



**Brighton & Hove
City Council**

**Report of the
Overview & Scrutiny Committee**

October 2012

**Council Tax Support
Scrutiny Panel**

Panel Members

**Councillor Alex Phillips (Chair)
Councillor Graham Cox
Councillor Anne Pissaridou
Rosemary Friggens (East Sussex Credit Union)**

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Volume Two contains all supporting evidence.

CHAIR'S FOREWORD

The Council Tax Benefit system is fundamentally changing; from April 2013 the support scheme will be for local determination. However with more localised control comes a reduction in funding of 10%, or about £2.5 million for Brighton and Hove.

Government has set a very challenging timetable for Council Tax Benefit reform, with legislation still going through Parliament as schemes are developed across the country. The Leader of the Council requested that this Scrutiny Panel review the Brighton & Hove Council Tax Low Income Discount Scheme to ensure that it is the best scheme possible.

Witnesses from advice and support agencies gave evidence as to the potential consequences the changes may have for many of the most vulnerable residents of the city. Witnesses from Jobcentre Plus also gave evidence regarding the current state of the jobs market in the city as one of the main motivations of the changes is to move people off benefits and back into work.

The Panel has recognised that the scheme proposed does attempt to mitigate the worst of the possible impacts on residents, placing a £3 weekly limit on the detriment possible in the first year, providing a £100,000 discretionary fund and doubling the earnings disregard from £5 to £10 per week.

However the Panel was still concerned that the impact of the scheme will be heavily felt by some of the most vulnerable residents of our city and has asked the administration to look again to see whether this impact can be reduced further, and the full cost of the changes absorbed by the council.

I'd like to thank my fellow panel members and everyone who attended the panel to provide evidence.



Cllr Alex Phillips
Scrutiny Panel Chair, Council Tax Support
October 2012

1. EXECUTIVE SUMMARY

- 1.1 From 1 April 2013 the national Council Tax Benefit system will be replaced by a new localised support scheme. The Council has brought forward proposals for a local support scheme, known as the 'Draft Council Tax Low Income Discount Scheme' (referred to in this report as "the Scheme") which is the focus of this scrutiny review.
- 1.2 Council Tax Benefit is a system for low income households. It offers support to those who pay council tax but whose income and capital fall below a set level. It is payable whether an individual rents or owns their own property, is in work or out of work.
- 1.3 Central Government has set out some parameters within which the new scheme has to operate, these are:
- Funding will be reduced by 10% from the current system. This equates to approximately £2.5 million for Brighton and Hove.
 - Pensioners will not be affected by the changes; only working age people will be affected.
 - Work incentives should be maximised.
 - Vulnerable groups should be protected as determined locally.
- 1.4 Proposals for a local scheme have undergone extensive consultation with residents and local community and voluntary groups, many of whom have also given evidence to this scrutiny review.
- 1.5 The draft scheme and transition principles were agreed at the Policy and Resources Committee on 12 July 2012.¹
- 1.6 The local scheme that has been consulted upon is summarised below:
- Not all of the reduction in funding will be passed on to residents. The council is proposing to meet £1million of the £2.5 million funding shortfall from within its overall budget.
 - The council tax discount for people of working age will be assessed on the basis of 90% of full council tax liability.
 - The earnings disregard for single working age people will be doubled from £5 to £10 per week.
 - There will be a cap on the maximum detriment that any household faces of £3 per week for 2013/14 assuming no other change in circumstances.
 - A £100,000 discretionary fund will be available to support the most vulnerable in exceptional circumstances.²
- 1.7 The scrutiny panel, consisting of Councillors Alex Phillips (Chair), Graham Cox and Anne Pissaridou, along with co-optee Rosemary Friggens from the East Sussex Credit Union, held a number of evidence gathering meetings before arriving at eleven recommendations.

