

Meeting:	Cabinet	Date:	5 December 2018
Subject:	Risk Based Verification		
Report Of:	Cabinet Member for Performance & Resources		
Wards Affected:	All		
Key Decision:	No	Budget/Policy Framework:	No
Contact Officer:	Ali Bell, Intelligent Client Officer		
	Email: alison.bell@gloucester.gov.uk	Tel:	396401
Appendices:	1. Risk Based Verification Policy (Exempt Category 7)		
	2. HB/CTB Circular S11/2011		

GENERAL RELEASE / EXEMPTIONS

The report and Appendix 2 are for general release, however, the public are likely to be excluded from the meeting during consideration of Appendix A to this report as it contains exempt information as defined in paragraph (7) of schedule 12A to the Local Government Act 1972 (as amended).

1.0 Purpose of Report

- 1.1 To approve the annual review of the Risk Based Verification Policy in determining evidence requirements for the assessment of new Housing Benefit and Council Tax Support claims.

2.0 Recommendations

- 2.1 Cabinet is asked to **RESOLVE:**

- (1) That the reviewed Risk Based Verification Policy for verifying Housing Benefit and Council Tax Support claims be approved.
- (2) That the reviewed Risk Based Verification Policy as at December 2018 be approved for immediate implementation.

3.0 Background and Key Issues

- 3.1 Risk-Based Verification (RBV) was implemented in March 2014 to apply different levels of checks to different new claims made for Housing Benefit and Council Tax Support in line with DWP guidance (HB/CTB S11/2011 Risk-Based Verification of HB/CTB Guidance)
- 3.2 The Department of Work and Pensions have previously recommended we review our policy following a potential impact on Local Authority error rates from the Housing Benefit subsidy claim for 2015/16. Ongoing work in this area has identified

that the policy needs slightly amending to clarify acceptable evidence for passported Housing Benefit and Council Tax Support claims.

- 3.3 The proposed reviewed policy will clarify that identity and national insurance number (NINO) checks can be undertaken for passported Housing Benefit and Council Tax Support claims by processing officers directly accessing the Department for Work and Pensions database to verify identity and NINO

4.0 Asset Based Community Development (ABCD) considerations

- 4.1 None

5.0 Alternative Options Considered

- 5.1 None

6.0 Reasons for Recommendations

- 6.1 The policy must be reviewed periodically to ensure it remains compliant in line with DWP guidance and creates the best experience for our Housing Benefit and Council Tax Support customers.

7.0 Future Work and Conclusions

- 7.1 None.

8.0 Financial Implications

- 8.1 None

9.0 Legal Implications

- 9.1 The risk based verification policy complies with the recommendations from the Department of Work and Pensions (DWP) outlined in Housing Benefit and Council Tax Benefit Circular HB/CTB S11/2011. This circular can be found at Appendix 2. It should be noted that this policy will be the basis on which we are audited in the future and complies with the Social Security (Administration) Act 1992. Providing we comply with this policy, we will be deemed to be verifying claims in the correct way. The policy must be approved by the Council's Section 151 Officer and adopted by the Council.

- 9.2 Risk Based Verification applies to all New Claims for Housing Benefit and Council Tax Support.

- 9.3 The course of action to be taken in respect of the risk scored is governed by this policy. As such there should not be any equalities impact.

(One Legal have been consulted in the preparation of this report)

10.0 Risk & Opportunity Management Implications

- 10.1 An evaluation of the risk associated with the implementation of this policy was carried out when implemented. Fraud will be carefully monitored to mitigate the risk

any increase with a baseline set to monitor against. Gloucester City Council's client team will continue to see claims from all levels of risk and will review 10% at all levels.

The software will randomly select 5% of low risk claims to be High Risk

11.0 People Impact Assessment (PIA) and Safeguarding

11.1 No potential impact identified

12.0 Other Corporate Implications

12.1 None

Background Documents: None