

MANCHESTER CITY COUNCIL

REPORT FOR RESOLUTION

Committee	Resources and Governance Overview and Scrutiny Committee
Date	21 June 2007
Subject	Benefit Fraud Inspection - Inspection of claims processing
Report of	City Treasurer

Purpose of Report

The purpose of this report is to update members on the outcome of the recent inspection of the Benefit Fraud Inspectorate (BFI). This will include the scope of the inspection and the outcome and recommendations made.

Recommendations

Members are recommended to note the report.

Consequences for the Revenue Budget

Improved collection of Benefit overpayments has a positive impact on the Council's financial position.

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Background documents

BFI news release 22 May 2007 (attached appendix 1)
Report of the Benefit Fraud Inspectorate May 2007 (available on request or via the BFI website)
Performance Standards for HB/CTB Administration

Wards Affected: All

Implications for:

Anti poverty

The Benefits Service deals directly with those in most financial need within the city. Any delays in processing benefits directly impacts on them emotionally and/or financially.

Equal Opportunities

Any delays in processing benefits could potentially affect the viability of housing schemes designed to assist particular vulnerable groups.

Environment

None directly

Employment

Any delays processing benefit claims can have a detrimental impact on employment levels in that people may be put off taking temporary or short-term contracts due to perceived problems with benefits, rent and Council Tax.

1. Introduction

1.1 This report follows a request from members to provide an update on the outcome of the Benefit Fraud Inspectorate (BFI) report on the Council's Benefits Service, claims processing.

1.2 The BFI are a central government agency reporting to ministers. They have recently transferred from the Department for Work and Pensions to the Audit Commission.

The inspection was carried out between January and March 2007 with an inspection team on site phase in February 2007. The report was then published on 22 May 2007. (All material before this date was subject to embargo). This included a news release from the BFI.

2. Background and Scope of the inspection

2.1 Inspection Background and Timescales

The BFI carry out a range of inspections covering benefits administration and related issues. This can include full inspections covering all areas of the Council's benefits administration to targeted inspections looking at key areas.

The Council was originally selected for a targeted inspection covering claims processing in September 2005. However, due to the scheduled implementation of the main benefits processing system in January 2006 this was deferred until January 2007.

The inspection includes Housing Benefit (HB) and Council Tax Benefit (CTB).

2.2 Performance Standards for Housing Benefit Administration

The standards and good practice expectations for all areas of benefits administration are covered in detail in the Department for Work and Pensions HB/CTB Performance Standards.

The standards are split into 4 discrete themes that cover the whole area of benefits administration:

- Claims Administration;
- Security;
- User focus; and
- Resource Management.

Each theme is then further split between Performance Measures (PMs) and Enablers. At the time of the inspection there were 19 PMs covering three of the theme areas- Claims Administration, Security and User Focus. There are also 65 enablers that set out a strategy, policy, and procedure or practice that should be in place within all councils.

The Council has to undertake an annual appraisal against both the PMs and enablers and when assessed using the DWPs scoring methodology, this provides a score of between 1 and 4 for the Benefits Administration part of the annual Comprehensive Performance Assessment process.

The Council has achieved a score of 3 for Benefits Administration against the standards since they were introduced in 2002. These scores have also been evidenced and then audited by earlier BFI monitoring

2.3 Scope of the targeted inspection

For the targeted inspection the BFI selected a range of PMs and enablers that they felt impacted on claims processing. This included 9 of the 19 PMs and 41 of the 65 enablers.

The following table shows the split of the inspection within the theme areas:

	Theme within Performance Measures			
	Claims Administration	Security	User Focus	Resource Management
Performance Measure	6	3	-	-
Enablers	10	7	11	13

2.4 Inspection Process

Prior to the inspection, the Council provided a range of performance information and evidence to support the enablers. When they were on site the inspectors undertook the following additional checks:

- Examined samples of new claims, changes of circumstances and interventions claims (in-claim reviews);
- Interviewed managers and staff;
- Examined management information;
- Interviewed stakeholders including registered social landlords and housing staff; and
- Observation of processes and physical environments.

3. Inspection Findings

3.1 Overall Performance

Attached to this report at appendix 2 is an extract from the BFI report. It is part of the Executive Summary and provides the BFI commentary on the overall performance of the Council.

