



The Commission for
Local Administration in England

Special Report



The Local Government Ombudsmen

Advice and guidance on arrangements for forwarding housing benefit appeals
to the Appeals Service

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Foreword

Section 23 (12A) of the Local Government Act 1974 provides that the Local Government Ombudsmen may, after consultation with the authorities concerned and other relevant organisations, provide such advice and guidance about good administrative practice that they consider appropriate, and arrange for it to be published for the information of the public.

A pattern of delays by some councils in the referral of housing benefit appeals to the Appeals Service is a particular concern of the Ombudsmen. The Council on Tribunals also expressed concern in its Annual Report for 2002/03. The Local Government Ombudsmen have received a number of complaints about such delays, which can be a cause of considerable financial hardship and/or distress to claimants.

The law provides no specific time limit for referrals of appeals. However, the Ombudsmen are pleased to note that the Department for Work and Pensions (DWP) has recently responded to their earlier recommendations that appeals should be referred within four weeks. The DWP has set that as the standard maximum period, but on their past performance some councils have a long way to go to meet that standard. This report aims to highlight some of the issues involved and provide guidance on achieving better performance in future.

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Local Government Ombudsmen
February 2004

Executive summary

- 1 The English Local Government Ombudsmen have become aware, as have other organisations, of a pattern of excessive delays by some councils in passing appeals about housing benefit on to the Appeals Service. Data collected by the Appeals Service in 2003 indicates that it was taking an average of over 24 weeks for appeals to be referred. Such delays can be the cause of significant hardship to claimants.
- 2 A period of four weeks has now been set as a national standard within which councils should pass on appeals. On past performance some councils have a long way to go to meet that standard.
- 3 We have therefore decided to issue advice that councils should do the following:
 - ensure that adequate training is given to all staff to ensure that submissions are in proper order and contain all relevant paperwork, and that staff are reminded of the need for urgency in dealing with appeals;
 - make sure that all correspondence on review and appeal requests is fast-tracked, and progress on each appeal case is monitored in order to help meet the four-week deadline;
 - instigate a system which identifies and gives special priority to those cases where there are particularly difficult personal circumstances, such as a threat of eviction to the claimant;
 - ensure the housing benefit and housing departments liaise where there is an outstanding appeal by a council tenant;
 - maintain frequent – at least monthly – monitoring of numbers and waiting times for appeal submissions;
 - act promptly where the number of appeals or the time taken appears to increase;
 - develop a properly resourced and practical plan for reducing backlogs speedily where they already exist;
 - make a senior manager responsible for ensuring that targets are met and sufficient resources are made available to enable that to happen;

- include performance in this area in the matters reported to the council's performance monitoring committee;
- make sure that they are not unnecessarily
 - demanding fresh appeals or imposing further conditions before processing appeal requests; or
 - seeking additional information at a late stage; and
- ensure that all enquiries about an appeal are responded to promptly.

A The law and guidance

- 1 Housing benefit is a national welfare benefit administered by local authorities, the purpose of which is to help people on low incomes pay their rent.
- 2 Claimants can appeal against what they consider to be adverse decisions on their housing benefit claims. Each new decision carries a fresh right of appeal. As claimants have this statutory right of appeal, the Ombudsmen do not usually investigate a complaint about a council's assessment of entitlement to housing benefit.¹
- 3 The Housing Benefit and Council Tax Benefit (Decisions and Appeals) Regulations 2001 (the Regulations) changed the arrangements for such appeals. These are now considered by independent tribunals of the Appeals Service for Social Security, Child Support and Vaccine Damage, rather than by council administered Review Boards (as had previously been the case). The Regulations came into force on 2 July 2001.
- 4 In March 2001 the then Department of Social Security issued guidance to councils about the operation of the new appeals procedure in Circular HB/CTB A11/2001 (the Circular).
- 5 The claimant can ask the council itself to revise a decision but also has the right, at the outset, to appeal to the Appeals Service against the decision. If a revision is requested, a right of appeal exists against the decision which follows the revision request. An appeal must be sent to the council and be made within one month of the council's decision. The Circular states that when a claimant appeals at the outset, this should lead to a reconsideration of the decision by the council unless that decision has previously been reviewed and no new information has been provided. If, on reconsideration following an appeal, the decision is unchanged by the council, the claimant is notified and the appeal should proceed to the Appeals Service. Where the decision is altered to the claimant's advantage, a new appeal must be made if the claimant still wishes to dispute the decision: if the decision alters to the claimant's disadvantage the original appeal continues, but the claimant has the right to make further representations.
- 6 The Circular says that, if a claimant has appealed immediately on receipt of a decision and the council is unable to revise the decision to the claimant's advantage, the appeal together with a submission from the council setting out the facts of the case and the reasons for the decision should be sent to the Appeals Service. The council should copy the papers to the claimant and any representative. The matter then rests with the Appeals Service.

