

Title: Replacement of existing Bereavement Benefits for New Claims from April 2017 - Bereavement Benefits for the 21 st Century (in Great Britain) IA No: Lead department or agency: Department for Work and Pensions Other departments or agencies:	Impact Assessment (IA)
	Date: 09/04/2014
	Stage: Final
	Source of intervention: Domestic
	Type of measure: Primary legislation
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Summary: Intervention and Options

RPC Opinion:

Cost of Preferred (or more likely) Option			
Total Net Present Value	Business Net Present Value	Net cost to business per year (EANCB on 2009 prices)	In scope of One-In, Measure qualifies as One-Out?
£0m	£0m	£m	No
			NA

What is the problem under consideration? Why is government intervention necessary?

Bereavement benefits are currently paid to provide financial support for spouses and civil partners following premature death of their partner during working life. Annually Managed Expenditure (AME) for benefit payments is projected to be around £550m in 2017/18. These benefits have been amended since state protection for widows was introduced in 1925; however incremental changes have blurred the principles behind them and their function, and resulted in a complex payment and contribution system. Government action is needed to ensure the benefits continue to effectively support the working age bereaved in a way that is coherent with the wider welfare and pensions system.

What are the policy objectives and the intended effects?

The proposal for the reformed benefit, Bereavement Support Payment (BSP), starting in 2017/18 at the earliest aims:

1. to simplify the payment system by moving to a more uniform structure, with support focused on the period immediately following bereavement; and
2. to simplify the contribution conditions, with a single rule irrespective of age and child dependent status.

This should support people through the difficult early months following bereavement in a more transparent way, so that the reformed benefit works more effectively as social insurance.

What policy options have been considered, including any alternatives to regulation? Please justify preferred option (further details in Evidence Base)

Default position - do nothing and continue to pay existing bereavement benefits to qualifiers.

Option 1 - entitlement to BSP will be based on a single year of class 1 or 2 National Insurance contributions, and will be paid in lump sums and instalments over 12 months. Indicative tax free values for it are in the region of £4,300 for recipients without dependent children and £9,800 for those with children. These awards will be disregarded for other benefits. Actual values and periodicity will be defined in regulations. It is anticipated that this option will replace the current system for new claims from April 2017.

This policy proposition recognises the immediate financial impact of bereavement, and people's vulnerability at this time. It both simplifies the benefit eligibility rules and payment differentials, and improves alignment with changes proposed by the single tier pension reform.

Will the policy be reviewed? It will be reviewed

If applicable, set review date: N/A

Does implementation go beyond minimum EU requirements?			N/A		
Are any of these organisations in scope? If Micros not exempted set out reason in Evidence Base.	Micro No	< 20 No	Small No	Medium No	Large No
What is the CO ₂ equivalent change in greenhouse gas emissions? (Million tonnes CO ₂ equivalent)			Traded: N/A	Non-traded: N/A	

I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) that the benefits justify the costs.

Signed by the responsible Minister:



Date: 09/04/2014

Summary: Analysis & Evidence

Policy Option 1

Description: Replacement of existing benefits for new claims, and maintenance of current system for legacy claims

FULL ECONOMIC ASSESSMENT

Price Base Year 2012/13	PV Base Year 2012/13	Time Period Years 4 years	Net Benefit (Present Value (PV)) (£m)		
			Low:	High:	Best Estimate:

COSTS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Cost (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate			£1,660m

Description and scale of key monetised costs by 'main affected groups'

Net Present Value reflects all costs for bereavement benefits post April 2017. The total cost from 2017/18 to 2020/21 stated above is to the exchequer; this includes costs of new and legacy systems, impact on Universal Credit (UC) and tax foregone. Please see the Fiscal Impact below for the scale of expenditures.

Individuals already in receipt of the current benefit will not be affected by the reform. The largest group of notional losers are those who would have received benefits for many years under the current system.

Other key non-monetised costs by 'main affected groups'

Department Expenditure Limits (DEL) costs to the business for employment support and payment system are not included at this point.

BENEFITS (£m)	Total Transition (Constant Price) Years	Average Annual (excl. Transition) (Constant Price)	Total Benefit (Present Value)
Low	Optional	Optional	Optional
High	Optional	Optional	Optional
Best Estimate			£1,660m

Description and scale of key monetised benefits by 'main affected groups'

Total benefit to individuals stated above is equal to the total cost to the taxpayer; this is because it represents benefit payments to recipients and as DEL costs on programme (back-to-work support) and administration (payment system) are not included at this point.