Although there are recommendations made that are covered in more detail later in this report, the BFI are satisfied that the Council was operating a secure Benefits Service with all claims (new claims, changes of circumstances and interventions) verified and checked to a high standard.

In addition, contrary to the recent press reports there are no statements or suggestions by the BFI that 'Benefits cheats, slip through the Town Hall net' as reported in the Manchester Evening News, 24 May 2007. This is confirmed by the security theme of the inspection report, which concluded that all PMs and Enablers measured within the security theme as part of the inspection were at standard.

The errors that were quoted in the press were not mistakes in respect of the claim assessment and payments, but related to how the claim was recorded using the complex statistical system data. This was mainly due to the staff working on a new computer system. Since then, due to extra management checks and staff becoming more confident on the system, this has now been resolved. Further sampling and management reporting will continue in this area, so that continued assurance can be provided.

3.2 Performance Measures

The 9 PMs selected for checking as part of the inspection were split between the claims processing and security themes. Of the 6 PMs covered within claims administration, 5 measured and reported on speed of processing for both new claims and changes of circumstances and 1 covered the accuracy of claims assessment. The other three PMs covered as part of the Security theme were around in claim checks and validation.

To reach the standards for the PMs the Council had to achieve the top level of performance for the area. Unfortunately due to the timescale of the inspection, which involved data between October and December 2006, the Council was not at standard at the time for any of the speed of processing PMs. This was due to post implementation recovery – see section 4.2.

The Council's Performance Measure results			
		Target	Result
PM1	Speed- new claims	36 days	Not at standard
PM2	% of claims over 50 days	10%	Not at standard
PM3	% of new claims within 14 days	90%	Not at standard
PM4	% of rent allowance within 7 days	90%	Not at standard
PM5	Speed- changes of circumstances	9 days	Not at standard
PM6	Accuracy	99%	At standard
PM10	% of Number of interventions within year	100%	At standard
PM11	% of data matches resolved in 2 months	100%	At standard
PM12	% of number of claimants visited	100%	At standard

3.3 Enablers

A copy of the BFI scoring document summary is attached at appendix 3. Of the 41 Enablers measured by the BFI; they concluded that the Council was at standard for 35.

Within the themes this is shown as follows

Claims administration, 10 out of the 10 Enablers measured were at standard

Security, 7 out of the 7 Enablers measured were at standard

User focus, 10 out of the 11 Enablers measured were at standard

Resource Management, 8 out of the 13 Enablers measured were at standard.

The 6 Enablers that were not met were:

Enabler 42	Staff have been set and are achieving targets, which as a minimum reflect corporate customer service targets for dealing with enquiries made by telephone, in person, by letter or email, and the local authority monitors performance against the targets.
Enabler 53	The Local Authority provides accurate and timely MIS data, HBMS data, quarterly performance measure data and annual self-assessment returns against the Performance Standards.
Enabler 55	There are up to date documented recruitment, induction, training, codes of conduct including pre-appointment checks and declaration of interest protocols, appraisal, retention and diversity strategies, whether corporate or specific to the Benefits Service.
Enabler 61	There are IT security and testing protocols and processes, including a secure user environment through password controlled access, to ensure that users only have the appropriate access to IT systems.
Enabler 62	The local authority has secure post opening procedures with all relevant items dealt with to VF standard, with protocols and processes for the secure control of case documents, cheques, receipts, automated payments and other valuable items including their return to the customer when appropriate.
Enabler 64	There is a risk based internal Audit programme to examine the Benefit Service's working practices and IT functionality for compliance with documented procedural guidance and legislative requirements.

3.4 Recommendations

Overall the BFI made 11 recommendations, details of which are attached to this report as appendix 4. It should be noted that at the beginning of the inspection the Council was advised that there would be 20 recommendations and the inspectors' findings would inform the level and priority of the recommendations made.

4. Management Comments on the Inspection Findings

4.1 Action Plan

An action plan to address the 11 recommendations made has now been produced and will be submitted to the Department for Work and Pensions on request. All action points will be addressed by March 2008

4.2 Impact of the new system implementation

The last financial year was an exceptional year because of the implementation of a new computer system, for which consolidation and recovery had a direct impact on the speed of processing and accuracy of claims. This is consistent with other large Mets that have gone through a system implementation and for whom performance was affected for at least nine months following implementation.

