in addition to above, the LA:
- analyses peaks and troughs of workloads to identify resource requirements to reduce processing times to fully meet regulatory requirements
 - Identifies trends and patterns from the results of monitoring previous decisions and feeds them into changes in working practices, the training provision for individuals and groups of staff and the appraisal cycle.

Risk and Impact

4.14 The risk and impact of the LA not performing **at standard** is:

Risk	Impact
<p>LA does not comply with the regulatory timescales</p>	<p>Claimants and other affected persons suffer hardship and distress because benefit is not paid on time leading to higher numbers of complaints to the LA, Authority Members, Members of Parliament (MPs) and Local Government Ombudsman (LGO)</p> <p>Backlogs sustained or increased Increased financial costs to LA from dealing with backlogs, handling higher numbers of complaints and increased demand from personal callers and telephone enquiries</p> <p>Tenants threatened with court action for rent arrears and it is more difficult to identify genuine arrears cases.</p>

Good practices

4.15 Good practices include:

- maintaining effective liaison links with the Council Tax Section, the Housing Department and private sector landlords to ensure that Council Tax payers and tenants are not threatened with court action before their benefit has been decided and paid
- reporting to senior officers and members to sustain accountability for a pre-determined programme of delivery and targets
- feeding information from exception reporting into changes to working practices, training provision and performance appraisal cycle
- reviewing and re-evaluating working structures and practices to establish more efficient and effective ways of processing benefit claims
- process mapping procedures to identify the barriers to achieving quicker processing times.

Payments on account

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Introduction

- 4.20 HB (General) Regulations, Reg. 91(1) requires that LAs should make a payment on account (POA) if:
- they are unable to decide a Rent Allowance (RA) claim within 14 days of receipt of the claim, and
 - that inability has not arisen out of the claimant's failure to provide the necessary information, when the LA has requested whether on the claim form or otherwise.
- 4.21 POAs should only be made when necessary, and for as brief a period as possible, as they are not intended as a substitute for making a full decision and correct payment on a claim.

Levels of performance

- 4.22 You are performing **at standard** if the LA:
- monitors RA claims received, to identify those where the decision cannot be made within 14 calendar days of receipt of claim to establish whether a POA is required and makes POAs for these claims in accordance with HB. (General) Regulations, Reg. 91(1)
 - generates and monitors a monthly age-analysis report for management identifying POAs that have been in payment for more than four weeks and takes necessary corrective action.
- 4.23 You are performing **above standard** if, in addition to above, the LA:
- analyses the trends and reasons for POAs to identify why claims cannot be fully decided upon receipt and takes necessary corrective action
 - identifies trends and patterns from the results of monitoring previous decisions and feeds them into changes in working practices, the training provision for individuals and groups of staff and the appraisal cycle.

Good practices

- 4.25 Good practices include:
- maintaining effective liaison links with private sector landlords to ensure that tenants are not threatened with court action for rent arrears

- feeding information from Management Information System (MIS) reporting into changes to working practices, training provision and performance appraisal cycle
- if in a backlog situation, setting targets for a stepped reduction in POAs
- providing for benefit processors, training and written procedural documentation on the circumstances in which POAs must be made.

Reported changes of circumstance

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Introduction

4.33 It is important that an LA:

- takes every opportunity to remind claimants and landlords of their duty to report changes of circumstance
- promptly deals with all reported changes so that claimants only receive the benefit to which they are entitled.

Levels of performance

4.34 You are performing **at standard** if the LA:

- refers explicitly, in all communications with claimants and landlords, to the need to report changes of circumstance in writing, backed by evidence, and draws their attention to the consequences of not doing so
- processes, on average, changes of circumstances within nine calendar days of receipt of a written report of the change or evidence in support of a change notified by telephone at the designated office
- establishes, if possible, the correct effective date for change, or the earliest date that can reasonably be identified
- requires the same standard of evidence for reported changes in circumstance as it does for new and renewal claims.

