

REPORT TO: Policy and Performance Review Committee

MEETING DATE: 29 April 2014

BY: Depute Chief Executive - Resources and People Services

SUBJECT: Welfare Reform Update

1 PURPOSE

- 1.1 To provide an update to PPRC Members on the changes introduced as a consequence of the Welfare Reform Act (2012).
- 1.2 To continue to develop an understanding of what these changes have meant for East Lothian households sustaining affordable tenancies or contending with other hardship.
- 1.3 To develop an understanding of what these changes have meant for a number of Council services and to highlight the measures the Council is continuing to take to try to minimise potentially negative impacts of welfare reform in the community.

2 RECOMMENDATIONS

PPRC agrees to:

- 2.1 note the potential impact of welfare reform on individuals and families.
- 2.2 note the potential impact of welfare reform on the delivery of associated Council services.
- 2.3 note the potential impact on the Council's revenues and council house rental income.

3 BACKGROUND

- 3.1 This report is the latest in a series of reports to Elected Members providing information on the UK Government's welfare reforms, the consequential changes to Council Services and the continuing impact on East Lothian residents.

- 3.2 Over the course of the last 21 months the Welfare Reform Task Group has considered the service implications of the various welfare reforms and in response has produced a Welfare Reform action plan which has been continually reviewed and updated. The Council's Corporate Risk Register was reviewed in 2013 to include Welfare Reform as a risk to a range of Council services.
- 3.3 A Welfare Reform Reference Group has facilitated liaison between Council Services, partners and stakeholders who share an interest in welfare reform. Members of this group include; Housing Associations, Health, East Lothian Tenants & Residents Panel, (ELTRP), DWP and Advice Agencies. Quarterly meetings of the group provide the opportunity for welfare reform updates and information sharing.
- 3.4 With the implementation of a number of significant welfare changes on 1st April 2013 Council Services have had to adapt the way they deliver services to ensure that they remain effective in keeping the detrimental effects on East Lothian residents to a minimum. Whilst this has been a challenging task it should be noted that further reforms associated with the introduction of Universal Credit have been delayed. This slippage has meant that in addition to coping with changes to the existing schemes the Council is obliged to continue to deliver a Housing Benefit Service for longer than had initially been envisaged.

Council Tax Reduction Scheme

- 3.5 The ELC Benefits Service has been administering the Scottish Government's Council Tax Reduction, (CTR) scheme since 1 April 2013. Whilst the legislative and funding framework for the CTR scheme is fundamentally different from the Council Tax Benefit scheme it replaced, the fact that claimants have experienced little or no change financially in their CTR awards throughout 2013/14 has meant that the overall change has had a low impact on East Lothian Council Tax Payers.
- 3.6 Since its implementation the Scottish Government has appointed the Scottish Tribunal Service to provide an independent [review panel for Council Tax Reduction scheme](#) decisions made by local authorities. The ELC Benefits Service is yet to submit any cases to the CTR Review Panel. In the meantime Housing Benefit appeals are still being heard by the Tribunals Service.

Scottish Government funding for the CTR scheme in 2014/15 will remain unchanged from 2013/14 levels however the increasing number of properties which Council Tax is charged on raises the possibility of an increase in the number of CTR claims having to be met from an already cash limited, fixed sum. (This differs from the previous Council Tax Benefit funding arrangement which was demand led).

Scottish Welfare Fund

- 3.7 Since 1 April 2013 the ELC Benefits Service has been administering Crisis Grants, (CGs) and Community Care Grants, (CCGs) as part of the

Scottish Government's '2 year' interim Scottish Welfare Fund, (SWF) scheme. These grants replaced 2 elements of the Social Fund, (loans) scheme which were previously administered by the DWP. The Scottish Government have confirmed that SWF will become a permanent scheme to be administered by Councils from April 2015.

