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Chief Executive
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6 February 2014

Dear Ms Malone

The audit of housing benefit – benefits performance audit risk assessment

Thank you for your letter of 3 February 2014 and the attached response to our risk assessment report sent to you on 2 December 2013.

I have considered your proposals to reduce the risks identified in our report and I am satisfied that your proposed actions, and note those already implemented, should make a positive contribution to the continuous improvement of the council's housing benefits service.

However, despite individual quality targets being in place for benefits processors and accuracy checking taking place, it is of concern that accuracy performance is below target and as a result subsidy was lost in 2012/13. In order to ensure performance improves, and subsidy loss is minimised, it will be important that the service improves accuracy checking processes and ensures appropriate timely action is taken where performance falls below target.

In order that we can be assured that the speed of processing change of circumstances is improved, I would request that an update based on the latest council performance information be provided for quarter 4 of 2013/14 and quarter 1 of 2014/15 by 31 July 2014.

I would like to thank you and your benefits management team for the positive and helpful approach displayed throughout the risk assessment process.

Yours sincerely



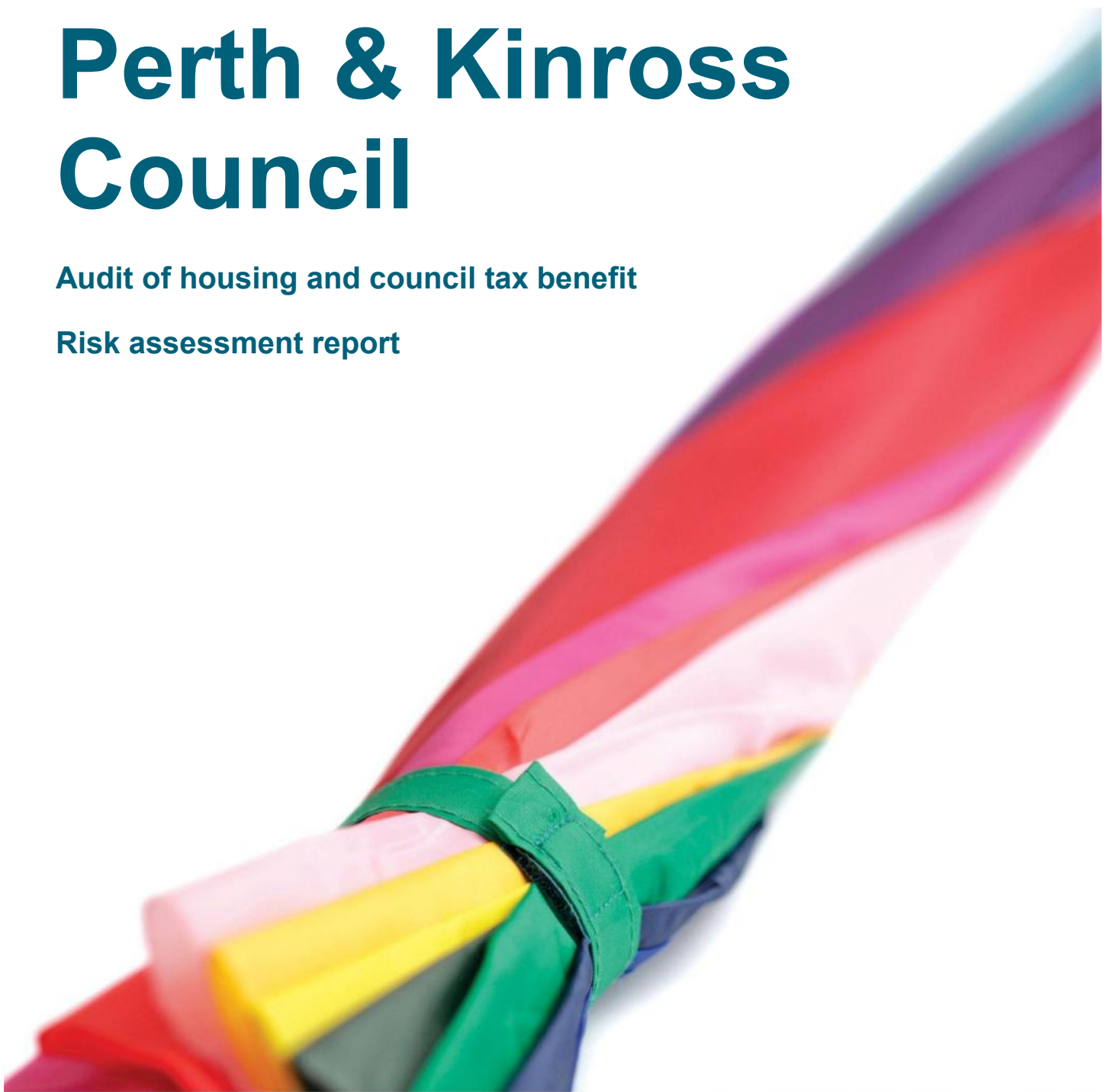
Russell Frith
Assistant Auditor General

cc: David Burke, Depute Chief Executive
Clare Brandon, Principal Officer – Benefits

Perth & Kinross Council

Audit of housing and council tax benefit

Risk assessment report



Prepared for Perth & Kinross Council
December 2013



Audit Scotland is a statutory body set up in April 2000 under the Public Finance and Accountability (Scotland) Act 2000. We help the Auditor General for Scotland and the Accounts Commission check that organisations spending public money use it properly, efficiently and effectively.

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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 Perth & Kinross 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
 - discussions with senior officers in the council during our site visit in November 2013.

Executive summary

