
**Manchester City Council
Report for Resolution**

Report to: Economy Scrutiny Committee – 6 February 2013
Subject: Impact of Welfare Reform
Report of: Sara Todd, Assistant Chief Executive (Regeneration)

Summary

This report gives an overview of the Welfare Reform Act and the impacts that it is having in residents in Manchester. It gives a summary of the work underway to assess and respond to the impacts and what is being done to mitigate the effects on households.

Recommendations

The Committee is invited to discuss the report.

Wards Affected: all

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1 Purpose

1.1 This report follows the City Council resolution of 5th December 2012 which highlighted the consequences that the Welfare Reform Act was likely to have on residents in Manchester. The motion asked the Chief Executive, through the Executive and Scrutiny process, to report back to Council in the New Year on the anticipated impact of these changes and what further action is being taken to alleviate the pressure on affected households

1.2 This report therefore looks at actual and anticipated impacts on residents in Manchester; action being taken to mitigate the effects on affected households; and further action that is planned.

2 Welfare Reform – changes

2.1 The Government's welfare reform agenda is seeking to reduce the UK's welfare benefit costs by £19 billion. They aim to simplify the system and make work more beneficial than claiming benefit. Many of the changes have already taken place but most of the key changes are scheduled to take place this year starting in April with the flagship Universal Credit being launched in October 2013. A summary of the numbers of people affected by each of the main benefit changes in Manchester is given in Appendix 1.

2.2 The key elements that are impacting upon Manchester residents are as follows:

Work Capability Assessment (from Oct. 2008)

2.3 The reassessment of claims of Incapacity Benefit (IB), has been taking place since October 2008 affecting around 18,000 residents claiming IB. 15,000 residents are claiming Employment and Support Allowance (ESA) which replaces IB. Once individuals have been assessed, they are placed into one of three groups: Those deemed 'fit for work' are given the opportunity to apply for Job Seekers Allowance (JSA) and are expected to actively seek employment; those deemed as being part of the 'support group' are transferred to Employment Support Allowance (ESA); and those deemed as being part of the 'work related activity group' (WRAG) remain on the basic rate of ESA and are provided with additional support in order for them to be able to work in the future. About 41% of IB claimants in Manchester have been found 'fit for work' with 59% still being unfit and eligible for ESA.

Local Housing Allowance (from April 2011)

2.4 New caps on Local Housing Allowance (LHA) set at the 30th percentile of rents in each Broad Market Rental Area (rather than the median) and also for certain sizes of properties have been implemented from April 2011 and are impacting on claimants in private rented accommodation. These changes to LHA for private tenants are likely to have impacts upon the extent to which people can afford to live in certain neighbourhoods. There will be areas of the city where there will be pressure on residents to move out due to a shortage of capacity of reasonably priced property and an increased pressure on other areas where there is more supply.

Thus there is likely to be pressure on residents in certain areas to move out due to the LHA cap and pressure on cheaper areas particularly in the north, east and central parts of the city where there is lower demand and consequently lower rents.

Lone Parent's on Income Support (from January 2012)

2.5 There are about 8,800 claimants of Income Support (IS) mainly clustered in the north and east of the city but with pockets in central Manchester and Wythenshawe. Since January 2012 new claims for IS for lone parents are only allowable if there is a child under the age of 5 (reduced to 7 in October 2010) with the parent. If not then parents 'sign on' for JSA. Existing claimants with no child under 5 will have the benefit removed in phases. Many thousands of lone parents have been switched from IS to JSA since October 2010. Nominally the rate of benefit is the same but parents must 'actively seek' and be 'available for work' or face JSA sanctions.

Disability Living Allowance (DLA) (April 2013)

2.6 About 34,000 people aged 16-64 claim Disability Living Allowance in the city. This is being replaced with a Personal Independence Payment (PIP) initially for new claims only from 8th April 2013. Re-assessment of existing claimants will start in October 2013.

2.7 Government considers that the new benefit will better reflect today's understanding of disability and PIP will include an assessment of individual needs. There will be no automatic transfer from one benefit to the other, so people currently receiving DLA will have to make a fresh claim for the new benefit, and will be re-assessed in line with new 12-point assessment criteria for daily living and mobility components of the benefit. ATOS are contracted to conduct these assessments and most people will have a face-to-face consultation as part of their claim. The reassessment of claimants is expected to result in a 20% reduction in the costs associated with DLA, which would mean potentially 6,800 residents losing their DLA in Manchester.

