#### **CLACKMANNANSHIRE COUNCIL**

Report to Council

Date of Meeting: 15 May 2014

Subject: Welfare Reform Update

#### Report by: Revenues and Payments Manager

#### 1.0 Purpose

1.1. This paper provides a update on the impact of the Welfare Reforms changes both nationally and locally and outlines the actions being undertaken to continue to mitigate the impact on individuals, local communities and the Council.

#### 2.0 Recommendations

- 2.1. It is recommended that Council:
- 2.1.1. Notes the continued impact of the Welfare Reform changes on residents in Clackmannanshire,
- 2.1.2. Notes the forecast impact of the Welfare Reforms on the financial position of Clackmannanshire Council in 2014/15,
- 2.1.3. Notes the actions planned and currently being undertaken to continue to mitigate the impact of the welfare changes,

#### 3.0 Introduction

- 3.1. The Council received a Welfare Reform Update Report on 15 August 2013. This paper gives a further update on the national and local changes that have occurred since August 2013, quantifies the impacts of these changes on both local communities and the Council, and reports on the action taken continue to mitigate the impact of the changes.
- 3.2. A Welfare Reform Briefing was also held for members in November 2013. This gave an update on performance of the Scottish Welfare Fund (SWF), DHP and rent arrears and underoccupation.

#### Changes Since August 2013

- 3.3. Since August 2013, the following changes have taken place:
  - In the Autumn 2013, DWP confirmed that the Single Fraud Investigation Service (SFIS) would be launched within DWP as a single organisation and implementation would occur during 2014. This runs contrary to the outcome of the consultation undertaken in 2012, which preferred local service delivery
  - In October 2013
    - The Scottish Government provided an additional £20m funding for Discretionary Housing Payments (DHP). This provided an additional £264,000 for Clackmannanshire, taking the DHP allocation to £443,000
    - Department of Work and Pensions (DWP) also committed an additional £20m for DHP payments. The Council has submitted a bid of £156,000 for this funding and is currently awaiting on a response from DWP
    - Personal Independence Payment (PIP) reassessments commence rollout to existing Disability Living Allowance (DLA) recipients in England and Wales. This follows on from the introduction of PIP for new claimants in April 2013. In January 2014, reassessment commences in Scotland with Dumfries and Galloway, Galashiels, Motherwell and Edinburgh being the first areas to start reassessment
    - The roll out of the Claimant Commitment by DWP was commenced, introducing an Agreement that individuals seeking Job Seekers Allowance are required to sign up to. This places requirements on the individual and should they fail to meet these requirements, they could have their benefit stopped through sanctions
    - In November 2013, Universal Credit is introduced in Scotland with Inverness undertaking the pilot exercise, as part of seven local authorities through out the United Kingdom. The pilot applies to new single job seekers only

#### Actions Undertaken Since August 2013

- 3.4. The Council continues to engage with individuals affected by the changes, communities and partners. Since the last update the following actions have been undertaken
  - The criteria for awarding of SWF were relaxed to ensure distributable funds are maximised
  - DHP criteria were relaxed to ensure that those residents experiencing hardship receive the most support that the Council can offer. The DWP allocation of £178,000 and the additional £264,000 received from the Scottish Government should be awarded by the end of the financial year

- Targeted contact being made with all Council tenants affected by underoccupation who have not already claimed DHP,
- The Council continues to work closely with Ochilview and Paragon Housing Association to ensure DHP allocations are maximised,
- The Welfare Reform Working Group continues to meeting six weekly with the aim of working in partnership to mitigate the impact of Welfare Reforms and to ensure Clackmannanshire has access to all sources of funding to meet the future needs of its residents.
- A Funding Bid of £141,000 was submitted to the Lottery Support and Connect Fund. This was successful and is to be used for the introduction of specialised bank accounts in partnership with Grand Central Savings,
- Local advice surgeries have been introduced at Hawkhill Community Centre and Tullibody Rent Officer, providing money and benefits advice. These surgeries are being undertaken in partnership with the Revenues and Housing service and DWP. These will continue to be rolled out at other community centres across Clackmannanshire.
- A Funding bid of £13,500 was submitted to the DWP to provide IT training to individuals with computer literacy issues. This was successful and is to be used to provide IT training at Council and Forth Valley College premises
- Continue to provide feedback, comments, information and statistics to various bodies in relation to the Welfare Reform changes including Directors of Finance, COSLA, Scottish Housing Regulator, with the most recent being the Scottish Governments consultation on the SWF in February 2014
- Continued attendance at local community events, providing information and support to individuals and communities.

## 4.0 National Context

4.1. While Welfare Reform changes continue to be rolled out, the timelines for the introduction of Universal Credit (UC) have slipped. In the DWP document Universal Credit; Local Support Service Framework which was issued in February 2013, the planned phasing was initially as follows:

Date	Phase	Implementation Activity
April 2013	Phase 1 - Pathfinder	UC starts in the four pathfinder authorities with single jobseekers Tameside, Warrington, Oldham and Wigan
October 2013	Phase 2 - Staged	Extended coverage of UC roll out, staged across

		Great Britain
April 2014 - 2017	Phase 3 - General Coverage	UC National implementation due to be completed by end 2017

- 4.2. In addition, the introduction of PIP and reassessment process to replace DLA payments was due to start in April 2013.
- 4.3. The current state of National roll outs of UC is Phase 1 was commenced for new single claimants in April 2013 in the Greater Manchester area. This was expanded to seven areas including Inverness in October 2013. This will be further expanded to 10 areas by Spring 2014. Existing claimants in these 10 areas will then be included by the end of 2014. UC will continue to expand beyond these areas after 2014 but no information is provided beyond this.
- 4.4. The current state of the introduction of PIP is that new claimants starting receiving PIP from April 2013, with reassessment of existing DLA claimants starting in October 2013. In January 2014, reassessment commences in Scotland with Dumfries and Galloway, Galashiels, Motherwell and Edinburgh being the first areas to start reassessment with the majority of the remaining claimants not being reassessed until 2015.