The main group of beneficiaries are younger childless people who would previously have got the Bereavement Allowance (BA) and/or the Lump Sum Payment, those with children who would have received Widowed Parent's Allowance (WPA) for a short time only, and those now eligible for other benefits.

Other key non-monetised benefits by 'main affected groups'

Possible indirect effect of increasing movement back into work owing to targeted employment support, along with associated follow-on of higher economic output and subsequent gain in tax take. This effect is highly uncertain, due to many potential influences, and so has not been quantified.

Other impacts: potential positive health benefits as a result of moves to work which due to uncertainty are left unquantified; likely reduction in stress on prospective applicants due to simplification of benefit is also unquantified; and DEL savings driven by the simplification of payment and administration are not quantified.

Key assumptions/sensitivities/risks

Discount rate (%) 3.5%

The key assumption is that the forecasts based on characteristics of current benefit recipients is a robust basis for understanding the future. The projections used are those underlying the Budget 2014 analysis, and are the best assessment of available evidence but still subject to forecasting error.

Any changes to the following also have an impact: DWP's Policy Simulation Model (PSM) estimates used for knock-on impact on UC and tax implications; and Office for Budget Responsibility (OBR) March 2014 forecasts of inflation used to uprate legacy benefits and Her Majesty's Treasury's (HMT's) GDP deflators used for Budget 2014 and Green Book discount factor applied over 4 years.

BUSINESS ASSESSMENT (Option 1)

Direct impact on business (Equivalent Annual) £m:			In scope of OIOO?	Measure qualifies as
Costs: N/A	Benefits: N/A	Net: N/A	No	NA

Evidence Base

Annual profile of monetised costs and benefits -
(£m) constant 2012/13 prices

	2017/18	2018/19	2019/20	2020/21	Total
Transition costs	0	0	0	0	0
Annual recurring costs	540	530	510	490	2,070
Total annual costs	540	530	510	490	2,070
Transition benefits	0	0	0	0	0
Annual recurring benefits	540	530	510	490	2,070
Total annual benefits	540	530	510	490	2,070

* For non-monetised benefits please see summary pages and main evidence base section

Note: (1) values are deflated by HMT's deflators; and (2) values are rounded to the nearest £10m.

The table above provides real terms costs and benefits based on deflating the nominal terms amounts in **Fiscal Impact: Option 1**. The totals are then discounted by the Green Book's 3.5% to deliver the Net Present Value of the **Full Economic Assessment** part.

Background

1. Currently, bereavement benefits consist of three different payment components:
 - **Bereavement Payment (BPT)** – a one-off tax-free payment of £2,000 payable to someone after their wife, husband or civil partner has died; and if eligible
 - **Bereavement Allowance (BA)** – a taxable weekly benefit which can be paid to someone for up to 52 weeks from the date of death of their wife, husband or civil partner if they are over 45 and under State Pension age. The rate of Bereavement Allowance is reduced by around 7% for each year the claimant is/was under the age of 55; or
 - **Widowed Parent's Allowance (WPA)** – a taxable weekly benefit which may be payable to a parent whose husband, wife or civil partner has died if they have at least one dependent child for whom they receive Child Benefit. It is payable until the claimant reaches State Pension age or upon cohabiting or remarriage/formation of civil partnership.

Problems

2. Currently age is a significant factor in determining the amount of entitlement to bereavement benefits. It has been considered a broad test of the ease with which a widowed spouse or civil partner can enter or re-enter the employment field to support themselves through work. Therefore, the benefit for those without dependent children has concentrated on those aged 45 and over. The importance of this age limit in determining financial need and the absence of any back-to-work support has been questioned prior to the current review of the benefits.
3. Complexity in contribution conditions, payment structure and award duration has meant it is very difficult for applicants to anticipate whether they qualify, how much they will receive and for how long. This uncertainty does not help potential applicants who are already feeling a loss of control after bereavement.
4. Additionally, because entitlement ceases if the claimant remarries, with the award suspended if the claimant is living together with a partner outside marriage, this can provide an artificial disincentive to people who wish to form new relationships after bereavement.