¹ <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=27803#mgDocuments>

² <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=27803#mgDocuments>

2. RECOMMENDATIONS

1. Absorbing £1million of the £2.5million cost of the council tax support changes is welcomed; consideration should be given to funding the additional £1.5 million required from savings elsewhere in the council's budget.
2. Within the budget and time constraints, the 'Draft Council Tax Low Income Discount Scheme' cannot be significantly improved. The Panel acknowledges however that the scheme will impact negatively on some residents, including vulnerable groups.
3. The Panel supports the £3 per week maximum detriment and £5 per week increase in earnings disregard. The implication of both elements should be reviewed prior to any removal after the transition year.
4. Further representations should be made to central Government to allow councils to alter all elements of the council tax system, such as single person discounts, and the current exclusion of full time students, within their new council tax arrangements.
5. The scheme and specific amounts payable needs to be communicated as early as possible to affected residents. This should be carried out in person, through community & voluntary sector organisations and all available media and marketing channels.
6. To inform the annual review of the scheme, the Panel recommends that a robust mechanism be established, utilising community & voluntary sector organisations and employment agencies, to closely monitor the impact of the changes.
7. Monitoring arrangements should be reported alongside the proposed scheme including timescales and names of those responsible.
8. Administration of the scheme should seek to support residents with wider financial inclusion issues. Work on financial inclusion being developed by the council should progressed as a matter of urgency.³
9. Administration and monitoring of the scheme should seek to identify any areas where digital inclusion becomes a barrier to residents engaging with welfare changes and the jobs market. This should also be considered as part of the wider scrutiny review into welfare reform.⁴
10. The City Overview Group- Welfare Reform should be expanded to include landlord representatives.
11. The Panel recommends a further scrutiny review of the impact of wider welfare reforms once implemented.

³ Financial inclusion refers to good financial decision-making (the 'demand side' of the equation) and access to suitable products and services (the 'supply side') – JRF 2008.

⁴ Digital inclusion relates to the ability to access technology (especially the internet in this case) and the skills to use it successfully. It is also about ensuring that the benefits of technology fully exploited – CLG 2008.

3. INTRODUCTION

Changes to Council Tax Benefit

- 3.1 The national Council Tax Benefit system is being abolished under the Welfare Reform Act 2012. The Local Government Finance Bill going through its stages in Parliament (at the time of writing) requires local authorities to introduce their own Council Tax Support Scheme by January 2013. With the introduction of the new scheme comes a 10% reduction in funding.
- 3.2 In Brighton & Hove, based on November 2011 caseload, there are nearly 28,000 claimants of Council Tax Benefit at a cost of an estimated £25m. Brighton & Hove City Council will therefore receive approximately £2.5million less money from Government as a result of this change.
- 3.3 Currently Council Tax Benefit is a national system for low income households. Council Tax Benefit is available if you pay council tax and your income and capital (savings and investments) are below a certain level. Individuals apply for Council Tax Benefit through a single application process for Housing & Council Tax Benefits. If you are eligible for Council Tax Benefit you will receive a reduction in your council tax bill and the council receives a grant to pay for this. Home ownership and employment status are not determining factors as to Council Tax Benefit eligibility.
- 3.4 The Government has stated that pensioners should receive the same level of support under the new scheme as at present, but support for people of working age is to be reduced.
- 3.5 The effect of pensioner protection means that the reduction in expenditure will need to be delivered across the other claimant groups. On average this would mean a reduction of at least £145.05 per annum, or £2.79 per working age claimant per week.
- 3.6 The Policy and Resources Committee papers of 12 July 2012 contain detailed contextual information that forms the basis of the scrutiny review; it can be accessed in full under agenda item 25:

<http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=689&MId=4315&Ver=4>

4. THE PROCESS

- 4.1 Early preparations for a local scheme were agreed at 19 April 2012 Cabinet. The report set out the planning, initial range of potential options and a timescale for multi-phased engagement and consultation processes. The report included a summary of the current Council Tax Benefits claimants workload, vulnerable groups, work incentives and options plus a decision-making timetable.⁵
- 4.2 A scrutiny workshop on designing a scheme was held for Overview and Scrutiny Committee (OSC) members. The workshop heard a presentation from then Director of Finance Catherine Vaughan, considering an initial draft Equality Impact Assessment and discussing feedback from the first phase of consultation with Emma Daniel, Policy and Research Manager for the Community and Voluntary Sector Forum.
- 4.3 The 'Draft Council Tax Low Income Discount Scheme' was agreed for publication and consultation by Policy and Resources on 12 July 2012, noting the results of the first phase of consultation and engagement.⁶
- 4.4 At the request of the Leader of the Council, Councillor Jason Kitcat, the OSC agreed to establish a Scrutiny Panel to consider the proposals regarding changes to the Scheme on 16 July 2012.⁷
- 4.5 The Council Tax Support Scrutiny Panel comprised Councillor Alex Phillips (Chair) and Councillors Graham Cox and Anne Pissaridou together with President of East Sussex Credit Union Rosemary Friggens as an independent co-optee.
- 4.6 The Scrutiny Review was originally scheduled as a one-day event but following legislative delays a second Panel meeting was arranged to hear from further witnesses. Its final report is being referred to 29 November 2012 Policy and Resources Committee (not 11 October P&R as planned) in considering an agreed scheme.
- 4.7 The Panel meetings on 17 September and 1 October heard evidence from representatives of Brighton Housing Trust, Brighton's Women's Centre, Brighton Unemployed Centre Families Project, Welfare Rights, Community and Voluntary Sector Forum, Jobcentre Plus, the Southern Landlords Association and council officers. Written submissions were also received from the Fed Centre for Independent Living and the YMCA. The Sussex Deaf Association arranged a separate meeting to discuss the scrutiny review.

