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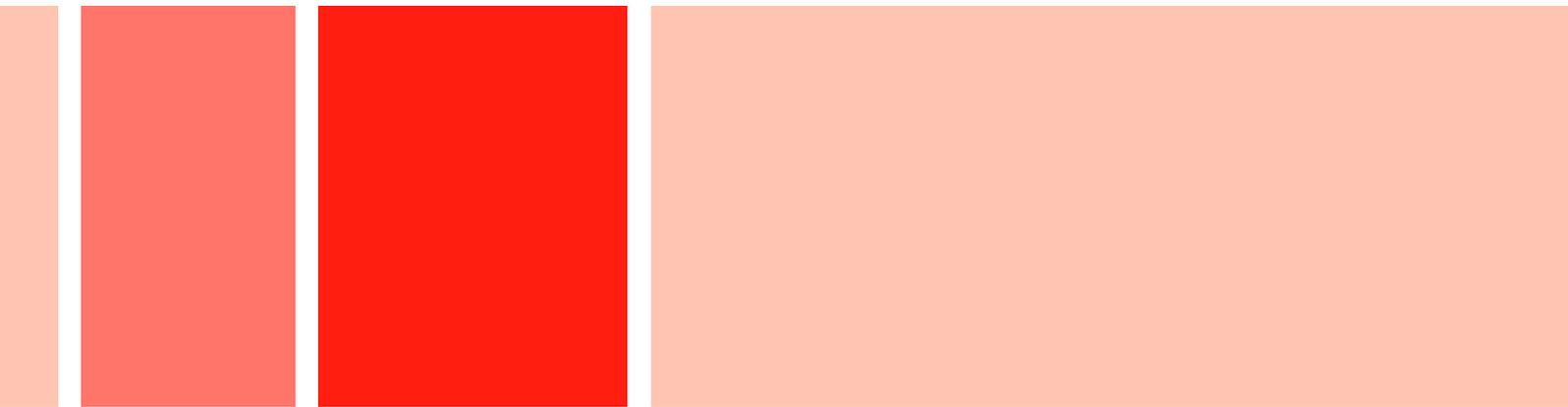
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# Evaluation of the Discretionary Assistance Fund

## MAIN REPORT



# Evaluation of the Discretionary Assistance Fund

Views expressed in this report are those of the researcher and not necessarily those of the Welsh Government

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## Glossary of Terms

<b>B</b>	
BACS	Banks Automated Clearing System
<b>C</b>	
Cabnet	The Citizens Advice Bureaux internal web/intranet.
CallValidate	CallValidate provides tool that allows organisations to capture and validate customers' names, addresses and date of birth details, whilst conducting a real-time check against their bank and credit card providers' records. See <a href="http://www.callcredit.co.uk/products-and-services/fraud-and-verification/callvalidate">http://www.callcredit.co.uk/products-and-services/fraud-and-verification/callvalidate</a>
CAJT	Committee for Administrative Justices and Tribunals
<b>D</b>	
DAF	Discretionary Assistance Fund in Wales
DWP	Department of Work and Pensions
<b>E</b>	
EAP	Emergency Assistance Payments from the DAF
<b>F</b>	
FFT	Family Fund Trading Limited
<b>I</b>	
IAP	Individual Assistance Payments from the DAF
<b>N</b>	
NPS	Northgate Public Services Limited
NPS Business Centre	The NPS Business Centre - located in Wrexham - that receives, processes and determines all applications to the DAF for grants.
<b>P</b>	
Partnership Manager	The individual in FFT responsible for managing the Delivery Partner network across Wales.

Paypoint	<p>PayPoint is an international company specialising in payment technologies. More than eight million customers visit over 26,700 PayPoint outlets every week to make regular cash payments towards their household bills, top up their mobile phones, load e-money and purchase bus tickets.</p> <p>FFT use PayPoint to pay cash to EAP clients via the nearest retailer to them that uses PayPoint. The system handles over £14 billion from 775 million transactions annually for more than 6,000 clients and merchants.</p>
PID	Project initiation documentation
PRINCE2	Projects in a controlled environment. This is a project management methodology used as standard in Government.
<b>W</b>	
WCBC	Wrexham County Borough Council
Webinar	An interactive training session conducted over the internet where delegates can pose questions to, and receive answers from the tutor.

# 1 Introduction

## 1.1 Background of the project

- 1 This report documents a process evaluation of the Discretionary Assistance Fund (DAF) in Wales. The DAF replaced parts of the Social Fund previously run by the Department for Work and Pensions (DWP) which was sometimes referred to as 'crisis loans' or 'community care grants'. The fund offers grant payments or support for two purposes:
  - (1) Emergency Assistance Payments (EAP) to provide help in an emergency or when there is an immediate threat to an individual, or to their family's health or wellbeing.
  - (2) Individual Assistance Payments (IAP) to help someone to live independently in the community and prevent the need for institutional care.
- 2 Through EAP and IAP, the DAF is available to people who do not have the means of paying for one-off things that they need, with the fund provided as a grant rather than a loan so that it doesn't need to be paid back.
- 3 In 2013 the Welsh Government appointed Northgate Public Services (NPS) to administer the fund on its behalf. NPS are supported by two lead Partners - Family Fund Trading Limited (FFT) and Wrexham County Borough Council (WCBC) - and a network of Delivery Partners such as Shelter Cymru, Citizens Advice Bureau, Wales Co-operative Centre, Credit Unions, Debt and Disability Alliance, Welfare Benefits Units, as well as a range of service delivery charities, voluntary organisations and housing organisations such as Registered Social Landlords. These Delivery Partners are able to signpost individuals to the DAF and support them complete applications where appropriate.
- 4 NPS were contracted initially for two years - with an option to extend for a further two years - to manage, implement, administer and monitor the grant scheme. The annual grant budget for the DAF is £10.2 million for the first two years. Having operated for over 12 months, Welsh Government wanted to assess how well the processes were working and whether any improvements could be made in efficiency or effectiveness.

## 1.2 Aims of the project

- 5 The specific aims of the evaluation were to:
  - (1) Assess whether the DAF is being implemented as intended including dealing with applications and making awards efficiently and effectively; whether all potential applicants are aware of the DAF and are able to apply easily; whether reporting requirements are being met; and whether data quality is acceptable.
  - (2) Assess whether NPS has established the DAF in accordance with its intended design and mode of operation. This includes consideration of the capacity and range of the network of referral or

Delivery Partners; the application, referral, assessment and appeals processes; and capture of appropriate monitoring information.

- (3) Assess whether NPS and its Partner organisation FFT have properly embedded all expected financial processes and are implementing them well. This includes consideration of data sharing arrangements and compliance with data protection legislation.
- (4) Assess the effectiveness of current arrangements for handling of enquiries made by elected representatives of DAF clients.
- (5) Highlight any deficiencies in relation to financial probity; failures to establish the intervention as intended and failures and problems in operation with, where appropriate, recommendations for redressing them or for making other improvements to the scheme.
- (6) Provide an assessment of whether value for money is being provided by the current contractual arrangements.

### **1.3 Methodology**

#### **1.3.1 Evidence**

- 6 We collected evidence for the evaluation through a combination of qualitative and quantitative research:
  - (1) Qualitative research - We have provided a list of the individuals and organisations we contacted in our qualitative research programme in Appendix 1. In summary they included:
    - (a) 17 face to face interviews with individuals directly involved in either the management and/or day to day operation of the DAF. These included individuals from the Welsh Government, NPS, FFT and WCBC. These interviews include all the managers of DAF in these four organisations.
    - (b) Interviews with a stratified sample of Delivery Partners. We have included the profile of the sample in Appendix 1. In summary it was designed to be representative of the types of organisations in the Statutory and third sectors, their locations across Wales and the types of client groups they support, for example ex-offenders, young people, individuals in distress etc. In total we conducted:
      - 6 face to face interviews with Delivery Partners who support clients making applications to the DAF.
      - 44 telephone interviews with Delivery Partners in the stratified sample.
      - A web based survey of all other Delivery Partners and interested parties to whom FFT send the quarterly Newsletter covering around 700 individuals.

In total 114 individuals responded representing 84 organisations of which around<sup>1</sup> 61 were registered Delivery Partner organisations.

The interviews and web survey were conducted using semi-structured questionnaires. We trialled the questions in the initial six face to face interviews and, using this initial feedback and further Welsh Government and NPS suggestions, modified them to the final versions.

The telephone interviews were conducted by experienced researchers in Welsh or English according to the preference of the interviewee.

Sampling the DAF applicants was out of scope for this process-based evaluation.

- (2) Quantitative research - We have provided a list of the reports and publications we have referenced in the Bibliography. These include documents prepared by NPS and FFT as well as national statistics on population sizes, areas of deprivation etc. In addition, NPS provided us with summary data on every application to the DAF between 1<sup>st</sup> April 2013 and 21<sup>st</sup> July 2014. We examined these reports and publications and where possible triangulated them with the national data.

- 7 We then analysed this evidence and prepared our findings and recommendations.

### **1.3.2 Project steps**

- 8 We undertook the assignment in five stages. These were detailed in our project initiation documentation (PID) and align with the government standard for project management (PRINCE2). We have not included the detail of these stages in this document but in summary they were:
  - (1) Project initiation.
  - (2) Assessment of the adequacy of scheme structure, relationships with Delivery Partners and their operation.
  - (3) Adequacy of the operation of the application, referral and award processes.
  - (4) Scrutiny of financial processes.
  - (5) Reporting.

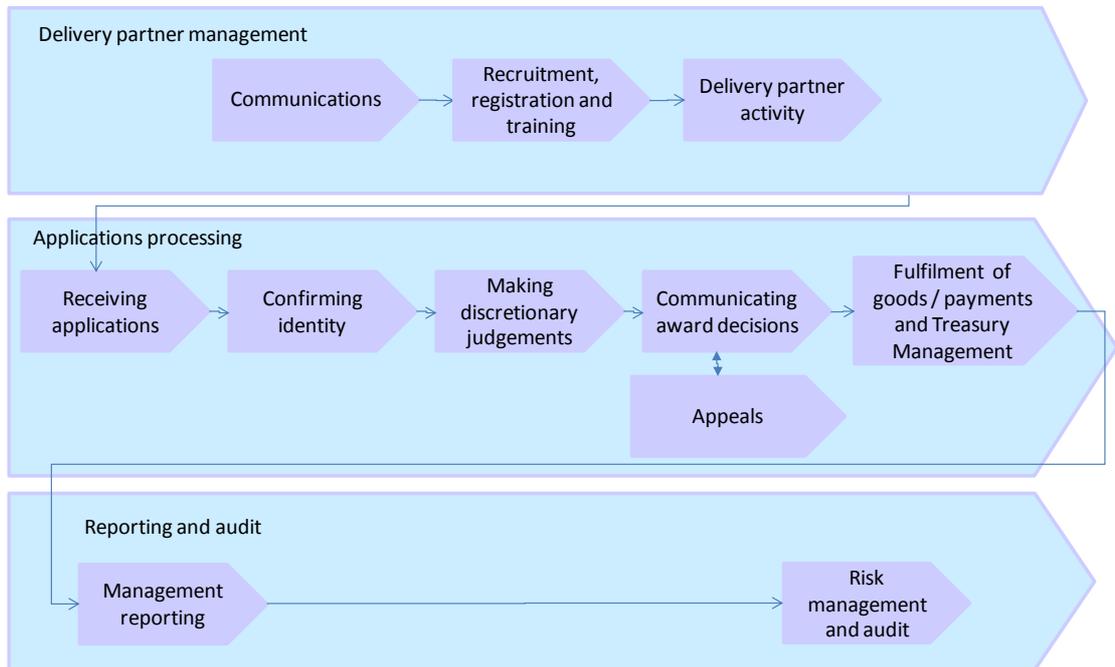
### **1.4 Structure of the report**

- 9 We have structured our findings against the broad process steps involved in delivering the DAF programme. We have cross referenced these to Welsh Government's original specification for the DAF

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<sup>1</sup> We are unsure of the reliability of the list of registered Partners see paragraph 26 onwards.

programme - Contract No C-056/2012/13 - and the terms of reference for this evaluation. Figure 1.1 below summarises the DAF process steps diagrammatically.



**Figure 1.1 Discretionary Assistance Fund Wales - Summary Processes**

- 10 Section 2 outlines the above processes and compares them against the intentions in the original Welsh Government specification. Section 3 details our conclusions and recommendations

#### 1.4.1 Data quality comments

- 11 We have provided a series of tables in the report showing the numbers and values of transactions in the year to March 31 2014. Unless otherwise stated, we obtained these from NPS's March 2014 Service Performance Summary report.
- 12 Having analysed the data in the NPS report and compared it with the underlying dataset of applications NPS provided to Blue Alumni at the start of the evaluation, we found the reports contained apparent discrepancies and did not reconcile with the underlying dataset NPS provided. NPS have confirmed that the reports are accurate and attributed the differences in the data to the various times at which the data was extracted from the computer systems. Whilst this position was probably adequate in the early stages of the programme, the discrepancies cast doubt over what otherwise would be a good monitoring pack.
- 13 The absence of full period processing procedures is the main cause of the timing differences and generates these apparent discrepancies. At present full period end processing is only implemented for the Fulfilment

and Treasury Management aspects of the fund undertaken by FFT but not for the initial application processing stages conducted in the NPS Business Centre. We return to this issue in 2.4 Reporting and audit. In summary, the reports would benefit by the introduction of full period end processing routines and having fully reconciled tables across the various stages in the application, award and fulfilment processes. This would improve consistency in the reports and enable NPS to take copies of the underlying data at the period end which would support any audit of activity levels at the end of each period.

- 14 The most consistent data in the NPS report is in section 6 on Treasury Management. The expenditure in this section is reconciled to the DAF Bank account and has been the subject of both internal and external audit. Even so there are some minor differences in the value of DAF expenditure between the Treasury Management table and other data in the same section of the report.
- 15 Our view is that the data in the NPS report provide good indications of activity levels in a specific period of time. We return to this issue in section 3 - Conclusions and Recommendations.