2.8 People claiming DLA in the city are typically clustered in the more deprived wards in the city. The potential loss of benefit for an individual on the highest level of care component is £77.45 a week and £54.05 for those on the highest level on the mobility component.

Housing Benefit - Under-occupancy (April 2013)

2.9 From 1st April 2013 social-sector houses will have a size criteria (the so-called 'bedroom tax') applied, with any working-age household deemed to be under-occupying their home having their Housing Benefit reduced by 14% of the rent for one-bed under-occupancy and 25% for two or more bed under-occupancy. When calculating how many bedrooms a family unit requires, a room for a foster child will not be included. Under-occupancy will affect at least 12,300 tenants in all parts of Manchester. (Appendix 2). However, under-occupancy creates a particular issue in some parts of the city (for example, Wythenshawe) where there is a lack of availability of smaller social housing properties.

2.10 Under-occupation penalties may potentially create a churn in tenancies (and within households) for a period from April 2013 potentially going on for two or three years. The scale of this could mean that the vast majority of household movements in the social housing sector over the next few years will be through internal transfers and mutual exchanges - leaving a much smaller proportion of lettings available for nominations and other routine lettings through the Council's allocations scheme. It is not expected that there will be major internal transfers between providers, however tenants might choose to alter their family living arrangements to maximize benefit or alternatively minimise the cut. Prospective tenants could end up searching for accommodation outside the city. Under-occupancy charges will result in more rent arrears. There is potential for an increase in homelessness which housing providers including those in the private sector will need to address.

Crisis Loans and Community Care Grants (April 2013)

2.11 Crisis Loans and Community Care Grants are being abolished, and a new Local Welfare Provision scheme has now been devised and agreed by the Council to replace it from 1st April 2013. This will provide both grants and loans to people that are being re-housed or resettled into new accommodation; residents needing support to stay in their home or residents requiring immediate financial assistance. Eligibility criteria will be used to make sure that residents are targeted at the most vulnerable and those in need.

2.12 The new scheme will focus on prevention and early intervention, addressing customer needs before they escalate and require more costly intervention. It will also link in with the work the Council is doing with troubled families. The Council will work with delivery partners such as the voluntary and community sector, Registered Providers and the advice sector to identify residents that require support and will manage a referral process into the service. Support will be prioritised to the most vulnerable customers/priority groups. Residents who do not meet eligibility criteria will be signposted to the wider offer of universal services and support available from the third/community and voluntary sector. The Council's scheme will develop over time to identify and avoid duplication with the range of other mandatory and discretionary support offered by the Council and likewise the support, grants and donations from other government agencies and third sector organisations.

2.13 A range of other provision including cold weather and winter fuel payments, funeral payments and Sure Start maternity grants will continue to be paid directly by DWP.

Council Tax Benefit (April 2013)

2.14 Council Tax Benefit (CTB) is being replaced, moving from a national scheme administered by local authorities, to a local authority scheme (Council Tax Support) funded by a non ring fenced grant but with a 10% reduction in funding from April 2013. The Government has committed to continue the benefit for those of pension credit age. Working age claimants who may have previously received full rebate on their council tax will now have a proportion of their council tax to pay. All existing CTB claims are being migrated onto the new scheme and those getting full benefit

previously will now have to pay 8.5% of their council tax bill. A small discretionary fund is being set up to help those in extreme hardship.

Benefit Cap (September 2013)

2.15 The cap was due to start in April but has now been delayed until 'summer 2013' except for four London boroughs. The total amount of benefit that working age people can receive will be restricted so that workless households should no longer receive more in benefits than the average earnings of working households. The cap will be £500 p/wk (£26,000/year) for couples and lone parents and £350 p/wk (£18,200/yr) for single adults. Where it is exceeded housing benefit will be restricted to a nominal 50p/week. Most of the people affected by the benefit cap live in London but there are about 600 people affected in Manchester (Appendix 3).

