

Name of meeting: Cabinet

Date: 30th Jan 2013

Title of report: Local Welfare Provision (LWP)

Is it likely to result in spending or saving £250k or more, or to have a significant effect on two or more electoral wards?	Yes
Is it in the Council's Forward Plan?	Yes
Is it eligible for "call in" by Scrutiny?	Yes
Date signed off by Director & name	Yes 26.10.12
Is it signed off by the Director of Resources?	David Smith – Director of Resources
Is it signed off by the Acting Assistant Director - Legal & Governance?	Yes 26.10.12
Cabinet member portfolio	Cllr David Sheard Cllr Shabir Pandor

Electoral [wards](#) affected: All

Ward councillors consulted:

Public or private: Public

1. Purpose of report

- 1.1 The Welfare Reform Act abolishes the current Community Care Grant and Crisis Loan schemes on 1st April 2013. Funding is being devolved to local authorities, and in order to avoid a gap in support for vulnerable people the authority needs to have new arrangements in place from 1st April 2013. On 6th November 2012 cabinet considered a report setting out a framework under which a local scheme of support can be established. Cabinet gave approval to the establishment of a Crisis Loan and Social fund scheme to be administered and set up by Customer and Exchequer Services. See appendix 1.
- 1.2 This report brings back this issue now to ask cabinet to note further work undertaken by officers to consult key stakeholders (see 4.4). Particularly the support from a broad range of stakeholders for the overall direction of travel adopted by the council in seeking to deliver the Local Welfare Provision (LWP) scheme through a sustainable partnership approach.

- 1.3 A final policy, appendix 2, has been produced from the draft cabinet approved on 6th November 2012, informed by consultation with key stakeholders. This sets out the criteria under which an award will be made and any conditionality that might be attached to the making of an award. Comments from workshops with key stakeholders are shown at appendix 3.
- 1.4 The policy aims to provide holistic support, taking into account complementary local provision including:- Discretionary Housing Payments, Homelessness prevention support, Section 17 Children's Act payments, Disability Related Expenditure allowances within social care fairer charging policy, Council Tax reduction scheme, Disabled Facilities Grant, Blue Badge, Education benefits (Free School Meals) etc. It is envisaged that staff processing applications will be able assess and co-ordinate an appropriate mix of support from the range of complementary provision. Existing information resources, systems and networks will be used and developed to support this approach.
- 1.5 Cabinet are asked to:
- Approve the framework contained within the policy as the direction of travel for the council in establishing and delivering the scheme.
 - Note the ongoing work lead by Customer and Exchequer Services to design the processes and procedures for delivery of the scheme with input from lead members in all political groups, partners, the voluntary sector, council officers and other stakeholders.
 - Note that an IT system has been commissioned from the existing supplier for the purposes of administering the scheme.
 - Note that work to recruit a small staff team to plan, administer and assess applications to the scheme and for Discretionary Housing Payments has commenced.

2 Key points

- 2.1 The elements specifically transferring from DWP are Community Care Grants and Crisis Loans for living expenses, the current scheme is cash limited and expenditure is split across the calendar months. It is important to understand that demand for this service at the DWP currently outstrips capacity and resources available.
- 2.2 Community Care Grants were primarily intended to help vulnerable people live as independent a life as possible in the community. They were awarded to households receiving means-tested benefits such as Jobseekers Allowance.
- 2.3 Crisis Loans were intended for applicants who are unable to meet their immediate short term needs in an emergency or as a consequence of a disaster. They were awarded for immediate living expenses in order to avoid serious damage or risk to the health or safety of the applicant or a member of the family.

- 2.4 The scheme could operate along similar lines to the current scheme in that the total monthly spend could be ringfenced or capped so that no further awards are made if the monthly spend is reached. If the scheme is not limited in this way or a similar fashion then any shortfall would need to be met directly from the General Fund, this would represent a significant financial risk to the council as demand would be uncontrolled.
- 2.5 The DWP are retaining budgeting loans (short term advances) these in the main are used to cover or bridge the gap between means tested welfare benefit payments.
- 2.6 The Department for Work and Pensions have advised us that in Kirklees they are currently receiving around 15,000 applications per annum and make awards in around 9,000 cases. For the 9000 cases awarded (i.e. that meet the criteria) approx 2000 of these actually receive no payment, due to funding not being available, i.e. that month's allocation has already been used up. Due to the welfare reforms we are anticipating increased demand for social fund payments in Kirklees over the next couple of years.
- 2.7 If funding levels remain as indicated below it is inevitable that there will be customers in Kirklees with high need who will meet the criteria in the policy but funding will not be available i.e. that month's allocation has been expended. These customers may be asked to re-apply as applications and circumstances will change on a regular basis, *further/research work will be undertaken on how the current systems works.*
- 2.8 There is currently no commitment to provide any funding beyond the current spending review period. There is therefore a risk to funding for 2015/16. Expected funding for the next 2 years is as set out below, DWP have recently confirmed the figures for 2013/14

2012/13	
Set-up funding	£11,190

2013/14	
Programme funding	£1,119,027
Administrative funding	£236,459

2014/15	
Programme funding	£1,119,027
Administrative funding	£216,740

- 2.9 Profiling the programme funding over a 12 month period suggests that on average, spend could equate to £93,252 per month or £21,519 per week.

- 2.10 The 9,000 successful applications made currently equate to an average award of £124.33 per applicant with an average of 173 successful applications each week when applied to the anticipated programme spend. (Figures are for illustration only)
- 2.11 As a direct consequence of other welfare reforms, we expect that the programme funding, which is already under funded, to be placed under even more pressure as demand is anticipated to rise. It is impossible to know what that overall shortfall might be but if we were to base it upon meeting the current demand from unsuccessful applicants (15000- 9000 = 6000) then it could equate to £750,000 shortfall. This shortfall in funding will increase by £125,000 for every 1000 applicants. (Figures are for illustration only)
- 2.12 For discussion an illustrative version of how the programme budget could be profiled across the year and split across various elements of provision is shown in table 1 below (see also points 8.2 & 8.3 of the final policy). The Advice Contract and Contingency elements would be top sliced from the programme budget, leaving the remainder as the element ordinarily available from which to fund provision to meet other assessed needs of scheme applicants. The amount identified for contingency is likely to be mainly used to meet the need for support following disaster e.g. flood or fire affecting several households or neighbourhoods. The Advice Contract element would be used to commission additional advice service capacity under the Advice Contract to meet the increased demand likely to be generated by the scheme.