## **2 Has the DAF been implemented as intended?**

### **2.1 Overview of how the DAF is delivered**

16 The Welsh Government direct and NPS lead two other organisations to manage the central Welsh DAF service. In addition, around 300 Delivery Partners, many of whom work directly with clients to support their DAF applications, complement the work of the central team. This section first provides a brief overview of how each party contributes to DAF and its current operation and then goes on to examine the current operations in detail. In summary:

- (1) The Welsh Government has policy responsibility, directs the fund and contract manages NPS in delivering the service.
- (2) NPS are the prime contractor and responsible for the delivery of the complete service. NPS process and determine applications to the fund and have subcontracted three elements of the service to:
  - (a) FFT who provide four services:
    - Recruitment, training and management of the Delivery Partner network.
    - Fulfilment of the awards through the provision of:
      - Cash and bank transfer payments for EAPs.
      - Vouchers for goods and services for items such as clothing and household goods.
      - Goods and installation services for white goods such as cookers.
    - Treasury Management of the DAF funds.

- An independent appeals process for appeals that have not been resolved within the NPS Business Centre.
- (b) WCBC enables the NPS Business Centre to access the Department of Work and Pension's (DWP's) benefits system. WCBC authorise and register specific individuals in the NPS Business Centre to access the DWP system. This enables them to verify the identity of applicants who have to be on benefits to be eligible for the IAP awards. WCBC also 'police' this access and ensure that DWP's audit requirements are met.
  - (3) All four organisations (Welsh Government, NPS, FFT and WCBC) collaborate on communicating the DAF to Welsh citizens and the Delivery Partner network.
  - (4) The roles of the Delivery Partners vary from simply signposting the availability of the fund through to helping clients complete the application process.
- 17 The rest of this section describes how each of the major process groups in the service is delivered and our assessment of how far it aligns with the original intentions of the Welsh Government.

## 2.2 Communications and Delivery Partner management

### 2.2.1 Original requirement

- 18 Welsh Government required the successful firm to recruit a Delivery Partner network across Wales and to make them and all potential recipients aware of the DAF. Their requirements were detailed in the original specification and were to:
- (1) Already have in place, or be in a position to establish and maintain, a network of approved Partner organisations across all areas of Wales who can act as delivery outlets. We (Welsh Government) expect this to involve organisations in the Third and Statutory Sector, and consider it extremely important that Credit Unions form part of this network as they play an important role in the Welsh Government's Tackling Poverty agenda.
  - (2) Devise and implement an appropriate training and support programme for approved Partner organisations prior to April 2013.
  - (3) Develop and agree with the Client an appropriate communication strategy so that all appropriate organisations and potential applicants are made aware of the grant scheme and its purpose and have the opportunity to submit a grant application including measures to reach groups with particular barriers to engagement.
  - (4) Develop and agree with the Welsh Government by 31 January 2014 appropriate mechanisms to identify best practice and a communication strategy to disseminate widely such best practice to relevant organisations across Wales.

- (5) By the end of March 2014 provide a compilation report including all the best practice examples that have been identified and disseminated.

## 2.2.2 What has been implemented

- 19 NPS and FFT have implemented three main processes to achieve these requirements which are illustrated in Figure 2.1 below.



**Figure 2.1 Communications and Delivery Partner management processes.**

- 20 At the start of the contract, FFT had an established Partner network and had contacts in the Statutory and the Third sector throughout Wales. Their parent Charity, the Family Fund, prior to the start of this programme, had engaged with these external organisations to support the delivery of services to families who have children with disabilities. NPS appointed FFT to build on the Family Fund's existing network in Wales and to develop a network of Delivery Partners specifically for the DAF.
- 21 Family Fund Trading appointed a Partnership Manager to lead this activity. The Partnership Manager is responsible for:
- (1) In conjunction with the Welsh Government's central information services, advertising the opportunity to become a Delivery Partner, running a series of informative events and speaking at conferences to promote the DAF.
  - (2) Running the Delivery Partner recruitment process.
  - (3) Appointing Delivery Partners.
  - (4) Training Delivery Partners with support from the NPS Business Centre.
  - (5) Maintaining the list of Delivery Partners who have formally registered and also a separate list of those who participate in the DAF in roles from just being kept informed of developments to supporting applicants through the application process.
  - (6) Keeping Delivery Partners informed of activities, changes and benefits to the DAF programme.
- 22 Each of these process steps is described in more detail below.

### 2.2.2.1 Communications

- 23 The Partnership Manager NPS, FFT, WCBC and the Welsh Government have implemented one unified communications approach to raise awareness of DAF in both Delivery Partner organisations and amongst potential grant recipients across Wales. One approach reduces effort

and ensures consistency of the message. The Partnership Manager leads most of these activities and is responsible for planning and organising communications and events to raise awareness of the DAF throughout Wales.

- 24 Three main communications channels are used:
- (1) Internet/web.  
This channel is aimed at both potential applicants and Delivery Partners. The Wales Co-operative Centre's Money Made Clear (MMC) website promotes the DAF<sup>2</sup>. Individual Delivery Partners also provide links to the fund from their websites. Most Citizens Advice Bureaux, Local Authorities and many other third sector Delivery Partners in Wales signpost the fund.
  - (2) Events and conferences.  
These activities are aimed predominantly at Delivery Partners. The Partnership Manager, Welsh Government and NPS staff present the DAF and provide details of what is available through the Fund. In the period from the start of the contract to March 2014:
    - (a) Conducted 250 visits and presentations reaching 1,145 individuals
    - (b) Welsh Government issued updates to Partners prior to the appointment of the Partnership Manager who subsequently issued 7 e-bulletins as well as an end of year report.
  - (3) Delivery Partners referring potential applicants to the DAF.  
This approach is aimed specifically at applicants. Delivery Partners have different levels of involvement from signposting applicants to the DAF or providing them with support when they complete their applications.
- 25 The NPS Business Centre records how applicants hear of the fund. Table 2.1 below lists the sources of referrals in the year to March 31<sup>st</sup> 2014.

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<sup>2</sup> See [http://www.moneymadeclearwales.org/home.php?page\\_id=60](http://www.moneymadeclearwales.org/home.php?page_id=60)

**Table 2.1 Where applicants heard of the DAF**

Source of referral in the year to March 31 2014	Number of applicants	Percentage of the total
Department of Work and Pensions	22,004	54.0%
Money made clear website	1,029	2.5%
Citizens advice bureaux	1,480	3.6%
Local Authorities	5,766	14.1%
Other	10,501	25.8%
Total	40,780	100%

(Source March 2014 Service Performance Summary but see comments in paragraph 11 on the robustness of this data)

#### 2.2.2.2 Delivery Partner recruitment, registration and training

##### *Recruitment, numbers and distribution*

- 26 Organisations expressing interest in the DAF are referred to the Partnership Manager who obtains and records their contact details. The 'End of Year overview for Registered Partner Organisations' Report issued in May 2014 stated that there were 208 Delivery Partners issued with Partner codes and 453 organisations registered within the Partner Network. NPS and FFT have not provided a Partner list that substantiates this number of Delivery Partners. Since Blue Alumni highlighted this at the start of the evaluation, NPS and FFT have been working hard to update the contact details of the Delivery Partners. Progress has been made but work was still progressing at the time of completing this report.
- 27 At the start of the evaluation, NPS and FFT maintained four lists of Delivery Partners and interested parties:
- (1) A list of fully registered Delivery Partners recorded in the NPS Business Centre's applications processing software. The Delivery Partners on this list have a formal registration number but some of their names have been shortened to 40 characters to fit the size of the computer field.
  - (2) A separate list of formally registered Partners held on a spreadsheet in the NPS Business Centre. This details the full names of the Partners.
  - (3) The Partnership Manager's Excel spreadsheet containing three work sheets including fully registered and unregistered Delivery Partners separated into National, Local Authority and other Delivery Partners.

- (4) The Partnership Manager's Excel spreadsheet containing a list of individuals' email addresses where she sends the quarterly Newsletter.
- 28 The NPS Business Centre and Partnership Manager gave us various versions of these lists during the course of the evaluation. The lists contained duplicates, several different names for the same organisations and missing contact details. The Partnership Manager gave us a corrected version of the list in October 2014 containing 377 current Delivery Partners of which 91 were classed as signposting Partners only. We have checked some of the contact details in this revised list and found 29 out of the 100 our telephone researchers contacted to be incorrect/out of date. FFT were still working on this and updating the lists of Delivery Partners when we completed the report.
- 29 Currently a small number of Credit Unions form part of this network and the Welsh Government is working with the Partnership Manager to encourage the involvement of more Credit Unions as they play an important role in Welsh Government's Tackling Poverty agenda.

#### *Registration*

- 30 When a Delivery Partner expresses interest in being formally registered, the Partnership Manager sends them an application form. Basic contact details from the returned form are then recorded on the Partnership Manager's lists (see 27(3) and 27(4) above) and the form is passed to the NPS Business Centre to be recorded formally on their lists (see 27(1) and 27(2) above). The software in the NPS Business Centre allocates the Delivery Partner a randomly-generated unique registration number. The Delivery Partner is then sent an email confirming formal registration providing them with their unique reference number.
- 31 Delivery Partners operating from several locations and with several case workers are recorded in a variety of ways:
- (1) Some Partners are registered once only with the central office address.
  - (2) Some are registered multiple times with an address for each location.
  - (3) Some are registered multiple times for each case worker working with individuals who may need DAF funding.
  - (4) Some use a combination of all the above three methods.
- 32 In the original specification for the service, the Welsh Government envisaged that the Delivery Partners would be 'accredited'. However, accreditation takes time both to agree the criteria and to complete the process. The Welsh Government relaxed this requirement at an earlier stage in order to aid rapid deployment of the service. Hence neither FFT nor NPS make any formal checks nor maintain a record of any checks on the Delivery Partner's name, credentials, address or other data on the application form.
- 33 We return to this in the section 2.4 on Reporting and audit. Whilst this approach is just adequate for the current level of reliance on Delivery

Partners, it should be revisited if more use is to be made of the network. Welsh Government 'registration' infers a badge of trust/authenticity for the Delivery Partners. Hence it is important to ensure they are bone-fide.

### *Training*

- 34 Whilst there has been a fair deal of activity in communicating and raising awareness of the DAF, up until the start of the evaluation there had been little training of the Delivery Partners in its operation. This statement is supported by our survey where 81% of 114 respondents indicated that they had not personally had any training.

*"Maybe a few guidance documents. No formal training sessions. We disseminate information about DAF internally through information resources."*

*"None at all and not even an introductory meeting to show how to use the applications."*

*"The case workers here were provided with information about DAF by the Local Authority and their internal line manager but the information from Northgate came through at the last minute. Initially information was difficult to find. We had no training or guidance on DAF. We referred to the Money Advice website and have been 'feeling our way' and learning through trial and error."*

- 35 The training that has taken place has included:

- (1) A self-help booklet - Guidance for Decision Makers<sup>3</sup> - that sets out: the background to the DAF, eligibility criteria, qualifying conditions, the steps in assessing priority, the budget, the decision making process and excluded needs for IAPs and EAPs.
- (2) A webinar.  
This was developed and tested as Delivery Partners had expressed concerns over costs of travel to presentations/forums etc. The webinar was a trial to determine if it would meet training needs. However, take up was low and NPS agreed with Welsh Government not to run further sessions but to develop and deliver full training days in year 2 of the DAF.
- (3) A one day training session was run specifically for a regional Citizens Advice Bureaux at RCT for 45 participants.
- (4) Five other visits to Citizens Advice Bureaux to provide training where attendees from other Bureaux attended reaching 35 delegates. For example, Caerphilly Council's training session was attended by Caerphilly Citizens Advice Bureaux.

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<sup>3</sup> See [Discretionary Assistance Fund - Guidance for Decision Makers](http://www.moneymadeclearwales.org/media/discretionary%20assistance%20fund%20-%20guidance%20for%20decision%20makers%20v2%20eng.pdf) on the Money Made Clear website

<http://www.moneymadeclearwales.org/media/discretionary%20assistance%20fund%20-%20guidance%20for%20decision%20makers%20v2%20eng.pdf>

- (5) Providing information about DAF on the Citizens Advice Bureaux's internal web (intranet) called "Cabnet" to all Citizens Advice Bureaux staff and volunteers.
- 36 However, respondents that had received training indicated it was fairly superficial. Typical comments included:
- "Some while ago a lady came to talk to us but only in a half hour session."*
- "Believe some people attended a workshop awareness course held by [a Local Authority] Social Inclusion Unit."*
- "A colleague had a very general presentation from Northgate at the beginning."*
- "Case workers print any information they need about DAF from the internet. Training was not offered by Northgate although some members of staff did learn about DAF on a training course [delivered by a third party organisation] but the course was primarily concerned with Universal Credit and not specific to DAF."*
- 37 There is strong demand for training with 74% of our 50 telephone respondents suggesting that training in the DAF would be helpful and improve their advice to DAF applicants. NPS discussed the revision of the current Partner recruitment and training strategy with the Welsh Government at the project board in March 2014. It was agreed that that training for existing Delivery Partners would be a priority to develop and pilot in the first quarter of 2014-15 and recruitment would be revisited in the autumn of 2014. This new approach to training had been trialled and was being implemented at the time of preparing this report.
- 38 The case workers we contacted in our survey suggested several areas where they felt training would be useful. Typical comments included:
- "A brief overview - a refresher course and perhaps information on how to help and how and where best to refer people."*
- "Anything would be better than nothing! My knowledge of DAF is very limited, so anything that we could disseminate to our front line case workers which would help them more confidently address the needs of victims would be good. A good grounding in the Fund, how to apply and who is eligible."*
- "For myself and all the case-workers and volunteers: 1. To be totally clear on the eligibility of the DAF scheme. 2. Ditto on the application form and process. 3. Ditto on any appeals process. And I don't mean an 85-page document to explain it all, to which no-one will refer - we just haven't the time. On-line info-frames are quick and easy to use - there should be a way to encapsulate the necessary relevant details into a SHORT series of these, so that all case-workers can have them at their fingertips for reference."*
- "How to improve our applications. A better knowledge of the criteria used and how best to produce the applications so that we get better and more consistent awards. "*

### 2.2.2.3 Delivery Partner activity

- 39 It is not possible to provide a robust assessment of the extent Delivery Partners support clients apply to the fund. We have evidence from our survey that they undertake far more than detailed in the Monthly Service Performance Summary Reports. According to the March 2014 report only around 3% of applications for funding are supported by the Delivery Partner network.
- 40 Based on the feedback we received from our telephone survey of Partners, the number of Delivery Partner supported applications is much higher and possibly in the order of 6 or 7 times more than reported. In total, 41 Delivery Partners in our telephone interviews estimated that they supported around 5,300 applications in the period March 2013 to September 2014. This compares to the reported total of just over 800 detailed in the NPS Service Performance Summary reports<sup>4</sup> for the same Delivery Partners and over the same period.
- 41 In discussion with NPS and based on the feedback from our survey, there appear to be five main causes of the under-reporting of Delivery Partner activity:
- (1) Only online supported applications are recorded as a formal step in the NPS central applications system and this depends on the Delivery Partner recording their registration number at the start of the process.
  - (2) Some of the Delivery Partners surveyed were not recording their involvement when supporting applications. We believe that this is due to two factors:
    - (a) Some Delivery Partners had experienced issues of their contact and address details being mixed with those of the client so they do not record their involvement as a matter of course to avoid this problem.
    - (b) Others were not aware that it is important due in part to the lack of training.
  - (3) The NPS Business Centre has details only of the registered Partners who have been allocated a Partner number and some of the 'unregistered' Delivery Partners in our survey indicated they were proactively supporting applications.
  - (4) Telephone supported applications to the Business Centre are recorded separately by NPS using manual recording systems. Our survey indicated that many case workers are assisting clients during the phone calls either by making the call on their behalf or sitting beside them and giving advice during the call. These instances are not routinely recorded.

