

UNIVERSAL CREDIT - Risks / Issues Register and Action Plan

Date of last review / update : 3rd May 2018

1. Strategic Risks & Issues				Action plan		
UNIVERSAL CREDIT - Risks / Issues Register Part 1 of 3				Action plan		
ID	Date	Risk / Issue	Status	Open / Cl	Organisation / Service	Actions / Activities / Controls / Mitigation
1.1	13/07/2017	Relationship with DWP / Job Centre Plus is ineffective	Open		Contracts & Performance, DWP	Regular dialogue, formal and informal meetings including fortnightly operational meetings and daily contact as needed. Membership of UC Board with regular meetings. Workshadowing. Dedicated contact within JCP Denbighshire. DCC attendance at national and regional DWP meetings.
1.2	20/12/2017	Not keeping up to date with DWP changes to UC (eg policies, processes, roll out dates) and not communicating changes to relevant parties	Open		Contracts & Performance, DWP, UC Board	Regular dialogue, formal and informal meetings including fortnightly operational meetings and daily contact as needed. Membership of UC Board with regular meetings. DCC attendance at national and DWP regional meetings. DWP update on UC a standing item agenda item at UC Board meeting. National DWP UC bulletin. Communication via the UC Board who in turn cascade to all in the areas they represent. UC Board Members ensure Universal Credit is discussed at their managers meetings.
1.3	13/07/2017	Relationship with UC Service Centre is ineffective	Open		Contracts & Performance, DWP	Undertake engagement activities, invitation to events, workshadowing, visits to one another's premises. DCC visit to Bangor Service Centre 13th March 2018. Service Centre staff attended UC Event on 23rd March 2018. DCC reps meeting with Bangor Service Centre 18th April 2018. Ongoing liaison through the DWP Partnership Manager for Denbighshire.
1.4	13/07/2017	Relationship with other service providers / key partners is ineffective	Open		Contracts & Performance, DWP	Regular meetings and dialogue with UC Board, complemented by email communications as needed. Monthly operational meetings with contracted partners (Civica & CAD), regular meetings of Tackling Poverty Operational Group. Joint DWP / DCC UC event undertaken 23rd March for key partners to showcase support available.
1.5	13/07/2017	Elected members and SLT are not engaged and fully briefed	Open		Contracts & Performance, Democratic Services	Communications and briefings. Regular briefings to Head of Finance / Section 151 Officer and in turn SLT and CET. Presentations at Member Area Groups taken place Nov 2017 - March 2018. Email briefings for elected members (Oct 17 & April 2018) with copies of press releases. Colleagues in Democratic Services briefed and sit on the UC Board.
1.6	13/07/2017	The LA receives negative publicity	Open		Comms Team, Contracts & Performance	Communications team represented on UC Board. Regular briefings with comms team. Comms team review external media including social media.
1.7	20/12/2017	Universal Credit website is not currently available in the Welsh Language	Open		DWP	05/12/17 DCC have raised this with DWP nationally who have this as a planned piece of work but timescales not yet available. DWP to keep us updated. Update 19/03/2018 the UC system/build is not in Welsh but all interactions through the build can be conducted through the medium of Welsh currently. DWP are in regular talks with the Welsh Language Commissioner and are working towards the Welsh Language version.
1.8	20/12/2017	Challenging to predict the numbers / impact in this phase as those moving onto UC are new claims and significant change of circumstances	Open		UC Board	Awareness through the UC Board. Working closely with DWP, learning from other LAs experience and using a range of tools to estimate and quantify numbers and impact. From go live monitoring and review to further inform forecasting.
1.9	16/01/2018	Pressures, both likely and unforeseen, put on the Local Authority's budgets due to the impact of UC	Open		Finance	A central reserve has been set up to help manage this risk. The annual review and update of the Medium Term Financial Plan (MTFP) involved identifying all pressures across the Council. Any strategic pressures that cannot be contained within service budgets are put forward as pressures and considered through the annual budget process. Finance are represented on the UC Board and sessions held with the wider Finance team.