5. At the time of Audit Scotland's previous risk assessment in September 2011, Perth & Kinross Council's benefit service had a significant and increasing backlog of work which had resulted in a considerable decline in its speed of processing performance.
6. Since then, the service has successfully cleared its backlog and achieved an improved speed of processing performance for 2012/13 which was above the Scottish average. It is to the service's credit that it managed to do so while it was dealing at the same time with the increased work from DWP's Automated Transfers to Local Authority Systems (ATLAS) notifications and the significant increase in caseload as a result of the current economy. This was all achieved with a decreasing number of experienced staff.
7. Performance has dipped for the current year and this is due to preparations for, and the successful implementation of, the various welfare reform changes, as well as further staff turnover. The service reports it is confident that information technology (IT) advances such as its electronic benefit application form will help deliver efficiency and improve performance.
8. The Revenues and Benefits Team Plan 2013/14 sets out its vision to achieve excellence in customer service and performance and specifically to ensure that the right benefit is given to the right person at the right time. However the council has lost over £227,000 in subsidy over

the last two years as a result of exceeding the lower threshold for local authority (LA) error. With the backlog of work that the service had in 2011/12 the major cause appeared to have been administrative delay, but with the backlog cleared by 2012/13 it is more likely that the major cause was official error.

9. Following Audit Scotland's previous risk assessment and to address the risks that were raised, the service implemented its Quality Performance Strategy in November 2011. This outlines how it will reduce official and customer error from entering the benefit system through a programme of quality checks and how it will detect and eliminate any error that is already in the benefits system through a programme of interventions.
10. However we consider that, in view of the significant loss of subsidy, the council has more work to do in meeting its vision and improving accuracy and ensuring that its intervention activity is effectively targeted on risk. All previous risks are detailed at Appendix A.