⁵ Agenda item 245. <http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=120&MId=3231&Ver=4>

⁶ <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=27803#mgDocuments>

⁷ Agenda item 9. <http://present.brighton-hove.gov.uk/ieListDocuments.aspx?CId=726&MId=4178&Ver=4>

5. THE PROPOSED SCHEME

5.1 Full details of the draft scheme can be found in 12 July 2012 Policy and Resources Committee paper.⁸ In summary it includes:

- support for council tax for people of pensionable age will be provided through a means tested discount equivalent to what they would have been entitled to under the previous Council Tax Benefit system
- support for council tax for people of working age will be provided through a means tested discount and in 2013/14 will take into account similar criteria to the old Council Tax Benefits scheme in deciding who is eligible
- the council tax discount for people of working age will be determined on the basis of 90% of full council tax liability
- the earnings disregard for single working age people will be doubled from £5 to £10 per week
- a cap on the maximum detriment that any household faces of £3 per week from 2012/13 to 2013/14 as a result of the replacement of Council Tax Benefits with this new Scheme– so long as there is no other change in circumstance
- up to £100,000 per annum available in a discretionary fund to provide additional assistance in exceptional circumstances to the most vulnerable

⁸ <http://present.brighton-hove.gov.uk/mgAi.aspx?ID=27803#mgDocuments>

6. FINDINGS AND RECOMMENDATIONS

The Proposed Scheme

- 6.1 The Council Tax Support Scrutiny Panel was established with the very tight remit to evaluate the draft scheme. In undertaking this piece of work however the Panel has also been mindful that these changes are part of a wider agenda of welfare reform and localism.
- 6.2 The Panel heard from a number of witnesses, including the CVSF and BHT that there was no 'win: win' solution to the implementation of the scheme. There was a general consensus that the proposed draft scheme cannot be improved within the given budget and time constraints. Any extra provisions intended to help one or other group of vulnerable residents would inevitably be to the detriment of other groups, and the current balance was felt to be about right.
- 6.3 There was a consensus that the proposal, taken as a whole and with its various mitigating elements as outlined in section 5 above, does manage to implement a scheme whilst protecting as far as possible the most vulnerable residents in the city.
- 6.4 The Panel was especially pleased that £1million of the funding gap was being found from within the wider council budget. The Panel had an extended debate as to whether or not to recommend that the full reduction in funding of £2.5 million should be found from within the council budget. There was concern that merely asking for the funding to be found would result in unknown cuts from other important services.
- 6.5 There was also a more fundamental debate as to whether the council should be seeking to implement the scheme at all, or whether it would be counter-productive hitting those households least able to pay and whom the council will have to support in more drastic ways as their circumstances deteriorate due to wider welfare changes. It was noted that a number of councils are looking to absorb the cost of the changes within their budgets in the first year.⁹
- 6.6 Linked to this was the idea that collecting council tax from residents who have never paid it before and may in many cases struggle to pay will negatively impact upon council tax collection rates.
- 6.7 The Panel noted that a number of local authorities are consulting on their council tax support in tandem with the full range of council tax changes. Some local authorities are proposing to meet the cost of any reduction from revenue raised by other council tax changes such as to second and empty home rules.¹⁰ Detailed briefings from Brighton & Hove City Council's finance team indicate that these changes are

⁹ At the time of writing these include West Oxfordshire, South Oxfordshire, Cherwell, Vale of White Horse, Tower Hamlets, Durham, and Nottingham.