2.16 The policy only applies to people of working age. Those who are working and receiving Working Tax Credit will be exempt. Families with a severely disabled member (on Disability Living Allowance, the Personal Independence Payments that will be replacing DLA, or Attendance Allowance) war widows/widowers and people on the support component of Employment Support Allowance will also be exempt. The map in Appendix 2 shows the distribution of those that will be affected by the benefit cap with clusters in Moss Side and Cheetham wards. It is estimated from Revenues and Benefits data that some families who are private sector tenants may lose up to £280/wk.

Universal Credit (October 2013 onwards)

2.17 The replacement of the complex mix of out of work benefits and working tax credits with a single payment is to be introduced in phases from October 2013 to 2017. Universal Credit (UC) will affect around 64,000 people currently claiming out-of-work benefits in Manchester. It replaces Income Support (IS), income-based Jobseeker's Allowance (JSA), income-related Employment and Support Allowance (ESA), Housing Benefit (HB), Child Tax Credit (CTC), and Working Tax Credit (WTC). In order to receive UC an individual or couple will have to sign a new claimant commitment, which sets out the expectations and requirements placed upon the claimant, as well as outlining the sanctions, should they fail to fulfil them. Most claimants will be expected to budget for their housing and living costs from a single payment of UC. Importantly because of the incorporation of child and working tax credits many low income but working families will also be affected by the introduction of Universal Credit.

2.18 UC will be paid directly to claimants monthly. The practice whereby rent is paid direct to landlords will cease except for a narrow defined group of claimants regarded as vulnerable. Typically about two thirds of all rent is paid to directly to social landlords at present. Research commissioned by the National Housing Federation identifies a significant minority of social housing tenants who will struggle to meet all of their rent payments in this new, monthly benefit payment cycle. This risk is of concern to Registered Providers as it is likely to result in many tenants being pushed into rent arrears who previously had managed their payments well. Landlords in six pilot projects, including Wakefield, testing direct payment of housing benefit to tenants via Universal Credit failed to collect 8% of rent on average in the first four

months. This information is causing landlords to have concerns about their business plans and may change who they let property to.

2.19 Universal Credit is going 'live' through a Pathfinder Phase 1 in four Job Centres in Warrington, Wigan, Ashton Under Lyne and Oldham from 29th April. The pathfinders will be initially for straight forward new claims to JSA only from claimants with no children, who are not home owners, are not in receipt of housing benefit at the time of claim and have less than £6,000 in savings. However, Manchester needs to be alive to the possibility of claimants transferring into the city.

3 Welfare Reform – impacts

3.1 The welfare reform changes are radical and far reaching and occur at a time when the City Council is having to making significant cuts in its budget and services because of the local government funding settlement. The cumulative impacts of welfare reform are important and can be viewed in terms of impacts on place i.e. those that impact on specific places or geographies; service impacts i.e. those that have implications for the way in which local authorities and partners deliver services; and people impacts i.e. those that impact upon specific groups of the population. The following are the most important aspects of these:

- **Neighbourhoods:** welfare reform will impact differently across the city. Claimants living in neighbourhoods in the wards of Harpurhey, Miles Platting and Newton Heath, Gorton North and Gorton South and Sharston, will be most impacted by the range of welfare reforms listed here (see Appendix 1). These are neighbourhoods with the highest volumes of out-of-work benefit claimants; DLA claimants; social tenants affected by under-occupancy penalties and households affected by the Benefit Cap, but other wards are affected also.
- **Social housing:** Because of under-occupancy penalties, social tenants, particularly in areas of the city with large concentrations of family housing will be affected by under occupancy changes to housing benefit losing between £14-£25 a week potentially leading to tenants moving between providers or into the private rented sector. Problems may be compounded by the lack of available accommodation of the right size in certain parts of the city. The impact on families and wider social support networks in neighbourhoods is also of concern. The total loss of benefits income to these tenants is estimated to be around £7.45m a year and there may be knock-on impacts in terms of rent arrears and income of housing associations.
- **Private rented sector:** Changes in Local Housing Allowance for private renters are likely to encourage movement of renters and worsen conditions at the bottom end of the market by incentivising landlords to target poor quality niche markets in already heavily disadvantaged areas. There may also be movement to neighbouring authorities. Anecdotal evidence suggests that more reputable landlords may be reluctant to offer tenancies to people on LHA in the future,
- **Disability:** Entitlement to Disability Living Allowance (DLA) may be lost by

almost 7,000 residents. The largest number of these are located in North Manchester particularly Harpurhey. Individual losses may be between £54 and £77 a week which amounting to over £19m a year for all claimants in the city on the lower rate of benefit.