#### National Audit Office Reports on Universal Credit

- 4.5. In September 2013, the National Audit Office (NAO) released its report Universal Credit : Early Progress. In this report, it noted that the DWP estimates the net benefit from UC of £38 billion over 12 years to 2022-23 with an annual benefit thereafter of £7 billion. It further reported that the DWP plans to spend £2.4 billion to implement UC up to April 2023. The programme spend to April 2013, was £425 million against budget of £431 million. Most of this spend (£303 million) was for designing and developing IT systems.
- 4.6. The key findings of the NAO were that the DWP "reset" the timeline for UC in early 2013 because of concerns about programme implementation, noting that there was no detailed "blueprint" and transition plan.
- 4.7. The NAO further concluded that at this early stage, the UC programme had not yet achieved value for money, due to the delayed rollout, weak control of the programme and spend to date.
- 4.8. Recommendations were made by the NAO which included establishing an effective governance structure, tightening financial management and control over spending and produce a realistic plan with clear objectives, linked to policy design and service requirements.
- 4.9. The NAO further reiterated its findings about lack of demonstrable value for money in its report issued in December 2013 on the DWP Accounts for 2012-13, where the Comptroller and Audit General reported that the accounts reflected a write off of £40.1 million of IT assets, against a value of £196.1 million and expects to write down £91 million of IT asset in 5 years to nil value by March 2018, owing to the considerable reduction in their expected useful life.

4.10. Separately the Comptroller and Auditor General qualified his audit opinion on the accounts in respect of the high level of fraud and errors in spending on benefits which were considered unacceptably high.

#### Council Tax Reduction

- 4.11. In April 2013, Council Tax Benefit (CTB) ceased and was replaced with Council Tax Reduction (CTR) with local authorities determining how the new CTR would be distributed. In Scotland in 2012-13, CTB payments of approximately £380 million were made. Under the new CTR arrangements, 90% of the 2012-13 funding was passed to Local Authorities to distribute as part of the Scottish Government Block Grant.
- 4.12. For 2013-14, the Scottish Government has confirmed CTR funds of £351 million to distribute. This includes £328 million CTR funding, with an additional £23 million to contribute to the 10% gap arising between 2012-13 award levels and the funding passed to Scottish local Authorities by DWP. For 2013-14 local authorities also contributed £17 million to fund the 10% gap, taking total CTR funding in Scotland to £368 million. This is still a real terms reduction of £12 million or 3.2%.
- 4.13. Set up and implementation costs for CTR are still to be allocated to individual local authorities from the £70.2 million funding available.
- 4.14. Both Scottish Government and Local Authorities are closely monitoring the distribution of CTR funds during the year to ascertain if current funding levels are sufficient or whether Local Authorities could still experience a gap between available funds and awarded fund by the end of March 2014.
- 4.15. In January 2014, it was agreed between COSLA and the Scottish Government that for the 2014-15 CTR funding, 80% of the funding will be distributed based on Qtr1 and Qtr 2 CTR 2013-14 expenditure, with the remaining 20% based on Qtr 3 and Qtr4 CTR 2013-14 funding, which would be confirmed by June/July 2014. This ensures that the distribution of funds is based on the most up to date information
- 4.16. It was also confirmed by COSLA and the Scottish Government that the CTR funding for 2014-15 would be £343 million, being £320 million for CTR with the £23 million contribution to the gap. The allocation of £7.05 million for CTRS administration costs is still to be determined.
- 4.17. The CTR scheme for 2014-15 was also uprated to reflect the UK benefits uprating.

#### DHP Funding

- 4.18. In October, both the Scottish Government and the DWP confirmed an additional £20 million funds was available. The Scottish Governments funding was distributed in November as part of the block grant, while DWPs funding was open to each Local Authority to bid for. Bidding for the DWP funding closed in early February 2014.
- 4.19. In December, the Scotland Office confirmed that additional funding of £40 million would be available across the UK for DHP in 2014-15 and 2015-16. In January 2014, the DWP confirmed that £165 million would be available

nationally for 2014-15, an increase of £20m from the 2013-14 DWP levels in 2013-14 of £145m. The is keeping DWP DHP levels broadly in line with 2013-14 levels.

4.20. In February 2014, the Scottish Government confirmed, through its Local Government Finance Circular that the £20 million DHP will again be available in 2014-15.

#### Single Fraud Investigation Service

- 4.21. In 2012, DWP undertook a consultation on options for delivering the Single Fraud Investigation Service (SFIS), which will bring together fraud investigation on behalf of DWP, HM Revenues and Customs (HMRC) and Local Authorities into one service. SFIS was originally due to be operational from April 2013 and the outcome of the consultation was for integrated and aligned fraud investigation Policies and procedures, with Fraud Investigation Officers remained employed by their respective Employers.
- 4.22. In September 2013, Lord Freud wrote to COSLA confirming that the preferred option for delivering the SFIS was as a single organisation within DWP. This was reiterated in the UK Governments December budget statement. In a letter to Local Authority Chief Executives on 9 December 2013, The Director of Fraud, Error and Debt Management confirmed that implementation of SFIS would commence in 2014 and that a joint working group would be set up with Local Authority representatives. The likelihood of TUPE applying was also being investigated.
- 4.23. DWP have confirmed that they will provide more definitive clarification of the impact and timescales of the implementation of SFIS in the start of 2014-15, although they confirmed in March 2014 that they are treating the transfer of staff to DWP through the Cabinet office Statement of Practice (COSOP) rather than Transfer of Undertaking (Protection of Employment) Regulations (TUPE).
- 4.24. COSLA are also currently considering the impact and attempting to engage with DWP. To date COSLA advisors have confirmed that :-
  - there are concerns around the use of COSOP rather than TUPE
  - there are concerns around the implementation timescales
  - there is insufficient funding for councils in respect of new burdens funding to assist in the transition,
- 4.25. Correspondence in relation to the SFIS have also been issued to all Unison branches.
- 4.26. DWP are also proposing providing £400,000 new burdens funding in Scotland for both 2014-15 and 2015-16 for implementation of SFIS. It is assumed that Clackmannanshire's share of this funding would be £4,000 based on previous allocations. This amount will not be sufficient to cover associated costs to implement the changes.

#### Scottish Welfare Fund

- 4.27. In November 2013, the Scottish Government undertook a consultation in relation to the Scottish Welfare Fund (SWF). Responses were invited by early February 2014. The consultation is the start of the legal process to underpin the Scottish Welfare Fund in legislation. It also sought views on options for independent scrutiny of decisions made by local authorities on applications to the Scottish Welfare Fund.
- 4.28. In February 2014, the Scottish Government confirmed, through its Local Government Finance Circular that the £37.8 million SWF distributed to Local Authorities in 2013-14 will again be available in 2014-15.

