

**Local Government North Yorkshire and York****4 October 2013****Impact of Welfare Benefit Reforms on North Yorkshire Residents****1 Purpose**

- 1.1 To provide an update on the initial impacts of benefit changes brought about by the Welfare Reform Act 2012 and associated regulations.

**2 Background**

- 2.1 Local Government North Yorkshire and York (LGNYY) received a report in July 2013 detailing the initial impacts in North Yorkshire and York of the benefit changes being introduced by The Welfare Act 2012. LGNYY requested an update report to be provided at its October meeting and six monthly thereafter.
- 2.2 The following welfare benefit changes have or are in the course of being implemented:
- Council Tax Support (CTS)
  - Housing Benefit Size Criteria in the social rented sector
  - Local Welfare Assistance, replacing Community Care Grants and Crisis Loans
  - Local Housing Allowance (LHA), uprated in line with the Consumer Price Index (previously capped to the 30<sup>th</sup> percentile of rents in the locality)
  - Personal Independence Payments (PIP), the replacement for Disability Living Allowance – affecting at present new claimants only
  - the benefit cap for working age people (introduced from 15 July to 30 September 2013)
  - the cap on the annual increases in most working-age benefits
- 2.3 A number of other significant changes are planned to take effect from 2013 to 2020:
- the introduction of Universal Credit (beginning with claims from the newly unemployed - current benefit claimants will be moved onto Universal Credit in a phased approach)
  - the migration of existing Incapacity Benefit claimants onto Employment and Support Allowance
  - the migration of existing DLA claimants to PIP
  - the rise in the State Pension age to 66 years for both men and women

### 3 National developments

#### 3.1 High Court ruling – ‘under-occupancy charge’ for disabled adults

3.1.1 The High Court ruled in July, that the under-occupancy charge (‘bedroom tax’) does not discriminate against disabled people. This followed a judicial review brought by lawyers representing 10 families which included disabled adults and children.

3.1.2 High-court judges concluded that discretionary housing payments gave local authorities enough flexibility to deal with shortfalls. However they ruled that the government must introduce regulations to protect disabled children who cannot share a bedroom because of their disabilities. The Court was critical of the government for failing to act earlier in changing the law in this regard despite the government knowing in 2012 that it needed to do so.

#### 3.2 Universal Credit roll out scaled back

3.2.1 The October national rollout of Universal Credit has been scaled back to six job centres: Hammersmith, Rugby, Inverness, Harrogate, Bath and Shotton. Only low numbers of people within these areas will be affected in the initial months due to the qualifying criteria<sup>1</sup>. The rollout in these areas follows on from the north-west ‘pathfinders’. Arising from these, the Department for Work and Pensions (DWP) found that the ICT systems were struggling to cope and that further enhancements to the technology were required. The National Audit Office has released a highly critical report on the introduction of the Universal Credit project, concluding that the project has been riddled with major IT problems and beset by "weak management, ineffective control and poor governance"<sup>2</sup>.

3.2.2 Despite these setbacks the DWP has said that it remains committed to deliver Universal Credit over a four year period to 2017 and has put in place measures to address the problems highlighted to date. Further details on development plans will be outlined in the autumn. Meanwhile the existing pathfinder authority pilots have been extended to December.

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<sup>1</sup> The qualifying criteria will be:

- live in a specified postcode area but not be homeless, in supported or temporary accommodation nor a homeowner
- be single, with no dependent children, a British citizen and aged between 18 years and 60 years and 6 months
- be fit for work
- not have a claim to Jobseeker’s Allowance (JSA) or Employment and Support Allowance (ESA) that ended in the last two weeks, except where ESA ended due to a decision that you no longer have limited capability for work
- not be pregnant nor have given birth within the last 15 weeks
- not be receiving existing benefits (JSA, ESA, Income Support, Housing Benefit) or Tax Credits nor awaiting a decision on, nor be appealing against, a decision not to award any of those
- not be in receipt of Disability Living Allowance (DLA) or Personal Independence Payment (PIP)
- not have savings in excess of £6,000
- not have any caring responsibilities
- not be self-employed, in education nor have a person acting on your behalf over your claim, and
- have a valid bank account and National Insurance Number

<sup>2</sup> ‘Universal Credit: early progress’, NAO, (5 September 2013)  
<http://www.nao.org.uk/wp-content/uploads/2014/09/Full-Report.pdf>

3.2.3 The LGA in response to the DWP's consultation on its Universal Credit Local Support Services Framework<sup>3</sup> - which sets out how organisations will be paid to help claimants moving onto the single benefit - has said that organisations providing support services for the incoming universal credit regime must be offered 'funding guarantees'. The DWP intends to publish a further version of the framework in autumn 2014 to inform local authority budgeting timetables for 2015/16.