The table is included for information and discussion only at this stage. Officers are starting discussion with delivery partners which will enable us to begin implementation of the scheme with an initial profile of the programme budget based on those discussions. However, this is a completely new local authority responsibility and uncertainties over demand discussed in this report. Therefore, we will be seeking delegated responsibility for the Director of Resources to alter these allocations in response to our experience of demand on implementation and delivery of the scheme throughout the year. As suggested by elected members monitoring information will be regularly supplied to those members who wish to receive it.

Total Government Programme Funding		£1,119,027	
Top-Sliced Elements		Annually	Weekly (N.B. 53 week year)
	Advice Contract	£100,000	
	Contingency	£300,000	£5,660.38
Element available for Assessed Provision		£719,027	£13,566.55
Totals		£1,119,027	£19,226.92
Possible weekly split of Assessed Provision element	Food and Emergency Packs		£4,476.96
	White goods + Furniture		£6,783.27
	Other, anything except above could for instance include:		£2,306.31
	<ul style="list-style-type: none"> • Clothing for expectant mothers or babies • Emergency transport costs i.e. job interview, hospital appointment? • Redecoration following incident, if landlord not liable to pay 		

Table 1: Illustrative Programme Budget Profile

3.0 Implications for the Council

The criteria outlined in the policy aim to identify the most vulnerable in order to make awards based on need. This represents a workable balance between meeting the needs of vulnerable people, while protecting the rate at which the remaining budget is spent to ensure it will support awards to vulnerable people over the year.

3.1 Authorities have statutory duties to vulnerable groups under:

- Child Poverty Act 2010,
- Disabled Persons (Services, Consultation and Representation) Act 1986,
- Chronically Sick and Disabled Persons Act 1970,
- Housing Act 1996,
- Equality Act 2010,

This is not an exhaustive list. Government expects that local authorities will establish schemes that minimise the impact on vulnerable groups

3.2 This paper makes a proposal to provide a scheme which is delivered in partnership with the voluntary sector. That approach will help us:

- target those in greatest need
- use existing systems and processes to deliver “in kind” support
- provide a vehicle by which the authority can pay for some of that “in kind” support helping to finance the provision
- Reduce expected administration costs.
- Use one IT system to control expenditure
- Controls payments to make the money go further.

3.3 Councillors from all political groups have been nominated to be involved in scheme design and will continue to be consulted by officers.

3.5 Equality and Diversity

The framework outlined in the policy aims to target resources on the most vulnerable in highest need and as such aims to help address inequalities. Subject to the criteria outlined the scheme will be equally available to residents across all the communities in Kirklees.

3.6 Council Priorities

The implementation of a local Scheme is a key priority for the Council. An appropriate local scheme that recognises the particular circumstances of the applicant will be key to delivering the Tackling Poverty strategy.

3.7 Resources and Value for Money

The scheme costs themselves will be met from the funding provided by government, this includes set up and ongoing administration funding. At this stage we would aim to fund the full costs of new IT, staff, and accommodation from this allocation.

3.8 Legal Implications

There will be no statutory requirement to provide a scheme equivalent to Community Care Grants or Crisis Loans. However, there is an expectation that authorities will provide support. It is likely those government departments such as Job Centre Plus and other agencies such as the Probation Service and Citizens Advice Bureaux will refer potential applicants to the authority for support irrespective of whether a scheme is in place.

The authority could be challenged if it does not have a scheme in place. It is possible that whatever scheme the authority has in place that the scheme itself could be challenged.

3.9 Risk Management

A number of risks have been identified (appendix 4).

3.11 Conclusions

Overall the council will need a flexible scheme that aims to assist vulnerable Kirklees residents with additional support. The scheme must target support at those most in need.

It is also clear that the demand for support will out strip capacity within the scheme.

4 Consultees and their opinions

4.1 The council is not required to consult on use of these resources.

However, in developing the attached proposals consultation has taken place with partners and the voluntary sector to ensure we use existing systems and processes, and are able to map and retain those elements that are working well

4.2 Voluntary Sector

- *Food Banks* – The largest and most established is the Welcome Centre based at Huddersfield Methodist mission providing 4605 emergency packs to 3925 people in 2011-12, there are several smaller food banks in North Kirklees usually associated with faith based organisations. Many food bank users present, with the kind of crisis or emergency needs covered by the current social fund, using some of the transferred resources to commission expanded services from these groups would effectively target “in kind” provision for those with relevant needs. Broadly these groups are willing to work as partners with the council in development and delivery of the scheme, the Welcome Centre has submitted an initial project proposal.
- *Furniture and white goods* – Fusion Recycling part of Fusion Housing and the National Children’s Centre through their “Pass It On shops” have well established provision covering distribution of free and low cost mainly recycled furniture and white goods to people in need. Both are interested in a role in shaping and delivering expanded provision through the scheme.
- *Advice providers* – Local advice providers involved in advice or referral around Community Care Grants and Crisis Loans are aware of the reform, funding transfer and the need to work with the council on scheme development to ensure their service users can continue to access support. It is intended to use some of the crisis loan funding to expand advice provision around preventative financial literacy advice and/or training for those requesting repeated support is suggested.

4.3 Public Sector/Council Services

- Council services operating discretionary spend for their users are aware of the reforms and recognise the potential for aligning their provision with the transferred resources. Clearly this links to:-
 - Discretionary Housing Payments.
 - Section 17 Children’s Act paymentsContinued consultation required at senior management level with services is needed to agree the mechanisms and extent to which this can be achieved.
- After initial discussion with the Probation service further consultation with them and other services supporting people with needs relevant to current Community Care Grants is suggested. This could clarify their role in active referral, initial assessment, needs verification and facilitating “in kind” provision within a proposed scheme.
- It is intended to gather operational information e.g. seasonality, budget and priority management which may transfer to a local scheme from local DWP partnership managers.

4.4 Stakeholder Workshops

Two workshops were held with relevant stakeholders in December one focussed on potential voluntary sector delivery partners and the other with council and public services offering support to people with crisis, emergency and community support needs. Nominated elected members were involved in these workshops or further discussion with officers. These demonstrated broad support for the council’s decision to implement an LWP scheme and approach in aiming to support and better integrate established local voluntary and public provision through

partnership. Stakeholder comments from the workshops are at appendix 3. Some of the key issues that emerged were:

