



Full Council
10 December 2012

Report from Deputy Director of Finance

For Decision

**Local Council Tax Support Scheme
and Changes to Council Tax Discounts and Exemptions**

1. Summary

1.1 This report sets out:

1.1.1 The findings and outcomes of the consultation arrangements for the proposed local Council Tax Support Scheme carried out over a nine week period between 11th June and 10th August 2012.

1.1.2 A recommended scheme for a new local Council Tax Support (hereafter referred to as “CTS”) scheme based upon the outcomes from the consultation process and achieving, as far as reasonably practicable, a financially neutral position in 2013/14 (the first year of operation).

1.1.3 The financial and equality impacts of the recommended local Council Tax Support scheme for Brent residents.

1.1.4 Recommended changes to Council Tax discounts and exemptions from 1st April 2013 for certain classes of empty properties.

1.1.5 The financial and equality impacts of the recommended changes to Council Tax discounts and exemptions

1.2 A summary of the background and government proposals are set out in this report.

2. Recommendations

2.1 Members of Full Council are asked to consider and approve the following recommendations:

2.1.1 To approve and authorise the making and implementation of the recommended Council Tax Support Scheme as set out in section 5 and Appendix H of this report.

2.1.2 To approve and authorise the recommended discounts for the Council Tax Discount and Exemption classes to come into effect from 1st April 2013 as set out in paragraphs 10.1, 10.2 and Table 15 of this report.

2.1.3 To consider and approve the response for the Council to reject the Government's conditional offer to accept a transition grant for the Council Tax Support Scheme for the reasons set out in section 4.16 to section 4.23 and Appendix F of this report.

2.1.4 To consider and note the findings on equalities and other impacts arising from the proposed CTS scheme as set out in Section 5 of this report.

2.1.5 To consider and note the findings of the Equalities Impact Assessment in relation to the recommended changes to the Council Tax discounts and exemptions as set out in Section 10 of this report.

2.1.6 To note alternative scheme options that existed and in particular, the transition funding since made available to Local Authorities that designed their schemes to be compliant with certain key requirements prescribed by the Government as set out in their transitional grant scheme dated 18th October 2012.

3. Executive summary

3.1 Under Government welfare reforms, the existing national Council Tax Benefit scheme is to be replaced by localised Council Tax Support schemes from 1st April 2013.

3.2 The changes will see the existing demand-led Benefit subsidy scheme replaced by a fixed grant that is at least 10% lower in value than the current 100% subsidised scheme. Depending upon the funding settlement from the government, this is anticipated to require financial savings in the region of £3.9M to £5.1M for 2013/14 dependent upon growth and Council Tax levels and based upon the Council's proportionate share of the reduced funding. (i.e. excluding the GLA element). The funding due to the GLA will be concurrently affected by similarly proportionate reductions.

- 3.3 Under the reforms, any Local Authority that has not formally approved its local scheme by 31st January 2013 will have a default scheme imposed upon it. In general terms, the default scheme will be similar to the existing national Council Tax Benefit scheme and thus will not achieve the level of savings required to meet the reduced funding levels.
- 3.4 Additionally, there are some aspects of the default scheme that appear to be more onerous in terms of administrative processing and may therefore have consequential resource implications. This relates to the treatment of Universal Credit for CTS purposes, following its introduction in October 2013.
- 3.5 It is therefore incumbent upon Full Council to formally set its local Council Tax Support scheme by 31st January 2013 to avoid the potential implications arising from this scenario although an earlier date is preferred in order to enact necessary operational, publicity and contingency plans.
- 3.6 The Council commenced consultation with the GLA concerning its proposed draft scheme on 25th May 2012. The draft scheme was published on the Brent Council website on 8th June 2012 and made available for customers to access at Customer Services Offices and Public Libraries within the Borough with effect from 11th June 2012.
- 3.7 The consultation was carried out using a range of approaches and publicity. These included online and paper consultation questionnaires and face to face meetings with stakeholders and customers.
- 3.8 The government proposes to protect pensioners (i.e. persons of pension credit age) who currently receive Council Tax Benefit from the effects of any changes made at a local level. Additionally, the same provisions will apply to pensioners that may be eligible for Council Tax Support under the Council's local scheme from 1st April 2013 onwards. This means that the minimum 10% savings referred to in section 3.2 above will, subject to the decision taken by the Council, need to be funded from the benefit entitlement of 24,604 working-age claimants.
- 3.9 The Council has the following options available for meeting the 10% savings level required:
 - 3.9.1 Subsidise the recommended scheme via savings elsewhere in the General Fund;
 - 3.9.2 Make changes to Council Tax exemptions and discounts to partially offset the Council Tax Support Scheme funding gap;
 - 3.9.3 Devise a new Council Tax Support scheme to reduce projected expenditure levels;

3.9.4 A combination of the above.

- 3.10 On the basis of the above, options and associated issues arising have been developed and modelled and a proposed scheme (as well as rejected alternatives), are identified within this report and its appendices for reference and information. The proposed scheme principles are contained in section 5 of this report.
- 3.11 Following separate consultations, DCLG are allowing Local Authorities discretion concerning some of the currently nationally-set Council Tax discounts and exemptions and the relevant amendments have been made to the Local Government Finance Act 1992. Decisions concerning these can only be made by Full Council. The additional income that may be generated as a consequence of these proposed changes is intended to partially offset the Council Tax Support Scheme funding gap. The proposals for change are contained in Section 10 of this report.