Rationale

5. Government is seeking to reform the welfare system as a whole in order to provide a more effective and supportive system that meets the needs of all in the future. DWP published the consultation 'Bereavement Benefit for the 21st Century' as part of the fundamental reassessment of the role that the welfare system plays going forward. It has consulted on the modernisation of fresh benefit claims - those made from April 2017. The departmental website provides the consultation document at the following link:
<https://www.gov.uk/government/consultations/bereavement-benefit-for-the-21st-century>.
6. The consultation proposals positioned bereavement benefits as support focused early on in the period of readjustment following bereavement. Ongoing, income-related support for those with insufficient income for their basic needs will in the future be provided by Universal Credit (UC). The Department's website provides a response to the consultation at the following link:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/181264/bereavement-benefit-consultation-response.rtf.

Objectives

7. DWP's consultation identified the following policy aims as being the foundation for any new benefit(s):
- they should be simple to understand and to claim;
 - they should provide fast, direct, financial help for immediate needs following the bereavement of a spouse/civil partner;
 - they should give recipients the flexibility they need to regain control of their situation in the period immediately following bereavement;
 - there should be additional support for families, to recognise the additional costs associated with raising children;
 - they should allow recipients to access the financial and work focused support provided by UC at a time that is right for them; and
 - they should be fair and promote self-dependency.

Response

8. The following are the chief Government responses to feedback on the public consultation.

Employment Support

9. This response focuses on supporting recipients of bereavement benefits who need to start work or change their working patterns after bereavement. This is guided by social research commissioned by the DWP which suggested that BA and in particular WPA recipients who had been out of work for some time before their bereavement would benefit from tailored back-to-work support, since they faced significant barriers in terms of skills, experience and confidence. Research Report 790 provides further details at the following link:
<https://www.gov.uk/government/publications/bereavement-benefits-findings-from-qualitative-research-rr790>.
10. Existing bereavement benefits are inactive ones; that is they are paid to all qualifiers and are not affected by being in paid employment. Evidence indicates that the majority of BA and WPA recipients are in work after their claim ends (presently around three fifths are not in receipt of other benefits after leaving this one), but there is scope to assist those not in work to move to that state.

Universal Credit and other benefits

11. The response also recognises the need not to duplicate income replacement (or income replacement top-up) to recipients of bereavement benefits, but at the same time not to disadvantage this vulnerable group. The introduction of the reformed benefit is due to happen after UC has gone live.¹ Therefore, it is important the benefits do not duplicate each other's income related financial support. The refocusing of payments for use in the period immediately after death of partner and the disregarding of them from applications to other benefits will mean that low-income households' ongoing needs are addressed through appropriate benefits.
12. If present arrangements were left unchanged, the value of any new benefit's regular payments would be taken into account as income in determining eligibility for and amount payable in UC

¹ Note although UC will be live before the introduction of Bereavement Benefit reforms, migration activity will still be in progress at this time.

in the future. Currently, under half of bereavement benefit recipients are in receipt of other benefits at some point during their claim, but under UC the proportion might rise.

Tax Status

13. The tax status of Bereavement Benefits is a matter for HM Treasury, who will consider all comments carefully with a view to reaching an appropriate solution. HM Treasury ministers have indicated that because the lump sum payment is intended to meet costs arising from bereavement, and is not intended to be a replacement for other income, they would not expect to levy income tax on this specific payment. As with all aspects of the tax system, any decisions on future changes to other bereavement payments will be taken as part of the annual fiscal process in the context of the wider public finances.

Options

Default and preferred options

14. Options for a new benefit system are:

- **Default position** – do nothing and continue to pay existing bereavement benefits to qualifiers under set conditions; or
- **Option 1** – entitlement to the reformed benefit (BSP) will be based on a single year of class 1 or 2 National Insurance contributions, and will be paid in a lump sum with instalments over 12 months. Total costs derived from the indicative values for the payments on the cover page, and based on improved modelling following the consultation are set out below. This protects current recipients and disregards the fresh awards from other benefits over 4 years, and assumes the awards are tax exempt. Actual values and periodicity will be defined in regulations.

It is anticipated that the new benefit will be introduced in respect of claims after 1 April 2017, with the terms of older ones relating to before this date protected to closure.