The following information supports this (it is just unfortunate that we had inspectors on site during this recovery period).

Liverpool went live October 2003 and their reported statistics for new claims processing were:

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
2003/4			140 days	167 days
2004/5	124 days	100 days	79 days	41 days

Leeds went live March 2004 and their reported statistics for new claims processing were:

	Quarter 1	Quarter 2	Quarter 3	Quarter 4
2004/5	108 days	97 days	unreported	69 days

As expected, 6 of the 11 recommendations relate to issues connected with the new system. As with any major system implementation, there continues to be for some time after implementation a process of challenging the system set up and the management information and data held and how this is used by the Council on a practical level. Work is now ongoing on all the system administration and control weaknesses as identified by the BFI, with a Post Implementation Review Audit due to be carried out by the Council's Audit section shortly.

4.3 Current performance levels

In terms of current performance, incremental improvements continue to be made and for the final quarter of the 2006/7 financial year and the beginning of this year, performance is now at acceptable levels for new claims processing, with performance below 35 days for both April and May. The intention is to continue this upward profile throughout the year ahead, with further work to improve the speed of processing changes of circumstances.

The following information shows the recent improvements for the main Benefits PMs.

- Average time to process new claims
Target 2006/7 38 days (Performance Measure 1)

Quarter 1	Quarter 2	Quarter 3	Quarter 4
73 days	75 days	70.6 days	37.5 days

- Percentage of new claims outstanding over 50 days
Target 2006/7 10% (Performance Measure 2)

Quarter 1	Quarter 2	Quarter 3	Quarter 4
49%	44%	19.1%	7.7%

- Average time to process change of circumstances
Target 2006/7 10 days (Performance Measure 5)

Quarter 1	Quarter 2	Quarter 3	Quarter 4
23 days	31 days	29.1 days	11.7 days

- Percentage of claims calculated accurately first time.
Target 2006/7 99% (Performance Measure 6)

Quarter 1	Quarter 2	Quarter 3	Quarter 4
96%	97.6%	98.4%	100%

The Council has also just undertaken the self-assessment for the 2007 Benefits administration part of the Council's CPA process. This has given a score of 3 out of the 4-point scale. Details will now be passed to the Audit Commission for validation and checking.

Conclusions

The report by the BFI was balanced and made appropriate and accepted recommendations, all of which will be actioned within the current financial year.

The BFI inspectors provided assurance to the Council that in their view the Council was operating a secure benefits service, with new claims and changes of circumstances verified and checked to a high standard.

The concerns about the delays in speed of processing have been accepted. After a challenging year following the implementation of a new Benefits processing system, performance in all areas of benefits administration is now improving to acceptable levels and customers are receiving benefits promptly.

Richard Paver
City Treasurer

Appendix 1 - BFI Press Release

Benefit Fraud Inspectorate (BFI) Inspection Report on Manchester City Council

Not to be published or broadcast before 09.30 hours – 22 May 2007

The Secretary of State for Work and Pensions, John Hutton, has today published an inspection report by the BFI on Manchester City Council.

In 2005/06 Manchester City Council administered some £225 million in housing benefits, about 16% of its gross revenue expenditure.

Manchester City Council had secure benefits administration processes, with new claims and changes of circumstances verified and checked to a high standard. All staff involved in verifying supporting evidence had been trained in the requirements of the Department's HB/CTB Security Guidance.

Interventions were well controlled and the average time taken to process new claims had improved from 72 days in June 2006 to 38 days in February 2007.

The implementation of a new IT system together with high levels of staff turnover had contributed to a high volume of outstanding claims and changes of circumstances. However, Manchester City Council was addressing these issues and the arrears of work were being brought under control.

Despite the measures that had been put in place by management to control the new claims process, delays were identified at key stages and the speed of processing of changes of circumstances had deteriorated.

There was a question over the integrity of the changes of circumstances data held on the Benefits IT system and the accuracy of the management information it provided. This was caused by a combination of IT system problems and user error. We were also concerned about the high number of staff who had high-level access privileges to the Benefits IT system.

Manchester City Council responded positively to the issues that were raised and said that remedial action would be taken.

BFI is an independent unit within the Department for Work and Pensions that reports directly to the Secretary of State for Work and Pensions on the standard of benefit administration and counter-fraud activity.

James Plaskitt, Minister for Housing and Anti-Fraud, announced the publication of the report in a written ministerial statement.