2. High Operational Risks & Issues				Action plan		
UNIVERSAL CREDIT - Risks / Issues Register Part 2 of 3				Action plan		
ID	Date	Risk / Issue	Status	Open / Cl	Organisation / Service	Actions / Activities / Controls / Mitigation
2.1	13/07/2017	Customers are not signposted to the relevant support	Open		DWP, UC Board	A range of training and awareness sessions undertaken over the last 12 months with front line staff together with development of communication plan, implemented October 2017 - April 2018. Some key activities as follows. 20/12 Webpage for UC on Denbighshire website. UC awareness sessions 24th & 25th Jan 2018 for all / any DCC staff. Joint DWP UC event to showcase support 23rd March 2018. Training from DWP for Library / One Stop Shop staff April 2018. Briefing specifically for Contact Centre Staff April 2018. Reference to DCC UC webpage in communications from services eg correspondence from Catering to parents. Multi faceted campaign by Housing Dept for their tenants. Colocation of staff from April 2018, ie DCC and Citizens Advice presence in Rhyl Job Centre to work alongside DWP staff to provide multi agency support in one location to Denbighshire residents. Use of 'Refernet' by DCC Services to safely and quickly refer customers to CAD.
2.2	13/07/2017	Incorrect information is given out to customers due to the complexities around phased postcode roll out, exemptions, entitlement to legacy benefits etc.	Open		DWP, UC Board	Communication through the UC Board. Ongoing training and updates for those giving advice in this area. All other frontline staff to signpost to DWP and / or Citizens Advice Denbighshire. Promotion of DCC UC webpage to residents with the latest up to date information.
2.3	13/07/2017	Unable to meet the demand for digital support	Open		Libraries / One Stop shops	Digital Support offered through Libraries and One Stop Shops. Fact finding visit to Flintshire Connects offices to learn from experience. Monitoring and review from go live April 2018. Working closely with 'Working Denbighshire.' Provision of other digital support in the County being mapped by Digital Futures Project.
2.4	13/07/2017	Unable to meet the demand for personal budgeting support	Open		Citizens Advice Denbighshire	Personal Budgeting Support, contracted services provided by Citizens Advice Denbighshire (CAD). CAD have undertaken extensive preparation work including appointing a dedicated UC adviser, training all staff and volunteers. Assurance has been given of CAD's readiness. Monitoring and review from go live April 2018. 'Money manager' website also available for those digitally able.
2.5	13/07/2017	Unable to meet the demand for support from the most vulnerable	Open		UC Board	Awareness / training for support services and frontline staff. Phased migration will give time to support learning as number of UCFS claimants rise. Monitoring and review from go live April 2018. Use of 'Policy in Practice' data report to identify priorities proactively with early intervention.
2.6	20/12/2017	Adverse impact on frontline staff faced with increase in customer needs	Open		HR	HR represented on UC Board and are investigating support available. Rhyl Job Centre have a complex case plan for claimants with complex cases
2.7	20/12/2017	Adverse impact on DCC staff personally for those claiming UC and facing difficulties, including those who are on low pay + not entitled to statutory sick pay or occupational sick pay and have to wait for UC award.	Open		HR	HR represented on UC Board. Promotion of support available through CAD. Promotion of availability of advance payments. Promotion of DCC UC webpage to all staff on April 2018 payslips. News story on internal 'Denbighshire Today' during April 2018. 'Spotlight' on DCC home webpage.
2.8	13/07/2017	Council Tax Reduction Scheme (CTRS) - Loss of direct link to housing benefit data impacts negatively on CTRS process	Open		DWP, Revenues & Benefits, UC Board	Training of frontline services to support the message must claim Council Tax Reduction separate to UC via the Local Authority. Message on CAD UC materials. Promoted on DCC UC webpage. Included in 'contract forms' between DCC Housing and Tenants. Promoted with partners at Tackling Poverty Operational Group. Colocation of staff from April 2018 in Rhyl Job Centre to work alongside DWP staff to address this.
2.9	20/12/2017	Council Tax Reduction Scheme (CTRS) - Administrative burden in the frequent need to recalculate amount of Council Tax Reduction for individuals where there is a fluctuation in the amount of their UC award as other income fluctuates.	Open		Revenues & Benefits	National issue. WLGA have raised with Welsh Government and this is currently under review.
2.10	13/07/2017	Free School Meals (FSM) - Loss of direct link to housing benefit data impacts negatively on FSM process which impacts on pupils, school funding (WG pupil deprivation grant) and school league tables.	Open		Education, DWP, Revenues & Benefits, UC Board	Training of frontline services to support the message must claim Free School Meals separate to UC via the Local Authority. Message on CAD UC materials. Education reviewing communications sent by schools to parents on fsm so parents know to apply. Promoted on DCC UC webpage. Briefing session with School Business & Finance Managers. Included in 'contract forms' between DCC Housing and Tenants. Promoted with partners at Tackling Poverty Operational Group. Colocation of staff from April 2018 in Rhyl Job Centre to work alongside DWP staff to address this.
2.11	20/12/2017	Free School Meals (FSM) - financial impact on Denbighshire County Council due to increase in those eligible for FSM. Increase is forecast due to the interim measure taken by Welsh Government that those on Universal Credit can claim free school meals for their school age children. This is a broader criteria than under 'legacy' benefits.	Open		Finance	Welsh Government are to hold a consultation with a view to refining eligibility so that it is a closer match to those eligible under 'legacy' benefits. In the interim Revenues & Benefits to report data on fsm take up at the monthly Revenues & Benefits Operational Board so that this can be monitored. Numbers unknown currently as will only impact on those who claim UC (ie new claimants or significant change of circumstances).