Estimated Cost/Benefit

15. This reform is costed from 2017/18 to 2020/21 and achieves all of the stated objectives. This shows that we will target additional resources on bereavement benefits over a parliament, to ensure that existing recipients are protected, and that those who claim the new BSP get the help that they need when they need it most. Note that current recipients' claims, which are protected by these reforms, reduce in number over time, and so a future Government could decide how to reinvest any savings which arise.

Fiscal impact

16. Estimated baseline is based on default position – do nothing. The table below shows the Department's forecasted AME spend (aligned to the Budget 2014 and OBR's Fiscal Sustainability Report 2013) for existing bereavement benefits for the periods when any future reform would be introduced. This quantification is derived from official projected caseloads and expected benefit rates.

Fiscal Impact: Baseline

Legacy system, £m	2017/18	2018/19	2019/20	2020/21
Lump sum	90	90	100	100
BA weekly payments	100	110	120	120
WPA Weekly payments	270	270	280	290
Working-age additional pension	40	40	40	40
Pre-2001 cases	50	40	30	20
Total DWP AME expenditure	550	550	560	570

Source: INFORM forecasts of DWP expenditure and Fiscal Sustainability Report.

Note: (1) values are in cash terms; and (2) values are rounded to the nearest £10m and so do not always sum to totals.

17. Estimated costs to the Department based on Option 1 are assessed relative to the above baseline. The table below shows what the DWP AME spend might be for the years when any future bereavement benefits change would be in place; calculations are based on official projected caseloads and various expected benefit, credit, tax and other cost rates.

Fiscal Impact: Option 1

Reform + Legacy, £m	2017/18	2018/19	2019/20	2020/21
New benefit lump sum	120	130	130	130
New benefit instalment element	50	100	100	100
New benefit impact on UC	30	50	70	80
Legacy benefits protection	380	290	240	210
Total DWP AME expenditure	580	560	540	530

Net Government saving	-40	-40	-20	0
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Sources: INFORM forecasts of DWP caseloads transformed by estimated reformed and legacy benefit rates and by estimated impact on UC and Tax (based on PSM 2014/15 outputs - FRS 2010/11 survey data).

Note: (1) values are in cash terms; (2) values are rounded to the nearest £10m and so do not always sum to totals; and (3) net saving incorporates tax foregone by HMRC on new benefit claims of £10m in 2017/18, £30m in 2018/19, £40m in 2019/20 and £40m in 2020/21.

18. These figures are based on the following:

- Budget 2014 forecasts for existing bereavement benefits stocks and flows from April 2017 are derived from DWP's INFORM model;
- costs derived from the above for Option 1 assume the remaining legacy system cases are uprated by the OBR CPI forecasts and the new claims are as set out under the option; and
- the Department's PSM estimates of the effect of the disregard for UC and overall tax implication are uprated by OBR CPI forecasts and applied to base numbers to give these parts of the costings.

Numbers affected

19. If Option 1 (preferred) is taken forward, then the relative size of groups that lose or gain relative to the current system might be derived from:

- Tables 1a and 1b below which show current benefit caseloads – WPA by duration of claim and BA by age of recipient. The inflow for BPT is not available from a published source but projections based on recent Management Information suggest it is between 8 and 10 thousand cases across a year; and
- the notional examples of the next part about impact on the individual which uses an in work and out of work split. Current data suggests that about three fifths of bereavement benefit leavers are not in receipt of other benefits.

The information in the following tables provide important context to the impacts in the following illustrations.

Table 1a and 1b: Caseload (in thousands) for WPA by length of the claim and BA by age of recipient (age at reporting period)

Number of years of the claim	WPA claims live
Greater than equal to 0 and less than 1 year	6.42
Greater than equal to 1 and less than 2 years	6.24
Greater than equal to 2 and less than 3 years	5.62
Greater than equal to 3 and less than 4 years	5.11
Greater than equal to 4 and less than 5 years	4.47
Greater than equal to 5 and less than 6 years	3.69
Greater than equal to 6 and less than 7 years	3.03
Greater than equal to 7 and less than 8 years	2.77
Greater than equal to 8 and less than 9 years	2.37
Greater than equal to 9 and less than 10 years	2.06
Greater than equal to 10 and less than 11 years	1.76
Greater than equal to 11 and less than 12 years	1.45
Greater than equal to 12 and less than 13 years	0.88
Total	45.87

Age	BA claims live
45	0.12
46	0.28
47	0.39
48	0.45
49	0.56
50	0.64
51	0.80
52	0.94
53	1.06
54	1.20
55-64	14.34
Total	20.80

Source: WPLS [National Statistics], August 2013 dataset <<http://statistics.dwp.gov.uk/asd/index.php?page=tabtool>>
 Note: values are rounded to the nearest ten and so do not always sum to totals.