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<sup>4</sup> This represents the sum of the year to date figures in the March 2014 and September 2014 Service Performance Summary reports.

- (5) We have not seen evidence to demonstrate that paper-based supported applications are attributed to the Delivery Partners in a robust manner.
- 42 Many of the respondents to our survey interact with clients in multiple ways. Out of 114 individuals responding to this question:
- (1) 25% manage teams of case workers.
  - (2) 72% make applications to DAF personally on behalf of clients.
  - (3) 56% empower clients to make their own applications.
  - (4) 24% respond to welfare issues and questions from the public (including DAF).
  - (5) 17% provide leaflets about DAF and/or signpost to on-line information
- (The percentages above add to more than 100 reflecting their multiple roles.)
- 43 Typical comments from the 72% who make applications on behalf of clients included:
- “...mainly supporting and making applications on behalf of and alongside clients.”*
- “The team make applications to DAF personally on behalf of residents at the hostel. Residents don’t apply themselves. It is part of the key worker process to work alongside the individual resident. Usually items are needed very quickly because people are offered Council accommodation and have to view, sign and move into their new home within 24 hours. People at the hostel rarely have the items they need.”*
- 44 Of the 129 contact details we used as our sample for telephone interviews, 17% (22) of these indicated they had or direct involvement with DAF when our telephone researchers called them. Of these 7 were listed as registered partners, 10 as sign-posters and 5 as unregistered partners. Checking the revised Delivery Partner list sent by NPS dated 14 September 3 of these had been removed from the revised list but the others remained.

## 2.3 Applications processing and fulfillment

### 2.3.1 Original requirement

- 45 Welsh Government required NPS to:
- (1) Provide an accessible application process for the fund to include the ability to make applications via the internet, phone and post taking into account the needs of a diverse range of vulnerable people who may access the fund.
  - (2) Ensure that all mediums for applications are offered in both English and Welsh formats.

- (3) Ensure that accessibility of services and mediums for applications include measures to promote equality and eliminate discrimination including providing measures to ensure access for disabled people (such as minicom and Braille), those with language problems such as easy read for those with low literacy and translation services for those with little/no English.
- (4) Put in place a fair and transparent process for assessing applications.
- (5) Ensure that all grants are allocated to individuals equitably, according to their relative need, regardless of where in Wales they live.
- (6) Establish an effective mechanism for referring suitable applicants, who do not meet the criteria for a Crisis Payment, to their local Credit Union in order to apply for a Crisis Loan.
- (7) Appeals and complaints:
  - (a) Establish a review system for receiving and assessing appeals against decisions in a fair and transparent way.
  - (b) The administration of the fund will be subject to the jurisdiction of the Public Service Ombudsman for Wales and the successful contractor will be expected to abide by the UK guidance on the Model Concerns and Complaints Policy Guidance.
- (8) Delivery of goods and services.
  - (a) For the IAP element, engage with suppliers of goods and services and agree national contracts that ensure value for money and appropriate support for clients.
  - (b) Make payments to successful IAP recipients within two weeks of receiving the application and to successful EAP applicants within a maximum of 24 hours of receipt of application.
- (9) Establish, administer and maintain the necessary IT required for the fund.

### 2.3.2 What has been implemented

46 NPS have implemented six main processes to satisfy these requirements. These are summarised in Figure 2.2 below.

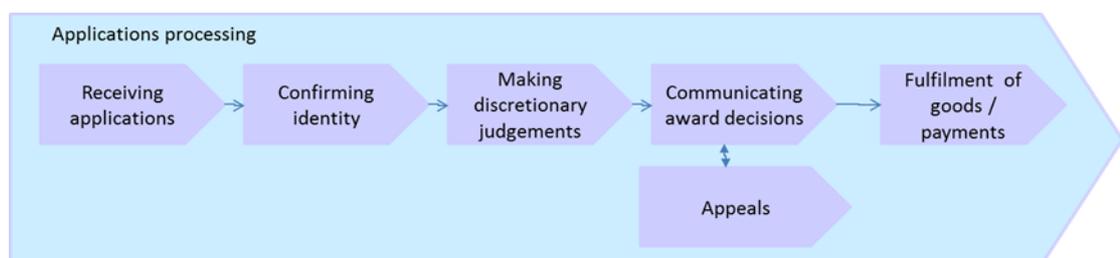


Figure 2.2 Application processes

### 2.3.2.1 Receiving applications

#### *Process*

- 47 The NPS Business Centre receives applications via three routes:
- (1) Paper application forms.
  - (2) The telephone.
  - (3) Direct entry of applications over the Web.
- 48 A copy of the application form can be found on the Money Made Clear Website<sup>5</sup>. The data collected for all the application routes is the same with the exception that only web based applications request the details of any Delivery Partners who are supporting the client's application. The Delivery Partner has to enter their registration code to denote their involvement.
- 49 NPS have put in place a series of measures to ensure vulnerable groups and individuals with specific challenges can access the service. These measures are well thought through and aimed at individuals with specific challenges such as disability, non UK languages and mental health problems. They include:
- (1) All NPS staff are trained in responding to applicants with varying language or accessibility needs. This training is conducted through a 2 week induction programme.
  - (2) English/Welsh as a second language.  
All NPS staff speak English and four also speak Welsh as their first language. They also have one member of staff who can speak a selection of languages including Punjabi, Farsi and Arabic. For other languages, NPS have a contract with Language Line who provide an interactive translation service for all languages. NPS Advisers dial their number, state the language and are provided with a translator who then enters into the telephone call to support the applicant and provide translation support. The NPS Welsh speakers also provide support in communications sessions for the Delivery Partner network.
  - (3) Clients with no or minimal finances.  
NPS have a freephone number in place which supports those clients in financial difficulty calling from landlines and any individuals calling from a mobile phone can dial an 0300 number which is charged at local rates.
  - (4) Web access.  
The design of the web pages has been interrogated and signed off by Shaw Trust (Disability Charity) who employ specialist screen-reader software to ensure IT systems are presented to support usage by people with disabilities.

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<sup>5</sup> See

<http://www.moneymadeclearwales.org/media/discretionary%20assistance%20fund%20-%20paper%20application%20form%20v2%20eng.pdf>

- (5) Hearing difficulties.  
Applicants who have partial or significant hearing loss can access the application process online or via paper application. They can also complete an application over the telephone using the Text Relay Assistance service. This is similar to Language Line where Text Relay provides a 3-way conversation using type between the text relay advisor, the applicant and the DAF advisor. NPS have two dedicated numbers for the deaf and hard of hearing where calls are routed straight to an advisor, without going through welcome messages or automated telephone functions. These calls are routed to senior advisors who have been taught to adjust their style of communication to suit the need of text phone callers.
- (6) Poorly sighted.  
Braille is available through a letter printing and distribution supplier.
- 50 Web-based applications can be submitted 24 hours per day, seven days per week. The NPS Business Centre receives and records paper-based and telephone applications, and processes on-line applications during their normal business hours which are Monday to Friday 9.00 to 17.30.
- 51 Advisers in the NPS Business Centre enter the client details for postal and telephone applications into the central computer system. The last step in this data entry process, once all the client details have been entered, is to check eligibility. The computer system generates an eligibility assessment which conforms with the Welsh Government criteria, namely:
- (1) For IAPs, that the applicant:
- (a) Lives in Wales.
  - (b) Is on 'appropriate' benefits and has less than £500 or £1000 if over pension age.
  - (c) Is leaving care, staying in the community or setting up home after an unsettled way of life, for example homelessness, so that the fund enables independent living or its continuation.
  - (d) Is under extreme pressure/circumstances under greater pressure than might normally be associated with low income
- (2) For EAPs, that the applicant:
- (a) Lives in Wales.
  - (b) Has experienced a sudden, urgent, unexpected event which needs immediate action.
- 52 The applicant is informed of the result of the eligibility assessment and read/communicated standard scripts informing them of their rights and how their data will be treated under Data Protection etc. and informed - if eligible - that their application will be passed for checking and then onto a decision maker. The advisor records all the items the client is applying for, such as, in the case of IAPs, washing machine, refrigerator, dining table and chairs etc. and, in the case of EAPs, the items the client needs to buy using the emergency payment such as food, clothing etc.

*Volume of applications*

- 53 Table 2.2 below provides a summary of the applications received via the various routes in the year to March 2014.

**Table 2.2 Applications requiring a decision**

Applications requiring a decision	Year to March 2014	%
Online	4,727	13.4%
Telephone	28,442	80.5%
Postal	2,159	6.1%
Total	35,328	100.0%

(Source March 2014 Service Performance Summary but see comments in paragraph 11 **Error! Reference source not found.** on the robustness of this data. The NPS report does not reconcile the 35,328 applications above to the 40,780 detailed in Table 2.1)

- 54 As can be seen from the table above, the vast majority of applications are via telephone. Based on feedback from Delivery Partners, an application takes 30 minutes or more to complete. This is due to the level of detail needed in the application to verify the individual's identity and the circumstances that make them eligible for a DAF award. Hence, telephone calls place a high burden on the NPS Business Centre.
- 55 In addition, as illustrated in
- 56 Table 2.3 below a much larger number of individuals (79,885) called during the year, wishing to apply. The data are not sufficiently detailed to track this larger number of enquires to individuals formally making the 40,780 applications but these two tables suggest that over a third of the individuals wishing to apply actually make an application. It also suggests that wider understanding of the eligibility criteria and/or more use of the Delivery Partner network could potentially filter out a large volume of calls and reduce work on the NPS Business Centre by advising applicants appropriately.

**Table 2.3 Analysis of then number of telephone calls and call centre availability**

Year to March 2014		
DAF Telephony Availability 09:00 – 17:30		99.90%
Type of call	Number of calls	%
Applicants wishing to apply to the scheme	79,885	57.6%
Applicants with queries regarding a submitted application	24,761	17.9%
Other	24,461	17.6%
Voicemails left	241	0.2%
Number of abandoned calls in this period	9,313	6.7%
Total	138,661	100.0%
NB The March 2014 Performance Summary Report lists the number of calls as 139,537 with no explanation of the difference to the sum of the call types		

(Source March 2014 Service Performance Summary but see comments in paragraph 11 on the robustness of this data)

- 57 1,130 or just less than 1% of the 138,661 calls above were conducted in the Welsh language.
- 58 Telephone call response rates are shown in Table 2.4 below. This shows that over 90% of calls are answered within 10 minutes which is a reasonable level of service compared with many call centres. The 6.7% of abandoned calls could indicate some frustrations with the process. However, abandoned calls can occur for many reasons and are often as much to do with the callers' level of patience as to be caused by long waiting times and some callers may abandon the call after only a short time.

**Table 2.4 Telephone call response times**

Year to March 2014		
Call waiting times:	Number	% of total
Less than 1 Minute	69,523	50.0%
Less than 5 Minutes	44,831	32.2%
Less than 10 Minutes	12,348	8.9%
More than 10 Minutes	3,100	2.2%
Number of abandoned calls in this period	9,313	6.7%
Total	139,115	100.0%
NB The March 2014 Performance Summary Report lists the number of calls as 139,537 with no explanation of the difference to the sum of the call response times		

(Source March 2014 Service Performance Summary but see comments in paragraph 11 on the robustness of this data)

- 59 NPS have not provided equivalent data on the postal or on-line enquiries but we examine in the section on decision making the relative success of each application method.