2.12	20/12/2017	Free School Meals (FSM) - delay in providing fsm to eligible children due to proof of Universal Credit award not being available from DWP until end of assessment period (ie 5 weeks after claim).	Open	Revenues & Benefits	National issue. WLGA have raised with Welsh Government and this is currently under review. DCC has spoken to a number of authorities and is currently drafting an interim solution for senior management approval.
2.13	13/07/2017	Housing Benefit Overpayment are more difficult to recoup both those to individuals and payments made directly to landlords.	Open	Revenues & Benefits, DWP	Revenues & Benefits to follow the process available through DWP and monitoring through the monthly operational meetings with Revenues & Benefits.
2.14	20/12/2017	Housing Benefit - administrative burden of the 2 week transitional housing benefit payment which initially is a complex, manual process	Open	Revenues & Benefits, DWP	Revenues & Benefits to follow the process available through DWP and monitoring through the monthly operational meetings with Revenues & Benefits.
2.15	13/07/2017	Discretionary Housing Payments (DHP) - Loss of direct link to housing benefit data negatively impacts on DHP process during initial UC assessment period.	Open	Revenues & Benefits	National issue. WLGA have raised with Welsh Government
2.16	13/07/2017	Rent element of UC is not passed onto the Registered Social Landlord by the tenant leading to rent arrears	Open	Housing, Housing Associations.	Alternative Payment Arrangements to be set up where appropriate. Active engagement with tenant. DCC Housing activities include Financial Inclusion action plan, tenant surgeries, roadshows, social media campaigns, website information and animation, new IT system, development of a Customer Engagement Contract. Housing Associations are represented on the UC Board.
2.17	13/07/2017	Rent element of UC is not passed onto the Private Landlord by the tenant leading to rent arrears	Open	Public Protection	Appropriate awareness raising of UC with private landlords as far as possible.
2.18	13/07/2017	Private landlords do not engage with the UC process effectively or wish to take on UC tenants	Open	Public Protection	Engagement with private landlords through Rent Smart Wales, Private Landlord Forums, Homeless Team's database of landlords, Benefits Team database of landlords who receive h.b. direct.
2.19	13/07/2017	Rent arrears - as claimant unable to manage their budget (eg assessment period / any additional delays, single monthly household payment, fluctuating payments)	Open	UC Board, Citizens Advice Denbighshire. Homeless Prevention Team	Ensure Personal Budgeting Support from Citizens Advice Denbighshire is well publicised. Homeless Prevention Team's new post located in Rhyl Job Centre to specifically address this issue from a preventative perspective.
2.20	13/07/2017	Council Tax arrears - as claimant unable to manage their budget (eg assessment period / any additional delays, single monthly household payment, fluctuating payments)	Open	UC Board Citizens Advice Denbighshire	Ensure Personal Budgeting Support from Citizens Advice Denbighshire is well publicised. Revenues & Benefits refer to Citizens Advice Denbighshire. Colocation of Citizens Advice Denbighshire in Rhyl Job Centre.
2.21	13/07/2017	Other priority debts not paid - as claimant unable to manage their budget (assessment period / any additional delays, single monthly household payment, fluctuating payments)	Open	UC Board Citizens Advice Denbighshire	Ensure Personal Budgeting Support from Citizens Advice Denbighshire is well publicised. Colocation of Citizens Advice Denbighshire in Rhyl Job Centre.
2.22	13/07/2017	Increase in homelessness leading to increase in demand for homeless services	Open	Homeless Prevention Team	All frontline staff have UC awareness sessions. Established good communication channels with Citizens Advice Denbighshire to refer customers. Homelessness Prevention Navigator based at JCP Rhyl. Identification of early cases for preventative work. Close working links with Housing Enforcement and landlords to support cases at risk of homelessness. Project working with Housing and utilising DHP to ensure where possible vulnerable tenants are in the best position possible prior to UC roll out.
2.23	13/07/2017	Increase in take up of payday loans and illegal money lending	Open	UC Board	All partners to promote as appropriate, advance payments, Credit Unions. Engage with WIMLU. Awareness campaign. Blocking of inappropriate payday websites with redirect to Credit Union.
2.24	12/03/2018	Annual peak in impact around September / October in the coastal area of Denbighshire as seasonal Summer work comes to a natural end.	Open	UC Board	Awareness through the UC Board. Monitoring of numbers and impact, review as appropriate.
2.25	12/03/2018	Impact on working people as they adjust to the changes	Open	UC Board	Awareness through the UC Board of the policy. Economic Business Development Team briefing