Impact on individuals

20. Under Option 1 (preferred), those that notionally lose out would be those on WPA for many years and older BA recipients in and out of work, and those that gain would be on WPA for fewer years and younger in and out of work recipients of BA and BPT. The following tables under each “what if” scenario provide **notional examples of average gain/loss**, so that the change can be assessed within existing benefit groups. It is important to note that these illustrative examples serve as an indication of what the average person in groups might gain or lose if the reform was initiated now, and payments in individual cases may differ from the central estimates. All examples are based on 2012/13 starts because sufficient data is available from this date.

Option 1 applied to WPA claims going forward from 2012/13

Table 2 below shows the net impact of the reform on those that would have been WPA recipients in the past by length of claim (up to 13 years). These values are the differences between benefit payments under present and proposed benefits in each year of the claim. They show examples of the winners and losers and by how much.

21. The main difference between new and old approaches to bereavement benefits for parents of dependent children is to do with duration. Under existing arrangements, this group can stay on the current system for many years without getting any support to go back into employment. Under option 1, support for all groups is focused on the first year after bereavement, and the BSP award is disregarded from application to other benefits. This means those requiring income replacement will be eligible for other benefits (such as UC) with appropriate back-to-work support for their circumstances to maintain a close link to the labour market.

22. The overall worth of existing and new benefits bundles for parents of dependent children are based on lump sums, regular payments and for some recipients a tax liability. On average, option 1 provides more money for the recipient than the present arrangement over the initial 2 years for those in and out of work, and means that those out of work are better-off in the first 3 years under the reform. However, it does offer less money for recipients in work 3 years onward and for those out of work after 4 years.

23. Key assumptions of net impact calculation:

- WPA rates are as set in April 2012 (for 2012/13) and updated by the OBR’s forecasted CPI for subsequent years. It is assumed the regular payment element of this is taxed at a rate of 20% where applicable. Both current lump sum and reformed benefit sums are tax-free;

- estimated UC rates are applied under either scheme, and cover awards formerly in income related working age benefits (JSA/ESA/IS), Housing Benefit (HB), National Tax Credits (WTC/CTC) and Pension Credits (PC). Higher amounts are paid under the option owing to the disregard of the new payment from application to the UC – this is especially the case for those out of work; and
- all accumulated benefits, annualised amounts, are deflated to 2012/13 values using HMT's GDP deflator series and discounted at the HMT Green Book rate of 3.5%.

Table 2: WPA group net gain/loss in thousands of £s, 2012/13 prices – difference between current and proposed schemes

Number of years of the claim	Those out of work: In-year	Those in work: In-year
Greater than equal to 0 and less than 1 year	5.3	4.2
Greater than equal to 1 and less than 2 years	-2.4	-3.5
Greater than equal to 2 and less than 3 years	-2.4	-3.4
Greater than equal to 3 and less than 4 years	-2.3	-3.3
Greater than equal to 4 and less than 5 years	-2.2	-3.1
Greater than equal to 5 and less than 6 years	-2.1	-3.0
Greater than equal to 6 and less than 7 years	-2.1	-3.0
Greater than equal to 7 and less than 8 years	-2.0	-2.9
Greater than equal to 8 and less than 9 years	-2.0	-2.8
Greater than equal to 9 and less than 10 years	-1.9	-2.7
Greater than equal to 10 and less than 11 years	-1.8	-2.6
Greater than equal to 11 and less than 12 years	-1.8	-2.5
Greater than equal to 12 and less than 13 years	-1.7	-2.4

Note: (1) values are rounded to the nearest hundred.

Option 1 applied to BA claims in 2012/13

Table 3 below shows the net impact of the reform on those that would have been BA recipients in the past by age (at reporting period). These values are the differences between benefit payments under present and proposed systems. They show examples of the winners and losers and by how much.