- **Poverty and debt:** There will be key challenges for many groups particularly those families (especially those with children) that are living in poverty with incomes below 60% of the median household. For those children living in families where no-one works and who are dependent on out-of-work and other benefits there will be particular stresses. For many families personal and household incomes may be significantly reduced. Levels of household debt are likely to rise and this may be exacerbated under Universal Credit by the move to single direct monthly payments to tenants. The risk that people may resort to 'pay-day-loan' companies or other money lenders is high.
- **Family support services:** The total impact on families and communities of the changes and the consequent impact on and demand for services, for instance in health and social care, supporting people, and children's services can not yet be fully appraised. There is likely to be significant impact on the services supporting families in our most dependent communities. There is also a risk that dependency will increase at a point where we most need to reduce it and we are likely to see increasing concentrations of dependency that in the long term could become even more entrenched.
- **Revenues and Benefits:** Demands of implementing and communicating welfare changes and implementing new schemes related to Council Tax Support, Local Welfare Provision and other schemes in very short timescales is falling on the Revenues and Benefits service.
- **The local economy:** In total there could be a reduction of up to £45m a year in the local economy due to loss of benefits, only a proportion of which could be made up as a result of people moving into work.

4 Responding to Welfare Reform

4.1 The City Council's response to welfare reform supports the vision of growth and reduced dependency supporting self-help, reliance and responsibility in our communities. However, the pace and scale of changes being implemented nationally will impact disproportionately on Manchester's communities. The lack of growth stimulus and job creation in the economy makes the transition from benefits to work for many people much more difficult at the present time.

4.2 Since the presentation and discussion on welfare reform at the Council meeting in July 2012, a corporate officer Welfare Reform Programme Board has been set up to assist in co-ordinating Council-wide responses. The Programme Board is covering a range of work streams from the national work influencing government to local work at SRF level. The activity below reflects some of the work being co-ordinated across the Council:

4.3 **Work and Skills:** There is a clear focus in the City Council's response to

welfare reform that work is the best route out of dependency on benefits. There are a range of initiatives that are being promoted city-wide and by SRF areas to residents affected by changes in their benefits to promote learning, skills and employment where it is needed: These include peer mentoring for those with mental health problems; work clubs; the Employer Suite connecting unemployed residents with jobs in the city centre; Job City 2013; Community Learning Hubs and a range of business start-up and support activities.

4.4 SRF level activity: As the impact assessment above summarises certain parts of the city will be impacted more than others. Welfare reform sub-groups of SRF Delivery Groups have now been established in five areas of the city. These are enabling work across agency boundaries to deliver effective responses to the impacts related to both welfare reform and cuts in services. A focus for these groups is supporting residents into work and seeking to reduce concentrations of dependency in particular wards.

4.5 Troubled families: Welfare reform (particularly the benefit cap) affecting those households identified as complex families has been identified as a key criteria for family support. This includes residents both in social and private housing. The provision of information on impacts from Revenues and Benefits to the Complex Families team has been beneficial in being able to bring direct interventions to help families dependent on benefits manage their budgets and access work.

4.6 Housing: The City Council and housing providers are working closely together identifying households in the social sector affected by under-occupancy and the benefit cap in particular, providing advice and other support services, and in general co-ordinating responses to mitigate and minimise the consequences of reform. All householders affected by under-occupancy have received letters from Revenues and Benefits and registered landlords have been carrying out visits to affected households. Discussion on the policy for transfers for those affected by welfare reform and wishing to downsize is taking place with providers and decisions will be made this month. The Council is working with the AGMA sponsored 'Help with Rent' team to provide advice and support to private tenants. A 'Lets Help You' product that will improve contact with Private Rented Sector (PRS) landlords willing to let to low income households and those claiming Local Housing Allowance is in the process of being acquired. Welfare Reform continues to be on the agendas of the Strategic Housing Board, Strategic Housing Partnership and the Registered Providers' Chief Executives Co-ordination meetings.