Appendix 2 - Extract from BFI Executive Summary, Overall Performance

- 1.15 Manchester City Council was operating a secure benefits service with new claims and changes of circumstances verified and checked to a high standard. Interventions were well controlled and speed of new claims processing, which was averaging 71 days in the third quarter of 2006/07, had improved to 38 days in February 2007. The extensive management checking carried out by the Benefits service demonstrated the council's commitment to providing a high level of accuracy in its claims processing. Our sampling confirmed that all new claims had been correctly assessed.
- 1.16 The council had exceeded the revised interventions target for the number of claimants visited. Good validation and monitoring procedures were in place and all staff involved in the verification of supporting evidence had been trained in the requirements of the Department's HB/CTB Security Guidance
- 1.17 To minimise evictions the council had developed good working relationships with landlords and was working with external stakeholders to promote benefit take-up. It had also conducted several campaigns and initiatives targeted at specific sections of the community.
- 1.18 Despite the measures that had been put in place by management to control the new claims process, delays were identified at key stages in the process, and the speed of processing for changes of circumstances had deteriorated.
- 1.19 There was a question over the integrity of the changes of circumstances data held on the Benefits IT system and the accuracy of the management information it provided. This was caused by a combination of IT system problems and user error.
- 1.20 We were concerned about the number of staff who had Benefits IT system high-level access privileges.
- 1.21 The council responded positively to the issues we raised and we were told that remedial action would be taken.

Appendix 3- Summary of BFI Findings

Focused Inspections – Claims processing		
	Met	Not met
Theme: Claims administration		
PM1 Performance Indicator for average speed of processing new claims (Standard 36 days)		N
PM2 Percentage of new claims outstanding over 50 days (Standard 10%)		N
PM3 Percentage of new claims decided within 14 days of receiving all information (Standard 90%)		N
PM4 Percentage of Rent Allowance claims paid on time within 7 days of decision being made (Standard 90%)		N
PM5 Performance Indicator for average speed of processing change of circumstances (Standard 9 days - subject to review)		N
PM6 Performance Indicator for accuracy of processing (Standard 99%)		
E1 Information is held at team or section level about the volume of work received, work actioned and work outstanding each month, if not more frequently. Trends and patterns in workloads are monitored and work priorities and resources are adjusted to prevent and/or manage down backlogs.	Y	
E2 The LA has clear systems, that it can demonstrate are working, to act on information received from Jobcentre Plus to make extended payments and to prioritise the processing of claims for customers moving into work.	Y	
E3 The need for information from the customer and third parties such as landlords is identified within 7 days of receipt of the claim or notification of change of circumstances with action taken to obtain it. There are routine, rapid arrangements for providing a certificate of earnings form for the employer to complete, allowing the change of circumstances or new claim to be processed rapidly, with safeguards to prevent fraud.	Y	
E4 The LA sends reminders or makes other contact with the customer, before the expiry of the 4 week or one month period within that the customer has been asked to supply further information or evidence.	Y	
E5 The LA has systems in place to prioritise action on changes of circumstances that lead to a reduction in, or a cessation of, benefit to minimise the occurrence of overpayments.	Y	
E6 The LA claim form(s) meets the relevant requirements as set out in the DWP series of HCTB1 claim forms and the standard application form used by all tenants contains consent wording to allow the sharing of information on the progress of the claim with the landlord in direct payment cases.	Y	
E7 The LA uses a form of consent that is specific about what the landlord can be told; and the LA accepts clear self-standing requests signed by the customer for a landlord or representative to make enquiries on the customer's behalf.	Y	
E8 The local authority communicates effectively with landlords by providing clear practical advice on the operation of HB, and landlords, including the LA landlord, are actively encouraged to contact the HB section before taking enforcement action for collection of rent arrears when the arrears are due to a delay in the payment of HB.	Y	
E9 Fully trained employees operate a risk assessment based and auditable checking regime to check for error in the system. The regime includes: <ul style="list-style-type: none"> the statistical accuracy checks for the correct number of cases required by the Performance Indicator sampling and checking 	Y	