### 3.3 Discretionary Housing Payments (DHP)

3.3.1 In July the government announced up to an additional £35m for Discretionary Housing Payments (DHP). This funding is intended to help claimants affected by housing benefit changes who need extra support, and is broken down as follows:

- £10m has been allocated as transitional funding with local authorities free to decide how they use this money. They may add this to their DHP funding or use it for another purpose altogether. (Examples given by the DWP of how the money could be spent for DHP purposes include: support for Housing Options or Homelessness teams to deal with customers affected by the reforms; support for services providing money advice or help finding work, hosted by partner organisations; pooling resources for joint initiatives between different local authorities; and for removal costs, rent in advance and deposits<sup>4</sup>.) The funding has been allocated to LAs through a formula that reflects the estimated impact of the removal of the spare room subsidy.
- £5m has been allocated to the 21 least densely populated areas in Great Britain to support remote and rural areas transitioning to the housing benefit cuts.
- £20m is being held by Department for Work and Pensions (DWP), which local authorities will be able to bid for. The DWP will write to local authorities once the details of the scheme are decided.

3.3.2 The LGA has said that whilst this additional money is welcome in the short-term, DHP does not provide a sustainable solution for the families hardest hit by the changes<sup>5</sup>. Consequently the LGA has called for the government to re-assess the distribution of discretionary housing payments to ensure that "supply better matches demand in local areas".

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<sup>3</sup> 'Universal Credit Local Support Services Framework: Responses Report', DWP, (August 2013)

<sup>4</sup> <http://www.dwp.gov.uk/docs/s5-2013.pdf>

<sup>5</sup> In a report commissioned by the LGA, the Centre for Economic & Social Inclusion estimates that the combined impact of housing reforms on social housing tenants is likely to be £1 billion each year. The total funding that has been made available to councils via Discretionary Housing Payments (DHPs) for this year (£155m), represents just £1 in every £7 of the impact of housing reforms on tenants.

'The local impacts of welfare reform: an assessment of cumulative impacts and mitigations', Centre for Economic and Social Inclusion (August 2013)

3.3.3 Breakdowns of the additional DHP funding per North Yorkshire district and City of York Council are given in Section 4 of this report.

### 3.4 Personal Independence Payments (PIP)

3.4.1 In July the DWP announced that Atos - the firm responsible for carrying out back-to-work assessments of disability benefit claimants - will lose its monopoly. This was after an audit discovered more than 40% of Atos's reports failed to meet the required standard. Other companies will be invited to bid for fresh regional contracts by summer 2014.

3.4.2 The DWP has released a PIP Toolkit for support organisations and advisers, setting out the assessment process<sup>6</sup>. Most people will be asked to a face-to-face consultation with a health professional as part of the assessment process.

### 3.5 Improving macro-economic prospects but anticipated further reductions in living standards for some people in and out of work on welfare benefits

3.5.1 The latest GDP figures show that economic output is picking up with consumer spending underpinning these recent gains in spite of the continued decline of real wages<sup>7</sup>.

3.5.2 The rate of unemployment in the UK dropped to 7.7% between May and July from 7.8% in the previous three months. The number of people unemployed fell by 24,000 in the period to 2.49m and the number of people claiming Jobseeker's Allowance (JSA) fell to its lowest level since February 2009. At the same time the number of people working part-time was the highest since records began in 1992 and double the number of five years ago. North Yorkshire and York also experienced a fall in long term unemployment. However in Scarborough district, nearly two fifths of JSA claimants are long-term unemployed (12 months or more). This is higher than the Yorkshire and Humber proportion of just over a third<sup>8</sup>.