- The importance for stakeholders of a genuine approach from the council to operating this scheme as a partnership. It is that scheme governance arrangements reflect this.
- That it will be very important for staff involved in assessments to have ready access to current information about the other areas of local support which may be relevant to people seeking help from the scheme. The software commissioned will provide a facility to store information relevant to signposting/referral of applicants unlikely to get help from the scheme.
- There was wide recognition that provision of several different stakeholders may be relevant for any one applicant's situation, so can the LWP scheme be established to support the principles of seamless service access? It is suggested that as the scheme is implemented the relevance and feasibility of the following established or new pieces of work is considered for adoption within the scheme:
 - The recently established Advice Services Partnership is intending to develop a single advice process where organisational boundaries are invisible to users.
 - The Common Assessment Framework developed within CHYPS
- Point 5.5 of the final policy (appendix 2) has been expanded from the original draft to reinforce the importance of continuing to build links to further support in relation to the principle of conditionality.
- Delivery partners are diverse in terms of size, length of establishment, capacity and management arrangements. It is important for them that any arrangements around funding, performance and budget monitoring and reporting are not unnecessarily onerous given their capacity. In working with partners to agree arrangements around issues such as expected levels of provision, unit or schedule based costs of this provision, arrangements for transferring funding to partners from the scheme to meet these costs, budgetary monitoring, needs assessment and prioritisation officers will continue to adopt a proportionate approach. Also officers will encourage partners to establish natural co-ordinating arrangements through which partners can support each other around reporting burdens and/or ensuring more consistent access to provision from the scheme across the district.
- Following stakeholder comments the final policy was also amended from the original draft with the following additions and qualifications to the targeted scenarios where applicants may receive support:
 - Addition of individuals as well as families under exceptional pressure.
 - Addition of people with no fixed abode.
 - Qualification to explain that the needs covered by a setting up home allowance should not be covered by the scheme for young people leaving care to who the allowance is available.
 - Addition of people with significant mental health problems.
 - Qualification that assistance with job interview or work clothing is only available where it can not be covered by job centre plus or work programme provision.

- Given that this is a new responsibility the importance of learning as the scheme is implemented informing the identification of scenarios where applicants receive support.
- Point 5.6 of the final policy has been included to reflect concerns that there maybe some needs we assess an applicant as having, food being the most obvious example, where the risks of not meeting that need may be too great and where levels of needs assessment needed would be minimal.

Officers will continue to engage with key stakeholders on aspects of scheme design and possible governance arrangements.

4.5 Management software –

The council and several other LAs have contributed to the work of our current benefits software provider Northgate to develop a hosted system module for scheme administration. We have commissioned this system which will be hosted by our current supplier, the system, will be web based and remotely accessible from multiple sites so facilitating active partner involvement and will provide routines intended to enable demand control and financial monitoring. The estimated cost for the IT system is approx 12k pa.

5 Next steps

- Continue to work with a cross party group of members, services, partners and stakeholders on scheme design and governance arrangements.
- Establish initial arrangements with delivery partners around levels of provision, costs, funding mechanisms, budget and performance monitoring Jan – Feb 2013
- Publish the scheme Feb 2013
- Work with Northgate to test elements of the IT system and arrange staff training as required. Jan – Apr 2013
- Set up processes for phone and web. Jan – Feb 2013
- Recruit staff to run the process Jan – Feb 2013. – *No budget has been provided by the DWP for staffing in 2012/13.*
- Training for staff March 2013

6. Officer recommendations and reasons

- 6.1 That the final Local Welfare Provision policy is adopted as the direction of travel for the council in establishing and delivering the scheme.
- 6.2 That cabinet reconfirms that delegated responsibility is given to David Smith, Director of Resources to amend the policy, working practices and programme budget profiling in year without the need for cabinet approval. This should enable changes and modification to the scheme to

be made quickly in order to react to reduced funding, financial pressures and unforeseen circumstances.

- 6.3 That cabinet notes the commissioning of an IT management system from the existing supplier.
- 6.4 That work continues on service and process design and governance with key stakeholders

7. Cabinet portfolio holder recommendation

The scheme will provide help to vulnerable people in the community who are unable to meet their immediate short term needs. No money will be provided, instead we will be utilising vouchers for goods and services and payment in kind to meet the customers needs.

Funding will be capped at DWP funding levels, and we will work with partners and the voluntary sector to make best use of the funding available. However, due to the level of government funding we will not be able to help all the people who present for the service.

8. Contact officer and relevant papers

Steve Bird, Welfare and Exchequer Services Manager
Julian Hobson, Senior Manager, Customer and Exchequer Services

9. Assistant director responsible

Jane Brady, Assistant Director for Customer & Exchequer Services

Appendix 1

Cabinet – 6 November 2012

Decision Summary

Agenda Item 9:

Localised Community Care Grant and Crisis Loans

(1) That approval be given to the establishment of a Crisis Loan and Social Fund Scheme, as set out within the considered report, and that the scheme be administered and set up by Customer and Exchequer Services in readiness for implementation on 1 April 2013.

(2) That expenditure on the scheme be capped at funding levels from the Department of Work and Pensions, as set out at paragraph 2.7 of the considered report.

(3) That the draft policy set out in the considered report be adopted as a direction of travel for the Council in relation to the adoption of a scheme.

(4) That approval be given to the delegation of authority to the Director of Resources to amend the policy and working practices In-Year, to enable changes and modifications to the scheme to be made quickly in order to react to reducing funding, financial pressures and unforeseen circumstances.

(5) That approval be given to the commissioning of the scheme from the existing supplier.

(6) That Officers be required to continue work on the policy with key stakeholders.

Appendix 2

Kirklees Council Local Welfare Provision (Social Fund) Scheme: Policy V3

1. Background

- 1.1. From 1st April 2013 some elements of the social fund will transfer from the Department for Work and Pensions to Kirklees. This policy replaces those parts of the Social Fund which will no longer be administered by the DWP.
- 1.2. The elements specifically transferring are Community Care Grants and Crisis Loans for living expenses, the current scheme is cash limited and expenditure is split across the calendar months. It is important to understand that demand for this service at the DWP currently outstrips capacity and resources available.
- 1.3. It is intended that the local scheme in Kirklees will also be cash limited to the funding transfer level in any give year split by calendar month.
- 1.4. The scheme will be administered by the Customer and Exchequer Services. Consultation with stakeholders has demonstrated an enthusiasm for a genuine partnership approach. It is intended that scheme governance arrangements reflect this.

2. Purpose of the Scheme

- 2.1. The scheme aims to assist vulnerable Kirklees residents with additional support. It will aim to use intelligence led proactive measures to identify and target support at those most in need.
 - Unable to meet their immediate short term subsistence needs and need assistance as the only way of preventing serious damage or risk to the health and safety of the person or their family Or:-
 - Need assistance to maintain their independence within the community.
- 2.2. The policy aims to provide holistic support, taking into account complementary local provision including:- Discretionary Housing Payments, Homelessness prevention support, Section 17 Children's Act payments, Disability Related Expenditure allowances within social care fairer charging policy, Council Tax Support, Disabled Facilities Grant, Blue Badge, Education benefits (Free School Meals) etc. It is envisaged that staff processing applications will be able to assess and co-ordinate an appropriate mix of support from the range of complementary provision. Existing information resources, systems and networks will be used and developed to support this approach.