#### Building Resilience for Welfare Reform Funding

4.29. In early February 2014, the Scottish Government, working with COSLA and the Improvement Service have confirmed grant funding of £600,000 is available to support projects that help individuals and organisations respond to the welfare reform and increases in child poverty resulting from the welfare changes. Funding is available for up to12 months for projects during 2014-15. Proposals are to take a joint approach with Community Planning Partners, including the third sector.

#### Welfare Reform Committee : Interim Report on the "Bedroom Tax"

- 4.30. At the end of January 20104, the Welfare Reform Committee released its report on the impact of underoccupation in Scotland since its introduction in April 2013. It recorded that the impacts as including:
  - Having a real and harmful impact on peoples lives
  - Many people being trapped into paying the "bedroom tax"
  - It introduces new costs to tenants, housing associations and local government
- 4.31. The report reported that the main mitigations against these impact included:
  - The level of DHP originally allocated by DWP is insufficient
  - The Scottish Government have allocated an additional £20 million in 2013-14 and 2014-15
  - The Scottish Government should explore further ways to mitigate the impacts,
  - Once the "bedroom tax" has been operating for a full year, the Scottish Government should consider whether £20 million is sufficient mitigation
  - Commends tenants, local authorities, housing associations and local voluntary organisations on their response and in particular in dealing with the rapidly changing situation with regard to DHPs.

#### 5.0 Local Context and Performance

- 5.1. The key welfare reform impacts that continue to affect the Council and local communities during 2014-15 are
  - Council Tax Reduction
  - Scottish Welfare Fund
  - DHPs
  - Underoccupation Reduction
  - SFIS
  - Universal Credit

#### Council Tax Reduction

- 5.2. Clackmannanshire's share of the £351 million Scottish Government Funding for 2013-14 for Council Tax Reduction is £3.498 million. This includes the Scottish Governments contribution of £230,000. An additional £170,000 is allocated by the Council, taking the total CTR fund to £3.668 million.
- 5.3. This compares to £3.8 million Council Tax Benefit awarded in Clackmannanshire in 2012-13. This would equate to a £132,000 reduction in funding or 3.5%.
- 5.4. The Council's share of the £70.2 million fund in 2013-14 for set up and implementation costs of CTR are still to be confirmed, although if distribution is consistent with CTR awards, this would be approximately £70,000. The main costs incurred in relation to the introduction of CTR relate to £75,000 of IT and software costs, which were incurred by the Council at the start of the financial year. Capital costs of £75,000 were allocated for this expenditure in 2013-14 and the costs incurred to date have been met through the Revenue service budget.
- 5.5. The Council's share of the CTR for 2014-15 of £343 million is still to be confirmed although is distributions remain consistent over the two years, Clackmannanshire's allocation would be approximately £3.418 million. With the £170, 000 allocated by the Council, this would be a fund of approximately £3.588 million. This would represent a reduction of £80,000 or 2.2%.
- 5.6. At the end of March 2014, the Councils actual CTR spend for 2013-14 was £3.687 million. This is £19,000 more than the CTR distributable funds available, with the shortfall being met by the Council.

#### Scottish Welfare Fund

5.7. In common with other Local Authorities, demand for both the Community Care Grant (CCG) and Crisis Grants(CG) has been lower than anticipated during the year. Overall actual expenditure at the end of March 2014 was £324,122 90% of the available SWF funds for the year 2013-14.

5.8. Detailed national benchmarked performance information to 31 December 2013, is provided in Appendix A, with Council performance information to 31 March 2014 summarised below:

	CCG £			National Average
Total Budget for 2013-14	230,847	129,545	129,545 360,392	
Total spend to Sept 13	56,160	24,103	80,263	-
Total spend to Dec 13	110,308	32,528	142,836	-
Total spend to March 14*	281,604	42,518	324,122	-
% actual annual spend	122%	33%	90%	81%**

\* This includes accruals of all applications where awards were made to 31 March 2014, but grants have still to be paid.

- \*\* This is based on the December 2013 National benchmarked performance.
- 5.9. During 2013-14, awards allocated in respect of CG have been consistent with approximately £8,000 £10,000 per quarter awarded. At the end of the financial year, £42,518 or 33% of the funds available for CG have been paid out. This compares to the national average of 38% at December 2013.
- 5.10. During the first three quarters of 2013-14, awards allocated on CCG have increased from £56,160 for the first 6 months to September 2013 to £110,308 in the 9 months to December 2013. This increase reflects the relaxing of the award criteria undertaken in the summer 2013.
- 5.11. In the final quarter of 2013-14, awards allocated on CCG totalled £171,296 for the 3 month period. At the year end, this equates to total funds awarded in 2013-14 of £281,604 or 122% of the funds available for CCG. The additional £50,757 (22%) of CCG awards are funded from the underspend on the CG budget. This is permissible provided the overall SWF budget is not exceeded.
- 5.12. The increase in quarter 4 Community Care Grant awards follows the identification of system reporting errors on submission of the first statutory return to the Scottish Government in October 2013. During the second half of 2013-14, the Revenues service engaged with the software supplier, Northgate, to resolve these. The system reporting errors were addressed by Northgate at the end of the 2013-14 financial year.

- 5.13. The system reporting impact resulted in not all successful Community Care Grant awards being reported. This issue has now been resolved and the correct awards for Community Care Grants will be reported in the Annual 2013-14 SWF Return.
- 5.14. It is important to note that both CG and CCG awards have been made correctly to customers who meet the criteria and within the defined timescales. The issue related purely to reporting arrangements set out in paragraphs 5.12 and 5.13.
- 5.15. The increase in the fourth quarter of 2013-14 results in the Council's total SWF spend in 2013-14 of £324,122 or 90% of the available Scottish Welfare funds. The balance of £36,270 is carried forward to 2014-15, taking the SWF to £396,662.
- 5.16. As the administration of the SWF was a new function for the Council introduced in April 2013, the Revenues and Payments Manager asked the Audit and Fraud service to review the processes and internal controls. This was undertaken in quarter 3 and no control weaknesses were uncovered. Recommendations were passed to the Revenues service in January 2014, for implementation and an action plan has been prepared.