1 Local Government Act 1974, section 26(6)(a)

- 7 The Regulations do not specify or suggest a timescale for the council's actions between receipt of the appeal request and the submission of the appeal papers to the Appeals Service.
- 8 Where complainants have appealed against a decision to recover an overpayment of housing benefit, they frequently find that deductions are made from their ongoing housing benefit payments despite their appeal. Any additional delays in the appeal process can then cause further hardship. Government guidance¹ states that councils should not seek to recover an overpayment until the time limit for requesting a review has expired.
- 9 The Benefit Fraud Inspectorate advises that councils will be performing "above standard" if they set public targets for handling appeals. It also sets out as examples of good practice:
- checking that the decision is correct before offering an explanation or written statement of reasons;
 - ensuring that the person carrying out the reconsideration of a decision is not the original decision maker, if practicable;
 - analysing the reasons for requests for reconsideration and appeals;
 - identifying training needs and instigating remedial action;
 - setting targets for dealing with reconsideration requests and appeals referrals; and
 - reporting to senior managers on outcomes against targets and on implementation of appeal decisions.
- 10 The Institute of Revenues, Rating and Valuation (IRRV) has recently produced a report of its Committee of Inquiry into the Operation and Structure of Housing Benefit and Council Tax Benefit in England, Scotland and Wales.
- 11 Commenting on appeals, the report says that it is essential that councils properly resource their appeals systems to handle the additional work arising from the new system. It goes on:
- "Given the crucial importance of housing costs, it is essential to avoid excessive delay. A tenant's ability to meet his or her rent and/or council tax may well depend on the outcome of an appeal. Protracted delay may lead to arrears which it will be difficult to repay. It is too soon to assess the performance of the Appeals Service in relation to housing benefit and council tax benefit, but the Committee is concerned at anecdotal evidence which indicates that some cases are taking several months to be heard. Housing benefit and council tax benefit appeals should be processed within six weeks."

- 12 The IRRV has confirmed that the six weeks referred to above is from the date on which the council notifies the appellant that the decision is unchanged to the appeal being heard by the Appeals Service.
- 13 The IRRV also says that it believes the appeals process and the role of the council should be blended into the overall Performance Standards Framework. It says that, as this framework now forms the basis of the scoring of housing benefit performance in relation to Comprehensive Performance Assessment, this would encourage councils to apply sufficient resources to this important function.
- 14 The IRRV strongly supports the view that there should be dedicated staff to deal with the appeals process. It suggests that smaller councils could work together to make maximum use of experienced staff. Councils should also be prepared to share good practice with other councils.
- 15 In July 2003 the Department of Work and Pensions issued a circular¹ to councils enclosing a service level agreement between the Appeals Service and councils. This sets a standard, for the first time, for the period within which councils should forward appeal submissions to the Appeals Service. That standard is based on our previous recommendations. The agreement says:

“The LA [council] will prepare an appeal submission and issue copies to AS [the Appeals Service], the appellant and the appellant’s representative, if known. A copy of the appropriate decision note or notices will be included together with all other relevant documentary evidence. The pages will be numbered clearly and the copies should be capable of reproduction ...

“The LA will complete the submission and issue it to all parties within four calendar weeks, this complies with the LA Ombudsman recommendations, of receipt of the appeal [*sic*]. Where the appeal is particularly complex or more information is required, it is accepted that this timescale may be exceeded. The LA will inform [the Appeals Service] of all cases, which have been outstanding for more than three months, where a submission has not been issued and explain the reasons for the delay and confirm when the submission will be provided ...”

- 16 The 2003 circular says that quarterly and annual reviews should be conducted to ensure that the Appeals Service and councils are carrying out their responsibilities within the timescales given. The annual review should detail the continuous improvement programmes in place as well as any plans for further action.