24. The new and old bereavement benefits for non-parents at or over 45 years have the same duration of 12 months. However, as above, under existing arrangements this group will not get any support to go back into employment. Within Option 1 the BSP award is disregarded from application to other benefits, so recipients will also be able to claim any relevant benefits with the appropriate back-to-work support.
25. The value of existing and new schemes for non-parents at or over 45 years are based on lump sums, regular payments and for some recipients a tax liability. On average, option 1 yields more money for recipients in work if they are 50 years old and younger than the current scheme, and for those out of work if they are 54 years old and younger. It does provide less money for recipients in work that are older than 50 years, and for those out of work that are older than 54 years.
26. Key assumptions of net impact calculation:
 - BA rates are as set in April 2012. It is assumed the regular payment element of this is taxed at a rate of 20% where applicable;
 - estimated UC rates are applied to both systems, and cover awards previously under income related working age benefits. Higher amounts are paid under the option owing to the disregard of the new payment from application to the UC – this is especially the case for those out of work; and
 - there is no need to deflate or discount any figures because this is a single year calculation already in 2012/13 cash terms.

Table 3: BA group net gain/loss in thousands of £s, 2012/13 prices – difference between current and proposed schemes

Age	Those out of work	Those in work
45	3.2	1.8
46	2.9	1.5
47	2.6	1.2
48	2.3	0.9
49	1.9	0.6
50	1.6	0.3
51	1.3	-0.0
52	0.9	-0.3
53	0.6	-0.6
54	0.3	-1.0
55-64	-0.0	-1.3

Note: (1) values are rounded to the nearest hundred.

Option 1 applied to BPT only cases in 2012/13

The next part details the benefit change, and then outlines the net impacts of the reform on those that would have been BPT only recipients in the past. These values are the differences between benefit payments under present and proposed systems. They show examples of the winners and losers and by how much.

27. The new and old systems for bereavement benefits for non-parents under 45 years old differ fundamentally. Currently, this group gets a one-off tax free payment. Then, if necessary, the recipient can apply for any working age benefit (which might be contingent on undertaking back-to-work support). Under Option 1, this group is subject to the same regime as the BA one, so recipients will also be able to claim BSP and any relevant benefits with the appropriate employment support.
28. The impact of the proposal for non-parents under 45 years old is simply the difference between the bereavement payments and the impact of exempting the payments from UC awards. On average gains are £4.6 thousand per annum for those out of work and £3.2 thousand per annum for those in work.
29. Key assumptions of net impact calculation:
 - BPT lump sum recipients receive £2,300 more under the option (in lump sum and instalments) over the previous one-off payment;
 - estimated UC rates are applied to either scheme, and cover awards previously under income related working age benefits. Higher amounts are paid under the option owing to the disregard of the new bereavement payment from application to the UC – this is especially the case for those out of work; and
 - there is no need to deflate or discount any figures because this is a single year calculation already in 2012/13 cash terms.

Risks

30. High-level fiscal analysis is based on several assumptions. The key assumption is that the DWP forecasts based on characteristics of current benefit recipients is a robust basis for understanding the future. The projections used are those underlying the Budget 2014 analysis, and are the best assessment of available evidence but still subject to forecasting error. Other possible sources of variation are: how well administrative data on WPA identifies those with a dependent child; accuracy of OBR CPI forecasts as uprating factors for upcoming periods, HMT GDP deflators and Green Book discount factor (3.5%); and any potential sampling and weighting error feeding into the PSM.

31. The notional examples of net gain/loss are based on calculations of: known rates for existing bereavement benefits and UC estimates for 2012/13 (and that regime rolled forward 13 years based on uprating by OBR CPI forecasts for the WPA examples), and the stated values for the new benefit; an assumed tax rate on current weekly bereavement benefits of 20% where applicable; and application of HMT's GDP deflators and Green Book discount factor on benefit monies accumulated over time. If new benefit values and the tax assumption change, and if/when inflation, deflators and discount factors are updated there will be ensuing change to the outturns.
32. There are costs omitted from high-level fiscal analysis because they are unquantifiable at this point. These include: DEL programme costs e.g. for back-to-work support cost to the business and also that for the extra caseloads into the various conditionality groups; and DEL payment and other administration costs, although this is likely to fall under Option 1 over the longer-term as shorter durations of payments (12 months) reduces the overall number of payments.

Notices

33. **Post implementation review** will follow when the Department has sufficient and detailed administrative data to allow assessment of the effect of the policy.