National and local priorities

11. The UK Government's welfare reform agenda aims to make work pay and simplify the benefits system by bringing together a range of working-age benefits, including HB, into a single streamlined payment of universal credit (UC) administered by DWP. This is the biggest change to the welfare system for over 60 years and has a significant impact on local authorities and the services they provide.
12. To help meet the challenges this national priority presents, a Joint Welfare Reform Steering Group was formally established in September 2012. This is chaired by the Head of Service Finance and Support, and includes council officials and external stakeholders such as local housing association, third sector, DWP and Citizens Advice Bureau representatives.
13. The council was also involved in the Scottish Welfare Fund Design and Implementation Group set up by the Scottish Government and the Convention of Scottish Local Authorities (COSLA) to design and oversee the implementation of the Scottish Welfare Fund (SWF) from April 2013.
14. Welfare reform changes were communicated to those customers involved by letter and to local residents, council staff, elected members and a wide range and number of stakeholders through an extensive programme of awareness sessions which set out the changes and the financial impact on local residents.
15. The council has also developed a virtual hub on its website to help provide a single point of reference for those residents in need and to guide them on a wide range of welfare reform and welfare rights issues.
16. The council has recently reviewed its policy for dealing with current and former tenant rent arrears in light of welfare reform changes. It continues to maximise rental income by early intervention and supporting tenants to sustain their tenancies while evicting only as a last

resort. Management information shows that current tenants' rent arrears up to and including October 2013 have increased to £1,053,119 from the March 2013 figure of £899,969.

17. Local priorities include sustaining the benefits service and retaining experienced staff. A report to the council's Senior Management Team in June 2013 detailed the cost to the council for the necessary retention of an experienced workforce to deliver HB until full migration of UC, Council Tax Reduction applications, any residual housing costs within UC for supported accommodation claims and potentially the anticipated Local Support Scheme.
18. The service is investing in IT, which we refer to later, to help it deliver an improved service to an increasing caseload with decreasing staff resources.

Business planning and reporting

19. 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 can be measured, monitored and reported.
20. The Revenues and Benefits Team Plan 2013/14 sets out its vision and objectives, reviews the performance and achievements of 2012/13, and details the priorities and performance targets for 2013/14 along with an associated action plan linked to national and local priorities.
21. The service's vision is to *achieve excellence in customer service and performance* and specifically *to ensure that the right benefit is given to the right person at the right time*.
22. Planning on a daily basis is informed by the service's *Direction of Travel Report* which is updated each day with workflow information and is used to identify priorities and determine work allocation.
23. Performance is reported on a monthly and quarterly basis and includes speed, accuracy, overpayments and fraud. The service's speed of processing performance is discussed with the Head of Service each week and also reported to the Housing & Community Care (HCC) Senior Management Team (SMT) each month.
24. Audit Scotland identified risks to continuous improvement during the previous risk assessment. We found inconsistencies in the speed of processing performance reporting between the service and HCC and that performance reporting for accuracy and appeals did not reflect actual performance. These have been addressed.

Risks to continuous improvement

1	There is no performance reporting on the council's intervention activity and outcomes.
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Risks to continuous improvement

- | | |
|---|--|
| 2 | At the HCC SMT meeting in June 2013, the minutes show that further information was to be requested regarding the dip in the speed of processing performance. Yet the minutes of the July and August meetings do not record how this was progressed or what the outcome was. This is linked to an internal audit (IA) report of August 2011 when the service had a substantial backlog; yet of the ten recent HCC SMT minutes reviewed by IA, only one referred to the processing delays. The council needs to ensure that there is adequate challenge and support when performance dips below target and that the outcome is documented. |
|---|--|