1 Circular HB/CTB A20/2003 issued July 2003

B Time taken to refer to the Appeals Service

- 1 The Department of Work and Pensions has carried out research¹ into times taken by councils to process appeals and refer them to the Appeals Service. In its wave 7 survey published in May 2003, it noted that although 65% of councils monitored the time taken to process an appeal, only 42% had targets for the length of time taken to refer the appeal to the Appeals Service. The average target time was 24 working days, although the average actual time taken was 31 days.
- 2 That survey showed that less than 30% of councils had any outstanding appeals at the time of the survey and 22% had more than 10 outstanding appeals. Metropolitan councils on average had 55 outstanding appeals, whereas district councils on average had five; London boroughs had an average of 40.
- 3 The reasons given by councils for the numbers of their outstanding appeals varied, but 20% cited lack of staff, 17% lack of resources and 15% lack of time of senior staff. Other reasons given included backlog of work, amount of preparation required in each case and waiting for further information.
- 4 The most recent, wave 8, survey published in October 2003 showed that 23% of councils (and 38% of English unitary authorities) were unable to say how many outstanding appeals they had (in total of any age). However, while 30% of councils said they had none, 4% said they had 101 or more, and a further 5% had between 51 and 100. Forty per cent of councils had staff dedicated to appeals work.
- 5 The Appeals Service says that, for cases they cleared between 1 April 2003 and 30 September 2003, it had taken on average 24.9 weeks between the date the appeal was lodged with the council and its receipt by the Appeals Service. (In the previous six months the equivalent figure had been 23.8 weeks.)

¹ Local Authority Omnibus Survey, waves 7 and 8

C Time taken by the Appeals Service

- 1 The Appeals Service states that, for housing benefit cases they cleared between 1 April 2003 and 30 September 2003, it took on average a further 11.6 weeks between receipt of the appeal papers from the council and the tribunal hearing.

D Concerns of advisers

- 1 Citizens Advice comments that it is concerned that councils continue to recover overpayments of housing benefit despite receipt of an appeal. Any undue delay in the appeal process then compounds the problem. It also says that CAB advisers find the general standard of appeal submissions poor, which indicates inadequate training of submission writers. They add that appeal papers are often out of order or contain irrelevant documents, and key evidence is omitted or arrives late in the process. Child Poverty Action Group (CPAG) says that it believes the practice of recovering overpayments whilst an appeal is in process is unlawful.

E Complaints to the Ombudsmen

The names used in the summaries are not the real names of the people concerned.

1 A significant number of complaints have been made to the Ombudsmen by people whose appeals have not been forwarded promptly to the Appeals Service. Some councils seem to have particular problems in this area. The problems seem to flow from a variety of causes, though the most common ones are:

- failure to give adequate priority or resources to processing appeals;
- failure to set targets and/or monitor the workload;
- delay in recognising that backlogs are developing, and then lack of adequate plans to reduce them within a reasonable period; and
- delays associated with changes to administrative processes, especially computer systems.

Other problems found in some cases include:

- an extra 'internal' appeal stage effectively being introduced;
- asking appellants to re-appeal after reconsideration, even though no revision had been made and a new appeal was therefore unnecessary;
- failing to take into account personal circumstances (eg threats of eviction) when prioritising work;
- delays in seeking and obtaining further information from complainants; and
- imposing a strict interpretation of an appeal such that it is difficult to have an appeal accepted where the council's official appeal form has not been used (there is no requirement in the regulations to use a specific form).

Complaint by Mrs Thistle against the London Borough of Bromley (01/B/09315) – Finding of maladministration and injustice – December 2002

Mrs Thistle made claims for housing benefit covering a period from September 2000 to October 2001. When she was told she was not eligible for benefit, she appealed – in November 2001. The Council confirmed its decision on the appeal in February 2002 but, rather than submitting the appeal at that point, wrongly asked for further information and whether Mrs Thistle wished to appeal further. Despite intervention by the Ombudsman's office at various points from March 2002 onwards, and promises of action, the appeal was not referred to the Appeals Service until October 2002. The Ombudsman concluded that the delay constituted maladministration and recommended compensation. Bromley Council says that it continues to experience problems in attracting and retaining permanent appeals officers and this has caused the delays.

2 The Ombudsmen seek remedies where unreasonable delay has been identified. We follow the line explained in more detail in our published guidance note on remedies.¹ For complaints about delays in referring housing benefit appeals, the remedy will include the immediate referral of appeal papers to the Appeals Service, if that has still not been done. Compensation will often be recommended. Factors taken into account when considering the appropriate amount of compensation will include:

- the amount of housing benefit involved in the appeal;
- loss of interest on any significant sum owed to the complainant;
- whether (in the case of an alleged overpayment) the council has inappropriately been deducting housing benefit while the appeal process is under way;
- whether the delay has caused the complainant to lose a tenancy or to fear that this might result;
- distress caused by the delay, including where ill health may have been exacerbated by the problem; and
- the time and trouble incurred by the complainant in pursuing the matter.