- 3.8 During the period April to December 2013 the Benefit Service was able to support 2238 claimants by making SWF awards. Some of these people were experiencing hardship which posed a threat to their health and safety whilst others were at risk of losing their ability to live independently. The awards ranged from cash payments averaging £96.00 and store vouchers made in respect of Crisis Grants, (CGs) to the supply and fitting of white goods, carpeting, bedding and furniture in respect of Community Care Grants, (CCGs) averaging £503.00.
- 3.9 A further Welfare Reform video is currently being produced to publicise how a CG award can help support people whose ability to sustain independent living could be at risk. This video has been based on a real-life case study and hopes to highlight the positive effect that a Community Care Grant can have.
- 3.10 In its first year of operation, SWF expenditure across Scotland has varied widely however an overall under spend of the fund is expected for 2013/14. During the first 2 quarters of 2013/14 SWF expenditure in East Lothian was below the projected spend profile. However, following the Scottish Government's easing of SWF Guidance in October 2013 East Lothian exceeded its profiled SWF expenditure during the second half of 2013/14 ensuring that a 100% disbursement of the £390,238 SWF budget was achieved by 31 March 2014. It is evident that now this level of demand has been established the SWF will need to be carefully managed throughout 2014/15 in order to remain within budget.
- 3.11 The Council's SWF budget for 2014/15 remains unchanged for the second year of the scheme. Aside from the 'program' funding of £390,200 the Benefits Service will also receive a SWF administration grant of £57,1200 which will continue to be used to sustain Benefit Service staffing levels through a period of ongoing Housing Benefit Administrative Subsidy cuts and Efficient Workforce Management savings.
- 3.12 Whilst the Benefits Service has successfully implemented and embedded the Scottish Welfare Fund administration in a way that ensures that a holistic service is available to East Lothian Residents, the additional work involved has equated to a 26% rise in caseload. This has meant that there has been a consequential negative impact on HB/CTR performance. During 2013/14 HB/CTR claims performance fell from an average of 23 to 27 days for processing 'new claims', (2 days short of the Service's 25 days target). Weekly work counts of HB/CTR caseload regularly show a 50% to 55% increase in outstanding work due to the priority being given to SWF assessments.

- 3.13 Indications from the first year of operation suggest that Local Authorities are exercising good stewardship of the SWF and are in the main achieving better outcomes for clients than those previously achieved by the Social Fund. Decisions are being made promptly and awards are being made within the timescales set by the SWF Guidance. There have been very few requests for 1st tier review of SWF decisions, and only one that has progressed to a 2nd tier review.
- 3.14 The preferred means of accessing the SWF service is through the on-line claim form however the majority of claimants have been accessing the service either via the telephone or by submitting paper based claims. A significant number of claims have been assisted by Tenancy Support staff and other Council Officers who are in a position to advise residents dealing with hardship. Meanwhile the Benefits Service is continuing to raise awareness amongst Customer Services, advice agencies, Adult and Children's Wellbeing colleagues to ensure optimal co-ordination between the various forms of support available from the Council. Currently crisis payments are paid from the Haddington and Musselburgh offices. The option to extend payment facilities to other local offices is being considered however this will be determined by the available capacity for the Benefit Service to exercise sufficient financial control.
- 3.15 The Benefits Service has endeavoured to provide as holistic a service as possible and will continue to develop its contacts to improve its capacity for signposting and referring clients on for further support and advice. The Unit already has established links to a number of Third Sector organisations which operate within the County and is currently the East Lothian Food Bank's largest referral agency.
- 3.16 From the Benefits Unit's perspective staff have had to become used to exercising more discretion than previously required when making HB/CTR decisions. Whilst the holistic approach to delivering the service has been beneficial for clients, each case represents a major time commitment in liaising between clients, internal/external agencies and the contracted domestic goods providers.
- 3.17 The Benefits Service has continued to be represented at CoSLA's SWF Practitioner's Group meetings in order to maintain its currency in SWF practice and the SWF service is frequently a topic of discussions held with stakeholders at Welfare Reform Reference Group meetings.
- 3.18 As the programme of welfare reforms continues it is evident that the Scottish Welfare Fund will continue to be an important component in the Council's efforts to minimise the effects of poverty and hardship on the lives of East Lothian residents. To assist in this a Scottish Welfare Fund Policy will be developed to ensure that the Fund is administered within an East Lothian context in line with SWF Guidance supplied by the Scottish Government. The development of this Policy will also draw on the Unit's experience to-date in delivering this new service.