- 2.3. The scheme aims to complement and further support existing voluntary and public sector provision and funding where feasible; this will help to protect the remaining funds for customers in need. E.g. Fusion furniture bank, Kirklees Citizens Advice – financial advice, the Methodist Mission etc
- 2.4. Partnership arrangements will be actively sought with local providers of assistance such as foodbanks and furniture re-use centres, and goods and services procurement pursued from local businesses and services offering accessible, value for money provision. As discussed in consultation with stakeholders, arrangements around funding, performance monitoring and reporting will need to be agreed flexibly reflecting the existing capacity and structures of delivery partners.
- 2.5. Sustainability and administration of the scheme will be supported by:-
- a) A single system for recording social fund awards made by the council and or the voluntary sector. This should provide the opportunity for the council to monitor expenditure at any given point and link/refer customer for additional support. Awards would stop at the point funding is used up each month, in the unlikely event of a surplus at month end this would be rolled forward.
 - b) Annual or monthly awards to voluntary organisations who provide basic assistance i.e. food etc. will make best use of the funding available
 - c) Irrespective of where the customer presents we will actively identify customers needing other forms of support referring them to appropriate local services with issues such as money management, debt advice, and financial capability training/education, application forms etc.
 - d) Additional help for customers who repeatedly apply to the scheme through a degree of conditionality where their assistance from the scheme is conditional on their co-operation with the referral arrangements to the additional support identified. E.g. financial advice or training, voluntary work experience etc.
 - e) Working in partnership with relevant services and local organisations to deliver an approach preventing repeat applications
 - f) Customer limits on the number and total value of repeat applications within a year.
- 2.6. The scheme will develop service standards ensuring high quality decision making including rapid response turn round and we will investigate how out of hours provision might work (i.e. weekend and evening) provision. Although this may be limited depending on additional administration costs.
- 2.7. The policy aims to ensure fair, equitable treatment and full consideration of the circumstances of each customer and the extent, nature and urgency of their need. However, it is inevitable that there will be customers with high need who will meet the criteria but no funding will be available i.e that month's allocation has been expended. These customers may be asked to re-apply as applications and circumstances will change on a regular basis, further research work will be undertaken on how the current systems works.

3. Targeted Scenarios for Support

3.1. The scheme will provide and target assistance to those identified as most in need. This may include:

- Families and individuals under exceptional pressure
- Homeless people, rough sleepers or those with no fixed abode
- Vulnerable older people
- People fleeing domestic violence
- Young people leaving care needing help for needs not covered by a setting up home allowance
- People moving out of institutional or residential care
- Ex offenders leaving prison or detention centres
- Chronically or terminally ill people
- People with alcohol or drug issues
- People with learning difficulties
- People with significant mental health problems.

3.2. It will reflect the existing Community Care Grants and Crisis Loans by considering assistance in 2 main need categories:

1) Customers needing assistance with short-term subsistence for example those who:

- Have no essential food to sustain basic living.
- Need essential goods associated with infants/children
- Are without or at immediate risk of not having fuel for heating or cooking
- Need help with emergency travel costs
- Have suffered a major upheaval or disaster
- Require suitable clothing for job interviews or work, (where not available through the Work Programme, Job Centre + or other provision).
- Need help towards essential medical related costs (where not provided by the NHS or another body)
- Require assistance to cover living expenses until they receive their first payment of benefit or salary, where this is not met by other benefits or benefit advances. (overlap with DHP)

2) Customers needing assistance to establish or maintain a home in the community for example those who:

- Have been in long term care
- Have left prison
- Have fled domestic violence
- Move to supported accommodation/independent living
- Need essential repairs to heating systems or modes of travel.

3.3. These are not exhaustive lists of scenarios; this is a new responsibility for local authorities with encouragement from government to develop our own provision not reinvent the existing system. Ongoing engagement with stakeholders and learning from experience as we implement LWP will enable us to identify additional circumstances relevant for support.

3.4. Assistance available could be the provision of:

- Beds
- Bedding
- White goods
- Heating appliances
- Essential domestic appliances/cookware
- Essential domestic furniture
- Clothing for expectant mothers or babies
- Emergency transport costs i.e Job interview, hospital appointment?
- Redecoration following incident. Should investigate if landlord should pay

3.5. The scheme would NOT normally assist with:

- Television or TV licence, TV packages, aerial, satellite or radio related costs.
- Telephone purchase, installation, rental, line and call charges
- Mobile or landline phone charges
- Cigarettes, prescription drugs etc
- Pet food or pet bills etc
- Housing costs or arrears of rent (except for certain rent in advance, boarding or minor repairs and improvements not met by other benefits or where help is available from other sources)
- Costs normally met by state support or benefits including Universal Credit
- Debts – (Financial advice would be given)
- Motor vehicle expenses (other than emergency travel expenses)
- Where the customer has access to sufficient income or savings
- Costs associated with care provision and domestic assistance (CFA)
- Needs occurring outside the UK
- Needs related to religion
- Educational or training needs including clothing and tools
- Expenses related to school attendance e.g. school meals, travelling expenses or clothing where assistance is available from other sources
- Expenses connected to legal proceedings (other than emergency transport if stranded away from home)
- Removal or storage charges for those re-housed following a compulsory purchase, redevelopment or closing order, a compulsory exchange of tenancies or under a housing authorities statutory homeless duties.
- Repairs to social housing properties or rented property
- Needs met free of charge by the NHS for those on passporting means-tested benefits.
- Work related expenses e.g. fares and clothing where help is available from other sources

- Mobility needs
- Holidays or breaks – of any type
- Water rates or charges
- Fuel or standing charges (except where this is the only means of avoiding disconnection or enabling reconnection of a supply)
- An expense which the council has a statutory duty to meet
- Customers able to access support from family members living in the same household
- Customers with no recourse to UK public funds i.e persons from abroad.
- Maternity (except clothing for pregnant women or growing babies)
- Funeral expenses or funeral related expenses of any type.
- Any other non essential items

4. Eligibility

4.1. The basic criteria for applicants eligible for help from the scheme are:

- Claiming Council Tax Reduction or eligible for CTR at an address in Kirklees.
- Resident in Kirklees on a low income and without access to sufficient funds to meet their immediate needs. Applicants will have demonstrated this if their income is at or below the level where, they would be entitled to a reduction of a liability under the council's local Council Tax Support Scheme if they had been liable to pay Council Tax.
- Aged 16 or over.
- Leaving care after a minimum period.
- Require support to stay in the community.
- Have demonstrated they are without immediate resource to meet the basic needs of themselves and / or their dependents.