Complaint by Mrs Edward against Liverpool City Council (01/C/16190) – Finding of maladministration and injustice – October 2002

An advice agency complained on Mrs Edward's behalf about delays by the Council in dealing with her request for reviews of decisions to recover overpaid housing benefit and council tax benefit.

Mrs Edward asked for a review of a decision to recover overpaid housing benefit in September 2000. The recovery of housing benefit was not suspended until June 2001, despite the Council stating that it had been suspended in October 2000. The Council finally reviewed the decision in July 2002 and decided that the amount was not recoverable. The Council reimbursed the deducted payments.

The Ombudsman decided that the 21 months delay was unreasonable and maladministration. The Council agreed to pay compensation of £525, which the Ombudsman considered a reasonable settlement of the complaint.

3 The following paragraphs give examples of the problems in some of the councils about which the Ombudsmen have received complaints. Both the Ombudsmen and other organisations are aware of delays by a number of other councils.

¹ *Guidance on Good Practice 6: Remedies*, March 2003

Scarborough Borough Council

- 4 The Ombudsman's investigation of a complaint against Scarborough Borough Council (see box below, 01/C/13400) revealed significant delays by the Council in the processing of appeals by claimants. The Council admitted that it was struggling to deal with the new appeals process when it was implemented in July 2001. In January 2002 the Council held 34 appeals dating back as far as June 2001 which had still not been submitted to the Appeals Service. Appellants were waiting – on average – five months for their appeals to be submitted. No additional resources were made available until the Council appointed a dedicated Appeals Officer in December 2002.

Complaint by Mr Ash against Scarborough Borough Council (01/C/13400) – Finding of maladministration and injustice – March 2002

Mr Ash was notified in October 2001 that his housing benefit payments had been cancelled. He then complained to the Ombudsman that the Council had delayed referring his appeal against its decision to the Appeals Service. The Council responded to Mr Ash's complaint by referring the appeal to the Appeals Service, leaving a total delay of two months between receipt of the appeal and its referral. The Ombudsman considered that the Council's failure to prepare properly for and adequately resource the new system of appeals was maladministration.

The Ombudsman considered that urgent referral of the appeal to the Appeals Service was a satisfactory settlement of the complaint. She also urged the Council to take special measures to ensure that other delayed appeals were quickly submitted to the Appeals Service.

- 5 The Council said that the number of appeals had increased substantially from the number of reviews requested under the previous system: on average only three appeals had gone to the Housing Benefit Review Board every month.

Complaint by Mrs Beech against Scarborough Borough Council (02/C/08443) – Finding of maladministration and injustice – November 2002

Mrs Beech complained that the Council delayed dealing with her appeal against a decision on 3 April 2002 to cancel her housing benefit from February 2002. She appealed against the decision on 21 May but the Council failed to send the appeal on to the Appeals Service until 9 September 2002.

The Ombudsman considered that the submission of the appeal to the Appeals Service and the payment of £75 compensation by the Council was a reasonable settlement of the complaint. However, she expressed disappointment that the Council had failed to implement the special measures to reduce the backlog promised following her previous report.

- 6 The Ombudsman subsequently received and investigated another complaint (see box on page 14, 02/C/08443) resulting in a report which provided an update on the Council's progress in improving its appeals service. As of September 2002, the Council had a backlog of 26 appeals (plus one exceptional case). Of these, 15 were at least six months old. By 28 October 2002, the Council said that the backlog had reduced to 19 and it planned to eliminate the backlog within 10 weeks. In doing this, the Council arranged to instruct managers of the service to be aware of the need to clear the current backlog and ensure it did not re-establish itself. It also agreed to deal with at least two backlog cases per week. The Council also approved funding for overtime to clear the work and agreed to monitor progress to ensure consistency. It says that the backlog has now been cleared.

Liverpool City Council

- 7 The Ombudsman has dealt with a significant number of complaints from individuals concerned about delays by Liverpool City Council in processing their appeals. The Ombudsman has, as a result, issued reports detailing the problems experienced by the complainants.