¹⁰ Including a number of those above and Breckland, Worcester, Kingston and Corby.

unlikely to raise the full £1.5million required. This briefing is attached in volume 2 to this report.

- 6.8 The Panel also noted that the Local Government Association and a number of councils have lobbied central Government regarding full localisation of council tax. Whilst allowing councils to change some elements of council tax, Government has protected pensioners, and prevented changes to single person discounts, and the exemption for students. The Panel was in agreement that if the council tax system is to be for local determination then all elements of it should be available for change. This would also dovetail with the Government's 'localism' agenda.
- 6.9 The Panel compared the proposed scheme in Brighton and Hove to those in other local authorities. Although our proposed scheme does appear to be relatively generous, there are a number of authorities that, for at least the first year, are absorbing the reduction in funding in full within their budgets.
- 6.10 The Panel felt unable to recommend where the funding to cover the full £2.5million gap might come from without looking at the council budget in its totality. It is fair to reflect that the Panel was somewhat split as to this issue.
- 6.11 One of the stated aims of the changes is to lift 'the poorest off benefits, by supporting them into work' and reduce 'reliance on support for council tax in the long term'.¹¹ To better understand these aims and the design of the scheme the Panel held a session with Jobcentre Plus representatives. A particular focus was whether there are the jobs available to allow people to find work. The only real win-win situation from the scheme is obtained if people can be found employment.

The Panel was advised that Jobcentre Plus had 336 vacancies in Brighton, of which 261 were permanent and 229 were full time. Hove had 125 vacancies. On a wider catchment area of approximately 90 minutes travel time (reaching eg to Worthing and Crawley) there were 1682 vacancies.

- 6.12 Alongside the actual number of vacancies the issues of skills and matching appropriate people to the right jobs was highlighted as an issue. The Panel noted that due to a lack of suitable jobs, graduates wishing to stay in the city following university were taking jobs that the local population without degrees are also seeking. This obviously has implications for unemployment.

¹¹ <http://www.communities.gov.uk/documents/localgovernment/pdf/2146581.pdf>

RECOMMENDATION 1

Absorbing £1million of the £2.5million cost of the council tax support changes is welcomed; consideration should be given to funding the additional £1.5 million required from savings elsewhere in the council's budget.

RECOMMENDATION 2

Within the budget and time constraints, the 'Draft Council Tax Low Income Discount Scheme' cannot be significantly improved. The Panel acknowledges however that the scheme will impact negatively on some residents including vulnerable groups.

RECOMMENDATION 3

The Panel supports the £3 per week maximum detriment and £5 per week increase in earnings disregard; the implication of both elements should be reviewed prior to any removal after the transition year.

RECOMMENDATION 4

Further representations should be made to government to allow councils to alter all elements of the council tax system, such as single person discounts, and the current exclusion of full time students, within their new council tax arrangements.

Engagement and Communication

- 6.12 The draft Equalities Impact Assessment (EIA), case studies and anecdotal evidence presented to the Panel gave an indication of those who could be affected by the change. Speakers gave examples of vulnerable groups on low incomes including – amongst others – women, single parents, younger people out of work on means-tested benefits, carers, people with disabilities or mental health problems, families with reduced child maintenance payments, families on benefits living in bigger houses and those for whom English is not their first language.
- 6.13 A lack of suitable information about council tax as a whole was cited by the Brighton Unemployed Centre Families Project as an area of concern, plus a lack of help for people with budgeting and other problems in dealing with benefits at a time of increasing complexity.
- 6.14 The Panel recognised the challenge in contacting those affected by the changes in good time. Timing of information advice and support is particularly important because in the interests of both the council and householders the aim is to issue as many council tax bills as possible at the start of the financial year.

- 6.15 The Panel feel that more basic 'over the fence' communication is also required. Written material alone, either in hard copy or on the internet won't reach all those affected. The Panel asks that 'hard to reach' people are targeted through radio and TV, through the local print media, as well as in person.

RECOMMENDATION 5

The scheme and specific amounts payable need to be communicated as early as possible to affected residents. This should be carried out in person, through community & voluntary sector organisations and all available media and marketing channels.