Renewal claims

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Levels of performance

4.42 You are performing **at standard** if the LA:

- invites further claims by sending out claim forms within eight weeks of the expiry of the current benefit period (except when the claimant has, in the 13 weeks before the end of the period, already submitted a claim)
- logs receipt of completed claim forms for further grants of benefit
- where completed forms have not been received sends out reminders within two weeks of the expiry of the current benefit period advising claimants that any delay may result in loss of benefit
- identifies and provides support to claimants who need help in completing their renewal claim forms because of, for example, disability, language or literacy problems
- makes a decision on 83% of claims that have been returned to the LA before the expiry of the current benefit period

4.43 You are performing **above standard** if, in addition to above, the LA:

- follows up claims when the claimant fails to return a renewal claim form
- analyses the reasons why claimants fail to return renewal claim forms to identify potential non-declaration of changes of circumstances and takes action to address outcomes of analysis
- uses information about a claimant's inability to return a claim form to help manage further claims for that person
- identifies trends and patterns from the results of monitoring previous decisions and feeds them into changes in working practices, the training provision for individuals and groups of staff and the appraisal cycle.

Working with landlords

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Introduction

- 5.0 Housing Benefit (HB) is an entitlement of the tenant rather than the landlord, but unless the operation of the HB system gives landlords the confidence to let to tenants reliant on HB, these tenants will be excluded from access to decent housing.

Communicating effectively with landlords

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Levels of performance

- 5.21 You are performing **at standard** if the LA:

- provides clear practical advice to landlords on the operation of HB, including practical helpsheets or leaflets suitable for smaller landlords and landlords new to HB, using if appropriate templates provided by the Department for Work and Pensions (DWP)
- provides clear guidance to staff enabling them to provide information to landlords on the progress of individual cases, if payment is direct to the landlord and when the tenant has consented, within the legal framework, including the framework of the DPA
- has regular two-way communication with landlords on HB administration, which reaches not just larger landlords but also smaller private landlords and their agents and smaller RSLs
- in direct payment cases, when the tenant has specifically consented to information on the renewal of the claim being shared with the landlord, either sends:
 - a copy letter to the landlord at the same time that a letter goes to the tenant inviting the tenant to renew their HB claim, or
 - letters to the landlord at the same time as sending reminders to those tenants who have not submitted their claim and whose benefit will cease unless the form is returned promptly.

- 5.22 When dealing with the LA Housing Departments, you are performing **at standard** if, in addition to the above, the LA:

- has policy and practice that the LA landlord does not take enforcement action for collection of arrears when arrears are due to arrears of HB.

Risk and Impact

5.24 The risk and impact of the LA not performing **at standard** is:

Risk	Impact
Failure to communicate and provide HB advice to landlords	Fewer private landlords are prepared to let to HB claimants. Landlords have bad experiences of letting to tenants making an HB claim and learn not to let to HB tenants
Failure to provide landlords with information about the progress of claims	It is more difficult for landlords to distinguish between arrears where HB is due, and arrears that should be collected by the tenant. Problems build up. Tenants lose their deposits. Rent guarantees provided by the LA have to be honoured. Landlords are deterred from further HB lettings where they have a choice.
Checks are not made on outstanding HB before rent enforcement is taken, or information on an HB claim is not supplied to the landlord side	Tenants entitled to HB receive letters threatening court action, resulting in unnecessary stress for the tenant and added administrative costs for the LA. It is more difficult to identify genuine arrears cases

Good practices

5.26 Good practices when working with **LA and RSL landlords** include:

- working with RSLs/LA landlord side to encourage the landlord to do a benefit maximisation check as part of all rent recovery procedures
- working with RSL/LA landlord side to minimise the risk of enforcement action for collection of arrears when arrears are due to arrears of HB
- providing the LA/RSL landlord with weekly lists of HB renewal claim forms not returned, stating the date each claim will be cancelled, ensuring that this practice is supported by tenant consent at the time of the claim

Paying landlords, preventing evictions

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Levels of performance

- 5.41 You are performing **at standard** if the LA has clear policies and practices to:
- make payment on account in line with the Processing of claims standard
 - encourage the landlord to make direct contact before taking enforcement action
- 5.42 You are performing **above standard** if, in addition to the above, the LA has clear policies and practices for managing priorities and dealing with urgent cases which pick up cases of serious arrears, debt and potential eviction before:
- they reach court
 - a Section 21 notice under assured shorthold is activated, or
 - the tenant loses the right to renew the tenancy.