Housing Benefit Under Occupancy

- 3.19 On 1 April 2013 a Housing Benefit Under Occupancy Supplement was introduced. Commonly referred to as the 'Bedroom Tax' the supplement is actually a restriction applied to the amount of Housing Benefit awarded to claimants who are under occupying their Council or Housing Association tenancy. Tenants under occupying by 1 bedroom are subject to a 14% reduction in the eligible rent used to calculate their HB whilst Tenants under occupying by 2 or more bedrooms are subject to a 25% reduction.
- 3.20 In preparation for this change the Council's Benefits and Community Housing Services worked together to identify those that would be affected by under occupancy and sought to engage with Council Tenants that were to be affected in order to make them aware of both the change and options that may be available to them. The Benefit Unit also worked closely with Housing Associations in order to facilitate similar work carried out by them on behalf of their tenants.
- 3.21 In the months preceding April 2013 approximately 840 Council tenants received 2 separate letters to alert them to how the changes would affect their Housing Benefit. In addition to this the under occupancy change was publicised in the 'Homefront' tenant's newspaper. Each letter issued contained a copy of a leaflet entitled 'Important Changes to Housing Benefit' along with further information about options for downsizing etc. This information continues to be available through local offices, libraries and the Council's [Welfare Reform web pages](#) have been updated to include information about under occupancy and other Welfare Reforms.
- 3.22 Since its introduction Area Housing Officers and Rent Income Officers have continued to engage with tenants affected by under occupancy, offering to meet them face to face to advise on their options including downsizing and mutual exchanges. Advice on claiming Discretionary Housing Payments, (DHP) has also been provided as well as information on where to get money advice and tenancy support has been offered where appropriate.
- 3.23 In an effort to limit how under occupancy affects new tenants Housing Officers are now advising all new tenants allocated houses with bedrooms they will under occupy about the charge and confirming that they understand they will be liable for the additional rent charge even when awarded maximum HB.

In an effort to encourage residents concerned about under occupancy, rent arrears or welfare reform related matters to seek appropriate help and advice the Council has produced a range of videos entitled 'East Lothian Debt, Benefits and Housing Advice'. These videos are available to view through the Council's [Youtube page](#) and stress the need for people to seek advice as early as possible.

- 3.24 Since October 2012 when the Council began engaging with households regarding under occupancy the Community Housing service has seen an increased number of transfer and mutual exchange applications from

tenants. Analysis of transfers and mutual exchanges is being carried out to monitor how the under occupancy change is affecting Tenant's behaviour. However the lack of appropriately sized housing stock is likely to continue to restrict housing options for those currently under occupying.

- 3.25 Since its introduction the Rent Income Team have been monitoring the affect of the under occupancy charge on rent collection. Whilst it is estimated that this change resulted in £345,000 less Housing Benefit being awarded to the Council Tenants affected, analysis of actual non payment of rent throughout 2013/14 has suggested that rent arrears have increased by £132,000 due to under occupancy. However it should be noted that the dynamics associated with under occupancy makes analysis of these figures very difficult. Whilst rent arrears are directly affected by this change it is more difficult to assess what other factors may be impacting on a tenant's ability to pay. It should be borne in mind that aside from the ongoing issues affecting employment and the economy it is also likely that East Lothian households relying on Housing Benefit for assistance with paying their rent may have also experienced cuts in other welfare benefits which have been changed by the welfare reforms.
- 3.26 Despite offers of advice and the potential assistance available from (DHP) awards, some tenants affected by under occupancy have not engaged with either Rent Income, Community Housing or Benefit Service staff and consequentially many have incurred rent arrears as a result of not paying the under occupancy element of their rent. It is likely that a number of these cases will be served with a notice of repossession.
- 3.27 HRA funding allocated to help with rent collection has provided additional staffing resource, enabling the Rent Income Team to manage the increased workload which has arisen due to the impact of the welfare reforms, (including under occupancy). The Team has significantly increased the number of visits to tenants in their own homes, where Officers will negotiate repayment, promote direct debit, signpost financial advice and encourage benefit take up. The team also work with Community Housing colleagues when under occupancy arrears are identified and Housing options need to be explored.

Additional 'Scottish Legal Aid Board' (SLAB) funding has also been secured by the Council to provide 2 temporary Tenancy Support workers who have been deployed within the Homelessness Team. This provides welfare benefits, money and debt advice to tenants of East Lothian Council and other social landlords. Advice is provided on a face-to-face basis, in locations throughout the council. These posts are funded until March 2015.