Delivering outcomes

25. 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.
26. As is the case for most, if not all, benefits services, the introduction of DWP's ATLAS notifications resulted in a significant increase in the number of changes the service receives. Instead of the automatic loading of information which had been initially expected, it was found that user intervention was required.
27. While this has had an adverse impact on speed of processing performance across Great Britain during 2012/13, the service managed to limit the impact by working with a private provider to achieve greater automation. From August 2013, when ATLAS automation software was implemented, simpler data changes are accepted and calculated without the need for intervention in approximately 65% of cases. This releases resources to complete other essential processing work.
28. Further examples of enhancing IT to meet the demands of increased processing work with fewer staff include:
 - phased implementation of an electronic claim application from February 2013 which streamlines the customer application process while supporting both national and local digital priorities. Management information shows a shift from a manual to electronic process of 33%
 - integration of the electronic claim from November 2013 will allow for the application form to be uploaded automatically into the main processing IT system. This will reduce staff time on keying data as well as scanning and indexing processes
 - introducing Risk Based Verification software from January 2014 will allow for a reduced level of information to be provided depending on each claim's allocated risk score. This means reduced evidence gathering leading to improved customer experience, improved speed of processing and further reduced scanning and indexing processes.

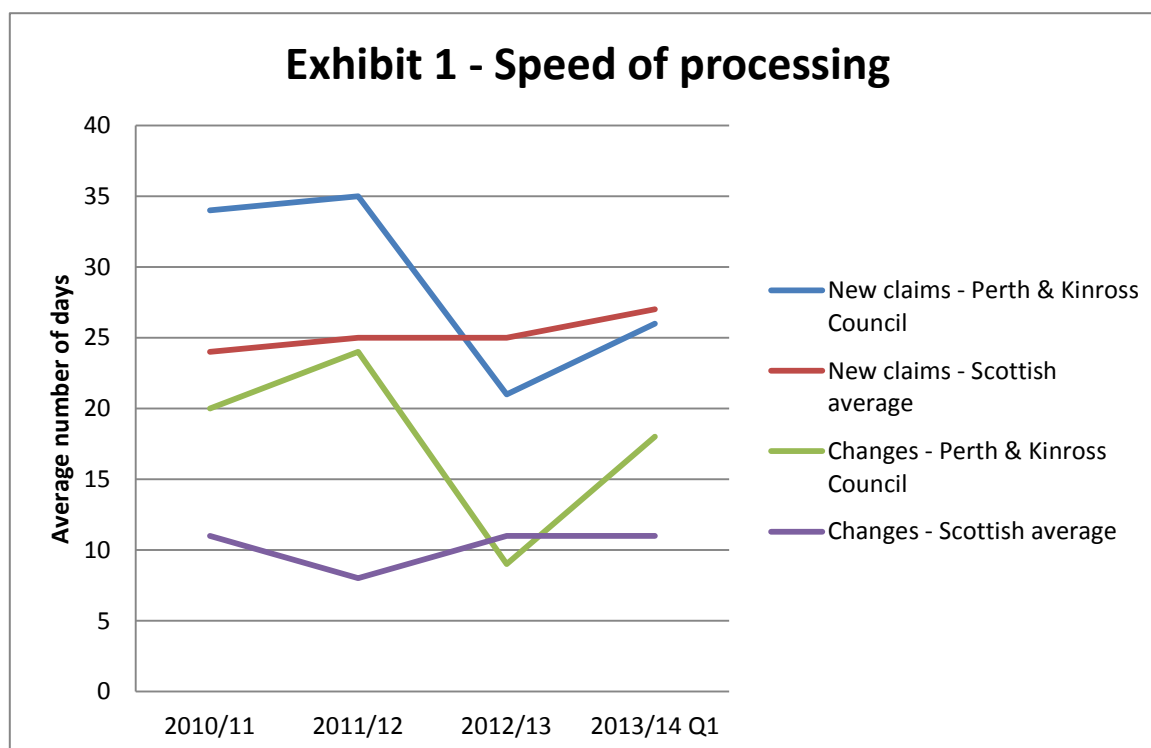
29. Another efficiency initiative was devised by a working group of processing staff who developed and recommended the implementation of individual productivity and accuracy targets. Individual performance is routinely measured and evaluated.