3. Operational Detail Risks & Issues

UNIVERSAL CREDIT - Risks / Issues Register Part 3 of 3				Action plan		
ID	Date	Risk / Issue	Status	Open / Cl	Organisation / Service	Actions / Activities / Controls / Mitigation
3.1	13/07/2017	Appointees need a separate email account for each claimant they support	Open		DWP	Raised nationally, DWP to keep DCC updated
3.2	13/07/2017	Rent verification - Delay in claim process due to non-matching of rent information from tenant and Registered Social Landlords	Open		Housing, Homeless Prevention Team Housing Associations.	DCC staff aware of the need to provide accurate and timely information to DWP. Use of Landlord Portal as and when possible / where available
3.3	13/09/2017	Rent verification - Delay in claim process due to non-matching of rent information from tenant and Private Landlords	Open		Public Protection	Influencing private landlords as far as possible to provide accurate and timely information to DWP.
3.4	02/10/2017	Rent arrears / mortgage arrears lead to court proceedings	Open		Citizens Advice Denbighshire. Homeless Prevention Team	CAD have provided training (Sept 2017) to District Judges at Prestatyn County Court so they have an understanding of the UC process and its possible impact on ability to meet rent and mortgage payments due.
3.5	13/07/2017	Identification - Delay in claim process due to lack of suitable identification for claimant	Open		UC Board	Understanding of identification requirements and promotion wherever possible
3.6	13/07/2017	Bank account - Delay in claim process as claimant does not have suitable bank account	Open		UC Board	Promotion of banking requirements and promotion wherever possible
3.7	13/07/2017	Travel to relevant Job Centre is difficult for claimant	Open		UC Board	Frontline staff to signpost to Job Centre - Some travel costs may be met by Job Centre and Job Centre can advise.
3.8	13/09/2017	Consent - support services face difficulties in supporting claimants as there is no implicit consent	Open		UC Board	A national issue, frontline staff to be aware
3.9	13/07/2017	Digital accounts gives opportunity for fraud / fishing	Open		UC Board	A national issue, frontline staff to be aware. Encourage customers to be responsible
3.10	13/09/2017	Self employed do not get advice and support they need. (UC assumes a minimum income floor rather than actual income from those self employed 12 months +. Disproportionate number of self-employed people in Denbighshire).	Open		DWP, UC Board	All frontline staff to refer customers to the local Job Centre as Job Centre has experts in advising the self employed
3.11	01/02/2018	The rules for paying housing costs on 2 homes are more stringent under UC regs than Housing Benefit regs.	Open		UC Board	Awareness raised with key internal and external partners at UC Board and Tackling Poverty Operational Board
3.12	01/02/2018	The rules for paying housing costs to 18-21 year olds are more stringent under UC regs than Housing Benefit regs	Closed April 2018			April 2018 - UK Government have announced that the legislation is to be amended and no longer applies
3.13	01/02/2018	1 UC payment award between couples	Open		UC Board	Awareness through the UC Board of the policy and prompting use of 'alternative payment arrangements' available through DWP.