- 3.28 As part of the combined effort being made by Council Services involved in responding to under occupancy HB claimants who are affected are being advised about and (where appropriate) assisted in claiming Discretionary Housing Payments, (DHPs). Whilst DHPs are not intended to be a long term solution for under occupancy charges, in many cases

they are providing a temporary measure which allows the claimant a transition period in which to adjust to paying the revised rent charge.

- 3.29 Throughout the course of 2013/14 DHP has come to be seen as an important element of mitigation for the impact of the under occupancy changes. As such it has attracted additional funding from both the DWP and Scottish Government. (See DHP section below).

Benefit Cap

- 3.30 After an initial delay in implementing the Benefit Cap this welfare change was rolled out across Scotland over a 4 week period which started week commencing 15 July 2013. The principle of this cap is to ensure that no one in receipt of welfare benefits will be allowed to exceed average earnings. In order to achieve this, the level of Housing Benefit is reduced in order to apply the overall Benefit Cap.
- 3.31 It was established that approximately 30 East Lothian households were affected. In addition to the DWP corresponding with those affected the Benefit Unit liaised with the Community Housing Service and Housing Associations in order to inform any proactive work that could be done by them to help reduce their tenant's exposure to the cap.
- 3.32 As a result of this work and decisions made by individual tenants to reduce their housing costs the final total of households actually affected by the Benefit Cap in East Lothian was managed down to 18. Of these 2 were Council tenants, 2 were Housing Association tenants, 4 were Homelessness clients housed in Private Sector Leasing temporary accommodation and the remainder were claimants renting in the private sector.
- 3.33 Whilst the management of these cases has helped reduce the number of East Lothian HB claimant's exposed to the Benefit Cap it should be noted that the implications for those still affected can be significant. Such cases are rare since they normally feature larger families housed in expensive, often temporary accommodation. However the Benefit Cap creates an imperative for the small number of cases to be managed into more affordable accommodation.

Discretionary Housing Payments

- 3.34 In anticipation of the potential detriment likely to be experienced by claimants affected by various Welfare Reforms introduced on 1 April 2013 the DWP initially allocated £125,982 towards East Lothian Council's 2013/14 DHP funding pot. The Council approved additional DHP funding provision of £80,000 within the 2013/14 Revenues & Benefits Budget providing a total DHP fund of £205,982 to be administered by the Benefits Service.
- 3.35 Subsequently, (on 31 July 2013) the DWP informed the Council that the Government contribution would increase to £137,196 taking the total available DHP fund to £217,196. In response to this the DHP Policy, was revised to take account of the additional funding and this informed the Benefits Service's approach to DHP decision making.

- 3.36 On 2 October 2013 the Scottish Government made additional funding available for Councils to top up their contributions towards DHP budgets. This required a further review of the DHP Policy and provided the Council's DHP fund with an additional £203,724. If added to the existing ELC and DWP contributions this would have given an overall total which would have significantly exceeded the maximum permitted total of **£342,990** set by the DWP.
- 3.37 The announcement of this funding so late in the financial year presented the Benefits Service with a major challenge. To make best use of all available funds only £2,070 of the original ELC contribution was used to bring SWF funding up to the maximum permitted total, (**i.e. £342,990**) and the balance of the Council's contribution was retained within the Benefit Service's budget to be used to provide a temporary staffing resource for a DHP Take-Up Campaign. This has ensured that the Benefits Service has had sufficient resource to disburse the 100% of all available DHP funding in 2013/14. As a result the campaign was allocated 3 temporary Grade 4 Benefit Assistants and has been managed by the Benefits Training and Development Officer as an additional duty.
- 3.38 From 17 December 2013 the Benefits Unit DHP Take-Up Campaign has been used to augment the work of the Benefits Processing Teams by providing a telephone and visiting capability. By 31 March 2014 the Benefit Service had made 715 DHP awards, (298 as a result of the campaign). This work along with referrals made by Rent Income, Community Housing and other Officers has ensured that 100% of the available DHP budget has been used to minimise housing related detriment being experienced by East Lothian residents.
- 3.39 Of the 715 DHP awards, 450 of them have been made to Council tenants receiving Housing Benefit who were also experiencing difficulty in maintaining their rent payments. These awards have contributed **£144,220** towards Council rent accounts and have provided a level of mitigation for increasing levels of rent arrears attributed to under occupancy and other welfare reform related hardship. A total of 265 DHP awards totalling £187,787 have been made to Housing Association tenants and HB claimants renting private sector tenancies. These awards have helped Housing Benefit claimants maintain their Private Sector and other Social Sector tenancies, thereby reducing pressure on the Council's Homelessness Service and Housing stock.
- 3.40 In deciding DHP awards Benefit decision makers must consider a range of factors including the extent of any rent shortfall, the reasons for it and whether the claimant has any alternative means of meeting it. Whilst Under occupancy has become a major factor in this assessment it should be borne in mind that DHP is also continuing to assist people experiencing hardship for an increasing number of reasons.