Subsidy

30. Despite an improvement in its speed of processing performance during 2012/13, the service has lost over £227,000 in subsidy over the last two years as a result of exceeding the lower threshold for LA error. For 2011/12, discussions with DWP and external audit continue but the loss is at least £115,000. Similarly for 2012/13, discussions continue and the loss is at least £112,000. With the backlog of work that the service had during 2011/12 the major cause appeared to have been administrative delay, but with the backlog cleared by 2012/13 it is less likely that delay was the major cause and more likely that it was official error.
31. The issue is that the service does not know what has caused this loss. Although it states that its LA error for 2013/14 is well below the threshold, we report later that more work needs to be done on analysing overpayments to minimise future error and financial losses.

Speed of processing

32. When customers claim benefit, it is a time of financial uncertainty for them and, as such, it is essential that the service has sufficient fully trained and effective benefit processors in place who can make informed decisions on complex benefit claims and pay benefit promptly.
33. Exhibit 1 illustrates the council's current and previous performance



Source: DWP and Perth & Kinross Council

34. At the time of Audit Scotland's previous risk assessment in September 2011 the service had a significant backlog of work. Exhibit 1 shows that during 2012/13, by which time the backlog had been cleared, its performance had greatly improved with new claims and changes of circumstances better than the respective national averages.
35. However the latest performance statistics from DWP show that performance has dipped for quarter one of 2013/14. The service attributes this to the loss of five agency staff in December 2013, the Christmas closedown period, the extensive preparations and necessary training in advance of the welfare reform changes from April 2013, the complex enquiries it has dealt with since then and its ever increasing caseload.
36. The service's latest 2013/14 performance information for September 2013 shows an improved new claims performance of 22 days from a high of 29 days. The change of circumstances performance of 21 days has improved from a high of 28 days but still remains well short of the 15 day target.
37. The service reports it is confident that further improvement will be gained with the bedding in and implementation of the initiatives referred to in the previous section.
38. Audit Scotland identified risks to continuous improvement during the previous risk assessment which all related to the backlog of work and recovery plans. These risks have been addressed.

Risks to continuous improvement	
3	The service's change of circumstances performance has dipped from April 2013. The latest performance statistics from DWP show that its performance of 18 days was below the Scottish average of 11 days and places it in position 26 of the 31 Scottish councils included in the return.
4	The service has set a target of 15 days for its change of circumstances performance this year. Last year it achieved 14 days while DWP reported a lower nine days but even with that improved performance the council suffered a financial loss yet again by way of reduced subsidy. The service needs to consider if this current target supports its aim of <i>ensuring that the right benefit is given to the right person at the right time</i> and whether it is set at a level that will guard against further subsidy loss.

Accuracy

39. 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.
40. Audit Scotland identified risks to continuous improvement during the previous risk assessment. We found that continuous improvement could not be demonstrated from 2008 when the quality checking approach had last been revised and that a review of the then approach was required to set out what actually was high risk and to determine how effectively

the service was meeting its objective to pay the right benefit to the right person at the right time.

41. As a result the service developed and implemented its Quality Performance Strategy in November 2011. The service states that this strategy outlines how *it will achieve excellence in the accuracy of its decision making and reduce official and customer error from entering the benefit system through a programme of quality checks.*
42. It aims to check at least 10% of decisions, with a 100% check for new staff. These checks are carried out pre-notification which supports the aim of reducing error entering the system. The majority of cases to be checked are selected based on risk and a lesser amount is randomly selected to make up the required 10%. Exhibit 2 illustrates the council's current and previous performance which is based on its randomly selected checks.