4.7 Support for residents: The City Council's Revenues and Benefits and Customer Services staff have been communicating with residents affected by benefit changes and preparing a new a range of support schemes to help residents affected by changes in their benefits:

- **Benefit Cap** – all 600 or so households affected by the benefit cap have received letters about the potential change in their benefits prior to the delay in implementation being announced by Government. All claims are expected to have transferred to the cap by September 2013. The Revenues and Benefits service is working with DWP to make contact with affected households.

- **Local Welfare Provision** – The City Council has agreed how the £2.72m grant for the delivery of the replacement local welfare provision will be spent from April 2013. It will be targeted at the most vulnerable residents and those with greatest need while ensuring that those ineligible are appropriately signposted to wider support.
- **Council Tax Support scheme** – The City Council has agreed a new scheme replacing Council Tax Benefit. All households will have to pay a minimum of 8.5% of the Council Tax due. About 40,000 households in the city will be paying council tax for the first time. Many of the rules for claiming will be the same as for Council Tax Benefit now, particularly in terms of who can claim, how income and household needs are assessed and how non-dependants are treated. People on Council Tax Benefit now will automatically be considered for Council Tax Support. Council Tax bills for 2013/14 should show the new Council Tax Support discount
- **Discretionary Housing Payments** - A new scheme for discretionary housing payments has been approved by the City Council and is being finalised. This enables the Council to pay, at its discretion, extra money towards housing costs to top up Housing and/or Council Tax Benefit. Many claimants are private residents whose housing benefit is too low for them to be able to pay their full rent. The Council has also used the scheme to assist claimants moving off benefits into work. Claims for the new financial year will be considered from late January onwards.
- **Council Tax Discounts and Exemptions** – linked to the new Council Tax Support Scheme the Council has agreed changes to the Council Tax discounts and exemptions. This means full Council Tax will now be charged on second homes and furnished properties that are not the sole or main residence of any individual and also on long term empty properties. There will be full exemptions from Council Tax charges due for properties left empty or unoccupied by members of the armed services.
- **Discretionary Council Tax Payments scheme** - has also been approved. Anyone who is liable to pay Council Tax in Manchester can apply for a payment under the Council Tax Payment scheme. Because all benefit claimants of working age have to pay more of their Council Tax or some Council Tax when they have previously had nothing to pay, this may impact on vulnerable residents in serious, anomalous situations for whom the Discretionary Payment Scheme can be used. Requests for support will be considered based on individual need and circumstances.

4.8 Advice services: Advice services in Manchester are currently facing unprecedented demand as a consequence of welfare reform but at the same time are facing withdrawal of funding from the Legal Services Commission. Services provided by the CAB through centres across the city are being continued through to the autumn but with revisions to the services offered.

4.9 Libraries: Advice sessions and support on welfare benefits is being provided by Revenues and Benefits staff at six libraries across the city. Residents are able to

telephone or book online to attend one of the sessions. Library staff are also able to check the validation forms for benefits claimants in twelve local libraries. Staff also signpost claimants to further information and advice services. Given the shift in Universal Credit to benefits claims only being made on-line, free computer access provided by libraries enables access to services for those families without the internet at home. Digital Champion volunteers will also be available to help people with basic internet skills.

4.10 Communications: A Communications Plan comprising awareness-raising for the public, staff, members and stakeholders has been devised. A 'Help with Benefits' button on the new website will provide info and guidance to residents on changes to welfare. Frontline workers both within the Council and externally are being briefed about changes and have the information to provide guidance and signposting to residents. Registered Providers in the city are carrying out door knocking exercises, amongst other engagement activity, to ensure that tenants affected by changes are aware of the implications and can obtain support. Welfare reform briefing sessions for ward members in SRF areas are being arranged.

4.11 Customer Services: The Customer Service Centre will transfer back to the Town Hall on in July. Revenues and Benefits advisors are being trained in welfare reform as part of the service implementation and training plans. A 'movers survey' is being carried out with customers to establish whether residents are moving into or around the city to cheaper accommodation notifying the Council of their change of address.

4.12 Intelligence: An assessment of the impacts of welfare reform at city and SRF level has already been carried out and reported to SRF Delivery Groups. A Welfare Reform 'dashboard' is now being produced on a regular basis.