Wider Welfare Reforms

- 3.41 Aside from the impact of the reforms on the Benefits administered directly by the Council it must be borne in mind that East Lothian residents continue to be affected by ongoing changes to other welfare benefits. Whilst in many instances these changes may have a neutral effect, in others it may result in both less income to the household and a higher rent to pay, (where the result of such a change impacts on the Housing Benefit and Council Tax Reduction assessment).
- 3.42 Since October 2013 the DWP have been working through a program which will eventually see people aged 16 to 64 who are currently entitled to receive Disability Living Allowance, (DLA) migrate on to Personal Independence Payments, (PiPs). In cases where the transfer takes place little or no detriment should occur however in some instances the review process could result in entitlement to either DLA or PiP being withdrawn or see a disability premium awarded at a rate which can have a detrimental effect on HB/CTR claimant's non dependant disregards.
- 3.43 The DWP are also continuing to migrate Incapacity Benefit claimants on to Employment Support Allowance, (ESA). Whilst this program has been underway since before the current welfare reforms started its roll out is now involving an increasing number of people. Those that are awarded ESA at a lower rate may receive some transitional protection however in many cases the associated 'Work Capability Assessment' (WCA) is resulting in claimants failing to qualify for ESA. The UK Government expects 50% of those found fit for work by the WCA to move on to Job Seeker's Allowance, 20% to move on to another benefit and 30% to move off Benefits altogether.
- 3.44 Due to the significant financial impact of WCA decisions many have been challenged. ELC Welfare Rights report that work associated with ESA related advice and involvement in representing clients at Social Security Appeals Tribunals continues to increase as a result.
- 3.45 In introducing the current Welfare Reforms the DWP is introducing a higher degree of 'conditionality' into the administration of claims. In October 2013 the Job Centre introduced the '[Claimant Commitment](#)' as part of the Jobseeker's agreement. This outlines what actions a claimant must carry out whilst receiving Job Seeker's Allowance, (JSA). It emphasises the claimant's responsibility to do all they can to look for work in return for the support they receive from the state.
- 3.46 In order to enforce the conditionality associated with the Claimant Commitment Job Centre Plus staff are able to apply sanctions to claimant's benefit entitlement where they have not complied with the Job Seeker's agreement. Lower level sanctions resulting in a disentanglement of JSA for a period ranging from 4 to 13 weeks can be applied in respect of a claimant failing to attend interviews or not actively seeking work. Higher level sanctions resulting in disallowance for a period of up to 3 years can be applied in respect of a claimant leaving a job or failing to take a job without good cause.

- 3.47 In its dealings with Job Centre Plus the Benefits Service's early experience of the recently introduced sanction regime to date has seen little in the way of a knock on impact for householders in receipt of JSA who are claiming HB/CTR. In discussions held at Welfare Reform Reference Group Meetings and other partnership forums, conditionality and sanctions remain a concern for Welfare Rights, Social Landlords and third sector agencies. It is believed that young people may be particularly at risk and in response a further welfare reform video aimed at informing this group on how to avoid sanctions is being produced.
- 3.48 As part of the Welfare Reform program the UK Government has decided to rationalise its approach to Benefit and Tax Credit fraud investigations. This rationalisation involves the creation of a Single Fraud Investigation Service, (SFIS) which will encompass DWP, HMRC and Local Authority Benefit Fraud Investigation elements.
- 3.49 Whilst the Council is yet to be informed of the exact timeframe involved it is understood that the ELC Benefit Fraud Investigation Team is to become part of an SFIS Team based in DWP offices. This change will see ELC Fraud Investigation staff transfer into DWP under a 'Cabinet Office Statement of Practice, (COSOP) agreement. The Revenues Manager and ELC Human Resources staff are currently liaising with their DWP counterparts to achieve as smooth a transition as possible.
- 3.50 It should be noted that in recent years the ELC Benefits Fraud Investigation Team has enjoyed a high degree of success in its prosecution rates. Given these changes the Benefits Service will be looking to establish a Service Level agreement with the new SFIS service which provides assurance that Housing Benefit Fraud in East Lothian is investigated thoroughly and that cases referred by the service are considered for prosecution in order to provide a continuing high level of deterrence to potential benefit fraud.