Exhibit 2: Accuracy performance

	Target	Achieved
2011/12	90%	87%
2012/13	92%	90%
2013/14 (YTD Aug)	91%	88%

Source: Perth & Kinross Council

43. Management information shows that during quarter one of 2013/14 there were 829 (85%) risk based checks and 148 (15%) random based checks with an accuracy performance of 83% from each.
44. Individual quality targets are set based on experience and therefore vary from officer to officer, and over time. The service states that currently of its 26 processing staff, six (23%) are temporary and relatively inexperienced. However summary analysis on individual performance shows that in quarter one of 2013/14, of the 25 processors who had work checked, only six (24%) achieved or exceeded the team target of 91%, 13 (52%) achieved between 80% and 90% and six (24%) processors were below 80%.
45. Routine analysis of checking results identifies any trends in error types, training needs, additional support and where necessary this is escalated to capability measures. Despite this, the service's accuracy performance shows little sign of improvement and combined with the subsidy losses, is not meeting the service's stated aim of delivering excellent service to its customers.

Risks to continuous improvement

5	The results of the risk based checks while collated are not reported to senior officers outside the service. Given the small numbers of randomly selected checks and the fact that performance is much the same as for the risk based checks both should be
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Risks to continuous improvement	
	added together to evaluate the service's accuracy performance.
6	The accuracy performance achieved does not demonstrate excellence. While the cases that are checked can be corrected before payment is issued the subsidy loss during 2012/13 demonstrates that excessive official error still entered the system.

Interventions

46. To minimise error in the caseload, councils must encourage customers to report changes of circumstances on time and have a robust intervention programme to identify changes and take appropriate corrective action.
47. The service's Quality Performance Strategy sets out how it will *detect and eliminate any error that is already in the benefits system* through a programme of interventions.
48. This strategy further states that intervention activity is *targeted at high risk areas, and that campaigns that prove successful will continue to be used, but where the results are poor the campaigns will be withdrawn or reviewed*.
49. This is not happening in practice. The service continues to undertake nationally identified risk reviews which only identify a very small number of changes. In addition, management information is not collated and used to evaluate the success rate of its individual programmes, such as earned income, occupational pensions, students etc.
50. Audit Scotland identified risks to continuous improvement during the previous risk assessment mainly around the small number and timings of the service's intervention activity. These risks remain in that the service has little assurance it is meeting its vision *to ensure that the right benefit is given to the right person at the right time*, and importantly to minimise error and financial losses.

Risks to continuous improvement	
7	Despite the Quality Performance Strategy the service's intervention approach is unclear. With the introduction of ATLAS the number of interventions now required has reduced. The service needs to review and revise its intervention approach to ensure that it is effectively and efficiently focused on identifying unreported changes and error in its caseload.
8	The council has no effective processes in place to review the effectiveness and efficiency of its risk criteria to ensure its intervention activity is effectively targeted.

Overpayments

51. To protect public funds, councils should take appropriate steps to ensure that overpayments are minimised and that when they do occur they are correctly classified and rigorously recovered. Exhibit 3 illustrates the council's recovery performance over the last three years.

Exhibit 3: Overpayment levels and recovery performance

	2010/11	2011/12	2012/13
Total overpayments	£1,736,715	£2,522,916	£2,746,054
HB debt recovered	£708,550	£850,653	£930,060
% recovered of total HB debt	41%	34%	34%

Source: Perth & Kinross Council

52. The service reports that its *Overpayments Policy* combined with a reviewed, and now shortened and more effective, timetable of recovery ensures that HB overpayment debt collection is maximised.
53. As part of the service's subsidy action plan, all overpayments are checked for correct classification to prevent any error at the annual subsidy audit. Management information for quarter one of 2013/14 shows that of the 1074 overpayments checked only 20 (2%) were classified incorrectly. Further analysis shows that these errors were caused by eight (32%) members of staff, five of whom had only one error each.
54. The council may want to consider the effectiveness of this on-going blanket approach to checking classification and extend its checking to determine the causes of overpayments to minimise any future financial losses for the council.