#### DHP

- 5.17. In October, the Scottish Government confirmed that the Council's share of the £20 million made available for DHP would be £265,000. Added to the existing fund of £178,000 from DWP, this made available total DHP funds in 2013-14 of £443,000. With the additional funding, the criteria in the DHP Policy approved by Council in May 2013 were relaxed. In the run up to Christmas 2013, the Revenues service reviewed all DHP awards where individuals were affected by underoccupation and were either unsuccessful or had only received a partial award. These claims were revisited and full awards given backdated to April 2013.
- 5.18. The Revenues service have been in contact with those individuals who are affected by underoccupation but had not yet made a claim to ensure that they received full DHP entitlement.
- 5.19. The Council also submitted a bid of £161,000 to DWP in February 2014, for a share of the £20 million announced by DWP in October 2013. In early March 2014, it was confirmed that the Council had been awarded £80,000 from the £161,000 bid. This additional award takes the Council's total distributable DHP funds to £523,000. This provides over 90% mitigation within Clackmannanshire, against the £570,000 benefit reduction arising from underoccupation and benefit cap.
- 5.20. A further review was undertaken in February 2014 to ensure that all DHP funds were on track to be awarded by the end of the financial year. At the end of March 2014, the total DHP funds of £523,000 were allocated to residents of Clackmannanshire.
- 5.21. In January 2014, DWP confirmed that the Council's allocation of the £165 million for 2014-15 would be £176,000. The Scottish Government also confirmed through its Local Government Finance Circular that the Council will

receive £265,000 in 2014-15. The Councils DHP fund for 2014-15 will total  $\pounds$ 441,000.

## Rent Arrears and Underoccupation

	Current	Arrears	Underoc	cupation	Total		
	£000	No	£000	No	£000	No	
March 13	£382	1,900	-	-	£382	1,900	
	5.45%				5.45%		
Oct 13	£469	1,944	103	103 602		2,546	
	5.93%		1.3%		7.23%		
Dec 13	£470	1955	84	464	£553	2419	
	5.94%		1.06%		7%		

5.22. The Council's current tenant arrears during the year has been as follows:

- 5.23. At the end of March 2013, current arrears were £382,000 (5.45%). With the introduction of the underoccupation in April 2013, current arrears increased during the year, peaking at £572,000 (7.23%) with underoccupation arrears of £103,000 (1.3%). At December 2013, the current arrears were £553,000 (7%), with underoccupation arrears of £84,000 (1.06%)
- 5.24. While the current tenant arrear excluding underoccupation level continues to rise during the year, the number of accounts in arrears had only increased by 2.8% since the start of the year from 1,900 to 1,955 at the end of December. The year end rent debtor position will be reported in the Annual Debtors Review, presented to Council in June 2014.
- 5.25. The arrears arising from the underoccupation reduction in benefit reduced in the second half of the financial year through the relaxation of the DHP policy and the allocation of the addition DHP funds made by DWP and the Scottish Government.
- 5.26. The Revenues service continues to engage regularly with tenants who are in arrears. Contact has been made with all tenants affected by underoccupation and will continue to be made in 2014-15.

## **Universal Credit**

5.27. The timescales for the introduction of UC continue to slip with the probable roll out in Clackmannanshire in 2015-16. The introduction of UC continues to create a risk for the Council in relation to reduction in DWP administration funding levels. In 2013-14, DWP provided Scottish Local Authorities with Administration funding totalling £40.833 million of which the Council received

£399,000 to cover the Council's cost of administering housing and council tax benefit and to investigate benefit fraud. This funding has consistently reduced by 10% per annum over the past three years.

- 5.28. In 2014-15, DWP provided Scottish Local Authorities with Administration funding totalling £30.280 million of which the Council will receive £299,000 to cover administration costs. This is a reduction of £10.553 million nationally and £100,000 locally, equating to a 26% reduction in funding.
- 5.29. It is anticipated that this level of reduction will occur over the next two to three years, with the introduction of the SFIS and UC.

#### 6.0 Mitigation and Actions for 2014-15

- 6.1. As the welfare changes continue to impact on local communities and individuals, the Council will continue to engage with partners, voluntary organisations and individuals to help then understand the changes that are affecting them and manage the changes.
- 6.2. The three key strands in the welfare reform changes and the impact on individuals and communities are
  - Providing information and advice, with a particular emphasis on financial advice and support
  - Access to IT and IT literacy
  - Supporting employability

#### Information and Advice

- 6.3. The Council and its partners provide considerable advice and information to individuals and as part of the Making Clackmannanshire Better Programme, a review is currently being undertaken on existing advice and information provision. On completion of the review, a full report will be produced with recommendations as to what changes might be required to maintain a sustainable service in the future.
- 6.4. Central to the review and the actions to be agreed will be the need to provide coordinated local advice and information across the Council and partners, which meets the needs and demands on the different issues facing individuals and local communities.

#### Access to IT and IT Literacy

- 6.5. With the move to on line applications for both UC and searching by Jobseekers on JobCentrePlus websites, individuals will need both access to IT and a considerable degree of IT literacy. The issue is being consider by the Local Employability Partnership (LEP), with training being rolled out by the end of the financial year.
- 6.6. In January 2014, the Council was successful in receiving DWP Flexible Support Grant Funding of £13,500 to provide training for IT literacy. This will be done through the LEP and in partnership with Forth Valley College.

#### Employability

6.7. Individuals who are currently out of work will need to be either supported into work for the first time, or back into the work place. Again the LEP will be assessing the issues in relation to employability and taking action in the new financial year.

#### Grand Central Savings

- 6.8. The Council has been successful in receiving £131,000 Lottery funding for two years, which it will use to fund a three year agreement with Grand Central Savings to provide specialised bank accounts and teller service for residents within Clackmannanshire. The net three year funding of £53,000 is included within the Council's budget for the next three years.
- 6.9. The type of bank service offered by GCS differs from that of a Credit Union as it provides very basic bank accounts for customers that are not currently served by Credit Unions. GCS also provides targeted and personal support to those who are operating a bank account for the first time.
- 6.10. GCS have confirm their intention to engage with Clackmannanshire Credit Union and build a sound partnering arrangement with referrals, where appropriate. Clackmannanshire Credit Union have been updated about the contract with GCS.
- 6.11. The Revenues service will undertake the procurement process and work towards providing a service in partnership with GCS by the end of Qrt 1 in 2014-15.

#### 7.0 Conclusion

- 7.1. The impact of the welfare reform continues to affect the Council, partners, local communities and individuals, although all parties remain committed to mitigating the impact as much as possible.
- 7.2. While the timescales for UC and PIP continue to slip, there is still considerable uncertainty around funding, demand and how services will need to be delivered in the future, which can make planning difficult.
- 7.3. The changes continue to be a considerable risk in relation to funding levels, increasing debt levels and increased demand at a time of reducing resources. Accordingly, the risk continues to remain high on the Council's corporate risk register.