*Delivery Partner views of the process*

- 60 Whilst 50% of 114 respondents felt that the application process is quite or very straightforward, those who also provided their views of the user friendliness of the process (87) fell broadly into three camps:

- (1) Generally acceptable (40%). Comments included:

*“Very user friendly especially on the telephone.”*

*“It is OK but the main problem is that the process is too slow. The time to decision is too lengthy. The people we are claiming for are always in dire circumstances, and the claims take one to two weeks.”*

- (2) Difficult to use and unfriendly (33%). Comments included:

*“The on-line form isn't very user friendly, it's quite long and confusing. It's easy to confuse the client's details with the agency address details. It's important to put the agency's name on the form to minimise Data Protection issues in follow up discussions with the call centre. Have experienced some advocacy blockages such as applying on behalf of people and then not being given updates because of Data Protection and vice versa when case workers have applied on behalf of clients and information has been sent to the organisation instead of the client.”*

*“Although the phone and on-line applications are useful there are some frustrating problems at times. There are differing responses from the call centre staff as to what can or cannot be done.”*

- (3) Useful for the case workers but daunting for most clients (26%). Comments included:

*“It's fairly straightforward for case workers who mainly set up the applications by phone using the office landline with the client at their side. However, applying direct, without help, is very difficult as most clients do not have mobiles or even landlines they can use. On-line applications are also not accessible to most of our clients as they don't have computers.”*

*“Clients are 'terrified' by the paper application because it is very large and it tends to panic them. It is also quite repetitive. Clients can use phones but [mobile] calls are expensive and they can be given conflicting advice and then also have no record of the phone conversation and information that they have submitted.”*

*“We deal with a lot of illiterate people, people who do not know how to turn on a computer so it is not easy for them.”*

- 61 The feedback we received from partners was that the staff operating the NPS Business Centre could manage and meet Delivery Partner expectations more effectively. However, it has to be recognised that this is quite a sensitive issue as declining a discretionary award is not popular, especially if the applicant or their representative does not fully understand the reasons. In addition, as part of this evaluation, NPS have informed us of instances where Delivery Partners and applicants have, at times, become abusive over the phone.
- 62 In terms of dealing with applications, at present, the Delivery Partners feel the staff could do more to support them. In order to get to this, we used a slight variation on the 'Net promoter score' (NPS) to assess the Delivery Partners' views<sup>6</sup>. The NPS is a fairly 'hard' measure and negative scores are common. Based on the Delivery Partner Case Workers who responded:
- (1) The overall average score given by the 88 respondents was just over 6 out of 10. If the Net promoter measure is applied the advisors scored minus 47% (88 responses with 10% promoters less 57% detractors and 33% passive ratings).
  - (2) The service as a whole scored slightly better with 87 respondents scoring the overall performance of the organisations running DAF processes and delivery at 6.4 out of 10. If the Net promoter measure is applied the service scored 35% (87 responses with 8% promoters, less 44% detractors and 48% passive ratings).
- 63 We found that Delivery Partner and applicant views are influenced by their lack of knowledge of the policy constraints put on the advisors, the checks the NPS Business centre have to make to prevent fraud and the clarity of the reasons why some applications are turned down.
- 64 We believe that greater transparency and communications of these matters to the Delivery Partner network would improve the image of the advisors in what, at times, is a difficult role. We also recommend that NPS use the scores we have obtained as a baseline from which to measure future progress. Typical comments included<sup>7</sup>:
- (1) For the higher ratings (10% of respondents):
 

*"Because nothing is ever too much bother and they are always happy to help."*
  - (2) For the passive scores (33% of respondents):
 

*"It's a difficult job, especially when the decisions are not what*

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<sup>6</sup> The net promoter score is widely used to assess customer views of a service. It is based on the numbers of respondents likely to recommend the service to their colleagues, friends and family on a scale of 0 to 10 - zero being not at all to ten being without hesitation. The score is then calculated as promoters - those rating their response at 9 or 10 less detractors those rating their response at 6 or less. Those scoring 7 or 8 are considered passives and discounted from the calculation. For this assessment we used a scale of 1 to 10.

<sup>7</sup> We have listed comments in rough proportion to the category percentages.

*people want to hear, but they do need more empathy with the clients' situations."*

*"Some advisors are very understanding and non-judgemental. Others are not and occasionally come across as negative and judgemental."*

*[Our telephone interviewer's notes] "This is an average because she would award 20 out of 10 for some people at the call centre as they are excellent but others provide "shoddy" information. She feels some are very poorly trained."*

(3) For the less positive responses (56% of respondents):

*"..almost as if they don't trust you and they try to trip you up. They don't believe what you are saying and need to keep confirming things. "*

*"Not too helpful because of their lack of knowledge of the local geography."*

*"Very poor service experienced on a regular basis."*

*"...not correctly following guidance, telling clients that the reason for their application is not valid or that there is no point in continuing with the application."*

65 Respondents questioned the consistency of advisors' assessments of eligibility. As can be seen from Figure 2.3 below, only one third of 103 individuals who responded to this question felt that the advisors' decisions were always or quite consistent. However, as we detail in paragraph 107 onwards, only slight differences in circumstances or the absence of key information can make the difference between a successful and unsuccessful application. Typical comments ranged from:

*"Pretty good in our experience."*

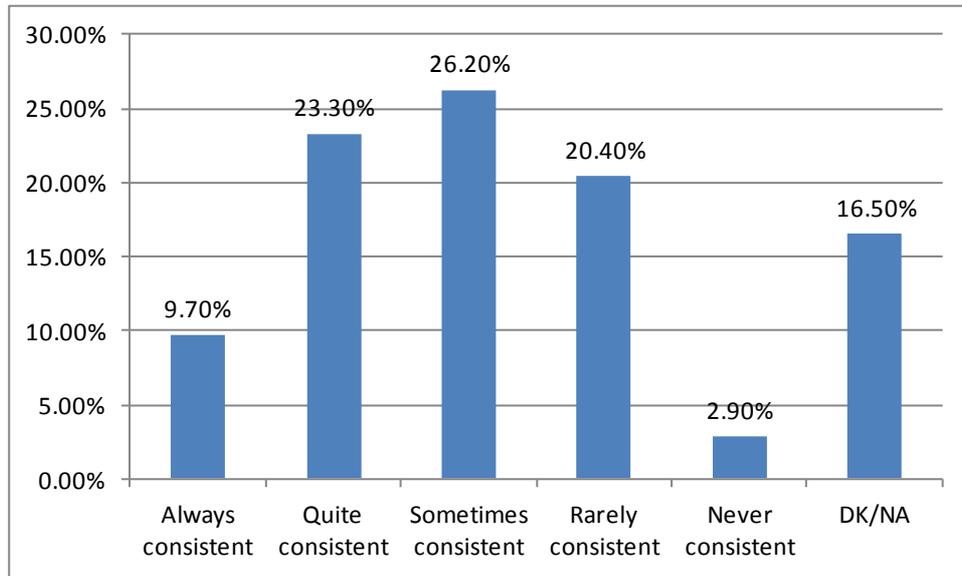
to:

*"Hit and miss".*

*"We never use the call centre now because of the inconsistency across call centre staff about the requirement to have applied for a budgeting loan first. We stopped ringing them routinely in Feb/March 2014."*

*"Actually very poor as it seems to be a requirement to turn people away in the beginning to avoid applications being made. However, a different adviser may make a different assessment."*

**Figure 2.3 Respondents' rating of the consistency of the Business Centre's initial assessment of eligibility and need**



### 2.3.2.2 Confirming identity

#### *Process*

- 66 A separate team at NPS checks the identity of applicants. This is the Customer Information System Team. Each team member is registered, via WCBC and authorised to access the DWP benefits system. DWP have a code of conduct the team members have to abide by to ensure data privacy and only bone fide access to the personal details held on the system. WCBC 'police' this code of conduct and periodically check the team's access and undertake any other checks that DWP request from time to time.
- 67 The advisors taking and entering applications into the main system also record summary details of the applications on a work flow spreadsheet. Members of the Customer Information Systems Team take new applications from this spreadsheet and check the details of applicants on benefits against the DWP benefits system. They check the identity of any applicants for EAP who are not on benefits with CallValidate as the DWP system cannot be used for people who are not on benefits.
- 68 The Customer Information Systems Team contact the applicant if any of the details do not match DWP's or CallValidate's data. The team decline applications where they cannot obtain a match.
- 69 Applicants with no home address, as a minimum, must be on the benefits system to pass this test. In these cases, the team record the homeless person's address as the NPS Business Centre to enable further processing.
- 70 Once an applicant's identity has been verified, the Team note this on the workflow spreadsheet and pass the application to the Decision team.

### *Volumes*

- 71 We have not obtained volumes on the number of applicants from NPS that fail this identity test. However, based on Table 2.2 above and Table 2.5 below, the team processed around 35,000 to 40,000 applications in the first year of operation.

### *The Delivery Partners' views*

- 72 This identity verification process is generally transparent to the Delivery Partners as it is conducted by a separate team in the NPS Business Centre. The clients' are only contacted if there are difficulties in verifying their identity. This may then cause problems as the Business Centre requires client authorisation to speak to the Delivery Partners.
- 73 Whilst we did not raise the Data Protection issue as a specific question, approximately 15% of the 114 respondents raised the Data Protection issues as a recurring 'frustration' in their comments. This is a sensitive issue as NPS have to abide by strict Data Protection regulations. Welsh Government and NPS should review the Data Sharing protocols. For example, if the original concept of having formally registered and accredited Delivery Partners were reintroduced, Data Protection and Privacy issues could form part of their accreditation. NPS could then relax the Data Protection checks they make and rely on the Delivery Partners' own internal systems. This would have to be balanced with periodic checks on Delivery Partner processes.
- 74 This comment from a registered Delivery Partner we surveyed typifies the current issue:

*"Data Protection constraints are an issue when we are applying to DAF on behalf of clients. We are given a four-digit Application code number (different from the Partner number) which we quote. Normally we can only call to progress an application if the client makes the call personally or is present but the approach of the call centre is not always consistent. Signing up as a DAF Partner organisation has not improved or simplified the process e.g. reduced the security questions. We are not treated any differently."*

### 2.3.2.3 Making discretionary judgments

#### *Process*

- 75 The Decision team reference the workflow spreadsheet and take each application in turn where the client's identity has been verified. They review the circumstances and use their judgement to determine what will be awarded. They apply Welsh Government's discretionary criteria. The applicant must meet one or more of the following criteria (as set out on the application form):
- (1) Be leaving an institution within the next six weeks after having lived there for three consecutive months or more, or on a frequent and regular basis due to disability or circumstances.
  - (2) Want to stay in the community rather than having to go into an institution.

- (3) Is taking part in a planned re-settlement programme after an unsettled way of life.
  - (4) Is in a family facing exceptional pressure, for example as a result of experiencing domestic violence or increased needs of a family member due to disability, chronic illness, or an accident.
  - (5) Is caring for a prisoner or young offender on release on temporary licence.
  - (6) Needs help with one-off or short term travelling expenses when deemed essential to support you to continue to live independently in your community.
- 76 The Decision team member reviews the details on the application form and if the criteria are met, further reviews each IAP item requested or the reason for an EAP. The team member makes decisions on each item and reason for the request to determine if an award is appropriate and how much the award should be. The team member uses a 'decision tree' for the amount of the award in each case. This provides guidance on the level of the award.
- 77 The Decision team member enters the reason for any item or request for a payment that is declined. Once the Decision maker has reviewed all the items on the application, the Decision maker marks the application for fulfilment and for communication to the applicant.
- 78 The decisions are communicated to FFT as 'orders' for fulfilment during normal business hours Monday to Friday. All successful applications (orders) are forwarded to FFT for fulfilment four times daily. This data file includes EAPs and IAPs. Any applications for IAP or EAP received after about 16.00 hrs. on Friday are not processed until start of business on Monday.

*Volumes and success rates*

- 79 Table 2.5 below provides a summary of the status of all applications received and processed at the end of March 2014. As per the table, 66%<sup>8</sup> of all the applications that were determined in the year were accepted and an award made - at least in part. We have not seen data on how many of the individual items requested on each application were approved so the actual acceptance rate will be lower than this percentage.

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<sup>8</sup>NPS have not reconciled the figures in Table 2.5 to those in Table 2.2 or Table 2.6. If the total number of applications in these tables of 35,328 requiring a decision in the year is used the success rate increases to 75%

**Table 2.5 Volume of applications and their outcomes  
year to March 2014**

Year to March 2014		
Application status	Year to date totals	% of the total
Paid	26,898	66.0%
Refused	8,778	21.5%
Withdrawn	1,404	3.4%
New/ineligible	3,296	8.1%
Extracted	1	0.0%
Pending	220	0.5%
Cancelled	182	0.4%
Resolving	1	0.0%
Total	40,780	100.0%
NB The March 2014 Performance Summary Report does not provide a reconciliation of the 40,780 applications to the 35,328 number of applications requiring a decision.		

(Source March 2014 Service Performance Summary but see comments in paragraph 11 on the robustness of this data)

- 80 Table 2.6 compares, as far as we are able to do on the available data, the relative success rates of each application method. Telephone and postal (paper-based) applications appear to be more successful than on-line applications.

**Table 2.6 Approval rates for each application method**

Year to March 2014			
Application method	1 Applications requiring a decision	2 Number of grants approved	Approval rate
Online	4,727	3,053	64.6%
Telephone	28,442	22,011	77.4%
Postal	2,159	1,640	76.0%
Total	35,328	26,704	75.6%
<p>1 Source March 2014 Performance Summary Report.                  2 Source Analysis of the dataset of applications provided by NPS.                  NB The March 2014 Performance Summary Report does not provide a reconciliation of the 40,780 applications in Table 2.5 to the 35,328 number of applications requiring a decision and we have been unable to reconcile the number of grants approved of 26,704 in the underlying data to the number 'paid' in Table 2.5 above. However, as the figures are of similar order we believe that these are reasonable estimates</p>			

- 81 Given the poor quality of the data available on the number of applications Delivery Partners support (see paragraph 39), it is not

possible to provide a fully comparative analysis of the relative success rates of supported and unsupported applications. However, the NPS application system does record Delivery Partner involvement where the Partner code is entered on-line. Using the underlying data set NPS provided at the start of the evaluation, Table 2.7 below suggests that supported applications have around a 20% better chance of success than those completed by the client themselves. However, this estimate has to be treated with caution due to inadequate recording of the Partners' involvement.

**Table 2.7 Comparative success rates of supported and unsupported online applications year ending March 2014**

Applications	Number	Number successful	% successful
Delivery Partner supported	727	546	75.1%
Un supported	4,424	2,507	56.7%
Total	5,151	3,053	59.3%
Source underlying data set provided by NPS			

*The Delivery Partner's views*

- 82 73% of the 42 respondents interviewed by telephone or face to face who could answer this question felt that their applications had a 'better than even chance' of being successful without appeal, with 45% of them believing that their success rates are in excess of 70%.