Risk and impact

- 5.43 The risk and impact to the LA of not performing **at standard** is:

Risk	Impact
Management and staff do not ensure that HB payments to landlords are paid promptly and regularly	Landlords learn not to let to HB claimants if they have a choice, or reduce investment and maintenance of property in order to maintain returns and minimise the loss associated with HB letting
The system is unresponsive when delays in HB claims cause a tenant serious problems	Tenants fall into debt. DETR research suggests about half of tenants may pay substantial amounts of rent to their landlord while their claim is being processed Tenants use up deposits paying for arrears and lose the right to renew the tenancy, increasing risk of homelessness, (<i>source DETR research</i>)

Good practices

5.44 Good practices include:

- effective liaison with landlords on the cases where delay is causing them most problems. This can include for instance providing HB sections with regular schedules from landlords of the arrears cases causing them most concern that can then be prioritised
- encouraging the landlord to contact the LA via a direct LA contact point, to avoid them taking court action for arrears when the claimant is waiting to have their HB entitlement assessed
- supplying landlords, particularly LA and RSL landlords, with case by case information on outstanding HB claims, when the tenant has consented to the sharing of information, before court action is taken
- encouraging landlords, particularly LA landlords, to ensure that a certificate from the HB section accompanies all applications for possession to the County Court to confirm that there are no outstanding benefit enquiries on the case as recommended by the Local Government Ombudsman (LGO) and by a recent Better Regulation Task Force report

Overpayments

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Introduction

- 8.2 To enable effective management of overpayments, LAs should have a debt strategy alongside effective policies and procedures that should provide a corporate approach to both minimising and managing debt. Effective debt management requires liaison with other departments and agencies, including the Department for Work and Pensions (DWP).

Identification of overpayments

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Levels of performance

- 8.21 You are **at standard** if the LA
- processes the change of circumstances and stops the overpayment continuing, on average within seven calendar days of the LA receiving sufficient information for it to act on the error or change of circumstances
 - can identify changes of circumstances, resulting in an overpayment, that are outstanding over seven calendar days.

Decisions on recoverability

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Introduction

- 8.40 Correct decision-making on whether or not there is an overpayment and if it is recoverable, under Regulations 98 and 99 of the HB Regulations and Regulations 83 and 84 of the CTB Regulations, is crucial because it:
- has critical consequences for the rights of claimants and other persons affected

Levels of performance

- 8.41 You are performing **at standard** if the LA:
- decides in all cases whether or not the overpayment was caused or contributed to by official error, as defined in the regulations
 - decides, if the overpayment or any relevant part of it was due to official error, what part, if any, is nonetheless recoverable as prescribed in the regulations

- complies with legislation, DWP corporate policies and its own procedures to:
 - decide if the overpayment should be recovered and, if so, from whom it should be recovered
 - notify the person(s) affected of the decision promptly and giving all the information required by the regulations, including the reasons both why there is an overpayment, and why it is recoverable
- records the decisions and exercise of any discretion, and the reasons for them, on file.

Good practices

8.44 Good practices include monitoring and reviewing the numbers and:

- reasons for successful revisions, supersessions, and appeals arising from disputed overpayments
- value of overpayments by category and case type to identify speed of transaction and training needs.

Recovery of overpayment debt

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Levels of performance

8.64 You are performing **at standard** if the LA:

- agrees recovery rates with debtors (in appropriate circumstances)
- only debits the rent account when it is in credit

Good practices

8.67 Good practices include:

- clear policies on the recovery of overpayments, taking into account the abilities of the claimant to pay and the appropriateness of recovery from the landlord