4.2. DWP recently confirmed they will not be looking at extending access to DWP data on the income and benefits of individual applicants to those administering the scheme until the end of 2013 at the earliest. Council staff that currently have access to this data for HB/CTB/CTR processing will be able to pass on limited information to colleagues administering the LWP scheme subject to established data owner responsibilities and DWP's updating of the Memorandum of Understanding. It is proposed that all available data on income and savings is assessed to determine if a customer is eligible for an award.

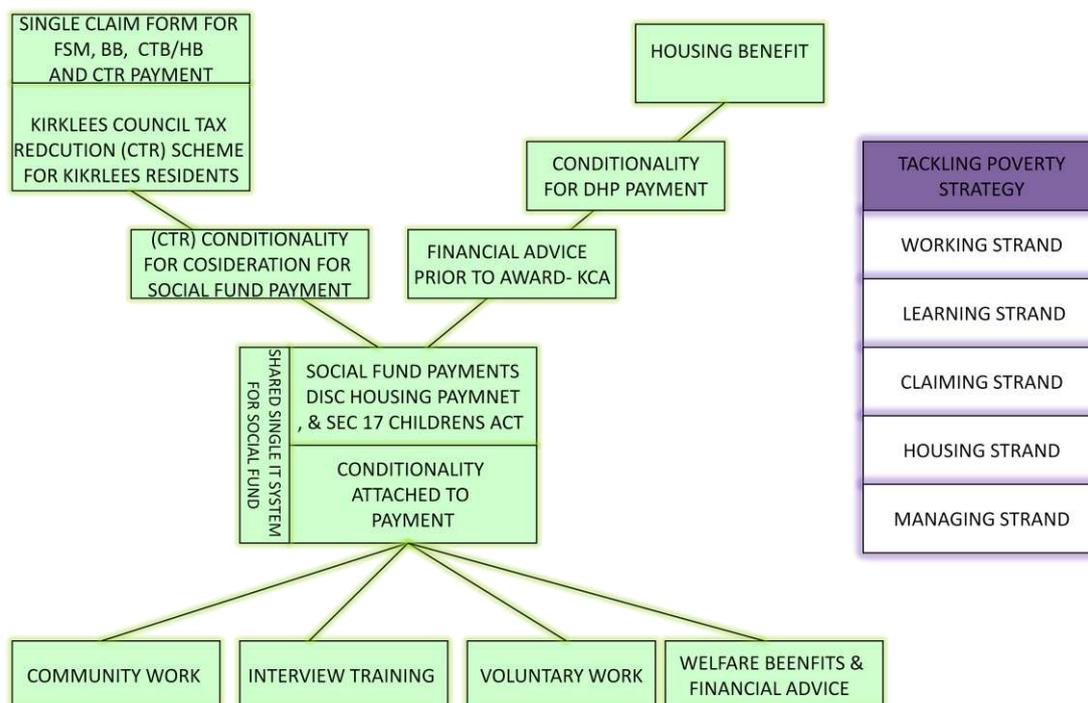
4.3. A proactive approach to identify and target support towards those most in need, including targeted campaigns and outreach activities is suggested.

4.4. It is anticipated that where an applicant has access to capital adequate to meet their identified needs the application will be refused.

4.5. All applications will be considered on an individual basis with due account given to the vulnerability and personal circumstances of each customer.

4.6. The amount of remaining available funding will be relevant to the prioritisation of awards; expenditure will be reviewed on a monthly basis.

5. The Application Process



5.1. The scheme will be open to applications from customers and their representatives. The scheme will provide a clear, transparent and accessible, application process through a number of access channels providing for consideration of applications from customers appointees or representatives and the facility to apply through support services across the council and appropriate external partners and outside agencies.

5.2. The process will support consistent and fair decision making by gathering appropriate data and supporting information in an accessible way and be flexible balancing avoidance of undue delay against the need for more detailed information to decide some applications.

5.3. Application will be mainly by phone using the council’s existing office hours and out of hours telephone contact provision. Assisted claiming to complete applications will be available through the council’s Customer Service Centres and relevant council support services, external partners and outside agencies i.e. Kirklees Citizens Advice, Fusion etc. This will be facilitated by an on-line process accessible on a self-service basis to customers or mediated by relevant council and external agency staff.

5.4. Case management, turnaround service levels will aim to ensure rapid high quality decision making with prioritisation of emergency assistance applications.

- 5.5. Repeat applications will be considered on a case by case basis however limits, will apply to the maximum number and total aggregate value for any one applicant in any financial year. Assistance for customers repeatedly applying to the scheme will be conditional on compliance with referral arrangements to additional support identified as appropriate. To support principles around holistic assessment and conditionality officers will continue to explore opportunities to develop links to relevant support around financial capability, improving employability, and physical and mental health.
- 5.6. The scheme will aim to recognise that in many instances people will present with a clear and urgent need for assistance with basic essentials e.g. food. Funding and delivery arrangements will be agreed with relevant partners in the scheme e.g. food banks to enable them to provide assistance rapidly with minimal assessment and flexibility around conditionality.

6. Assistance from the Scheme

- 6.1. The scheme aims to provide support in a form and at a level appropriate to the individual circumstances of each applicant and their dependents and in relation to the total remaining resources potentially available to the scheme.
- 6.2. Assistance will be provided to the appropriate party, this may be:
- The customer
 - Their partner
 - An appointee or authorised representative
 - Directly to an organisation supplying the services and/or goods to any of the above assessed under the scheme as meeting the identified needs.
- 6.3. It is anticipated that assistance provided under the scheme will be in a form *other than cash*. Goods in the main will be second hand i.e. furniture, white goods etc.
- This is likely to include:
- Vouchers for food/goods
 - Direct payments to voluntary sector or suppliers of suitable goods or services
 - Pre payment cards for goods or fuel i.e. electric
 - Food /clothing parcels – voluntary sector or local suppliers
 - Services from local partners e.g. financial capability, benefits advice etc
- 6.4. The scheme will aim for flexibility in delivery appropriate to the individual applicants or dependents circumstances.
- 6.5. It is anticipated that applicants will not be expected to repay the value of any assistance provided. i.e. it's not a loans system.
- 6.6. The scheme will include calculation of the maximum value of assistance for living expenses and particular items.

- 6.7. Customers will be expected to take due care of any goods provided and must NOT sell these on.
- Repeat requests for furniture or white goods are very likely to be refused.

7. Right of Review

7.1. As this is a voluntary service NO right of appeal exists. However, applicants or their authorised representative can request that the decision under the scheme be reviewed. Reasons for review could include:

- Assistance or repeat assistance refused
- Form of the assistance is not appropriate
- Value of the assistance does not meet identified need

7.2. Under circumstances in 7.1 the review will only be in the form of a new application in the following month (at least 14 days must have elapsed between the last application and new evidence may be required).