#### 8.0 Sustainability Implications

8.1. None

#### 9.0 Resource Implications

9.1. Financial Details

- 9.2. The full financial implications of the recommendations are set out in the report. This includes a reference to full life cycle costs where appropriate.
- 9.3. Finance have been consulted and have agreed the financial implications as set out in the report. Yes ☑

#### 9.4. Staffing

There may be some impact of staffing levels in the future which are dependant on decisions regarding Universal Credit and SFIS. Costs associated with additional staffing not covered through administrative grant is identifed and included as part of budget pressures for 2014/15 and 2015/16.

#### 10.0 Exempt Reports

10.1. Is this report exempt? Yes (please detail the reasons for exemption below) No 🗹

#### 11.0 Declarations

The recommendations contained within this report support or implement our Corporate Priorities and Council Policies.

(1) **Our Priorities** (Please double click on the check box  $\square$ )

The area has a positive image and attracts people and businesses	
Our communities are more cohesive and inclusive	
People are better skilled, trained and ready for learning and employment	
Our communities are safer	
Vulnerable people and families are supported	$\checkmark$
Substance misuse and its effects are reduced	
Health is improving and health inequalities are reducing	
The environment is protected and enhanced for all	
The Council is effective, efficient and recognised for excellence	$\checkmark$

#### (2) **Council Policies** (Please detail)

#### 12.0 Equalities Impact

12.1 Have you undertaken the required equalities impact assessment to ensure that no groups are adversely affected by the recommendations? Yes  $\square$  No  $\square$  N/A

#### 13.0 Legality

13.1 It has been confirmed that in adopting the recommendations contained in this report, the Council is acting within its legal powers. Yes ☑

#### 14.0 Appendices

14.1 Please list any appendices attached to this report. If there are no appendices, please state "none".

Appendix A – Confirmed Funding Levels 2014-15

Appendix B - Scottish Welfare Fund Performance Statistics – December 2013

#### 15.0 Background Papers

15.1 Have you used other documents to compile your report? (All documents must be kept available by the author for public inspection for four years from the date of meeting at which the report is considered)

Yes 🗹 (please list the documents below) No 🗆

Housing and Council TAx Benefit Circular HB/CTR S5/2012

Housing Benefit Circular HB S10/2013

Housing and Council Tax Benefit Circular HB/CTR S10/2013

Local Government Finance Circular 1/2013

Welfare Reform Update to Council - 15 August 2013

Department for Work and Pensions 2012-13 Accounts - NAO

**Director of Finance WR Survey Data December 2013** 

Local Government Finance Circular 1/2014

COSLA Welfare Reform Updated - October 2013 to January 2014

Minutes of Welfare Reform LA Reps Meeting - October 2013 - January 2014

Localising Support for Council Tax - Communities and Local Government

Impact of WR by Housing Associations : Early effects and responses by landlords and tenants - NHF

Early Impacts of Welfare Reform on rent arrears - Scottish Housing Regulator

Housing and Welfare Reform Update - APSE

Interim Report on 'Bedroom Tax' - Welfare Reform Committee

Welfare Reform Committee - Official Report

**Universal Credit :early Progress - NAO** 

**Universal Credit - Local Support Services Framework** 

Housing Benefit Circular HB S1/2014

## Author(s)

NAME	DESIGNATION	TEL NO / EXTENSION
Susan Mackay	Revenues and Payments Manager	452047

#### Approved by

NAME	DESIGNATION	SIGNATURE
Julie Burnett	Senior Support Services Manager	
Nikki Bridle	Director of Finance & Corporate Services	

## WELFARE REFORM UPDATE

#### APPENDIX A

## CONFIRMED FUNDING LEVELS 2014-15

Welfare Reform Impact	Distributable Funding 2013-14		Administra 2013-14			Costs 2013-14		Funding 2014-15	
Council Tax Reduction	CTR Funds	£3.498m*		-	Software cost	ts £75,000**	CTR Funds	£TBC	
	Council	<u>£0.170m</u>					Council	<u>£0.170m</u>	
	Total	£3.668m					Total	£TBC	
	*Includes £23 additional fror	•			** Funding sti confirmed - £ allocated nati	70.2m			
DHP	DWP	£178,000		-	Staffing	£60,000	DWP	£177,000	
	SGovt	£265,000					SGovt	<u>£265,000</u>	
	DWP Bid	£80,000					Total	£442,000	
	Total	£523,000							
SWF	Funds	£360,000		-	-		Distributable	£TBC	
DWP Administration	-		Funding	£399,000	Staffing	£615,000	Funding	£299,000	
SWF Administration	-		Funding	£59,000	Staffing	£ 65,000	Funding	£55,000	
Underoccupation	-			-	Staffing	£150,000	-		
Total	£4.551 m		£45	8,000	£965	,000	£966,	£966,000	