methodology, in accordance with HB/CTB Circulars S1/2000 and minimum 4% sample across a range of decisions on new claims, <ul style="list-style-type: none"> a minimum 4% sample across a range of decisions on new claims, changes of circumstance amendments and overpayment calculations before a payment or decision notice is issued. New claims within the 4% sample attract a full check. For changes of circumstances within the 4% sample, the check covers the last user action or is a full check, if on the basis of risk the LA decides it is necessary. 		
E10 In tandem with its targeted review activity, the LA analyses the results of all management and accuracy checks across a full range of its activities, including counter-fraud and uses its findings to identify the overall level of error in its caseload, inform training plans and the appraisal process and deliver continuous improvement in its performance and service delivery.	Y	
Theme: Security		
PM10 Number of interventions where review action commenced in the last quarter	Y	
PM11 Percentage of data-matches resolved within two months (Standard is 100%)	Y	
PM12 Number of claimants visited (Standard is the published annual visits target for reviews per A34/2004 revised for the year)	Y	
E17 The LA ensures a person making a claim or notifying a change of circumstances furnishes all the certificates, documents, information and other evidence in its original form to support the claim as they may reasonably require, to the standard of VF.	Y	
E18 All employees responsible for receiving and verifying documents are trained on the latest evidence requirements; including identifying false documents and following up discrepancies, and apply this in order to comply with the relevant legislation.	Y	
E19 The local authority provides data (the HBMS extract) in 'loadable' state for all 12 months on specified dates, ensuring the accuracy of customer NINOs recorded on their benefit systems: 98% to match with DWP records. All incidents rated 1 & 2 by HBMS to be resolved within a maximum of 3 months unless otherwise agreed with HBMS.	Y	
E32 The LA has chosen to use and operates the "do not re-direct" (DNR) scheme in accordance with the legislation and procedural guidance, see <i>HB/CTB Circular Security Manual, Do Not Redirect Service</i> .	Y	
Theme: User focus		
E38 The local authority has a written strategy or plan, covering issues of customer service, availability of help and advice, and access, to encourage take-up of HB/CTB that goes beyond the first step of raising awareness, and works in partnership with other stakeholders, such as The Pension Service, LA Welfare Rights Services, CAB and voluntary groups, to ensure that eligible customers are enabled to make successful claims.	Y	
E39 The local authority carries out targeted campaigns on under-claiming sections of the community, ensuring that assistance is given to eligible customers to make a claim and evaluates the results. The LA does this with in conjunction with other stakeholders when this will add value.	Y	
E41 Decisions on claims are notified promptly to customers and, if relevant, third parties, and are written concisely, with the reader in mind and in the right tone. Letters state the decision clearly, do not contain jargon and explain technical terms such as "non-dependent." Overpayment decisions are notified to the person(s) affected within 14 days of the final calculation	Y	
E42 Staff have been set and are achieving targets, which as a minimum reflect corporate customer service targets for dealing with enquiries made		N

by telephone, in person, by letter or e-mail, and the local authority monitors performance against the targets.		
E43 The local authority provides an over-the-counter service for customers presenting completed claim forms and evidence and verifies them to the standard of the VF, so that customers can avoid sending in key documents	Y	
E43 The local authority provides an over-the-counter service for customers presenting completed claim forms and evidence and verifies them to the standard of the VF, so that customers can avoid sending in key documents.	Y	
E44 Local Service Level Agreements (SLAs), model SLA, or Partnership agreements are in place with organisations connected with benefits delivery. These will include Jobcentre Plus, The Pension Service, the Rent Service, the Appeals Service and Debt Management services. If a national model SLA exists, this should be adopted as the minimum requirement.	Y	
E45 The local authority monitors and reviews all its SLAs in accordance with the arrangements set out in each SLA, with action taken to improve effectiveness and security as indicated by the monitoring report	Y	
E46 The local authority maintains regular contact, supported by formalised and documented working arrangements if considered appropriate, with other organisations, for example Registered Social Landlords (RSLs), advice agencies, police, Crown Prosecution Service or Procurator Fiscal in Scotland	Y	
E47 Nominated skilled individuals are responsible for handling queries, disputes, requests for reconsideration/revision, appeals referrals, ensuring they are correct in law, and representing the local authority case at tribunal hearings	Y	
E48 Decisions from appeals tribunals are implemented as soon as practicable - the local authority seeks to complete this action within 4 calendar weeks.	Y	
E49 There are clear procedures and the local authority sets targets that as a minimum match corporate targets for dealing with complaints. Customers are advised how they can make a complaint. Complaints are identified, registered, and their progress monitored. Effective remedial action is taken to address the causes of complaints.	Y	
Theme: Resource management		
E50 The local authority sets targets that are comprehensive in scope, include the statutory PIs, are stretching and provide a baseline of current performance.	Y	
E51 There are arrangements in place to monitor the delivery of plans and targets on a quarterly basis (including if appropriate resources to monitor outsourced elements in line with contracts) to inform senior officers and Members.	Y	
E52 The local authority has documented arrangements to manage risks to the service provision to ensure business continuity during change programmes and emergencies.	Y	
E53 The local authority provides accurate and timely MIS data, HBMS data, quarterly performance measure data and annual self-assessment returns against the Performance Standards.		N
E54 The local authority identifies where statutory PI targets and standards for performance measures are not being achieved and establishes the reasons so that corrective action can be implemented for the future.	Y	
E55 There are up-to-date documented recruitment, induction, training, codes of conduct including pre-appointment checks and declaration of interest protocols, appraisal, retention and diversity strategies, whether corporate or specific to the Benefits Service.		N
E56 The local authority provides a structured training programme underpinned with training material that recognises the different skills bases, competencies and professional qualifications needed by benefit processors, overpayment recovery officers, customer facing employees, fraud investigators, supervisors and managers	Y	
E59 The IT systems support all aspects of paying and accounting for	Y	