3.5.3 New research carried out by the Institute for Fiscal Studies<sup>9</sup> shows that the current government's tax and benefit reforms that have been implemented or are due to be implemented will, on average, modestly strengthen people's incentives to work. In the absence of such reforms work incentives would have weakened as a result of falling real earnings. Specifically Universal Credit will strengthen the incentive for couples to have one person in work rather than none but weaken the incentive for both members of a couple to work rather than just one. Incentives are strengthened much less for those with children than those without children.

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<sup>6</sup> <https://www.gov.uk/government/publications/the-personal-independence-payment-toolkit-for-partners/the-personal-independence-payment-pip-toolkit-for-partners>

<sup>7</sup> August 2013 GDP Estimates, National Institute of Economic & Social Research

<sup>8</sup> North Yorkshire Economic Monitor – <http://www.northyorks.gov.uk/CHttpHandler.ashx?id=23642&p=0>

<sup>9</sup> 'Government's welfare reforms mean overall work incentives modestly strengthened despite wage falls', IFS (September 2013)

- 3.5.4 A recent study by the Joseph Rowntree Foundation<sup>10</sup> concludes that the high cost of child care, the sharp withdrawal rates of Universal Credit once an individual is employed above a set number of hours and the persistence of low pay could combine to undermine the success of the new system. For people working fewer hours though Universal Credit will allow them to be better off than not working at all (something that was not always true under the previous system), albeit with an income below the minimum income standard<sup>11</sup>.
- 3.5.5 It is worth bearing in mind though that the impact of welfare benefit reforms will also fall upon those who are already in work as well as those out of work. Increased tax allowances will only partially alleviate falling incomes relative to rising costs<sup>12</sup>.
- 3.5.6 According to a recent study<sup>13</sup>, 59% of all welfare reform reductions fall on households where somebody works. The study also calculates that as a result of the welfare reforms (excluding the impact of Universal Credit<sup>14</sup>) households claiming benefit will on average lose £1,615 a year (£31 per week) by 2016. Scarborough district is again named as one of the areas where the impact of the reforms is likely to be most strongly felt alongside a range of other coastal towns and cities with a high dependence upon benefits.
- 3.5.7 The LGA notes that it remains the case that many households are likely to need further assistance to deal with the impacts of the welfare benefit reforms with much of this assistance needing to be provided by local authorities such as targeted information campaigns; personal support – to manage finances, avoid arrears and make choices for the future; and joining-up locally across employment, skills, troubled families and other services in order to support those affected – including by learning the lessons from Community Budgets<sup>15</sup>.

## **4 Impact of the changes introduced to date**

- 4.1 Council Tax Support (CTS) – 10% reduction in Council Tax Benefit introduced nationally for claimants under pensionable age.
- 4.1.1 Local authorities in North Yorkshire continue to report that although the amount of Council Tax collected to date remains in line with last year's figures, or has fallen only very marginally, there has been a noticeable increase in the number of reminders and, in the case of some, an increase in the number of summonses issued.

<sup>10</sup> 'Does Universal Credit Enable Households to Reach a Minimum Income Standard?', JRF (July 2013)

<sup>11</sup> Updated annually, the Minimum Income Standard compiled by the JRF shows the cost of items and activities the public think are needed for a decent standard of living. It also calculates the earnings required to enable different household types to achieve this living standard. Single people need to earn at least £16,850 a year before tax in 2013 for a minimum acceptable living standard. Couples with two children need to earn at least £19,400 each.

<sup>12</sup> 'A Minimum Income Standard for the UK in 2013', JRF, (June 2013),

<sup>13</sup> 'The local impacts of welfare reform: an assessment of cumulative impacts and mitigations', Centre for Economic and Social Inclusion (August 2013)

<sup>14</sup> The DWP has calculated that almost three million households will gain under Universal Credit

<sup>15</sup> 'The local impacts of welfare reform: an assessment of cumulative impacts and mitigations', Centre for Economic and Social Inclusion (August 2013)

4.1.2 Craven District Council reports that for both reminders and summonses the figures are 40% higher than at the same stage last year. Scarborough Borough Council has seen a 67% increase in reminders and a 57% increase in summonses than at the same time last year (August 2012). City of York Council is continuing to find that there is a marked difference between collection rates relating to working age customers (a 63-65% expected outturn) as compared with pensioners (98-99% return). Ryedale District Council is planning to do an additional recovery cycle at the end of the financial year and hopes by doing this to achieve a similar collection rate to the previous year (currently its Council Tax collection rate has dropped by approximately 0.25%).