Risk to continuous improvement

9	There is no routine analysis of overpayments raised to determine the cause and to identify any necessary changes or additions to processes, procedures or training that could minimise error and subsequently financial losses for the council.
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Counter-fraud

55. The prevention, detection and investigation of fraudulent claims are important aspects of a secure and effective benefit service. Counter-fraud activities help to protect public funds by ensuring that fraudulent claims are identified and sanctions are applied where appropriate.
56. Fraud investigations are carried out by a small team and to help ensure impartiality there is an independent sanction panel which, guided by the *Benefit Fraud Strategy*, decides which sanction is appropriate. Exhibit 4 illustrates the council's current and previous performance.

Exhibit 4: Benefit fraud sanctions performance

	2010/11	2011/12	2012/13	2013/14 (YTD Aug)
Administrative Cautions	21	29	9	1

Exhibit 4: Benefit fraud sanctions performance				
Administrative Penalties	3	3	4	1
Referred for prosecution	14	10	6	5
Total	38	42	19	7

Source: Perth & Kinross Council

57. The investigations team, in line with others, has found that the prompt reporting of changes of circumstances through ATLAS has reduced the number of fraud referrals it now receives. In addition the decision to focus on complex and high level prosecution cases when working with DWP has led to a dip in the number of sanctions.
58. Audit Scotland identified risks to continuous improvement during the previous risk assessment in that there were no management checks on live fraud investigations to ensure prompt progress and compliance with legislation and guidance. This risk has been addressed.

Appendix A

Progress against action plan dated October 2011		
Risk identified	Target completion date	Addressed in full
Although new claims and changes speed of processing is measured monthly by the service, there are no individual targets for each. Given the backlog of processing work and the declining speed of processing performance, two separate targets would provide a better focus and context for measurement.	Aug 2011	Yes
The speed of processing performance reporting is inconsistent between the service and HCC. The service's speed of processing target is based on the Right Time indicator whereas HCC Key Monitoring Information reports new claims and changes separately but without the context of performance targets to highlight the weak performance. Without consistent performance reporting at all levels its effectiveness is diluted and important trends may be missed.	April 2012	Yes
From 2008 accuracy performance has been reported solely from the results of the risk based checks. However from April 2011 the results of the randomly selected checks are also recorded but this still does not give an indication of the overall accuracy performance.	Jan 2012	Yes
Appeals performance is not measured based on the actual date cases are submitted to the Tribunal Service and as a result the service cannot demonstrate continuous improvement.	Jan 2012	Yes
The service currently does not have an accurate number of all changes of circumstances work that is outstanding. As a result, it cannot effectively target resources for recovery.	Aug 2011	Yes
The remedial action taken by the council is not delivering improvement in the shorter term and customer service is suffering. Different options now need to be considered.	Aug 2011	Yes
There is no documented recovery plan setting out key milestone dates as to when the backlog of new claims and changes will be reduced and then cleared.	Aug 2011	Yes

Progress against action plan dated October 2011		
While by their very nature the errors found through high risk checking might not reduce, the approach should, if fully effective, improve the overall accuracy performance. Continuous improvement cannot be demonstrated from 2008 when this approach was implemented. This indicates that the current approach requires review in terms of what actually is high risk and how effectively the service is meeting its objective to pay the right benefit to the right person at the right time.	Jan 2012	Yes
The number of interventions carried out through the service's local campaigns is low and cannot provide adequate assurance that all high-risk cases are being effectively targeted.	Jan 2012	No
The amount of overpayments being raised indicates that the local campaign activity is not being carried out at the right time and not meeting its core objective of effectively minimising overpayments.	Feb 2012	No
Management information for 2011/12 shows that there has been no intervention activity during the first quarter April to June.	Jan 2012	Yes
The resourcing level for intervention work is low. The service may want to consider, possibly at a later date and when the backlogs are cleared, where best the responsibility for this work sits.	Jan 2012	No
There are no management checks on live fraud investigations to ensure prompt progress and compliance with legislation and guidance.	Oct 2011	Yes

**AUDIT OF HOUSING AND COUNCIL TAX BENEFIT: IMPROVEMENT PLAN
(IMPROVEMENT AREAS HIGHLIGHTED IN RISK ASSESSMENT REPORT DECEMBER 2013)**