## WELFARE REFORM UPDATE CONFIRMED FUNDING LEVELS 2014-15

#### APPENDIX A

# OVERALL SPEND - CCG &CG combined from April 2013

Local Authority	CCG & CG total	CCG & CG total	CCG&CG total	CCG&CG total	CCG&CG total	CCG &CG	CCG & CG	spend v monthly	CCG & CG total
	Annual £	12 Month Profile £	Oct 13	Nov 13	Dec 13	YTD SPEND	Dec 13	profile to date	ytd annual spend %
			actual £	actual £	actual £	total	Monthly %	% cumulative	
Aberdeen City	899,841	74,986	75,631	70,789		436,307	125	65	48
Aberdeenshire	464,735	38,727	23,056	23,428	13,093	155,697	34	45	34
Angus	419,071	34,922	30,379	42,471	23,823	224,041	68	71	53
Argyll & Bute	372,760	31,063	29,024	35,229	35,891	223,013	116		60
Clackmannanshire	360,392	30,032	19,077	22,898		142,836	69		40
Dumfries & Galloway	623,237	51,936	31,695	30,883	41,520	360,136	80		58
Dundee City	1,336,637	111,387	99,596	128,568	137,264	779,308	123	78	58
East Ayrshire	925,502	77,125	75,141	61,483	63,512	459,104	82	66	50
East Dunbartonshire	336,815	28,071	17,625	25,484	28,800	177,359	103	70	
East Lothian	390,238	32,520	28,842	36,172	59,932	192,723	184		49
East Renfrewshire	257,919	21,493	14,504	14,034	16,111	88,162	75		34
Edinburgh, City of	2,187,628	182,303	166,416	140,056	155,299	1,247,355	85		57
EileanSiar	47,963	3,995	2,017	4,642	818	23,143	20		48
Falkirk	927,822	77,319	69,399	62,846	68,091	382,798	88	55	41
Fife	1,859,993	154,999	125,821	147,219	144,336	803,170	93	58	43
Glasgow City	7,721,116	643,427	806,323	1,254,659	1,199,107	5,418,356	186	94	70
Highland	800,673	66,722	58,496	47,955	50,388	309,622	76	52	39
Inverclyde	732,537	61,044	46,446	58,218	55,416	372,966	91	68	51
Midlothian	385,338	32,112	40,349	28,305	29,632	178,318	92	62	46
Moray	387,117	32,262	19,495	34,149	86,017	279,626	267	96	72
North Ayrshire	1,068,524	89,044	89,958	59,711	57,307	434,409	64	54	41
North Lanarkshire	2,956,014	246,334	194,593	206,043	155,510	1,186,691	63	54	40
Orkney Islands	56,320	4,693	1,698	5,257	449	30,148	10	71	54
Perth & Kinross	592,924	49,410	56,251	42,891	73,674	354,414	149		60
Renfrewshire	1,148,857	95,737	174,715	165,985	119,675	952,850	125	111	83
Scottish Borders	406,547	33,879	33,219	28,838	30,201	259,189	89		64
Shetland Islands	59,492	4,958	1,804	3,529	2,231	16,384	45		28
South Ayrshire	712,905	59,408	58,787	61,801	43,930	375,967	74	70	
South Lanarkshire	2,143,781	178,648	261,558	219,565	161,644	1,454,682	90		68
Stirling	516,564	43,047	44,367	47,411	44,882	219,662	104	57	43
West Dunbartonshire	829,587	69,132	70,009	63,284	48,539	585,562	70		71
West Lothian	1,066,391	88,865	91,956	83,701	147,833	674,436	166	84	63
Scotland Total	32,995,240	2,749,600	2,858,248	3,257,504	3,209,131	18,798,434	117	76	57

# COMMUNITY CARE GRANT SPEND from April 2013

	Community Care Grants	CCG Actual	CCG Actual	CCG Actual	CCG Actual	% monthly	spend v monthly	% ytd
Local Authority	ANNUAL BUDGET 13/14	Oct-13	Nov-13	Dec-13	ytd	average	profile to date	annual spend
	rounded to nearest £	rounded £	rounded £	rounded £	total spend	rounded %	% cumulative	rounded %
Aberdeen City	540,786	55,983	41,949	62,223	290,371	138	72	54
Aberdeenshire	301,674	12,942	12,201	3,585	83,975	14		28
Angus	273,205	17,933	29,630	13,888	140,708	61	77	52
Argyll & Bute	263,907	19,154	21,151	25,239	156,324	115		59
Clackmannanshire	230,847	17,832	20,159	16,157	110,308	84	72	48
Dumfries & Galloway	430,012	24,691	22,991	34,471	284,068	96		66
Dundee City	986,180	75,049	96,651	112,113	600,077	136		61
East Ayrshire	650,528	50,045	20,396	17,781	254,877	33	59	39
East Dunbartonshire	242,097	14,645	20,332	23,443	145,428	116		60
East Lothian	264,481	23,894	28,021	47,662	151,307	216	86	57
East Renfrewshire	182,290	13,320	12,930	15,061	79,379	99	65	44
Edinburgh, City of	1,429,737	142,659	113,620	126,085	1,075,236	106	113	75
EileanSiar	36,160	1,652	3,989	250	20,144	8	-	56
Falkirk	634,342	53,799	47,244	54,661	280,622	103	66	44
Fife	1,219,553	104,716	117,824	120,490	634,085	119		52
Glasgow City	5,756,371	709,216	1,108,112	1,131,125	4,816,814	236	126	84
Highland	555,135	43,901	30,982	35,782	235,993	77	64	43
Inverclyde	453,774	38,906	45,162	45,556	299,533			66
Midlothian	253,461	27,310	19,103	19,087	109,179	90	65	43
Moray	285,259	9,905	21,548	69,887	209,273	294	110	73
North Ayrshire	705,972	75,972	45,281	43,167	333,739	73	71	47
North Lanarkshire	2,125,263	130,929	156,144	103,079	879,818			41
Orkney Islands	47,868	1,371	4,877	400	28,478	10	89	59
Perth & Kinross	420,828	45,404	33,338	60,766	273,905		98	65
Renfrewshire	693,919	141,961	135,503	87,481	698,162	151	151	101
Scottish Borders	283,996	20,215	20,385	21,725	181,605		96	64
Shetland Islands	42,588	1,414	3,037	1,509	13,817	43		32
South Ayrshire	533,669	47,145	49,565	29,801	292,739	67	82	55
South Lanarkshire	1,539,479	220,253	186,561	138,105	1,131,264	108	110	73
Stirling	379,733	38,625	36,628	31,898	173,892	101	69	46
West Dunbartonshire	562,482	50,918	43,862	33,856	406,042	72	108	72
West Lothian	674,404	76,796	68,794	132,278	570,170		127	85
Scotland Total	23,000,000	2,308,555	2,617,968	2,658,610	14,961,330	3,447	98	65