#### 4.2 Housing Benefit Size Criteria ('under-occupancy charge')

4.2.1 Local authorities in North Yorkshire and York continue to report that the majority of the work has been to explain and advise customers about the under-occupancy charge. Harrogate Borough Council for example has a range of measures in place to provide support including home visits to identify potential exemptions for carers and disabled children and a programme of direct intervention with support and advice provided to enable home moves etc.

4.2.2 The under-occupancy charge continues to impact upon DHP applications. For example Harrogate Borough Council has made 49 DHP awards to date for those most affected by the size criteria rules. City of York Council has calculated that of the 378 DHP applications processed by the end of August, 157 were due to the under-occupancy charge. That notwithstanding the Council has experienced a continued reduction in the numbers affected by the under-occupancy charge. This has in large part been achieved by tenants downsizing through mutual exchanges. However the rate of reduction appears to have slowed over the summer. City of York Council will be using the additional DWP transitional funding (see paragraph 3.3.1) to further focus efforts on reducing the number of people 'under-occupying' properties.

4.2.3 The Housing Associations across North Yorkshire and York present a mixed picture about the impact that the under-occupancy charge to date has had upon the total level of their rent arrears. Yorkshire Coast Homes reports that as at 6 September 2013, 226 tenants affected by the under-occupancy charge owed rent, with 28 not paying at all and 198 households were making attempts to pay something. In total 1260 tenants were in rent arrears. It reports that some tenants affected by the charge are continuing to struggle to find the extra money from their income and it remains to be seen how they will cope during the winter months with increasing utility bills. Broadacres also anticipates that rent arrears will increase during the winter. The Home Group reports that it is not seeing a great impact on arrears as a result of the under-occupancy charge (or the welfare reforms more generally) in York, Ryedale or the North Yorkshire Coast. The main impact of the under-occupancy charge is still on the high number of mutual exchanges that it is processing.

4.2.4 An increase in mutual exchanges arising from the under-occupancy charge could be viewed in a positive light. However as detailed in the previous report Housing providers and Housing Authorities in York and North Yorkshire may need to review the Choice Based Letting Scheme in order to better manage increases in the number of vacant properties and mutual exchanges arising from the under-occupancy charge.

4.2.5 Nationally, figures provided by 114 local authorities across Britain show that since the under-occupancy charge was introduced in April, over 50,000 council housing tenants have fallen behind on paying their rent<sup>16</sup>. At least another 30,000 people living in housing association properties have also fallen behind on rent payments since April according to the National Housing Federation<sup>17</sup>.

#### 4.3 Impact of the welfare benefit reforms and the rising cost of living on rent arrears and homelessness

4.3.1 As reported in the previous report, rising rent arrears are a key issue for Housing Associations in North Yorkshire and York. This is due in part to the effects of the welfare benefit changes to date but also due to the rising cost of living. Broadacres for instance reports that almost 20% of its tenants affected by housing benefit reductions were already in arrears of over £500 before April. Its projections for rent arrears to increase by at least £100,000 this year has increased in line with its assumptions to date. Common to all Housing Associations, the level of rent arrears is masked to some degree by customers who are in receipt of DHP awards. The level of rent arrears is expected to increase again during the winter months.

4.3.2 City of York Council reports that in respect of its housing tenants, rent arrears at the end of August 2013 were 18% higher than at the same time last year.

4.3.3 The North Yorkshire District Councils' Homeless Prevention Services have seen a 37% increase in households assisted compared to the same period last year. Of the 852 individuals and families prevented from becoming homeless, 22% were relating to Housing Benefit problems.