Green: Action completed

Orange: Work In Progress and on track

Red: Not progressing, timescale not met

Governance Arrangements are as follows:

- Revenues and Benefits Service - Ongoing and Weekly Review
- Senior Management Team - Monthly Reporting
- Report on progress to future Housing and Health Committee and Audit Sub Committee

BUSINESS PLANNING & REPORTING		Last UpDate: 9th January 2014 Lynn Brady, Revenues and Benefits Service Manager				Owner:
Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress	
1. The performance reporting on the intervention activity and outcomes requires review.	Include intervention activity and outcomes in the Team Plan for 2014/2015 and set a timetable for campaign activity.	Mar-14	Principal Officer - Benefits		The Quality Performance Strategy is under review - a detailed timetable of intervention activity has been included for 2014; and success will be monitored quarterly. Performance Frameworks are in place to monitor the results of intervention activity in terms of benefit savings, overpayments and income maximisation.	
2. Ensure adequate challenge and support when performance dips below target and the outcomes are documented.	Report to Finance & Support Management Team Weekly	Jan-2014	R&B Service Manager		The Benefits Service Manager has made arrangements to report weekly to Finance & Support Management Team.	
DELIVERING OUTCOMES						
Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress	
3. Change of Circumstances performance has dipped, monitor and review for improvements.	Report to Service Manager weekly on CIC indicator and identify any dip in performance.	immediate	Principal Officer - Benefits		The Principal Officer reports weekly to both Service Manager and Head of Service and will address any challenges when performance dips.	

Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress
4. Consider the change of circumstances target for 14-15 against supporting the aim of ensuring that the right benefit is given to the right person at the right time and whether it is set at a level that will guard against further subsidy loss.	Revise targets in March 2014 for 2014-2015 year and set at a level that will guard against further subsidy losses.	Mar-14	R&B Service Manager		Review in March 2014.
ACCURACY					
Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress
5. Given the small numbers of randomly selected checks and the fact that performance is much the same as for the risk based checks both should be added together to evaluate the service's accuracy performance.	Merge all quality checks, random and risk based, and report accuracy on overall results.	Jan-2014	Principal Officer - Benefits		✓Actions Completed: Quality Strategy amended January 2014.
6. Ensure that accuracy performance alleviates official error where possible from entering the system.	LA error overpayments will be addressed with individual team members for training and development purposes. With individual performance challenged where necessary.	Mar-14	Benefits Management Team		
INTERVENTIONS					
Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress
7. The service needs to review and revise its intervention approach to ensure that it is effectively and efficiently focused on identifying unreported changes and error in its caseload.	As at risk 1. Include intervention activity and outcomes in the Team Plan for 2014/2015 and set a timetable for campaign activity.	Mar-14	Principal Officer - Benefits		The Quality Performance Strategy is under review - a detailed timetable of intervention activity has been included for 2014; and success will be monitored quarterly. Performance Frameworks are in place to monitor the results of intervention activity in terms of benefit savings, overpayments and income maximisation. Targets will be set from April 2014 and included in revised Team Plan.
8. Review the efficiency of intervention activity to ensure it is effectively targeted.	Measure outcomes from intervention activity to demonstrate weekly increases and reductions in benefit and overall results from each individual campaign.	Jun-14	Principal Officer - Benefits		
OVERPAYMENTS					
Key Risks Identified in Risk Assessment Report	Key Actions	Timescale	Lead Officer	RAG	Progress
9. Analysis of overpayments on mis-classification should be expanded to determine the causes of overpayments to minimise any future financial losses for the council.	As at risk6. LA error overpayments will be addressed with individual team members for training and development purposes. With individual performance challenged where necessary.	Mar-14	Benefits Management Team		Completed: Quality Strategy amended January 2014. See risk 5 & 6 above.