*"Applications are more successful when we are able to put in a lot of information. On review the application then usually goes through but it takes a long time and meanwhile the client is suffering."*

*"Experienced members of staff know the buzzwords to use to hit the correct notes so have success, whilst if insufficient information is forwarded, the applications are rejected. Training on this would be helpful. Both the paper application and the on-line application are okay but the on-line application is quicker and free."*

*"We have virtually a 100% success rate with paper applications with supporting letters."*

- 83 40% of the 103 Delivery Partners who responded to the question indicated that they were rarely (11%) or never (29%) given feedback on why an application had failed. Of the 55 who were given feedback and responded to the question, 18% felt the feedback was clear, 34% felt it was only sometimes clear and 42% considered the feedback was not adequate with the remainder not commenting.
- 84 Having reviewed several of the letters providing feedback we recognise the Delivery Partners' comments. Many of the letters simply state the item is not included in the scheme. The background notes held on the NPS computer system contain comprehensive reasons on why the

Decision maker has or has not agreed an award. Therefore, we feel this is an area that could be developed.

- 85 These are typical Delivery Partner comments demonstrating the challenges they face in obtaining feedback:

*“Each time my client was refused DAF I had to ring to obtain feedback. I would first need to send a signed authority to do this which took a few days. This reduced the time I had to prepare the case for the DAF Review.”*

*“Every client is given a different reason although the circumstances could be exactly the same.”*

*“It lacks clarity. It lacks consistency. It lacks any sense that empathy has been applied. It is subject, it would seem, to the individual whims of whoever happens to receive the request.”*

- 86 One of the most poignant comments we received was:

*“Most applications come back as not vulnerable and even after the appeal they come back as the same but do not give any explanation as to why they have come to this decision and when the tenant is suicidal and has no means I feel this is high vulnerability.”*

#### 2.3.2.4 Appeals

##### *Process*

- 87 If applicants do not agree with the decision they can ask for a review. The applicant must write to the NPS Business Centre within 20 working days of the decision and explaining why they want a review. Applicants can also provide further supporting documentation that was not included in the original application. There are potentially two stages in the review process:

- (1) An initial or stage 1 review where another member of the NPS Business Centre Decision team reviews the application again together with any additional supporting material. The results of this review are then communicated to the applicant.
- (2) If the appeal fails on the first review, the applicant can apply for a second. The application is then passed to FFT who convene a panel of four staff employed by their parent charity The Family Fund. These individuals work regularly with disadvantaged families and are very familiar with the sort of pressures they face. The results of this second review are final.

##### *Volumes*

- 88 The March 2014 Service Performance Summary report includes details of the reviews only in March. Nonetheless, we have found discrepancies between the NPS report for the number of reviews in March and the underlying data set provided by NPS. For example, the report states there were only 19 reviews carried forward from previous months yet the underlying dataset lists 100. While NPS have stated that the monthly report is accurate and review data will support this position, despite

requests to do so, they have not provided Blue Alumni with the review data to validate the tables in their report. We have therefore used the data from the underlying dataset in Table 2.8 below.

**Table 2.8 Appeals in the year to March 2014.**

Year to March 2014		
Appeal outcome	Number	% of total
Unresolved at the year end	63	4.9%
Refusal of a complete application overturned	505	39.1%
Increased grant to an already approved application	317	24.5%
Original decision upheld	408	31.6%
Total	1,293	100.0%
Source underlying NPS dataset		

- 89 FFT conducted 72 of the above reviews of which they upheld 48 of the original decisions, overturned 22 and 2 were subsequently abandoned/withdrawn.
- 90 Nearly  $\frac{2}{3}$ <sup>rds</sup> of all appeals including 30% of second stage reviews successfully result in increased amounts being awarded. According to the NPS Service Performance Summary Report for March the reasons for granting the appeal were as follows:
- (1) 38% - Based on additional information being provided.
  - (2) 39% - NPS Decision makers' discretion.
  - (3) 10% - Additional identity data provided.
  - (4) 13% - Other reasons - either exchanging an item on an award or due to input errors
- 91 According to the underlying data, 60% of appeals are resolved within 15 days and a further 23% within 30 days but as can be seen from Figure 2.4 below there is a long 'tail' with one appeal taking 212 days to resolve.

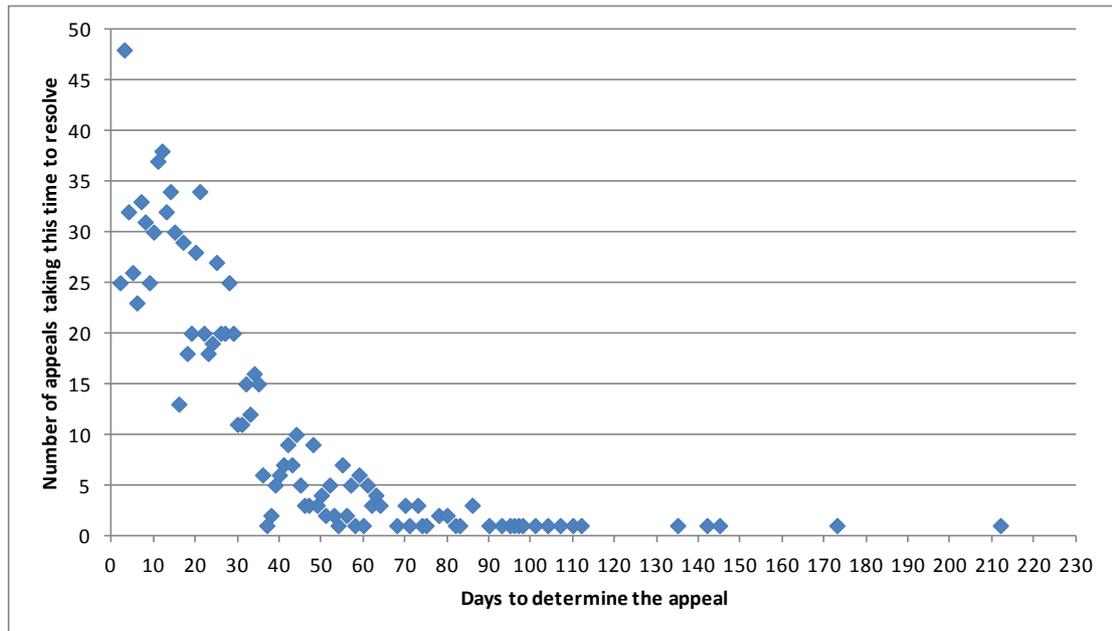


Figure 2.4 Length of time taken to resolve appeals

- 92 We chose and reviewed in detail three of the appeals taking over 100 days including the one which took 212 days to resolve. In each case the delay had been caused by the client either not providing information or taking a long time to respond.

*Delivery Partners' views*

- 93 Just under 50% of the 103 Delivery Partners responding to this question routinely appeal applications that are refused first time around (30% always and 19.4% mostly) with a further 24% occasionally. Case workers appear, at least to some extent, to be resigned to the process. Typical comments included:

*“Always appeal and always get approved on appeal, which is why we get frustrated to understand why it was not approved in the first instance.”*

*“Always appeal as long as the family wants us to. May have to appeal several times to get all the items requested.”*

*“An appeal takes 20 days. A case worker was advised by the Call Centre that it would be quicker to put in a second application instead of going through the review process!”*

*“Our case workers always go to appeal and almost all appeals have been successful. However this involves additional time and effort and in the meantime the applicant may be experiencing hardship.”*

*“We are usually told ‘sorry you cannot apply, go for a budgeting loan instead, and if that is refused, then apply for a DAF’. This all takes a ridiculous amount of time - meanwhile the client is sleeping on the floor.”*

*“This is what I mean by obfuscation. It is hard to avoid the sense that things are refused for no other reason than to keep the application on hold.”*

### 2.3.2.5 Fulfilment of goods and cash payments

#### *Process*

- 94 Approved awards are passed electronically to FFT over a secure internet connection. FFT then:
- (1) Place onward orders with their suppliers for the delivery and, where appropriate, installation of goods.
  - (2) Issue pre-payment cards for shops such as Argos for specific items that applicants can pick up themselves or have delivered.
  - (3) For EAP, transfer cash payments either directly to the applicants' own bank accounts or use the PayPoint Cashout service so that applicants can obtain the cash using the many retail outlets that provide the service.
- 95 One approved application can result in several orders being placed as each application could be for a number of items and related services. For example, the purchase and installation of a cooker would result in at least two orders - one for the cooker and one for its installation - and the award could also include a refrigerator, washing machine and other household goods needed for independent living.
- 96 FFT have national agreements in place with:
- (1) Argos
  - (2) Euronics
  - (3) Homebase
  - (4) Park Clothing
  - (5) PayPoint
  - (6) The Banks Automated Clearing System (BACS)
- 97 FFT use their standard IT platform to deliver the fulfilment service. They place an order for each required item/service on the relevant supplier. NPS provide the client with details on how to fulfil their award. For PayPoint CashOut this is by an SMS text sent directly to the Beneficiary's mobile phone. Pre-payment cards are posted to the Beneficiary for their activation and use. The award letter from NPS for fulfilment at Euronics stores contains details of how to obtain their goods. Sometimes the details of awards are provided to the Delivery Partner, if the client is being supported in making their application.
- 98 The FFT IT fulfilment platform and the surrounding business processes have been implemented and deployed for several benefit-related schemes. All DAF orders are identified by individual unique application identifiers and invoice payments are made via a separate bank account set up specifically to administer DAF monies.
- 99 Once a quarter, the suppliers pay a rebate to FFT for the goods and services delivered to clients. This is paid back to the Welsh Government. In the year to March 2014, this rebate totalled £228,422.

- 100 FFT have recently identified one area where Euronics awards and PayPoint awards have not been redeemed and have expired wholly unspent as the grant recipient has not collected the goods. This accounted for £177,554 after deducting the 3.5% rebate and the transaction fees in the half-year to September 30<sup>th</sup> 2013. They expect the full year net refund to be in the order of £413,000 and have put in place procedures to track and report these on a systematic basis.

*Volumes*

- 101 Table 2.9 below lists the number of orders placed on the various suppliers as a result of the awards and their value in the year to March 2014. The number and value of awards paid reflects what was actually expended by the DAF in this period as opposed to the value awarded.

**Table 2.9 DAF orders placed year to March 2014**

Orders placed	Year to March 2014			
	Number	Value £	Number	Value £
<b>Orders processed - predominantly IAP</b>				
Argos/Homebase payment card	7,608	£2,342,877.47		
Britannia removals	0	£0.00		
Euronics white goods	7,994	£4,159,245.89		
Park clothing payment card	1,003	£24,245.00		
<b>Total</b>			16,605	£6,526,368.36
<b>Orders processed - predominantly EAP</b>				
BACS	1,580	£72,337.28		
PayPoint	16,357	£525,469.40		
<b>Total</b>			17,937	£597,806.68
<b>Total number of orders/expenditure on DAF</b>			<b>34,542</b>	<b>£7,124,175.04</b>
NB Each award granted can result in several orders placed on suppliers. Hence the total number of orders is more than the total number of awards.				
The values of the orders placed and paid are routinely reconciled to the DAF Bank account and are subject to both internal and external audit. However, NPS have not reconciled the number of cash payments				

(Source March 2014 Summary Performance report - The report does not reconcile the values paid to the value awarded)

*Fulfilment times*

- 102 The Welsh Government sets service levels for successful applications as follows:
- (1) IAP recipients within two weeks of receiving the application.
  - (2) EAP recipients within a maximum of 24 hours of receipt of application - except those received late on a Friday, over the weekend or on public holidays which are fulfilled on the following working day.
- 103 The NPS March 2014 Summary Performance report provides fulfilment times only for the month of March. We have reproduced their data in Table 2.10 below which shows that the service levels were met in March 2014.

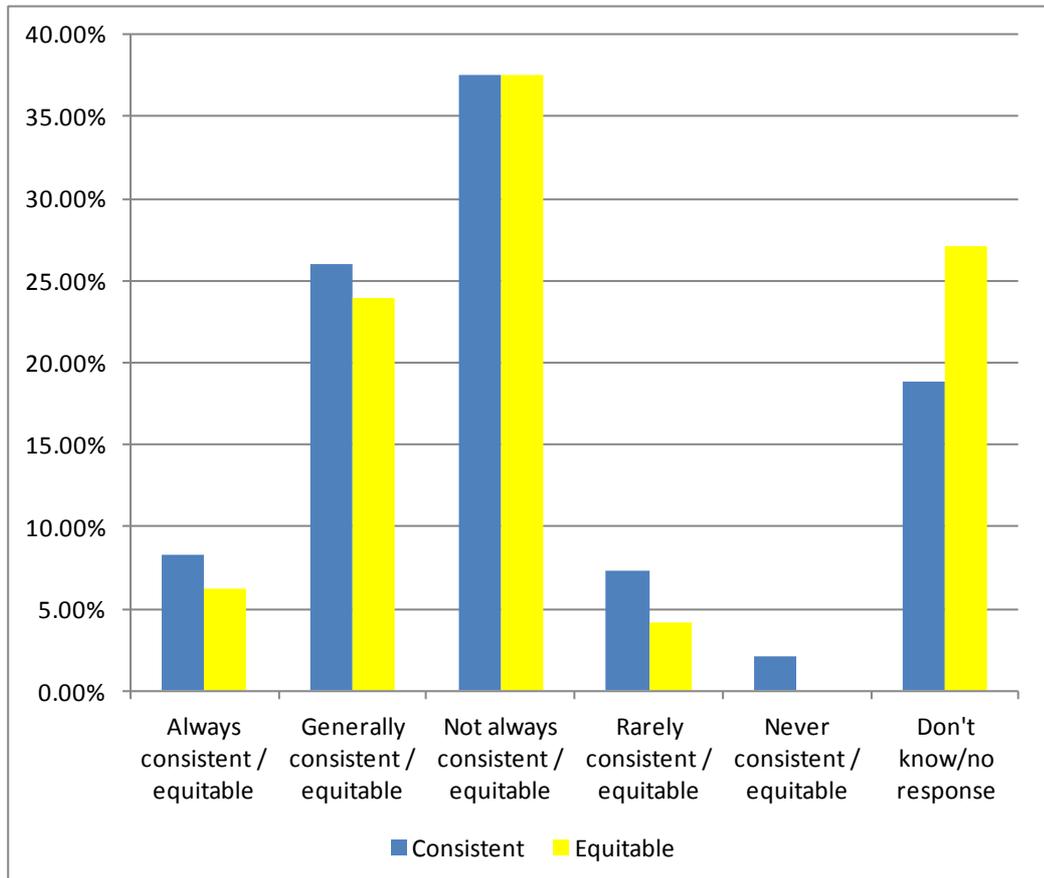
**Table 2.10 Fulfillment times**

March 2014			
EAP	24 hours	Over 24 hours	% in service level
1,952	1,946	6	99.7%
IAP	2 weeks	Over 2 weeks	
1,108	1,108	0	100.0%

*Delivery Partners' views*

104 As can be seen in Figure 2.5 below, Delivery Partners believe that there are inconsistencies in fulfilment decisions<sup>9</sup>.