8. Financial Constraints and Controls

8.1. Programme funding allocated from Central Government is £ 1,119,027 for each of 2013/14 and 2014/15, there is no commitment to funding beyond this period.

8.2. This necessitates close and regular monitoring of spend on assistance against this budget. The programme funding will be allocated on a month by month basis over these 2 years and managed to ensure the scheme retains a contingency to allocate to appropriate assistance in the event of a local emergency (e.g. a wider scale flood or fire affecting several households) alongside provision available through Emergency planning provisions.

8.3. It is anticipated that in profiling expected spend of the programme funding appropriate elements will be allocated to providing particular forms of emergency or community support assistance. For example

- food and emergency packs,
- essential white goods, household furniture and equipment,
- financial capability.

These amounts being used to purchase agreed levels and standards of provision by supplementing the resources of existing local providers.

These portions will be allocated to providers on a monthly basis with a requirement that they monitor spend against their allocation and service provision against agreed levels. The remainder of the programme funding being available to funding individually assessed assistance, meeting the identified needs of individual applicants.

8.4. Monthly allocation will be capped at aggregate funding levels, apportionment and monitoring of programme funding spend will enable ongoing assessment of demand and if appropriate in view of peaks and troughs provide the evidence for the Council to review the funds available to the scheme.

8.5. All financial management will be subject to monthly and quarterly reporting and review and assistance will be provided on the basis of available funds.

8.6. The scheme will use management systems and software providing detailed and robust real time management information to allow continuous monitoring of for instance:

- Spend on assistance
- Forms assistance provide in
- Projected allocation of funds
- Numbers of applicants assisted
- Equalities data
- Turn round of applications and repeat application.

The scheme will seek to maximise the programme funding available for those most in need by deterring fraudulent applications and false statements with appropriate controls enabling prompt action where required. Work with neighbouring councils to reduce the potential for duplicate applications across council boundaries will be continued throughout the life of the scheme & will be controlled throughout closer working.

LWP Stakeholder Workshops

Two workshops were held with relevant stakeholders in December one focussed on potential voluntary sector delivery partners and the other with council and public services offering support to people with crisis, emergency and community support needs. Nominated elected members were involved in these workshops or further discussion with officers. These demonstrated broad support for the council's decision to implement an LWP scheme and approach in aiming to support and better integrate established local voluntary and public provision through partnership. Stakeholder comments from the workshops are recorded in the table below. Some of the key issues that emerged were:

- The importance for stakeholders of a genuine approach from the council to operating this scheme as a partnership. It is that scheme governance arrangements reflect this.
- That it will be very important for staff involved in assessments to have ready access to current information about the other areas of local support which may be relevant to people seeking help from the scheme. The software commissioned will provide a facility to store information relevant to signposting/referral of applicants unlikely to get help from the scheme.
- There was wide recognition that provision of several different stakeholders may be relevant for any one applicant's situation, so can the LWP scheme be established to support the principles of seamless service access? It is suggested that as the scheme is implemented the relevance and feasibility of the following established or new pieces of work is considered for adoption within the scheme:
 - The recently established Advice Services Partnership is intending to develop a single advice process where organisational boundaries are invisible to users.
 - The Common Assessment Framework developed within CHYPS
- Point 5.5 of the final policy (appendix 2) has been expanded from the original draft to reinforce the importance of continuing to build links to further support in relation to the principle of conditionality.
- Delivery partners are diverse in terms of size, length of establishment, capacity and management arrangements. It is important for them that any arrangements around funding, performance and budget monitoring and reporting are not unnecessarily onerous given their capacity. In working with partners to agree arrangements around issues such as expected levels of provision, unit or schedule based costs of this provision, arrangements for transferring funding to partners from the scheme to meet these costs, budgetary monitoring, needs assessment and prioritisation officers will continue to adopt a proportionate approach. Also officers will encourage partners to establish natural co-ordinating arrangements through which partners can support each other around reporting burdens and/or ensuring more consistent access to provision from the scheme across the district.
- Following stakeholder comments the final policy was also amended from the original draft with the following additions and qualifications to the targeted scenarios where applicants may receive support:

- Addition of individuals as well as families under exceptional pressure.
- Addition of people with no fixed abode.
- Qualification to explain that the needs covered by a setting up home allowance should not be covered by the scheme for young people leaving care to who the allowance is available.
- Addition of people with significant mental health problems.
- Qualification that assistance with job interview or work clothing is only available where it can not be covered by job centre plus or work programme provision.
- Given that this is a new responsibility the importance of learning as the scheme is implemented informing the identification of scenarios where applicants receive support.
- Point 5.6 of the final policy has been included to reflect concerns that there maybe some needs we assess an applicant as having, food being the most obvious example, where the risks of not meeting that need may be too great and where levels of needs assessment needed would be minimal.

Officers will continue to engage with key stakeholders on aspects of scheme design and possible governance arrangements.

Support Needed (Goods / Services etc)

Comments from 3rd Dec workshop (voluntary organisations)

- Monthly cut off – doesn't meet crisis need.
- Fuel poverty – contradiction in the draft policy.
- In kind payments – issues include pre-paid cards.
- Look at credit union – supporting them to loan more appropriately than loan sharks
- People who won't access the service – how can we help?
- Mentoring / well being – can't do over telephone
- Medical need – may include alcohol / substance users' requirement as a solution (for example, someone may need to buy alcohol or it could be dangerous medically).
- Is there potential for job creation?
- Recycled goods are out there – costs of storage and distribution
- How does this link with the debt advice etc?
- Group of clients / individuals different to current crisis grant applications
- Emergency shelters are needed – bunk beds etc / also for people who don't want to be on their own
- Will Kirklees staff know about alternative provisions / options?
- Always a number of poor people that will be dependant – must provide support without condemnation

- Could be helped by a different access route?
- Inexpensive – suppliers.
- Not a structure which is too top heavy.
- Users service provision will change – families that have been working and circumstances change

Comments from 4th Dec workshop

- Need a stronger network to give support and assistance
- Early intervention – we need to encourage people to come forward for help at an early stage to prevent the situation from getting worse
- Giving local businesses support
- Recruit volunteers / champions to help with the introduction of the scheme
- Voucher system working alongside supermarkets
- Guarantee service / item being provided legitimately to people in need
- We need to be the last resort
- No specific limits or times allowed to claim, maybe able to offer alternatives, help by other partners. Limits around certain things but its difficult to limit food.
- Expert system – database to show what provision is available.
- Prioritise – food, heating, rent, clothing.
- Demand will be huge for furniture / white goods etc – how can this be managed?
- Do we know which groups of customers will be most affected by the changes? How will this affect children – safeguarding issues?
- Budgeting help – Is there enough available? A lot of services are stretched very thin
- Its important to raise awareness of the changes (social fund, welfare reform) so people can plan for the future (outreach work, making customers aware)
- DHP's – will the social fund link to them? Will all this work be dealt with by the same team? Should this work be brought together (DHP, gateway etc)?
- Are DHP payments separate? Should the same team deal with DHPs and social fund?
- Universal credit – more help may be needed when this is introduced. Loans may be needed to provide some transitional protection to customers. Could the credit union get involved?
- Buying power – could the council use it buying power to secure cheaper goods if buying in bulk?