Complaint by Mrs Llewellyn against Liverpool City Council (01/C/07860) – Finding of maladministration and injustice – September 2002

An advice agency complained on behalf of Mrs Llewellyn that the Council unreasonably delayed dealing with her appeals against decisions to recover overpayments of housing benefit and council tax benefit. Mrs Llewellyn appealed in December 2001 against a decision to recover an overpayment of housing benefit. The Council passed the papers to the Appeals Service in December 2002. The Ombudsman found that there was an unreasonable delay of nine months in passing that appeal to the Appeals Service.

The Council agreed to pay compensation to Mrs Llewellyn of £375, which the Ombudsman considered a reasonable settlement of the complaint.

- 8 The Council says that, following a critical report by the Benefit Fraud Inspectorate, it set up a team to deal with old Housing Benefit Review Board cases and the backlog of appeals received up to 31 August 2000. At that time the backlog was 600 cases. The team comprised two officers and a manager. By April 2001 all the outstanding Housing Benefit Review Board cases had been dealt with, and the team took on responsibility for complaints about the Council's housing benefit section as well as dealing with appeals and reviews.
- 9 In December 2001 there were 360 appeals outstanding. In June 2003 the Council says there were approximately 266 appeals outstanding.
- 10 The Council introduced a new computer system on 27 January 2003 which meant that all appeals made from that date on were scanned into a computer. There were approximately 200 unprocessed 'paper' appeals dating from before the introduction of the new computer system. The Council worked to reduce them gradually.
- 11 Appeals were given priority where the claimant had made a complaint about delay either to the Council's complaints procedure or to the Ombudsman. Priority was also given where there was a threat of eviction.
- 12 One officer had the responsibility of producing tribunal reports, which took an average of three hours to produce. The Council's housing benefit appeals team comprised six members, with two 'quality checkers' to ensure consistency.
- 13 The Council says that one of the reasons why there is delay in the processing of appeals is that the Regulations require them to prepare a submission for the Appeals Service for every case where the Council does not find in favour of the claimant. The Council says that the submissions are very time-consuming to prepare and, in many cases, the claimant chooses not to proceed further after receiving the Council's submission, or fails to respond at all (in which case the appeal is 'struck out'). The Council says that, under the previous sets of rules, there were a significant number of complainants who did not pursue their appeals after the Council had reconsidered their cases. The Council says that there would be a significant reduction of work if claimants were still required to appeal again after the Council's reconsideration (where the decision remained the same).
- 14 At the time, the Council said that it had been unable to provide any further resources to the appeals team as it had had to give priority to the processing of new and renewal claims. It now says that it gives a high priority to dealing with appeals, and works to ensure that its resources are fairly distributed between appeals and claims processing.

- 15 The Council confirmed in August 2003 that all outstanding 'paper' appeals from before January 2003 had been dealt with. A further computer system came into use in October 2003. The Council says that efforts to improve performance since then have successfully removed the historic backlog of work. (If so, this should result in fewer complaints to the Ombudsman in coming months.)

Complaint by Mrs George against Liverpool City Council (01/C/16273) – Finding of maladministration and injustice – September 2002

Mrs George complained about the way the Council had dealt with her claims for housing benefit, and delays by the Council in dealing with her appeal against a decision to recover overpaid housing benefit. She appealed in December 2000, but the papers were not passed to the Appeals Service until March 2002.

The Ombudsman found that the Council had unreasonably delayed determining Mrs George's claim for housing benefit by 11 months and took 15 months too long to deal with her appeal. The Council paid compensation of £375 to Mrs George, plus an additional £150 to her daughter for her time and trouble in pursuing the complaint on her mother's behalf.

Complaint by Mrs Brook against Liverpool City Council (01/C/15191) – Finding of maladministration and injustice – September 2002

An advice agency complained on behalf of Mrs Brook that the Council unreasonably delayed dealing with her appeal against a decision to recover an overpayment of housing benefit and council tax benefit. Mrs Brook appealed in August 2001, but the papers were not passed to the Appeals Service until June 2002.

The Ombudsman found that there was an unreasonable delay of 10 months in dealing with Mrs Brook's appeal. The Ombudsman also criticised the Council for continuing to recover the overpayment after the appeal had been made. The Council agreed to pay compensation of £300, which included £50 to reflect the distress caused by the receipt of a summons which should not have been issued.