Monitoring

- 6.16 The Panel was concerned that the possible impact of the scheme on vulnerable household groups would not be fully known until after implementation. Monitoring these effects would be central to the review of the scheme after the transition year.
- 6.17 It would be especially important to publicise the scheme in a variety of ways and to advise, help and support residents, in particular the most vulnerable and those who had not paid council tax before.
- 6.18 The EIA gives an indication of the possible effects on different groups of council tax payers at least for the transition year. However it is only through implementing the scheme that the detailed impact on low income households would become apparent, including the nature of the demand for discretionary funds.
- 6.19 Added to this uncertainty the impact of other, perhaps more significant welfare changes, means that a robust monitoring arrangement will be required. This will mean working closely with advice services from the community and voluntary sector to understand how their caseload changes too.
- 6.20 Members were also of the opinion that a review should include evidence from local businesses, landlords and organisations supporting employment.
- 6.21 Panel Members were anxious that details of how a review of the scheme will be undertaken are published as early as possible and allow for a partnership approach to the review. Evidence heard indicated that many community and voluntary sector organisations would welcome a chance to input into monitoring and reviewing the implementation of the scheme.

RECOMMENDATION 6

To inform the annual review of the scheme the Panel recommends that a robust mechanism be established, utilising community & voluntary sector organisations and employment agencies, to closely monitor the impact of the changes.

RECOMMENDATION 7

Monitoring arrangements should be reported alongside the proposed scheme including timescales and names of those responsible.

Support and Advice

- 6.22 The Panel heard from a number of support and advice groups, whose representatives described disturbing cases of helping households whose outgoings exceeded income.
- 6.23 It was highlighted that many people affected by the changes would not be using support groups and would be particularly hard to reach. It was crucial that council and other staff and volunteers would be available and trained to provide appropriate information, advice, help and support tailored to people's circumstances. This ranged from basic information: 'What is Council Tax?' 'Why do I have to pay and why is it a priority debt?' to specialised interventions at the enforcement stage.
- 6.24 The Panel was reassured that preparatory work on this was in progress between the council and advice services.
- 6.25 Members were aware that some families with multiple needs or struggling to meet their financial commitments were already known by different teams in the council and other organisations. Several speakers referred to the need for more 'joining up' with and between other work areas including integrated families and child poverty. Early intervention is extremely beneficial and can help prevent arrears.
- 6.26 Access to and capability to use on-line financial services (advice, credit, savings and accounts) would be key so digital and financial inclusion measures were needed to be well linked in at an early stage to help vulnerable residents.
- 6.27 Members acknowledged the different interests of the council, landlords, utility and water companies in terms of financial inclusion strategies and recommended a more formalised joined up approach (to include landlords) to the needs of individual residents.
- 6.28 This reform is part of a wider policy of decentralisation, giving councils increased financial autonomy and a greater stake in the economic future of their local area.

Financial and Digital Inclusion

- 6.29 Whilst the Panel has not investigated financial inclusion in any depth, it has gained an understanding of how the council tax reform agenda fits into wider welfare changes and concerns regarding financial inclusion issues.
- 6.30 A number of witnesses highlighted that the opportunity exists, and should be taken, to signpost to wider financial advice and guidance whilst supporting residents with the new Scheme.
- 6.31 Financial inclusion is defined as the ability to access appropriate financial services or products. Without this ability people are often referred to as financially excluded. For example, many services are cheaper when paid for by direct debit; a bank account is required to access this service.
- 6.32 Anyone can be financially excluded, and as a result of the economic downturn many more people than usual are struggling financially. People that are financially excluded might;
- Not be able to access affordable credit
 - Have difficulty obtaining a bank account
 - Be financially at risk through not having home insurance
 - Struggle to budget and manage money or plan for the unexpected
- 6.33 Panel members were advised that a piece of work is ongoing looking at how best the council, advice providers and financial organisations can address some of the financial inclusion issues evident within the city. A report went to Cabinet in April 2012. Members were keen for this to be progressed rapidly with updates provided as part of the monitoring of this report.
- 6.34 Digital inclusion, linked to the issue of financial inclusion, was raised by a number of witnesses. Digital inclusion is about ensuring that all residents have access to technology and the skills to use it to improve their lives. It is also about ensuring that the indirect benefits of technology to improve all aspects of service planning and delivery are fully exploited.
- 6.35 Digital inclusion will be especially important as Universal Credit will be claimed online. Evidence from Jobcentre Plus also highlighted the importance for jobseekers to have good IT skills to be able to fully engage with the jobs market.
- 6.36 Research shows a clear correlation between digital and social exclusion. This means that those already at a disadvantage and arguably with the most to gain from the internet are the least likely to be making use of it and further disadvantaged by not using it.