4.13 Work on the above areas is continuing under the auspices of the Welfare Reform Programme Board. The key issues for the Board now are:

- Ensuring that the range of support available to residents through Local Welfare Provision, Council Tax Support, Discretionary Housing Payments and other schemes are available to residents from 1st April or as soon as are available.
- Continuing to assess and develop service responses, especially at the local level through SRF structures drawing together action related to employment and skills, debt and advice and closely monitoring the impacts on the ground.
- Informing and communicating the changes to residents, front-line workers, staff and members through the Council website and through briefing sessions in SRF areas.
- Continuing to monitor the impacts of welfare reform throughout this year and beyond as changes begin to impact.

5. Conclusions

5.1 Welfare reform presents a major challenge to residents receiving benefits in the city. There are a complex number and type of changes taking place within short timescales that are affecting or about to affect families' dependant on a variety of benefits.

5.2 The Council is seeking to view in an holistic way the impact that welfare reform is having on families and communities. There are impacts on places, impacts on services and impacts on people that need to be considered.

5.3 Co-ordinating the local service and agency responses in neighbourhoods affected through SRF structures drawing together in particular action related to employment and skills, debt and advice and closely monitoring the uptake and demand for these services on the ground is a key priority.

5.4 Developing and co-ordinating the service and support response to residents, working with partners such as Registered Providers, has been a priority for the past 12 months. The Revenues and Benefits service plays a critical role in ensuring that residents affected by changes are communicated with and that discretionary payments and support schemes such as the devolved Community Care Grants and Crisis Loans and new Council Tax Support scheme can support residents. The role that support to troubled families can also provide is of key importance. By working with families to tackle worklessness, poverty and dependency issues in an integrated way we will be able to support them in a transition into work.

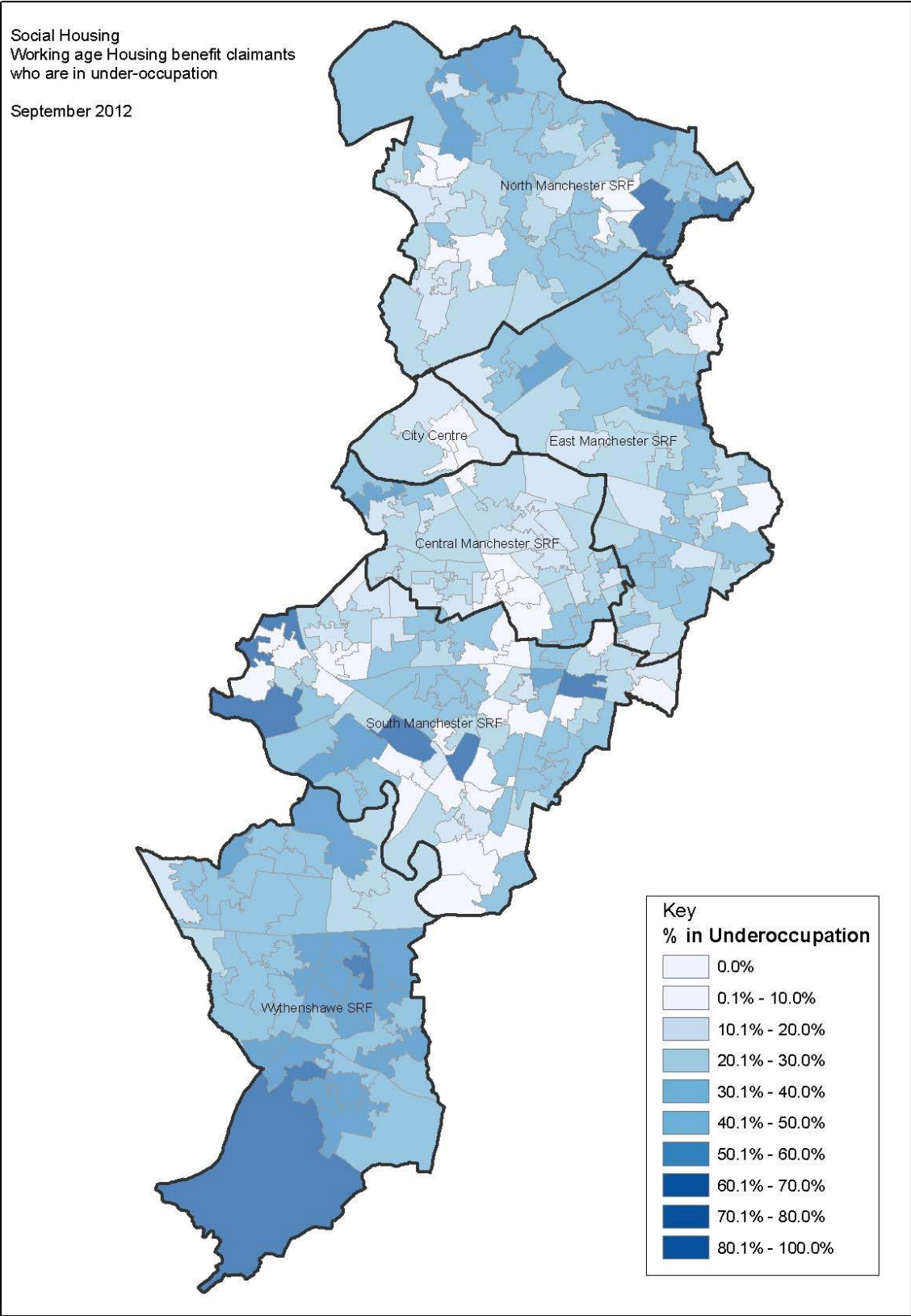
5.5 At a time when budget cuts are being imposed the impact of greater demands on public services is of concern. How effectively services can combine to support families being impacted in communities is something that task groups in each of the SRF areas are now addressing. The long term aim is to reduce concentrations of dependency in the areas that are most affected by the changes.