Complaint by Mr Cooper against Liverpool City Council (02/C/14947) – Local settlement of complaint – March 2003

Mr Cooper appealed in December 2001 against a Council decision not to award housing benefit from August 2001 to September 2001. Mr Cooper was told by the Council in February 2002 that his appeal had not been considered due to a backlog of work in the office. His representative wrote to the Council in September 2002 chasing up his appeal. The Council responded in November 2002. The appeal was submitted to the Appeals Service in April 2003. The Council agreed to pay £200 compensation for the unreasonable delay.

London Borough of Ealing

- 16 The Ombudsman has received a number of complaints about delays by Ealing Council in the processing of appeals. The Council has contracted out the administration of housing benefit to a private company, but retains responsibility for determining claims.
- 17 In January 2002 the Council said that the number of review requests and appeals received since July 2001 had greatly exceeded expectations. At that time, there were 122 old style appeals open (received before July 2001) and 1,262 cases under the new system, of which 477 were appeals. The Council had agreed to provide funding to employ a team to clear outstanding review requests up to April 2002 by the end of June 2002.

Complaint by Ms Jayasuriya against Ealing Borough Council (01/A/11146) – Finding of maladministration and injustice – June 2003

In September 2001 Ms Jayasuriya requested a review of a decision on her housing benefit. The assessment was reviewed and adjusted. Ms Jayasuriya appealed against a decision that deductions should be made for non-dependants. In February 2003 the Council told the Ombudsman that the case had been reconsidered but the decision would be unchanged. It would therefore prepare a case for submission to the Appeals Service. However, in May 2003 the Council reconsidered the matter again and wrote off an overpayment for the disputed period.

The Ombudsman criticised the Council for delaying the appeal for 18 months, and recommended that the Council pay £250 to reflect the time and trouble caused by the delay. The Council was also asked to tell the Ombudsman what steps it was taking to reduce the backlog of appeal submissions. This should include reasonable targets for a staged reduction in the numbers so that, by the end of 2003, it would be exceptional for an appeal to be more than a month old. The Council was also asked to report to the Ombudsman on its progress in meeting these targets after three months and six months.

- 18 From 1 April 2002 the Council took over responsibility from the contractors for dealing with all new appeals, and attempted to recruit more staff for the appeals team. Recruitment was difficult and the team was not complete until October.
- 19 By December 2002 the backlog of review cases from before April 2002 had mostly been cleared, but this had generated more appeals. The appeals team had around 650 outstanding cases. These included 46 appeals which had been waiting since before April 2002. Priority was being given to clearing these and none was dated from before December 2001. The Council had a target to clear these 46 cases by the end of March 2003, but in May 2003 had eight of them still left. By then the total number of cases with the appeals team was 941, more than half having been made since December 2002.
- 20 The Council said that it was commissioning a full review of the outstanding cases in order to focus on those which had a current financial impact on the complainant, and to reduce the numbers by considering the merits of each case.

F Conclusion

- 1 The work of the Local Government Ombudsmen has revealed a pattern of excessive delays by some councils in passing housing benefit appeals to the Appeals Service. Some appeals have been waiting many months before the Service is even aware that they have been made. While some initial problems might have been expected with a new system, it is now more than two years since the present system was introduced and there are still significant delays. We were concerned at the lack of any target for the time taken by councils to process appeals, and had recommended that no more than four weeks should usually be needed. We are pleased to note that, since work began on preparing this report, that standard has been adopted based on our recommendation.

- 2 However, adopting a standard and monitoring against it is not on its own sufficient to ensure that performance in this area improves. Some of the underlying problems found are listed in paragraph 1 of section E, and case examples are given throughout this report. In order to tackle the problems and help them achieve the standard, councils should:
 - ensure that adequate training is given to all staff to ensure that submissions are in proper order and contain all relevant paperwork, and that staff are reminded of the need for urgency in dealing with appeals;
 - make sure that all correspondence on review and appeal requests is fast-tracked, and progress on each appeal case is monitored in order to help meet the four-week deadline;
 - instigate a system which identifies and gives special priority to those cases where there are particularly difficult personal circumstances, such as a threat of eviction to the claimant;
 - ensure the housing benefit and housing departments liaise where there is an outstanding appeal by a council tenant;
 - maintain frequent – at least monthly – monitoring of numbers and waiting times for appeal submissions;
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 - develop a properly resourced and practical plan for reducing backlogs speedily where they already exist;
 - make a senior manager responsible for ensuring that targets are met and sufficient resources are made available to enable that to happen;

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