Homeless Prevention Cases			
	Q1 2012/13	Q2 2013/14	+% Change
North Yorkshire	622	852	37%
Craven	41	54	32%
Harrogate	144	165	15%
Hambleton	97	149	54%
Richmondshire	69	148	114%
Ryedale	44	68	55%
Scarborough	190	203	7%
Selby	37	65	76%

<sup>16</sup> '50,000 people now facing eviction over bedroom tax', The Independent, 19 September 2013

<sup>17</sup> 'More than half of families hit by bedroom tax pushed into debt', NHF press release, 18 September 2013

#### 4.4 Local Welfare Assistance/Emergency food provision

- 4.4.1 The bulk of awards made in relation to the County Council's Local Assistance Fund from the beginning of April to the end of August have been from families under exceptional pressure (36% of all awards made) followed by people who are homeless or at risk of homelessness (20% of all awards made).
- 4.4.2 Over 30% of all enquiries have been from Scarborough district, with by far the highest number of calls for food and cash/loans, and marginally the highest for utility credit being from there. Lower demand in some other districts though may in part be due to the fewer number of 'authorised agencies' available in that district.
- 4.4.3 Requests have been highest for food, followed by cash or a loan (which is not covered by the Fund), and then a combined request (normally for food and utility credit / food and cash).
- 4.4.4 The NYLAF eligibility criteria for people applying for food, has been broadened recently beyond people who fit the fund's vulnerable groups and 'families under extreme pressure' categories. Each case is looked at individually; however if a person is able to meet other criteria and is able to demonstrate an urgent need for food that cannot be met by other forms of support they are provided with a one-off food parcel. The County Council is keen though to continue to work with other emergency food providers locally. This is not least because where people are able to access a food bank they are able to receive a food parcel immediately rather than having to wait for up to 24 hours to receive a food parcel through the NYLAF. Also the funding available to the County Council through the NYLAF is intended to be used for a wide range of support, not just food.
- 4.4.5 City of York Council is carrying out a survey of users experience of its equivalent scheme ('York Financial Assistance Scheme') in order to consider what changes should be made to the scheme in 2014/15. Over 80% of awards to date have been for 'emergency' assistance (victim of crime, travelling expenses for family bereavement etc.) and the remainder for 'community' assistance (homeless and resettled into the community etc.)
- 4.4.6 More generally in terms of food banks, Children's Centres in North Yorkshire have been working with food banks to make referrals and/or act as food donation points. The Children's Centres try to complement referrals to food banks though with longer term support by making referrals to the CAB, providing budgeting advice, and providing access to Adult Learning Courses such as cooking on a budget and healthy eating.
- 4.4.7 Research carried out by Harrogate and Ripon Centres for Voluntary Service between April and August this year suggests that there is a continued increase in food poverty incidences in North Yorkshire. The findings also show that across all districts the main reason that people are citing for needing to use a food bank is due to them having received a benefit sanction

or because their benefits have been delayed<sup>18</sup>. There is no data available from the DWP to verify this anecdotal information. This is because since April the DWP has dropped the rule that Jobcentres must record the reason why they have referred a client on to a foodbank<sup>19</sup>. However benefit sanctions is also one of the reasons that applicants are giving when applying to the County Council's Local Assistance Scheme for a food parcel.

#### 4.5 Discretionary Housing Payments (DHP)

4.5.1 All local authorities in North Yorkshire and York have been allocated a share of the extra £10m transitional funding as part of the government's announcement of an additional £35m for DHP mentioned in paragraph 3.3. This additional funding can be used in other ways including but not exclusively to increase the local authority's DHP pot. Scarborough Borough Council for example has allocated its share of the funding to its Housing Options Team for assistance with a rent deposit/bond scheme to help prevent homelessness.

4.5.2 Craven, Richmondshire and Ryedale district councils have also been allocated a share of the £5m additional funding provided to district councils/unitaries in the 21 least densely populated areas in Great Britain mentioned above. Accompanying guidance has been produced by the DWP to help these local authorities identify and target the isolated and remote communities within their area for receipt of DHP<sup>20</sup>. The awards for North Yorkshire district councils and City of York Council are as follows:-

District/Unitary	Transitional Funding - DHP	Funding to the 21 least densely populated areas in Great Britain - DHP
Craven	£4,934	£110,926
Hambleton	£10,990	nil
Harrogate	£16,672	nil
Richmondshire	£4,654	£104,640
Ryedale	£7,016	£157,746
Scarborough	£18,613	nil
Selby	£10,558	nil
York	£34,870	nil

4.5.3 In line with national trends, local authorities in North Yorkshire and York have found that the number of claims has increased significantly compared to the same time last year. Selby District Council for example reports that in the financial year to date it has paid over £28,000 in DHPs, which is nearly three times the amount spent in the whole of 2012/13.