benefit, including counter-fraud and debt recovery, and interfaces effectively with other relevant council IT systems. They provide accurate management and statistical information and enable production of ad hoc management information and exception reports.		
E61 There are IT security and testing protocols and processes, including a secure user environment through password controlled access, to ensure that users only have the appropriate access to IT systems.		N
E62 The local authority has secure post opening procedures with all relevant items dealt with to VF standards or their equivalent, with protocols and processes for the secure control of case documents, cheques, receipts, automated payments and other valuable items including their return to the customer when appropriate.		N
E63 The local authority carries out a check, which includes a sample case check, on its quarterly performance measure data to validate user input before submitting it to DWP	Y	
E64 There is a risk based Internal Audit programme to examine the Benefit Service's working practices and IT functionality for compliance with documented procedural guidance and legislative requirements.		N
E65 The local authority implements agreed recommendations from internal and external audit and inspection reports.	Y	

Appendix 4 - Summary of BFI recommendations

High priority	
We recommend that Manchester City Council:	
1	<ul style="list-style-type: none"> investigates the reasons for the delays found at all key stages in the new claims process to improve the speed of claims administration
2	<ul style="list-style-type: none"> analyses and identifies the reasons why customers fail to provide all supporting evidence when submitting a claim to minimise the number submitted without supporting evidence
3	<ul style="list-style-type: none"> reports accurate performance to the Department by undertaking management checks on the Benefits IT system to ensure that: <ul style="list-style-type: none"> changes of circumstances are correctly recorded correct effective dates are entered speed of processing is calculated accurately
4	<ul style="list-style-type: none"> <i>This recommendation is excluded from the published version and covers access rules and rights to the system.</i>
5	<ul style="list-style-type: none"> ensures that the Benefits service complies with corporate IT guidance for the number of staff who have high-level system privileges and can provide assurance that they are adequately trained and competent to fulfil this responsible role
6	<ul style="list-style-type: none"> ensures Internal audit urgently carries out a post implementation review of the Benefits IT system to provide assurance to senior officers and Members of: <ul style="list-style-type: none"> compliance with legislative requirements security and integrity of the data.
Medium priority	
7	<ul style="list-style-type: none"> ensures that formal testing procedures are put in place for Benefits IT system updates and that a formal acceptance procedure for relevant stakeholders is introduced
8	<ul style="list-style-type: none"> carries out management checks to ensure that all of the requirements of the Department's Memorandum of Understanding for access to its Customer Information System are complied with
9	<ul style="list-style-type: none"> ensures that the weaknesses identified in the Benefits service's post-opening process are addressed and that appropriate management checks are carried out.
Low priority	
10	<ul style="list-style-type: none"> ensures that Benefits service staff are made aware of customer service targets and that performance against all corporate targets is monitored
11	<ul style="list-style-type: none"> ensures that documented corporate policies and procedures are updated and that these documents are subjected to standard document management principles which includes version control.