Partnership Working

Comments from 3rd Dec workshop (voluntary organisations)

- Small voluntary organisations need an easy, low admin method of delivering the service, probably based on referrals from bigger organisations.
- There potentially could be lots of organisations involved in the provision, so a consistent approach is required.
- There is a limit to what volunteers are going to be able to do. Some of the organisations are quite small and they don't operate full time.
- We are worried that this is a way of getting the job done "on the cheap" because of the perceived reliance on voluntary organisations.
- Volunteering – term cannot be linked to condition because it becomes enforced work.
- How will the voluntary sector cope if they did it?
- Like idea of having some sort of responsibility with provider
- Implication for frontline organisations – to take on some of the applications (to fund that) or contracting support to service required
- Need trust and flexible dialogue with council. A real partnership not just a paper partnership.
- Up-skilling volunteers / providers – public resources team can't do all outreach
- Need to be part of review process / management / representation for transparency of spending (to be part of governance structure and policies)
- Voluntary sector need to work closer together – might increase possibility to access other funding streams.
- Knowledge base / expert system. How do we replace the current approach / application process done by the voluntary sector?
- Smarter with structure of organisations – i.e. prison release on Fridays
- Can do more with public services – coming in, drop in
- Have their own community network.

Comments from 4th Dec workshop

- Could partners pool together to provide furniture etc from one place, distributing from different areas to a main depot
- Voluntary sector – need to remain neutral so they can continue to help people. How does this fit if they are the ones who are turning applications down?
- Using other provisions across the organisations will become very important
- There must be consistency amongst the different organisations
- We must help sustain the voluntary sector, otherwise the scheme can't succeed

Funding

Comments from 3rd Dec workshop (voluntary organisations)

- Even when funding has been spent (monthly budget) – need to acknowledge that some needs have to be met, i.e. food / fuel

Comments from 4th Dec workshop

- How do you avoid the budget running out and what else could be available? What impact would that have on the review or reapplication the month after?
- Budget – could we pass some of the money to the voluntary organisations to support them

Eligibility

Comments from 3rd Dec workshop (voluntary organisations)

- Repeat applications – must be looked at on an individual basis. Although they may have applied a number of times their reasons may be genuine. So, it may not be appropriate to attach conditions to them getting further help.
- Common assessment framework

Comments from 4th Dec workshop

- Conditionality – in what way will this be applied and how can it be enforced?
- Eligibility - people who aren't claiming benefit, how will they get help?

Applications

Comments from 3rd Dec workshop (voluntary organisations)

- How will repeat applications be monitored by all the various organisations?
- Who will run the out of hour's provision and how will this work? What if someone is in desperate need of help and it's outside the council's normal working hours?
- Free phone numbers / access to one – essential for individuals and agencies referring. Warm phone provision.
- How will the council cope with the number of applications, enquiries etc?
- Applications – what about people who are not in the system?
- Telephone application – not flexible / is impersonal / need to be face to face
- Web based applications – too frightening to people?
- Nomadic clients / cross boundaries – validity of clients may be an issue

Comments from 4th Dec workshop

- Application process – who will pay for the telephone call?
- Application process – customer may be in a queue of phone calls, so they won't always get immediate help from someone
- Application process – its important to have a designated pathway so people know where to go for help
- Application process – confidentiality is important, so customers can be confident about approaching us
- Application process – customers need an immediate decision, they shouldn't have to wait
- Application – need for transparency and face to face contact
- Need to have out of hours access
- Application – what will the web based system look like? Will the self serve element be simple to use?
- Specialist teams for help in completing applications
- What will the database do? Will it be able to link to gateway, food parcels etc?
- Homeless – concerns as they are not 'on system'
- A specialist team to make the decisions
- Central control team?

- A central point for people to contact, whatever the need
- Access – need to ensure that people have various channels to access support.

Reviews / appeals

Comments from 3rd Dec workshop (voluntary organisations)

- Review process would work best if an independent person looked at it. Immediate review is essential if help has been turned down. A customer shouldn't have to wait until the following month and reapply. If their application has been turned down due to a lack of funds they should be able to reapply as soon as more funding is available.

Comments from 4th Dec workshop

- Reviews – Should be conducted by an independent panel. Elected members could sit on the panel. If an application is turned down the customer should be able to appeal straight away. Could we visit customers to collect further information to support their applications?

Cash needs

Comments from 3rd Dec workshop (voluntary organisations)

- Customers may need cash on certain occasions, for example, pay as you go fuel, travel expenses, out of hours emergencies.
- If no cash – take it or leave it?
- Fuel and cash, no alternative, on a card?

Comments from 4th Dec workshop

- How will we manage payments for cash?
- Payments for fuel – cash may still be needed; vouchers / tokens are not always possible. Would it be possible to issue payment cards for example like paypoint / payzone?
- Fuel tariffs – its important to ensure people are on the best tariff, to try to prevent the problem
- In favour of non-cash apart from in emergencies (urgent repairs, family crisis etc)

Linking to wider provision

Comments from 4th Dec workshop

- Improved access to information in neighbourhoods, for examples, community centres, libraries, so people are aware of what help is available