<sup>18</sup> Selby Foodbank's records show that between 1<sup>st</sup> April to 31 August 2013 48% of all food parcels were given out as a result of benefit sanctions, changes to benefits or delayed benefits.

<sup>19</sup> <http://www.trusselltrust.org/resources/documents/DWP-has-broken-agreement-between-Jobcentres-and-foodbanks.pdf>

<sup>20</sup> [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/226996/u4-2013.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226996/u4-2013.pdf)

4.5.4 The impact of the introduction of the benefit cap on DHP claims is negligible at this stage with regards to the number of DHP applications. This is due to the small numbers of people affected by the cap<sup>21</sup> and also the support and advice provided by our local authorities to help people budget for the loss of income in advance. (To some of the individuals affected by the benefit cap however the financial impact is significant – for example in Scarborough district of the 29 households affected by the benefit cap the average weekly loss is £54 with the highest loss of £138.) In common with other local authorities City of York Council has found that the actual number of households affected by the cap has been significantly lower than earlier DWP estimates. Harrogate Borough Council notes that the majority of those affected by the benefit cap are taking advantage of the Council's in-house support service.

#### 4.6 Personal Independence Payment

4.6.1 This was introduced in June 2013 for new claimants in North Yorkshire and City of York so it remains too early for conclusions to be drawn regarding impacts. The re-assessment of some current DLA claimants will start from October 2013 but as reported previously this will be only if there is a change in circumstance, the end of an existing award, or if it applies to young people approaching 16. The majority of existing claimants will not be reassessed until 2015 or later.

### **5 Impacts on service delivery: local authorities, housing associations and key voluntary sector agencies providing advice and information**

#### 5.1 Local authorities

5.1.1 Work in the benefit and revenues sections in most but not all district councils and City of York Council continues to increase in relation to customers who are of working age. Ryedale District Council for example reports that the increase in DHP applications has created a considerable amount of administration and follow-up visits from the Housing Options team. For both Hambleton and Richmondshire district councils however the caseload has remained relatively static since 1 April. As detailed in previous reports, all have been pro-active in working with customers to inform them of the benefit changes and to develop support mechanisms where possible.

5.1.2 As reported in section 3.2 above, Harrogate has been selected as a pathfinder area for the roll out of Universal Credit. Further details are awaited from the DWP implementation team but the project is expected to commence in October. Preparatory work has commenced to map out local support provision and establish potential partners who may be involved with the delivery of the support requirement necessitated by the new benefit. Harrogate Borough Council's housing team has appointed a Tenancy Support Officer to play a key role in supporting tenants most affected by the reforms.

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<sup>21</sup> Hambleton and Richmondshire District Councils have in fact not received any notification from the DWP of any capped cases and so no DHP applications have been made from either council in response to the benefit cap.

- 5.1.3 North Yorkshire County Council's Benefits, Assessments and Charging Teams in Health and Adult Services have continued to see a marked increase in demand for advice and assistance to claim welfare benefits. This includes demand to act as advocates to challenge and overturn decisions made by the DWP.
- 5.2 Housing Associations
- 5.2.1 As reported in detail in previous reports, Housing Associations are implementing a range of initiatives to help their tenants try to cope with the welfare benefit changes, including tackling rent arrears.
- 5.3 Citizens Advice Bureaux
- 5.3.1 The Q1 figures for North Yorkshire and York CAB show that debt and benefits advice remain the largest types of enquiry locally by some margin. 28% of new cases related to benefits and 39.5% related to debt for York CAB and for the bureaux elsewhere in the county 32% related to benefits and 30% to debt.
- 5.3.2 The CAB in North Yorkshire and York have recently commissioned one of their welfare benefit workers to visit each bureau in September to undertake a needs analysis, and develop a co-ordinated proposal for how all the bureaux could share resources and work together to provide the best value for money and the maximum outputs.
- 5.4 Welfare Benefits Unit for York and North Yorkshire
- 5.4.1 The Welfare Benefits Unit for York and North Yorkshire Unit, which provides valuable second tier support for organisations working with clients with benefits issues, reports that it remains busy with many training requests. It continues to be the case that outside of the City of York the Unit does not have funding to provide support to organisations with benefit appeals elsewhere in the county.

## **6 Recommendations**

- 6.1 Local Government North Yorkshire and York is recommended to note and comment upon the findings in the report.

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