**Figure 2.5 Respondents' views of how consistent and equitable the IAP fulfillment decisions are (including those reviewed) in terms of assessment of need, items funded and levels of funding**



105 Typical comments include:

*“Have similar cases but different assessments and it seems to be whether you catch an adviser on a good or a bad day. On the phone the inconsistencies are quite dramatic so I prefer to go on-line. Examples:*

<sup>9</sup> Based on 103 responses to the survey

*Fridge not being awarded for a diabetic client who, for health reasons, needed to keep his insulin in a fridge. An adviser who considered that a washing machine was a luxury for a family of 5 children.”*

*“Had two applications in two different locations for similar items but different results.”*

- 106 We put the inconsistency comments to the NPS Business Centre. One of the Delivery Partners in our telephone interview gave us three example applications which the case worker considered to be identical but which had received different responses. We asked for an explanation of the reasons for the different decisions in each of these instances. We have reproduced NPS’s responses below and added our own notes.
- (1) Internet application that was initially rejected but approved at 1<sup>st</sup> stage appeal. The decisions were consistent with guidelines as the first was overturned once adequate identity details had been provided.
    - (a) Background: Fleeing Domestic violence. Resettlement, Applicant only.
    - (b) Refused as multiple attempts to verify the client’s identity and circumstance failed.
    - (c) Tier 1 review requested and supplied further information.
    - (d) Granted essential items only. Total amount awarded £980.00.
  - (2) Telephone application that went to 2<sup>nd</sup> stage appeal. The decisions were consistent with guidelines and progressively overturned in the two stage appeal process as further detail was provided.
    - (a) Background: A woman fleeing domestic violence. Resettlement. Applicant only, children shown in notes
    - (b) Granted essential items only as the identity check presented evidence of an active ESA(IR) claim but no evidence of Child Tax Credit (CTC) so the beds for children were refused.
    - (c) Tier 1 Review requested for fridge freezer and beds.
    - (d) Granted fridge freezer but the beds were refused as CTC was still not evidenced.
    - (e) Tier two request made as CTC was now evidenced.
    - (f) Granted the total amount of £1,027.00
  - (3) Telephone application that went to 1<sup>st</sup> stage appeal. The original Decision maker and 1<sup>st</sup> stage reviewer did not take the same view. Whilst this shows an inconsistency, it also shows a strength that the appeal process is working.
    - (a) Background: Fleeing domestic violence. Resettlement.
    - (b) Granted essential items only.
    - (c) Tier 1 Review requested on washing machine, fridge freezer and flooring.

(d) Granted due to client vulnerabilities - the original decision maker had not considered the vulnerability sufficient to warrant and award. A second Decision maker made a different decision on appeal. There were also two supporting EAPs during the period of fleeing and resettlement for this applicant. Total amount awarded (IAP) £1,776.00 (EAP) £60.

- 107 As can be seen from the notes the reasons for approval/rejection are based on relatively small, but important differences in the details provided to support the application in two of the Discretionary decisions and a difference of view between the Decision makers in the third.
- 108 The above cases illustrate the issues taken into consideration and the need for applicants to provide all relevant information. Better training of the Delivery Partner case workers would have put them in a position to ensure that all the details were in place before submitting the applications. This would reduce a considerable amount of work, delay and frustration in these applications.
- 109 In our telephone interviews we asked respondents for their views on the fulfilment methods introduced with IAP i.e. providing vouchers for goods not cash. 83% of the 35 Delivery Partners who responded to this question felt that the fulfilment approach of providing goods rather than cash is the most appropriate way of fulfilling the award. Welsh Government colleagues indicated that a key question in the consultation document back in 2012 was whether this approach should be taken or whether cash payments should be made. These responses suggest that the established fulfilment approach is currently operating well. Typical comments included:

*"It is very positive that they provide goods not cash. Good quality items are provided by Euronics as well as excellent, delivery, installation and after-sales service - they are really, really good. Argos offers choice. The amounts awarded are very reasonable so there is some £ left over sometimes and Euronics are flexible in how they allow people to vire the funding to buy higher quality items."*

*"Very good, the system is then less open to abuse and the vouchers have to be spent on what they are given for i.e. a washing machine and not a school trip."*

*"I think it is good that the client no longer gets the money in their hands, as the money is spent on the items they now require more."*

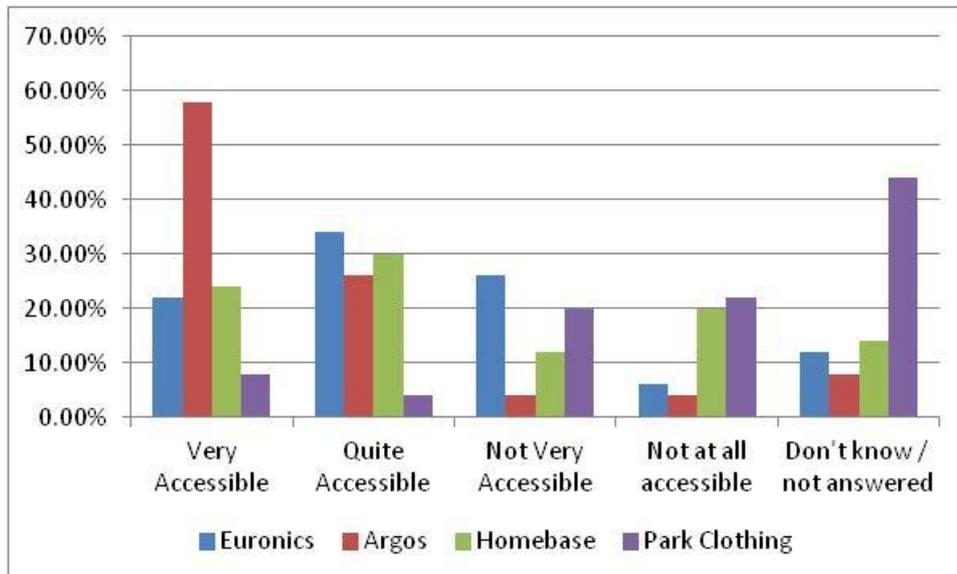
- 110 There were some negative comments regarding value for money and the restrictions around clients obtaining goods from other sources:

*"Most unsatisfactory. Prevents recipient from buying from local suppliers or buying second hand goods. The requirement to buy the cheapest item at all times is also a false economy."*

*"I understand the principle of vouchers rather than cash but if cash were also available and when an award of £100 has been made for a sofa from Argos - which cannot be purchased - then why not allow people to buy a second hand sofa from a re-cycling outlet at the lower cost? They could probably get a chair as well for the same price."*

111 Accessibility of the stores providing the services causes some problems. Whilst the cash payments via PayPoint are available at many retailers, the other suppliers are not always easily accessible to clients who have limited means of transport or are in rural locations. In our online survey we asked respondents' for their opinion on the accessibility of the fulfilment stores<sup>10</sup>.

**Figure 2.6 Respondents' views as to how accessible the fulfilment Partners' stores - Euronics, Argos, Homebase and others - are to the majority of their clients**



112 Typical comments included:

*“Argos is 28 miles away. A lot of people don't drive or own a car and a lot don't like using public transport due to mental health issues. It's not supporting the local shops. Vouchers are good but a scheme that means they can be used to support the local shops would be good.”*

*“Argos is OK for people living in the Arfon area of Gwynedd as they have branches in Caernarfon and Bangor, but no good for people living in the Dwyfor or Meirionnydd areas. There are several branches of Euronics, but the choice of items is limited. Homebase in Llandudno is too far away from any part of Gwynedd.”*

*“Our clients are all in West Cardiff, so have good access to all of these stores. It's probably a very different situation in rural Wales.”*

*“Our county covers a fifth of Wales, most people have to travel 35 miles to reach the stores.”*

*“These businesses are not easily accessible to our service users and this means they are reliant on our service to purchase many of the items. Unless colleagues are aware to also include delivery and installation some items can be withheld due to financial difficulties. Homebase stores are at least 22 miles from our area.”*

<sup>10</sup> Based on 96 responses to these questions.

- 113 The Delivery Partners responding to the survey also had a series of suggestions for improving value for money in the goods provided and also for additional items to be funded. We understand that many of these have been raised before in the Delivery Partner Forums and are fed into Welsh Government's policy reviews. We have also passed these suggestions onto the Welsh Government for consideration. In summary they included:
- (1) Greater use of suppliers that are local/close to recipients of funding to reduce client travel costs and support the local economy.
  - (2) Increased awards for items such as flooring, sofas and other furniture. There were also many suggestions for supplying used goods instead of new so that more items could be purchased.
  - (3) Suggestions that 'white goods' could be purchased at lower cost than those supplied by Euronics - although we are not clear if Delivery Partners have a full sight of the total costs of ownership - which might change their views.
  - (4) Monies for rent deposits where clients are not eligible for budgeting loans.
- 114 40% of the 86 people who responded to the question felt that the fulfilment system offers good value for money with a further 27% not having a firm view either way, and only 21% disagreeing. However, value for money is a personal judgement and the individual does not always have sight of the full costs of ownership and procurement costs.
- 115 Looking specifically at the EAP awards, these are paid in cash or direct into bank accounts. Recipients can obtain the cash from local retailers providing the PayPoint facilities. Respondents to our survey made various suggestions as to how these could be improved. We have also passed these suggestions onto the Welsh Government which, in summary, included:
- (1) Making the process even faster - when an individual is in an emergency they need funds very quickly. This particularly applies to:
    - (a) Emergency applications made outside of normal office hours - particularly at a weekend - which are not processed until the next business day
    - (b) Individuals being re-housed who often have to move in much more quickly than the two week service level timescale for IAP awards.
  - (2) Being very clear on eligibility - some of our respondents were unsure on what constituted an emergency and of the circumstances that would support an application to DAF for assistance.
  - (3) Increasing the amounts of the awards - individuals can be waiting for their DWP benefits to come through for two weeks and have no money for food or other essentials in the interim. A £30 award will not last for the two week period. We understand the Welsh

Government has now increased the amount that can be awarded under an EAP.

## 2.4 Reporting and audit

### 2.4.1 Original requirement

116 The Welsh Government set out the following requirements in their specification:

- (1) Reporting:
  - (a) The successful contractor shall compile and provide to the Client monitoring information, submitted initially on a monthly basis from the 1st May 2013 until otherwise directed by the Client. The monitoring information required will be developed and agreed with the Client prior to 1st April 2013 but will include information on the number of grants / payments awarded and their timeliness, as well as referrals made under the Social Fund, the outcome of those referrals and whether applicants (both successful and unsuccessful) were signposted to further sources of advice and support.
  - (b) The successful contractor shall provide to the Client by 15th July 2013 a full report on the grant scheme covering the period 1st April 2013 to 30th June 2013 ; and subsequent reports on a quarterly basis until 15th April 2015. These reports shall include:
    - An explanation of the monitoring carried out on the recipients of the grant/payments with a summary of the findings;
    - An analysis of the grant expenditure during the period together with information on the timing of payments to grant recipients including whether target times for the payments of Community Care Grants and Crisis Payments are being met;
    - Accumulate statistical information (on key themes) on applications and outcomes and to provide this to the Welsh Government. The key themes will be discussed with the contractor but will include a breakdown of applications by age, gender, lone parent status, age of any children in family, household type, disability, ethnicity, and the use of the Welsh language;
    - Provide the Welsh Government with profiles of expenditure and reports to show extent of performance in the previous quarter;
  - (c) Attend regular progress meetings at the Welsh Government Offices at Merthyr Tydfil.
  - (d) The successful contractor will be expected to respond to the day to day queries from the Tackling Poverty Unit in the Welsh Government.

- (e) The successful contractor shall provide to the Client such information in relation to any aspect of the management, implementation, monitoring or administration of the grant scheme as may be requested from time to time. This will include information or evidence for answering questions from National Assembly for Wales Members, National Assembly for Wales Committees or other Government departments or organisations as directed by the Client.
- (2) Banking arrangements:
    - (a) Ensure the grant resources are readily identifiable from those of any other scheme, person or organisation.
    - (b) Efficient and cost effective money transmission methods are used.
  - (3) Financial record keeping, controls and audit:
    - (a) Produce accounts for the grant scheme ensuring that they are properly presented, and that proper records relating to the accounts are kept.
    - (b) Ensure that all the financial controls and accounting systems agreed with the client are applied at all stages in the administration of the grant scheme.
    - (c) Ensure that full and proper systems are in place to prevent and identify fraudulent applications to the fund.
    - (d) The successful contractor must maintain a sound system of internal financial controls, including safeguards against fraud.
    - (e) Ensure that all funds received are directed to the purposes for which they have been provided and are administered appropriately and correctly.
    - (f) The successful contractor must also make arrangements to retain all papers or other records relating to the management, implementation, monitoring or administration of the grant scheme for a period of 6 years after the expiry or termination of their contract.
  - (4) Audit - The successful contractor must ensure:
    - (a) Its annual audited accounts separately identify expenditure on the grant scheme. The signed and audited accounts must be submitted to the Client within 6 months following the end of the financial year to which they relate.
    - (b) Full and proper audit trails are being maintained for all funds.

#### **2.4.2 What has been implemented**

117 These requirements have been embedded to varying degrees in the business processes described in the sections above. This section draws out how the business processes meet the requirements under the headings of Reporting, Financial record keeping and controls and audit.