Universal Credit

- 3.51 The DWP's original plan for Universal Credit, (UC) was to start rolling it out for new claims for working age claimants by October 2013. It was understood that the migration of HB claims into UC would see a decline in the associated financial support given to Councils in respect of HB administration. In response the ELC Benefits Services had planned for a migration of the working age HB caseload throughout 2014/15 and prepared by integrating other welfare/financial assessment functions within the service in order to provide funding from a mix of sources, (as well as provide a more holistic Benefits service). Delays in the Universal Credit program have meant that to-date only a small number of DWP districts have been involved in pilot projects which have seen only limited groups of claimants move on to Universal Credit.
- 3.52 Currently the Inverness Job Centre is the only one in Scotland involved in administering claims as part of the UC pilot. A date for roll out in the Lothians is yet to be confirmed however once it begins it will eventually see a managed migration of Housing Benefit caseload away from Local Authority administration to the DWP. At this point in time it is expected

that it will be 2016 before we see any significant amount of UC claims in Scotland however the DWP have stated that the migration of claims will be completed by 2017. In the meantime it is expected that the DWP will continue to reduce the financial support associated with HB administration.

- 3.53 As the Universal Credit programme moves towards national roll-out it is becoming apparent that UK Ministers and U.C. Programme Managers are seeking a partnership with Local Authorities to assist in its delivery. Currently this is being referred to a Local Support Services Framework. Whilst the detail of this framework is yet to be agreed it is likely that 'digital inclusion' will be a key feature. With this in mind the Welfare Reform Task Group plans to submit a bid to the Scottish Government 'Welfare Reform Resilience Fund' seeking funding to implement the Council's Digital Inclusion Strategy.
- 3.54 The potential role for Local Authorities under the support framework is likely to be in providing a face to face service and facilitating on-line access to Universal Credit for customers who may experience difficulties in doing so themselves. Whilst 'East Lothian Works' will continue to provide a hub for supporting East Lothian residents back into employment in the future Local Offices and Libraries will be required to work in partnership with other agencies and volunteers playing a key role in supporting people access their state benefit entitlement.
- 3.55 At the point of writing the DWP have yet to confirm how the Local Support Framework might be funded in the long term and this continues to be a subject for discussions taking place between CoSLA, the UK and Scottish Governments.

4 POLICY IMPLICATIONS

- 4.1 A Scottish Welfare Fund Policy will be developed to facilitate the consistent delivery of Crisis Loans and Community Care Grants elements of the Scottish Welfare Grants Service. Policy development will be informed by the Scottish Government SWF Guidance and will draw on the Benefits Unit's early experience in delivering the service.
- 4.2 The Discretionary Housing Payments, (DHP) Policy will be reviewed and amended to reflect the available funding for 2014/15.

5 EQUALITIES IMPACT ASSESSMENT

- 5.1 Equalities impact assessments will apply to both policy documents.

6 RESOURCE IMPLICATIONS

- 6.1 Financial – it is currently anticipated that all of the areas reported upon within this report will be managed within existing approved budgets. However, it should be noted that with SWF demand established by the first year of operation and funding fixed at 2013/14 rates there is a risk

associated with any potential unforeseen variances in demand/workload during 2014/15.

6.2 Financial – It should also be noted that the Scottish Government are engaged in discussions with the DWP relating to the use of DHP as a means of mitigation for the Under Occupancy Supplement. Whilst this may result in the raising of the maximum permitted total allowing additional Scottish Government funding to be committed there is a risk that funding may be transferred to an alternative mitigation scheme.

6.3 Other – None

7 BACKGROUND PAPERS

7.1 Welfare Reform Key Actions summary

7.2 Corporate Risk Register entry (ELC CR4)

7.3 DHP Policy

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