RISK LOG – Appendix 4

Project:		Social Fund Replacement Scheme						
Produced By:		Mick Ambrose						
Given To:		Project group						
Version:	2.0	Date:			29 th Sept 2012			
Date Raised	Risk Description	Probability of Event (P)	Impact (I)	Risk Factor (P x I)	Financial Impact	Managed Response		
						Action to mitigate risk	Who?	Review
August 2012	<ul style="list-style-type: none"> Suppressed Demand for social fund and crisis loan payments Resources from DWP based on past use and demand levels which have been aggressively managed down by DWP. Welfare reform and continuing economic downturn very likely to increase demand. 	5	5	25	Depend if scheme funding capped.	<ul style="list-style-type: none"> Design scheme to align with current LA funding from DWP and 3rd sector provision. Design scheme to include a proactive approach to reducing repeat applications. (access to money advice, financial capability training, affordable credit) Design scheme to provide monitoring and reporting sufficient to determine current and project future demand. System must track all expenditure 2 year funding from DWP published so potential cap level is known. 	C&E	On going
August 2012	<ul style="list-style-type: none"> Reputational risk - resources based on managed down level of demand with no projections for likely future increased demand. The council will be turning down people who would previously have received support. 	5	5	25	N/A	<ul style="list-style-type: none"> Clear communications vital to reduce this risk (which it is unlikely can be eliminated) Ensure transparent process and procedures. All political party support for the scheme 		Ongoing
August 2012	<ul style="list-style-type: none"> Cross-boundary issues and postcode lotteries. E.g. local connection rules, or their absence, risking residents unable to prove a local connection (e.g., where escaping domestic violence) concentrating in areas without such rules. 	4	5	20	Unknown	<ul style="list-style-type: none"> Negotiations with neighbouring councils aimed at a common approach to cross boundary issues Regular Liaison groups already created with WYC 		Ongoing
August 2012	<ul style="list-style-type: none"> Timescales insufficient to build all the local partnership or commissioning arrangements needed to maximise value from the devolved resources via alignment with existing community based or LA provision. 	4	5	20	Unknown	<ul style="list-style-type: none"> Continue mapping work with providers/referrers. Ensure 3rd sector and LA depts. formally consulted on or involved in scheme priorities and design 		On going

August 2012	<ul style="list-style-type: none"> Insufficient access channels to the scheme – overall channel shift to digital or telephone based possibly self-serve delivery unlikely to meet the requirements or support accurate needs. 	4	5	20		<ul style="list-style-type: none"> Build in face to face access both through partner services and groups referring to or assessing for the scheme and direct thru CSCs and LICs? Need to ensure appropriate training and support of front line staff in scheme eligibility and in dealing sensitively and safely with people facing crisis or urgent support needs. 		Ongoing
August 2012	<ul style="list-style-type: none"> No system currently in place to administer the local scheme Time-limits will restrict procurement 	4	4	16		<ul style="list-style-type: none"> Looking at current supplier for Housing and Council Tax benefits and Blue badge system Northgate System demo completed Hosted service 12k 		
August 2012	<ul style="list-style-type: none"> Staffing & Resources Government review of localised social fund intended for 2014/15 	4	4	16	Unknown	<ul style="list-style-type: none"> Recruitment well in advance of implementation Training on process and systems Use of reporting info with other LAs, LGA etc. in discussion with government on success/failure of the localisation and as evidence for continued and/or increased resources. 		On going
August 2012	<ul style="list-style-type: none"> Funding & Programme resources only confirmed to Mar 2015 (end of spending review period). 	4	5	20	Funding shortfall at least £1.34m for 2015-16	<ul style="list-style-type: none"> Council needs to consider possible need to allocate resources to meet the demand generated in the first 2 years of the scheme. Review scheme in year 1 and 2. 		On going
August 2012	<ul style="list-style-type: none"> Stakeholder, partners and 3rd sector partners do not continue to engage with service development/ design 	3	5	15	Unknown	<ul style="list-style-type: none"> Ensure work is reflected in relevant Tackling Poverty theme action plans Design scheme to align with other council discretionary funding. Ensure discussion to agree levels of and arrangements for alignment with senior management and elected members. 		On going
August 2012	<ul style="list-style-type: none"> Lack of political ownership of the scheme 	3	5	15	Unknown	<ul style="list-style-type: none"> Take up offers of involvement from members already expressing interest Regular dialogue with appropriate portfolio holder Ensure cabinet consider and provide a steer on key priorities for the scheme 		Ongoing
August 2012	<ul style="list-style-type: none"> Not planning comms to deliver enough but not too much sufficiently distributed, relevant and timely information ahead of the scheme's launch and in early stages of operation 	4	4	16	Unknown	<ul style="list-style-type: none"> Ensure dedicated comms officer is available throughout the whole programme 	Communications Service	Ongoing
August 2012	<ul style="list-style-type: none"> Possible legal challenges. E.g. Internal review/appeal system put in place not robust/transparent enough – only further recourse is the ombudsman - may increase the risk of legal challenge as 	3	5	15	Unknown	<ul style="list-style-type: none"> May not be possible to reduce risk but a clearly transparent and accessible review process may reduce impact of challenge. Scheme priorities and eligibility criteria should be widely drawn assessors need to be empowered to use and 		Ongoing

	<p>compared Independent Review Service which is being abolished.</p> <ul style="list-style-type: none"> Over rigid prescription of eligibility may lead to challenges around fettering of decision making in a discretionary scheme. Not planning a general public consultation 					<p>demonstrate discretion in decision making.</p> <ul style="list-style-type: none"> We are and will be discussing and consulting on priorities, eligibility and scheme design options with elected members, Senior Council Management and a wide range of council services and third sector organisations as either potential delivery partners or referrers to the scheme. 		
August 2012	<ul style="list-style-type: none"> Increased expectations of the council's role in dealing with emergencies. (e.g., riots or floods) 	3	5	15		<ul style="list-style-type: none"> Discuss appropriate aspects with Emergency Planners Decision on whether scheme budget managed to ensure a contingency or whether the council would support the scheme with additional resources 		Ongoing
August 2012	<ul style="list-style-type: none"> Residents suffering an emergency will need to access support Out-of-Hours. 	4	4	16	Depends on emergency	<ul style="list-style-type: none"> Align with existing Council provision (KD/Carephones/Emergency duty team) Does level of administrative funding transferred allow the council to support this? 		Ongoing
August 2012	<ul style="list-style-type: none"> Aspiration for nearly all delivery of support under the scheme to be non cash. Risk of this not meeting the needs of those presenting with the most urgent needs esp. out of hours. 	3	5	15	Unknown	<ul style="list-style-type: none"> Need to be able to deliver some cash awards, provide venues, staff support and guidance to ensure this can be done safely. 		Ongoing
Sep 2012	<ul style="list-style-type: none"> Services or Partners making service available where no entitlement exists under the scheme i.e resident from abroad. 	2	4	8	Unknown	<ul style="list-style-type: none"> Training and support Single IT system Monitoring 		Ongoing
August 2012	<ul style="list-style-type: none"> IT – Northgate and probably other suppliers are developing new services and software to facilitate delivery and management of local social fund replacements. May not provide sufficient functionality or access. 	3	5	15	Unknown	<ul style="list-style-type: none"> Continue to work with Northgate and other LAs on development of their proposed web based hosted service. 		Ongoing
August 2012	<ul style="list-style-type: none"> IT - Cost of new service unsustainable in relation to level of admin funding and level of service the council would wish to provide 	3	2	6	Unknown	<ul style="list-style-type: none"> Estimated at 12k Consider other suppliers in procurement/tendering 	C&E	Ongoing

NOTE: For Probability / Impact Measurement the continuum is 1-5 where 1 = Low and 5 = High