### *Reporting*

- 118 We have covered the regular Newsletters to Delivery Partners and similar general communications in section 2.2. In addition NPS prepare three regular monitoring reports:
- (1) The monthly Service Performance Summary report. We have drawn from the March 2014 version of this report throughout the above sections. This forms the main report Welsh Government use to monitor the DAF.
  - (2) A quarterly Diversity Data report.
  - (3) End of Year overview for Registered Partner Organisations. This report draws its data from the monthly report in (1) above and provides an overview of activities completed and awards in the DAF.
- 119 As we state in section 1.4.1 (Data quality comments), the Monthly Service Performance Summary is prepared without the benefit of period end processing and contains many anomalies, most of which we have noted in the above sections. The only section that we believe conforms to standard accounting practices and accounting reporting quality is the Treasury Management table on page 35 of the Service Performance Summary report. This is reconciled to the DAF bank account and can be supported by the individual transactions that comprise the totals. It has also been subject to Deloitte's external audit.
- 120 NPS have confirmed that the monitoring reports are accurate but contain differences in the data due to the various times at which the data is extracted from the underlying computer systems. Welsh Government have accepted their explanations. Whilst this method of reporting activity may have been adequate in the early stages of the programme, these differences need to be addressed to improve the credibility of what otherwise is a good performance monitoring pack.
- 121 NPS have regularly compiled and provided monitoring information on a monthly basis from the 1st May 2013 as agreed with Welsh Government. This includes information on the number of grants / payments awarded and their timeliness. The Welsh Government decided that a quarterly report would not be needed as the monthly one provided information more regularly. The monthly and quarterly Diversity reports include:
- (1) An analysis of the grant expenditure during the period together with information on the timing of payments to grant recipients including whether target times for the payments of EAP and IAP are being met.
  - (2) Cumulative statistical information (on key themes) on applications as agreed with the Welsh Government and including a breakdown of applications by age, gender, lone parent status, age of any children in family, household type, disability, ethnicity, and the use of the Welsh language.
  - (3) The profile of expenditure to show extent of performance on a monthly and year to date basis.

122 The reports do not show:

- (1) Whether applicants (both successful and unsuccessful) were signposted to further sources of advice and support.
- (2) An explanation of the monitoring carried out on the recipients of the grant/payments with a summary of the findings.

*Financial record keeping, controls and audit*

123 NPS have agreed financial controls and accounting systems with the Welsh Government and implemented them. However, whilst the overall Treasury Management of the fund is robust and subject to internal and external audit and the whole process demonstrates some best practices, in our view, there are some gaps in the financial record keeping across the totality of the application and grant management process.

124 We have listed below Blue Alumni’s assessment of these practices:

**Table 2.11 Assessment of financial record keeping, controls and audit**

Process stage	Assessment
Delivery Partner management	Neither Family Fund Trading nor Northgate Public Services make any formal checks nor maintain a record of any checks on the Delivery Partner’s name, credentials, address or other data on the application form. By providing the Delivery Partner with a formal registration code, the DAF programme is essentially providing a ‘badge of trust’. This heightens the risk of a bogus Delivery Partner registering and then fraudulently representing clients.
Applications processing	<p>The division of the work of applications processing and determining the awards between 3 separate teams in the NPS Business Centre demonstrates good separation of duties across the individuals in the centre.</p> <p>This practice is weakened to some extent by the Decision makers on occasion also undertaking the recording of applications at busy times to ensure telephone response rates are kept to acceptable levels.</p> <p>However, Decision makers are not allowed to make a decision on an application they have received. NPS informed Blue Alumni that 30% of the applications are checked daily with the aid of software which prepares a report on any unusual staff member’s activity and that to date there have been no instances where the same member of staff has been identified against one application.</p>

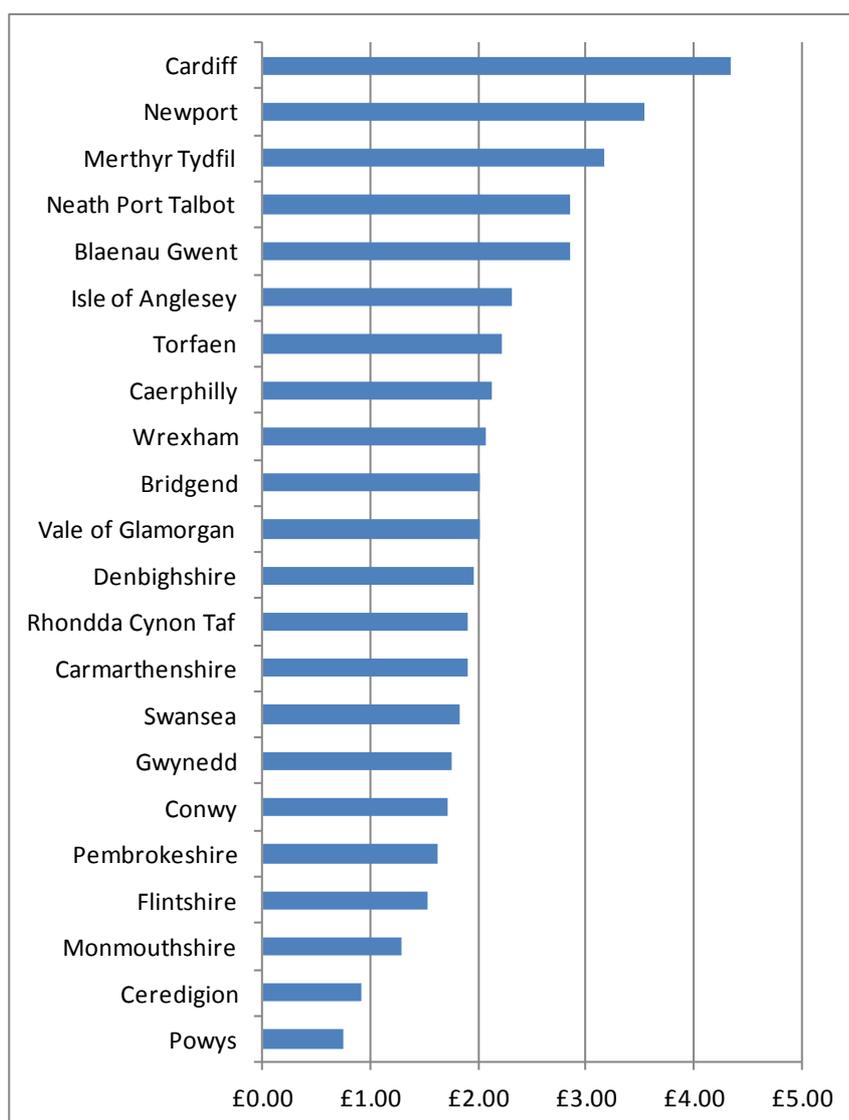
Process stage	Assessment
Eligibility checking	The eligibility criteria are clear and have been built into the applications processing software. Nevertheless the NPS Business Centre Advisers have some discretion in passing through marginal cases for further review. We see this as fully in-line with the policy rationale for the DAF.
Identity checking	<p>Using the DWP and CallValidate systems to confirm the identity of applicants provides a sound basis for checking identity. However, NPS have not evidenced any random follow up checks on applicants to ensure the details they have provided are accurate. This means that imposters and instances of identity fraud are less likely to be identified.</p> <p>Checking the identity of homeless and rough sleepers is particularly problematic. Whilst the grants to these individuals are generally small, they still require some form of validation. Greater use of a trained and accredited Delivery Partner network has the potential to mitigate the risk. As we suggest in 136(2) below this would require the on-boarding, registration and management of the Delivery Partners to be strengthened.</p>
Decision making process	<p>This is in two parts:</p> <ul style="list-style-type: none"> <li>• Once an item on the application has been approved, the Decision maker has the benefit of a decision tree to determine the amount of money to be paid for the item. This helps to ensure consistency and provides good financial control over the amounts awarded.</li> <li>• Deciding the items to be included in an award. There are no, and cannot be, fully deterministic rules for a discretionary award. The decision has to be based on the assessment of the individual reviewing the application. In our Delivery Partner survey 24% of 103 respondents felt the decisions were rarely or never consistent and based on the data in section 2.3.2.4, around 60% of appeals resulted in the original decision being overturned. Some form of 'decision tree', similar to the one above for determining the value of the award, would help to improve the consistency of the judgements made on whether to approve an award or not. This decision tree could also be shared with trusted Delivery Partners to help them manage applicants' expectations.</li> </ul>
Fulfilment	The FFT processes are well established and used across several grant schemes.
Banking arrangements	The DAF bank accounts are completely separate from the FFT and held in a special client account for the Welsh Government.

Process stage	Assessment
Producing accounts and reports for the DAF	<p>This is in three parts:</p> <ul style="list-style-type: none"> <li>• The accounts prepared by FFT on the overall Treasury Management of the fund are sound, audited and reconciled to the DAF bank accounts. This provides strong financial control and the ability to audit the published figures.</li> <li>• Bearing in mind NPS’s statement that the accounts prepared for applications processing/commitments on the DAF were accurate at the time they were prepared, sections of the Service Performance Summary reports: <ul style="list-style-type: none"> <li>○ Cannot subsequently be verified by the underlying transactions and hence have no audit trail.</li> <li>○ Are not reconciled to the Treasury Management accounts.</li> </ul> </li> </ul> <p>This makes the applications processing aspects of the grant administration system difficult to check. Any financial system that is difficult to check heightens the risk that fraud could be obscured.</p> <ul style="list-style-type: none"> <li>• It is not possible to obtain a full audit trail of an individual application from initial receipt to fulfilment without viewing the transactions on computer screens located in premises over 100 miles apart.</li> </ul>
External audit	<p>The Treasury Management aspects of the fund are subject to both internal and external audit.</p> <p>At present there are no plans to undertake either an internal or external audit of the applications processing aspects of the DAF. These processes authorise the payment of over £7 million per annum of Welsh Government Public funding. We view the absence of a formal external audit of these processes as a major weakness.</p> <p>The weakness is mitigated to some extent by NPS undertaking formal risk assessments to identify areas where fraud can occur and agreeing with Welsh Government mitigating actions. However, whilst the risk management processes are commendable, they do not replace independent audit.</p>
Retention of papers	<p>NPS have a policy to keep all hard copy application forms for one year rather the requisite 6 year period set out in the specification.</p>

## 2.5 Delivery across Wales

- 125 One of the main reasons the Welsh Government implemented the DAF with this type of central Business Centre was to ensure uniform delivery across Wales with limited variation in the level of discretionary awards. The systems that have been implemented centralise and standardise the decision making processes. The current approach provides the opportunity to ensure Welsh national priorities can be implemented uniformly across the country.
- 126 Our preliminary assessment indicates that the Fund is meeting needs in areas of greatest deprivation. However, we have been unable, within the scope of this review, to determine fully if 'need' is evenly met across Wales. This is due to:
- (1) The absence of a truly representative 'proxy for need' that indicates the relative level of need in different locations.
  - (2) The lack of comprehensive data on Delivery Partner locations. The data NPS have provided do not have all the postal addresses of the locations where Delivery Partners provide DAF support. In many cases the NPS lists just provide notes such as 'delivery across Wales' which is inadequate to assess coverage in any detail.
- 127 As an alternative, we have used the spend on DAF in each Local Authority compared to its population size. Figure 2.7 below illustrates the expenditure on DAF per head of population in each local authority in the year to March 2014.

**Figure 2.7 DAF awards per capita (total population size) in each Welsh local authority**



(Source March 2014 Service Performance Summary but see comments in paragraph 11 on the robustness of this data)

128 As can be seen from the table, the DAF scheme is being applied for and supported more in Cardiff, Newport, Merthyr Tydfil, Neath Port Talbot and Blaenau Gwent than in other areas. These areas have higher levels of deprivation than the other local authorities so these figures broadly indicate a distribution of the Fund according to need.

### 3 Conclusions and Recommendations

129 The DAF programme was implemented in a very short period of time (circa 4 months) and is fully operational. A range of Delivery Partners are engaged and are supporting citizens in need to access the Fund and vulnerable individuals have benefitted from the awards. Welsh Government, NPS, FFT and WCBC should be commended for this achievement.

- 130 In the year from 1<sup>st</sup> April 2013 to 31<sup>st</sup> March 2014, out of 40,780 applications to the Fund, 26,898 were agreed and paid to vulnerable individuals with an award ranging from £5 to £100 for emergencies to a maximum of £4,200 for individuals and families moving into independent living. From the work we have undertaken, these awards have been given for the purposes intended, as set out in Welsh Government Guidance, and the number of Welsh citizens receiving funds is distributed roughly in proportion to the degree of need in each local authority area across Wales. The funds have been given for purposes that range from money for food in emergencies to supplying refrigerators, washing machines, cookers and other household items to support independent living.
- 131 Whilst we were not tasked with collecting evidence on the effect the fund has had on peoples' lives<sup>11</sup> all the Delivery Partners involved in the DAF who we contacted in our survey emphasised the positive impact that the fund has had on vulnerable people in need. We have been informed of cases where the DAF has helped:
- (1) Individuals who could not obtain budgeting loans for basic living essentials due to them being unable to repay them.
  - (2) In exceptional circumstances (as travel is not normally eligible for funding) contributing towards a father's travel costs to take his son with leukaemia to hospital while waiting for DWP benefits to be received.
  - (3) A single mother with an 8 month old baby who was sleeping on a blow up mattress by providing beds and also signposting her to other support agencies for further advice.
  - (4) A woman with four children set up in a new home after fleeing domestic violence.
- 132 In our view the programme now forms a good base on which to build. However, as with any programme, improvements can always be made and the DAF is no exception. There are a number of areas where the DAF processes are not fully in line with the original concept set out in Welsh Government's specification<sup>12</sup>. However, this is to be expected as this was the first time a scheme like this had been established in Welsh Government and lessons have been learnt during implementation, in part taking into account feedback from partners. We have identified, with the help of those involved in its management and operation, specific areas where the operational processes can be improved or would benefit from further review.
- 133 In this section we review each major process group in turn and set out our conclusions and recommendations for improvements.