# Average payout for CCG - Monthly from April 2013

Local Authority	CCG Spend	no of CCG	average spend	CCG Spend	no of CCG	average spend	CCG Spend	no of CCG	average spend	CCG YTD
	Oct 13	paid out	Oct 13	Nov 13	paid out	Nov 13	Dec 13	paid out	Dec 13	average
	rounded £	Oct-13	rounded £	rounded £	Nov-13	rounded £	rounded £	Dec-13	rounded £	spend £
Aberdeen City	55,983	100	560	41,949	94	446	62,223	124	502	
Aberdeenshire	12,942	19		12,201	31	394	3,585	5	717	503
Angus	17,933	52	345	29,630	62	478	13,888	35	397	460
Argyll & Bute	19,154	39	491	21,151	43	492	25,239	60	421	547
Clackmannanshire	17,832	28		20,159	26	775	16,157	15	1,077	546
Dumfries & Galloway	24,691	57	433	22,991	43	535	34,471	52	663	505
Dundee City	75,049	131	573	96,651	150	644	112,113	169	663	476
East Ayrshire	50,045	63	794	20,396	86	237	17,781	69	258	496
East Dunbartonshire	14,645	18		20,332	25	813	23,443	27	868	
East Lothian	23,894	66	362	28,021	65	431	47,662	94	507	441
East Renfrewshire	13,320	28	476	12,930	25	517	15,061	24	628	484
Edinburgh, City of	142,659	232	615	113,620	148	768	126,085	158	798	652
EileanSiar	1,652	4	413	3,989	7	570	250	1	250	544
Falkirk	53,799	106	508	47,244	123	384	54,661	102	536	427
Fife	104,716	130	806	117,824	176	669	120,490	181	666	626
Glasgow City	709,216	665	1,066	1,108,112	1,171	946	1,131,125	1,357	834	917
Highland	43,901	60	732	30,982	47	659	35,782	35	1,022	803
Inverclyde	38,906	85	458	45,162	141	320	45,556	80	569	473
Midlothian	27,310	66	414	19,103	55	347	19,087	48	398	364
Moray	9,905	24	413	21,548	35	616	69,887	58	1,205	717
North Ayrshire	75,972	138	551	45,281	100	453	43,167	0	0	505
North Lanarkshire	130,929	319	410	156,144	332	470	103,079	194	531	421
Orkney Islands	1,371	5	274	4,877	6	813	400	1	400	678
Perth & Kinross	45,404	56	811	33,338	40	833	60,766	46	1,321	609
Renfrewshire	141,961	171	830	135,503	178	761	87,481	154	568	705
Scottish Borders	20,215	37	546	20,385	43	474	21,725	32	679	510
Shetland Islands	1,414	2	707	3,037	3	1,012	1,509	1	1,509	628
South Ayrshire	47,145	68	693	49,565	52	953	29,801	21	1,419	884
South Lanarkshire	220,253	244	903	186,561	237	787	138,105	145	952	740
Stirling	38,625	53	729	36,628	133	275	31,898	66	483	
West Dunbartonshire	50,918	115	443	43,862	110	399	33,856	90	376	359
West Lothian	76,796	137	561	68,794	83	829	132,278	25	5,291	689
Scotland Total	2,308,555	3,318	696	2,617,968	3,870	676	2,658,610	3,469	766	636

## CCG AWARD % from April 2013

Stirling

West Lothian

Scotland Total

West Dunbartonshire

#### **Claims recd Awarded** % awarded Claims recd Awarded Local Authority % awarded Claims recd Awarded % awarded ytd claims ytd % Oct-13 Oct-13 Oct-13 Nov-13 Nov-13 Nov-13 Dec-13 Dec-13 **Dec-13** awarded awarded Aberdeen Citv Aberdeenshire Angus Argyll & Bute Clackmannanshire Dumfries & Gallowav Dundee City 1.260 East Avrshire East Dunbartonshire East Lothian East Renfrewshire Edinburgh, City of 1.650 EileanSiar Falkirk 1,013 Fife Glasgow City 5,254 Highland Inverclyde Midlothian Moray North Avrshire North Lanarkshire 2.090 Orkney Islands -5 Perth & Kinross Renfrewshire Scottish Borders Shetland Islands South Ayrshire South Lanarkshire 1,529

#### **APPENDIX B**

1,131

23.506

# **CRISIS GRANT SPEND from April 2013**

ı <sup>,</sup>	Crisis Grants 2013-14	Crisis Grant	CG Spend	CG Spend	CG Spend	Crisis Grant	% of monthly	spend v monthly	% ytd
Local Authority		MONTHLY PROFILE	Oct-13	Nov-13	Dec-13	ytd spend	average	profile to date	annual spend
	rounded to nearest £	rounded to nearest £	rounded £	rounded £	rounded £		rounded %	% cumulative	rounded %
Aberdeen City	359,055	29,921	19,648	28,840	31,384	145,936	105	54	
Aberdeenshire	163,061	13,588	10,114	11,228	9,509	71,721	70		
Angus	145,866	12,155	12,446	12,841	9,935	83,333	82	76	
Argyll & Bute	108,853	9,071	9,870	14,078	10,652	66,689	117	82	
Clackmannanshire	129,545	10,795	1,245	2,739	4,441	32,528	41	33	25
Dumfries & Galloway	193,225	16,102		7,892	7,049	76,068	44	52	39
Dundee City	350,457	29,205	24,547	31,917	25,151	179,231	86		
East Ayrshire	274,974	22,914		41,087	45,731	204,227	200		74
East Dunbartonshire	94,718	7,896		5,151	5,357	31,932	68		
East Lothian	125,757	10,480		8,151	12,270	41,416	117	44	33
East Renfrewshire	75,629	6,302	1,184	1,105	1,049	8,783	17	15	
Edinburgh, City of	757,891	63,158		26,436	29,215	172,119	46		23
EileanSiar	11,803	984		653	568	2,999	58		25
Falkirk	293,480	24,457	15,600	15,602	13,430	102,176	55		
Fife	640,440	53,370	21,105	29,395	23,846	169,085	45	35	
Glasgow City	1,964,745	163,729	97,107	146,547	67,982	601,540	42	41	31
Highland	245,538	20,461	14,595	16,974	14,606	73,629	71	40	
Inverclyde	278,763	23,230	7,540	13,056	9,860	73,433	42	35	
Midlothian	131,877	10,990	13,039	9,202	10,545	69,139	96	70	
Moray	101,858	8,488	9,590	12,601	16,131	70,353	190	92	69
North Ayrshire	362,552	30,213	13,986	14,430	14,140	100,665	47	37	28
North Lanarkshire	830,751	69,229	63,664	49,899	52,431	306,903	76	49	
Orkney Islands	8,452	704		380	49		7	26	
Perth & Kinross	172,096	14,341	10,847	9,553	12,908	79,353	90	61	46
Renfrewshire	454,938	37,911	32,754	30,482	32,194	254,688	85	75	
Scottish Borders	122,551	10,213	13,005	8,452	8,476		83	84	63
Shetland Islands	16,904	1,409	390	492	722	2,567	51	20	15
South Ayrshire	179,236	14,936	11,642	12,236	14,129	83,228	95	62	46
South Lanarkshire	604,302	50,358	41,305	33,004	23,539	323,418	47	71	54
Stirling	136,831	11,403		10,784	12,984	45,771	114	45	
West Dunbartonshire	267,105	22,259	19,091	19,422	14,683	179,520	66	90	
West Lothian	391,987	32,665	15,160	14,907	15,555	104,267	48	35	
Scotland Total	9,995,240	832,937		639,536	550,521	3,835,970	66		38