RECOMMENDATION 8

Administration of the scheme should seek to support residents with wider financial inclusion issues. Work on financial inclusion being developed by the council should progressed as a matter of urgency.¹²

RECOMMENDATION 9

Administration and monitoring of the scheme should seek to identify any areas where digital inclusion becomes a barrier to residents engaging with welfare changes and the jobs market. This should also be considered as part of the wider scrutiny review into welfare reform.¹³

Wider Welfare Reforms

- 6.37 The Panel focused purely on the changes to Council Tax Support. However members heard potentially worrying evidence on wider changes to welfare and the potential impact of the Welfare Reform Bill 2012 including the total benefits cap and Universal Credit.
- 6.38 Regarding the City's response to the wider welfare reforms, and addressing the needs of individual residents, the Brighton Housing Trust referred to the work of the City Overview Group – Welfare Reform, suggesting that more closely integrated working was needed on financial and digital inclusion, advice, community banking and fuel poverty, plus including key stakeholders such as social and private landlords to ensure a joined up approach.

RECOMMENDATION 10

The City Overview Group- Welfare Reform should be expanded to include landlord representatives.

- 6.39 The Panel felt that further scrutiny work would be very timely once the changes have been implemented. The review into the impact of wider welfare changes should also include a look at support for financial inclusion within the city and whether current arrangements are suitable to meet future challenges.

RECOMMENDATION 11

The Panel recommends a further scrutiny review of the impact of wider welfare reforms once implemented.

¹² Financial inclusion refers to good financial decision-making (the 'demand side' of the equation) and access to suitable products and services (the 'supply side') – JRF 2008.

¹³ Digital inclusion relates to the ability to access technology (especially the internet in this case) and the skills to use it successfully. It is also about ensuring that the benefits of technology fully exploited – CLG 2008.

7. CONCLUSION

- 7.1 Generally the Panel is persuaded that within the given constraints the suggested Scheme for Brighton & Hove cannot be significantly improved.
- 7.2 A more fundamental question as to whether the council should be looking to absorb the 10% reduction in funding resulted in less of a consensus amongst Panel members.
- 7.3 The Panel was content that the proposals for a local scheme have undergone extensive consultation with residents and local community and voluntary groups.
- 7.4 The Panel's eleven recommendations of the panel are set out below.
- 1) **Absorbing £1million of the £2.5million cost of the council tax support changes is welcomed; consideration should be given to funding the additional £1.5 million required from savings elsewhere in the council's budget.**
 - 2) **Within the budget and time constraints, the 'Draft Council Tax Low Income Discount Scheme' cannot be significantly improved. The Panel acknowledges however that the scheme will impact negatively on some residents including vulnerable groups.**
 - 3) **The Panel supports the £3 per week maximum detriment and £5 per week increase in earnings disregard; both elements should be reviewed prior to any removal after the transition year.**
 - 4) **Further representations should be made to government to allow councils to alter all elements of the council tax system, such as single person discounts, and the current exclusion of full time students, within their new council tax arrangements.**
 - 5) **The scheme and specific amounts payable need to be communicated as early as possible to affected residents. This should be carried out in person, through community & voluntary sector organisations and all available media and marketing channels.**
 - 6) **To inform the annual review of the scheme the Panel recommends that a robust mechanism be established, utilising community & voluntary sector organisations and employment agencies, to closely monitor the impact of the changes.**

- 7) Monitoring arrangements should be reported alongside the proposed scheme including timescales and names of those responsible.**
- 8) Administration of the scheme should seek to support residents with wider financial inclusion issues. Work on financial inclusion being developed by the council should progressed as a matter of urgency.**
- 9) Administration and monitoring of the scheme should seek to identify any areas where digital inclusion becomes a barrier to residents engaging with welfare changes and the jobs market. This should also be considered as part of the wider scrutiny review into welfare reform.**
- 10) The City Overview Group- Welfare Reform should be expanded to include landlord representatives.**
- 11) The Panel recommends a further scrutiny review of the impact of wider welfare reforms once implemented.**