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<sup>11</sup> Blue Alumni were tasked with assessing the operation of the fund and the effectiveness of its processes.

<sup>12</sup> See section 2 of the main report,

### 3.1 Greater use of the Delivery Partner network

134 The limited data available to Blue Alumni indicate that applications supported by Delivery Partners are more likely to be successful than others. Eligibility and the discretionary decision making process is based on policy criteria. Having a well-trained and appropriately distributed Delivery Partner network across Wales whose staff and case workers fully understand the eligibility criteria and discretionary guidelines would result in:

- (1) A reduction in the number of ineligible applications as the Delivery Partners would be able to filter out ineligible applicants and signpost them to other sources of support at an early stage in the process. Whilst we do not have robust figures to provide a detailed estimate, the data suggests that there are around 3,000 ineligible applications per year and that Delivery Partner supported applications are around 20% more likely to succeed than unsupported applications (see Tables 2.5 and 2.7).
- (2) Potentially greater use of the on-line application channel placing less demand on the telephone advisors' time.
- (3) More effective management of eligible applicants' expectations on what they might be awarded in funding.
- (4) Greater transparency around the funding decisions made and fewer appeals.
- (5) Greater assurance that all citizens across Wales can learn of and access the DAF if needed.
- (6) Reduced NPS processing and appeals activities.

135 In addition, the DAF Delivery Partners potentially could provide extremely valuable and wider support to the Welsh Government's Tackling Poverty Agenda. They are in direct contact with the most vulnerable citizens in Wales and are keen to provide support to improve people's lives. Rather than limiting their efforts to supporting the DAF, the Welsh Government could build on this group, possibly through a separate programme, to help implement a range of initiatives.

136 The Welsh Government should:

- (1) Conduct a series of sessions with the Delivery Partners to review the recommendations in this report and clarify actions.
- (2) Improve the Delivery Partner registration, on-boarding and monitoring processes.
  - (a) Improve recording of their contact, delivery locations and organisation details. This should include formal checks to ensure they are bone-fide operations. Ideally Delivery Partners should be able to apply on-line for DAF status and, once approved, maintain their own contact records.
  - (b) Set out formal compliance procedures. These should include:

- Data protection procedures to ensure client details are held securely and in compliance with Data Protection legislation. This would enable the NPS Business Centre to rely on registered Delivery Partner procedures for data protection and remove the need to ensure the client is present on each occasion.
  - Undertaking, where possible, preliminary client identity checks and eligibility screening to reduce the number of failed applications due to identity issues.
- (c) Conduct and record formal Delivery Partner training in the established DAF processes to ensure they understand the systems, eligibility and discretionary criteria used.
  - (d) Fully record their involvement in supporting applications.
  - (e) Monitor their success/failure rates robustly.
  - (f) Conduct periodic audits of their processes/compliance, based on their level of involvement and success rates using a risk based audit approach.
- (3) Identify any gaps in the Delivery Partner network - either in delivery locations across Wales or in the specialist client groups supported or both - and target recruitment to fill these gaps where possible.
  - (4) Consider if the DAF Delivery Partner network could be used in other programmes across Wales and options for developing the Delivery Partner network and its continuing management.

### 3.2 Application processing

137 The DAF application processing procedures work well. Whilst the workflow between the three teams in the NPS Business Centre is managed using a fairly basic approach with Excel spreadsheets, this works and is effective. The main areas where there could be improvements are:

- (1) The application forms.

These are long, involved and complex to complete. Nearly 30% of the Delivery Partners indicated that they are too difficult for most clients to complete (see paragraph 60) and would benefit from improvements in design.

- (2) Channel shift.

86% of applications are made either by phone or on paper application forms (see Table 2.2). These are far more costly to process than on-line submissions. Phone and paper based applications cannot be eliminated completely as many clients do not have access to the internet nor do Delivery Partners when working in outreach locations. However, as each telephone application takes around 30 minutes to complete (see paragraph 54), a 1% shift in applications from the telephone to the internet

channel would result in about a month's reduction in processing effort on current application volumes.

(3) Transparency in decision making.

The feedback letters do not always give sufficient detail as to why an item has not been awarded. This has led to Delivery Partners being unclear on the reasons. The NPS Decision makers' notes contain fairly comprehensive reasons why an application has been successful or declined which should be added to the letter to provide feedback. Greater clarity in the reasoning would provide feedback to the Delivery Partners on what information should be provided on the application form and also what is excluded from the fund. This would in turn reduce processing times and workloads in the NPS Business Centre. We understand that Welsh Government and NPS are looking at this issue.

(4) Role of the NPS Advisors

Feedback we received from Delivery Partners was that the staff operating the NPS Business Centre could manage and meet Delivery Partner expectations more effectively. However, it has to be recognised that this is quite a sensitive issue as declining a discretionary award is not popular, especially if the applicant or their representative does not fully understand the reasons. In addition, as part of this evaluation, NPS have informed us of instances where partners and applicants have, at times, become abusive over the phone. In terms of dealing with applications, at present, the Delivery Partners feel the staff could do more to support them.

This evaluation has found that case workers' views are influenced by their lack of knowledge of the policy constraints put on the advisors, the checks the NPS Business centre have to make to prevent fraud and the clarity of the reasons why some applications are turned down.

We believe that greater transparency and communications of these matters to the Delivery Partner network would improve the image of the advisors in what, at times, is a difficult role. We also recommend that NPS use the Net Promoter Scores we have obtained in this evaluation as a baseline from which to measure future progress.

(5) Other suggestions

In our survey, the Delivery Partners made some suggestions as to how the scheme could be improved.

- (a) Over 65% (of 98 respondents) felt that the application process can be improved. Suggestions included simplification of the application forms, providing more guidance on what can and cannot be funded and placing greater trust in Delivery Partners.

- (b) Extending the range of goods and services that can be routinely included in awards, such as carpets in appropriate circumstances.
- (c) Providing further delivery options for applicants with special needs or who have limited budgets to pay for, or challenges in travelling to and carry back goods from the fulfilment outlets.

We understand that Delivery Partners have put forward similar suggestions to Welsh Government in the regular consultative meetings that take place, hosted by NPS and FFT. We recommend that the Welsh Government convenes a series of process review/design workshops between NPS and the Delivery Partners to identify and implement the improvements that can be made to each step in the application process and act on cost effective, agreed outcomes.

### **3.3 Fulfillment**

138 Delivery Partners' views of the fulfilment approach, in providing goods rather than cash, were overwhelmingly positive (see paragraph 109). 84% of the 38 Delivery Partners who responded to this specific question in our telephone interviews felt that the fulfilment approach of providing goods rather than cash is the most appropriate way of fulfilling the award. Their main concerns were:

- (1) The accessibility of some of the stores/providers.
- (2) That Value for Money might be better served, in some cases, with the provision of used goods from reliable sources.
- (3) The inability to use local suppliers.

139 We have provided the suggestions made by the Delivery Partners in our survey to the Welsh Government under separate cover. We recommend that the Welsh Government consider these suggestions and assess the feasibility/benefits of adopting them.

### **3.4 Reporting and audit**

140 NPS and Welsh Government jointly agreed a set of periodic reports to monitor activity and expenditure on the DAF. NPS have produced these according to schedule and used them to inform discussions with Welsh Government in regular contract monitoring meetings.

141 The absence of full period processing procedures is the main cause of the timing differences generating apparent discrepancies we have described within our report. Whilst period end processing is implemented for the fulfilment and Treasury Management aspects of the Fund undertaken by FFT it is not for the initial application processing stages conducted in the NPS Business Centre. The reports would benefit by the introduction of full period end processing routines and having fully reconciled tables across the various stages in the application, award and fulfilment processes. This would improve consistency in the reports and enable NPS to take copies of the

underlying data at the period end which would support any audit of activity levels at the end of each period.

- 142 Blue Alumni assessed the strengths and weakness of the financial controls within the processes and found the financial practices to be generally strong. NPS conduct regular reviews of the potential risk of fraudulent applications, review these with the Welsh Government and agree mitigating actions.
- 143 We have noted a few areas where the controls could be improved. These are:
- (1) Completing more formal checks on the credentials of Delivery Partners to 'accredit' them. The Welsh Government relaxed this original requirement for the programme to get the Delivery Partner network in place quickly. We recommend that this decision is revisited particularly if more use is to be made of the Delivery Partner network in the future.
  - (2) Providing more guidance on the circumstances where discretion can be used in decision making and sharing this with Delivery Partners to improve transparency and consistency.
  - (3) Introducing full period end processing as detailed above.
  - (4) Subjecting the applications and awards processing in the NPS Business Centre to external audit as originally envisaged. At present, only the Fulfilment and Treasury Management aspects of the fund are subject to internal and external audits but NPS's authorisation of over £7 million of DAF awards is not.

### 3.5 Value for money

- 144 Processing costs are in the order of £34<sup>13</sup> per application which we believe is reasonable for a programme that has to balance the accountability of awarding Welsh Government funding, reach across all of Wales and meet tight service levels.
- 145 These processing costs compare reasonably to the IAP grants which are in the order of £1,000 or more. However, when considering the emergency payments of around £30, it has to be remembered that all the same checks have to be made to ensure probity. Implementation of several of the suggestions and recommendations we have made could reduce the level of processing effort needed. Welsh Government could consider setting targets for efficiency improvements in processing costs in the next stages of the DAF.
- 146 Another option could include making greater use of the Delivery Partner network. 69% of 90 individuals responding to the question indicated their willingness to be more involved. They are face to face with applicants and in the best position to assess clients' needs; filter out ineligible applications; and make more applications on line. We suggest that this

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<sup>13</sup> £1.4 million divided by 40,780 applications

approach is explored with them further to determine if it would relieve some workloads.

- 147 Identity checking, final decision and payments could still be made via the current system. Subject to the internet application channel being used, this approach would speed up the application process and reduce costs at the same time.

## Appendix 1 - The individuals and organisations contacted in the qualitative research programme

Staff interviewed in the main central partner organisations			
Welsh Government	NPS	FFT	WCBC
Charlotte Anscombe	Anne Seddon	Alistair Young	Mathew Evans
Chris Gittins	Arwyn Humphries	Helen Richards	
Mike Harmer	Deveshin Reddy	Paul Gay	
Lisa Howells	Helen Keelty	Paul Smith	
Semele Mylona	Jacqueline Gilbert	Mike McEvoy	
	Nigel Burrows		

Profile of the respondents to the survey of Delivery Partners		
<b>Method:</b>		
Telephone	44	38.6%
Face to face	6	5.3%
On Line	64	56.1%
TOTAL INTERVIEWS	114	
<b>Interview conducted in Welsh or English:</b>		
Welsh	2	1.8%
English	112	98.2%
TOTAL INTERVIEWS	114	
<b>Type of DAF Partner in the face to face and telephone survey:</b>		
Registered Partner	37	74%
Unregistered Partner	6	12%
Signposting Organisation	4	8%
RP but signposting only	2	4%
Not known	1	2%
TOTAL RESPONDENTS	50	
<b>Sector:</b>		
Local Authority	27	23.7%
Housing Association	26	22.8%
Citizens Advice Bureau	4	3.5%
Local Authority Hostel	2	1.7%

<b>Profile of the respondents to the survey of Delivery Partners</b>		
Credit Union	1	0.9%
Health Authority	1	0.9%
Hospice	1	0.9%
Unspecified charities and 3 <sup>rd</sup> sector	29	25.4%
Other	23	20.2%
<b>TOTAL RESPONSES</b>	<b>114</b>	

<b>Organisations responding to the survey</b> (NB More than one individual may have responded from a single organisation)	
ACE (Action In Caerau And Ely)	Hafan
Action For Children	Hafod Care Association
Adref Ltd	Hafod Housing Association
Age Concern Morgannwg	Huggard Charitable Trust
Age Cymru Swansea Bay	Isle of Anglesey CBC
ANS	Melin Homes
Arch Initiatives	Neath Port Talbot CBC - Welfare Rights Unit
Blaenau Gwent County Council	Neath Port Talbot Council for Voluntary Service
Bridgend CBC	Newport CBC
Bridgend Lifesavers Credit Union	Newport City Homes
Brynmenyn House	Newport Council Housing Options
Buttle UK	North Wales Energy Advice Centre
Cadwyn Housing Association	Office of Sian James MP
Caer Las Cymru	Pembrokeshire Care Society
Caerphilly County Borough Council	Pembrokeshire u3a
Caerphilly County Borough Council - Rents Service	RCT Homes
Cardiff Charities Consortium	Rhondda Housing Association
Cardiff County Council - Ty Greenfarm (Hostel)	Right From The Start
Cardiff YMCA	Shelter Cymru
Cardiff YMCA Housing Association	Sight Support
Cardigan Youth Project known as Area 43	Solas Cymru
Ceredigion Care Society	St David's Hospice Care
Charter Housing Association	Swansea Neath Port Talbot Citizens Advice Bureau
Citizen's Advice Bureau	Swansea Tenancy Support Unit
Citizens Advice Bureau Denbighshire	Swansea Young Families Scheme - Action for Children
Citizens Advice Bureau Merthyr Tydfil	Tai Ceredigion
Citizens Advice Bureau Pembroke	Tai Wales & West Housing
Coastal Housing Group	Terence Higgins Trust
Community Housing Cymru Group	The Friends Of Velindre Hospital
Constituency Office - Jessica Morden MP	The Prince's Trust
Conwy County Council	The Wallich Centre
Cornerstone Support Services Limited	Torfaen County Borough Council
Cymdeithas Tai Cantref Cyf	Torfaen Women's Aid
Cyrenians Cymru, Tenancy Support	United Welsh Housing Association Ltd
Disability Can Do Organisation	Urban Villages Communities 1 <sup>st</sup>
Family Housing Association (Wales) Ltd	Vale of Glamorgan
Felinfoel Family Centre	Victim Support (Cardiff)
Flintshire Welfare Rights Unit	Wales & West Housing Association

Organisations responding to the survey (NB More than one individual may have responded from a single organisation)	
Flying Start	WA-RCT
Gofal	Wrexham CBC Welfare Rights
Gwalia Care and Support	Wrexham CBC Tenancy Support
Gwynedd Council	Youth Cymru

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