Appendix 1: Welfare Reform impacts by Ward and SRF area

Ward	All Out of Work Benefits	Housing Benefit Claimants	Households in under-occupation	DLA Claimants	DLA less 20%	Benefits cap
	Feb-12	Dec-12	Aug-12	Feb-12	Feb-12	Sep-12
Ancoats and Clayton	2320	31%	567	1240	992	21
Ardwick	2460	40%	421	1185	948	24
Baguley	2390	38%	663	1410	1128	10
Bradford	2945	39%	443	1435	1148	18
Brooklands	1620	28%	450	1075	860	12
Burnage	1875	32%	457	1170	936	17
Charlestown	2525	40%	539	1485	1188	13
Cheetham	2650	35%	421	1345	1076	53
Chorlton	765	12%	72	495	396	1
Chorlton Park	1465	23%	323	825	660	7
City Centre	360	4%	24	135	108	0
Crumpsall	2270	34%	158	1285	1028	27
Didsbury East	750	10%	80	490	392	2
Didsbury West	660	11%	48	395	316	1
Fallowfield	1480	32%	275	875	700	20
Gorton North	2540	40%	385	1195	956	29
Gorton South	2755	38%	420	1360	1088	27
Harpurhey	3645	50%	622	1710	1368	32
Higher Blackley	2255	38%	576	1365	1092	16
Hulme	2110	29%	621	850	680	10
Levenshulme	1415	21%	60	750	600	9
Longsight	2050	34%	187	925	740	28
Miles Platting and Newton Heath	3285	50%	745	1700	1360	15
Moss Side	2730	44%	453	1095	876	65
Moston	1990	25%	288	1130	904	14
Northenden	2205	33%	640	1350	1080	20
Old Moat	1770	30%	346	860	688	19
Rusholme	1480	32%	154	825	660	17
Sharston	2745	40%	974	1600	1280	13
Whalley Range	1625	24%	110	800	640	13
Withington	800	16%	74	440	352	6
Woodhouse Park	2275	42%	778	1335	1068	12
North SRF Area	15,335	37%	2,604	8,320	6,656	155
South SRF Area	12,605	21%	1,845	7,100	5,680	95

Central SRF Area	10,830	36%	1,836	4,880	3,904	144
East SRF Area	13,845	39%	2,560	6,930	5,544	110
Wythenshawe SRF Area	11,235	36%	3,505	5,695	4,556	67
Total	64,210	31%	12,374	34,135	27,308	571

Appendix 2: Social housing tenants under- occupying properties



Appendix 3: Residents affected by the Benefit Cap