# Average payout for Crisis Grants - Monthly from April 2013

Local Authority	CG Spend,	No of CG	ave spend	CG Spend,	No of CG	ave spend	CG Spend,	No of CG	ave spend	CG YTD	
	Oct-13	claims paid o	Oct-13	Nov-13	claims paid or	Nov-13	Dec-13	claims paid	Dec-13	average	
	rounded £	Oct-13	rounded £	rounded £	Nov-13	rounded £	rounded £	Dec-13	rounded £	spend	
Aberdeen City	19,648	368	53	28,840	416	69	31,384	426	74	57	
Aberdeenshire	10,114	134	75	11,228	140	80	9,509	124	77	69	
Angus	12,446	214	58	12,841	175	73	9,935			61	
Argyll & Bute	9,870	104	95	14,078	160	88	10,652	141	76	81	
Clackmannanshire	1,245	78	16	2,739	64	43	4,441	50		60	
Dumfries & Galloway	7,004	143	49	7,892	159		7,049	140	50	51	
Dundee City	24,547	315	78	31,917	348	92	25,151	300	84	67	
East Ayrshire	25,095	115	218	41,087	333	123	45,731	263	174	89	
East Dunbartonshire	2,980	62	48	5,151	78	66	5,357	75	71	58	
East Lothian	4,948	79	63	8,151	100	82	12,270	78	157	77	
East Renfrewshire	1,184	18	66	1,105	21	53	1,049	15	70	61	
Edinburgh, City of	23,757	388	61	26,436	395	67	29,215	358	82	57	
EileanSiar	365	6	61	653	13	50	568	9	63	53	
Falkirk	15,600	241	65	15,602	239	65	13,430	214	63	61	
Fife	21,105	358	59	29,395	434	68	23,846	361	66	63	
Glasgow City	97,107	821	118	146,547	885	166	67,982	633	107	113	
Highland	14,595	165	88	16,974	210	81	14,606	193	76	73	
Inverclyde	7,540	93	81	13,056	167	78	9,860	110	90	88	
Midlothian	13,039	222	59	9,202	178	52	10,545	152	69	59	
Moray	9,590	133	72	12,601	159	79	16,131	145	111	72	
North Ayrshire	13,986	263	53	14,430	244	59	14,140	0	0	59	
North Lanarkshire	63,664	665	96	49,899	537	93	52,431	539	97	79	
Orkney Islands	327	3	109	380	6	63	49	1	49	62	
Perth & Kinross	10,847	144	75	9,553	176	54	12,908	185	70	66	
Renfrewshire	32,754	539	61	30,482	475	64	32,194	485	66	63	
Scottish Borders	13,005	210	62	8,452	170	50	8,476	149	57	56	
Shetland Islands	390	10	39	492	11	45	722	15	48	43	
South Ayrshire	11,642	192	61	12,236	181	68	14,129	165	86	60	
South Lanarkshire	41,305	536	77	33,004	451	73	23,539	324	73	67	
Stirling	5,742	81	71	10,784	70	154	12,984	117	111	81	
West Dunbartonshire	19,091	422	45	19,422	434	45	14,683	314	47	44	
West Lothian	15,160	161	94	14,907	204	73	15,555	150	104	75	
Scotland Total	549,693	7,283	75	639,536	7,633	84	550,521	6,450	85	69	

# CRISIS GRANT AWARD % from April 2013

Local Authority	Claims recd	Awarded	% awarded	Claims recd	Awarded	% awarded	Claims recd	Awarded	% awarded	ytd claims	ytd %
	Oct-13	Oct-13	Oct-13	Nov-13	Nov-13	Nov-13	Dec-13	Dec-13	Dec-13	awarded	awarded
Aberdeen City	483	368	76	537	416	77	524	426	81	2,570	
Aberdeenshire	177	134	76	189	140	74	187	124	66	1,038	
Angus	263	214	81	268	175	65	233	219	94	1,365	
Argyll & Bute	149	104	70	194	160	82	189	141	75		72
Clackmannanshire	146	78	53	109	64	59	110	50	45	544	
Dumfries & Galloway	284	143	50	260	159	61	230	140	61	1,494	61
Dundee City	508	315	62	467	348	75	434	300	69	2,658	58
East Ayrshire	452	115	25	433	333	77	313	263	84	2,282	65
East Dunbartonshire	81	62	77	102	78	76	94	75	80	551	67
East Lothian	123	79	64	128	100	78	113	78	69	541	61
East Renfrewshire	20	18	90	17	21	124	19	15	79	144	69
Edinburgh, City of	509	388	76	533	395	74	489	358	73	2,995	67
EileanSiar	7	6	86	15	13	87	11	9	82	57	80
Falkirk	367	241	66	421	239	57	346	214	62	1,669	59
Fife	491	358	73	481	434	90	437	361	83	2,686	71
Glasgow City	1289	821	64	1111	885	80	925	633	68	5,346	68
Highland	203	165	81	259	210	81	222	193	87	1,002	70
Inverclyde	109	93	85	141	167	118	122	110	90	830	66
Midlothian	288	222	77	248	178	72	203	152	75	1,166	63
Moray	156	133	85	206	159	77	179	145	81	979	71
North Ayrshire	355	263	74	354	244	69	0	0	0	1,697	67
North Lanarkshire	807	665	82	717	537	75	682	539	79	/	
Orkney Islands	6	3	50	8	6	75	1	1	100	27	40
Perth & Kinross	163	144	88	189	176	93	228	185	81	1,206	
Renfrewshire	637	539	85	583	475	81	543	485	89	· · · ·	
Scottish Borders	223	210	94	205	170	83	161	149	93	,	
Shetland Islands	12	10	83	15	11	73	15	15	100	/	
South Ayrshire	223	192	86	206	181	88	210	165			
South Lanarkshire	728	536	74	608	451	74	482	324	67	4,843	
Stirling	94	81	86	75	70	93	137	117	85	,	
West Dunbartonshire	529	422	80	567	434	77	408	314	77	4,090	
West Lothian	238	161	68	299	204	68	251	150	60	,	57
Scotland Total	10120	7283	72	9945	7633	77	8498	6450	76	,	