Background

4. Government proposals and main principles

- 4.1 The government has made provision within the Local Government Finance Bill to replace the current national Council Tax Benefit (CTB) scheme from 1st April 2013 with localised schemes for Council Tax Support (CTS) devised by individual (or groups of) local authorities (LA's).
- 4.2 Responsibility within central government for Council Tax Support has passed from the Department of Work and Pensions (DWP) (responsible for the existing national scheme) to the Department for Communities and Local Government (DCLG) (responsible for the localised provision from April 2013).
- 4.3 Local CTS schemes will be funded by a fixed grant unlike the current Council Tax Benefit scheme which has demand-led funding. The fixed grant will result in an immediate reduction to funding when compared to current levels of subsidised expenditure. The headline reduction is 10% but draft figures issued by DCLG indicate that the reduction for the Council is closer to 13.7%.
- 4.4 Local Authorities have a duty to run a local Council Tax Support Scheme within their area that must contain the following:
- Pensioner claimants will generally be protected from changes to their existing CTB award through the provision of a statutory scheme. (However, a small number of claimants in receipt of war widows or war disablement pensions currently have their income from these pensions ignored when calculating their entitlement to Council Tax Benefit under a Brent Council local scheme. With the

cessation of Council Tax Benefit and the provision of national rules for claims and eligibility for persons of pensionable age, this will cease and only £10 of their weekly income from such pensions may be ignored). The protection for pensioner claimants will result in the 10% financial saving referred to in section 4.3 above falling disproportionately on working-age claimants unless it can be met through other arrangements.

- Schemes must support work incentives. The CLG Policy Statement of Intent does not give a recommended approach to be taken but indicates the considerations of the scheme design that may impact upon work decisions and which local authorities may want to consider.
- LA's must ensure that appropriate consideration has been given to support for other vulnerable groups, including those which may require protection under other statutory provisions including the Child Poverty Act 2010, the Disabled Persons Act 1986 and the Equality Act 2010, amongst others.

4.5 The DCLG has issued Policy Statements of Intent that address a range of issues including the following:

- Vulnerable People and Key Local Authority Duties,
- Taking work incentives into account,
- Information Sharing and Powers to Tackle Fraud.

The Local Government Finance Act 2012 states that a Billing Authority must have regard to any guidance issued by the Secretary of State. The recommended scheme has sought to address these requirements and is outlined within this report and associated appendices.

4.6 Under the Local Government Finance Act 2012, the Council must, in the following order, consult with major precepting authorities (i.e. the GLA), publish a draft scheme in such manner as it thinks fit and consult such other persons as it considers are likely to have an interest in the operation of the scheme.

4.7 The Council must make its scheme and publish it in such manner as it thinks fit. The decision to make the scheme is reserved for Full Council and cannot be delegated.

4.8 Once a local Council Tax Support scheme has been made by the Council, it cannot be revised for at least one financial year. A Billing Authority must however *consider* whether to revise or replace its scheme with another one on an annual basis. In practice, this would require any proposals to amend the scheme to be drafted in the summer months to enable consultation and decision making processes to be concluded in time for Council Tax annual billing preparations.

- 4.9 Any revision to a scheme must be made by the Council by the 31st January immediately preceding the financial year in which it is to take effect and will require consultation arrangements to be applied. Additionally, in future, consideration must be given to providing transitional protection where the support is to be reduced or removed.
- 4.10 Existing CTB claimants on 31st March 2013 including those that have applied for Benefit but not had their entitlement determined at that time, will not need to reapply for CTS as their application will be treated as though it were made for Council Tax Support. This was outlined within the CLG'S Policy Statement of Intent dated 17th May 2012.
- 4.11 The implementation of the local Council Tax Support scheme coincides with other major reforms to the Welfare system including Universal Credit; the overall Benefit income cap; Housing Benefit restrictions for under-occupation in the social sector; and the devolvement of certain Social Fund functions from central to local government. This is likely to result in some claimants being affected by multiple changes arising from the reforms.
- 4.12 In the absence of the Council agreeing a local Council Tax Support Scheme by 31st January 2013, the Government will impose a default scheme. The technical operation and application of this scheme is not dissimilar to the existing national Council Tax Benefit Scheme although it will incorporate a number of new features relevant to the introduction of Universal Credit. The financial implications of this scheme mean that the Council would need to find additional funding of between £3.9M and £5.1M as set out in Appendix C to this report. The imposition of the default scheme was therefore not progressed as a financially viable option.
- 4.13 The default scheme is only applicable where a Council has not adopted a local scheme by 31st January 2013. As such, a Local Authority could still adopt their own local scheme based upon the default scheme provisions. Consideration has also been given to adopting a local scheme similar to the default scheme provisions although due to the financial implications as previously outlined in 4.12 above, this was not progressed further.
- 4.14 The Government has made amendments to the Local Government Finance Act 1992 (amended by the Local Government Finance Act 2012) to existing Council Tax discount and exemption provisions that if adopted, would enable Local Authorities to offset some of the potential funding gap arising from the localised arrangements for Council Tax Support. This provision has been considered and progressed as it reduces the potential funding gap that may otherwise need to be met from the localised Council Tax Support Scheme and the recommended proposal for this is set out in section 10 of this report.

- 4.15 There is also an option to meet part of the funding gap arising from the local Council Tax Support arrangements through savings achieved elsewhere within the Council. However, this option has been rejected for the same financial reasons as those outlined in 4.12 and 4.13 above.
- 4.16 Since the Government published its Policy Statements of Intent and subsequent to the Council concluding its consultation and submitting a report to the Executive outlining the proposed scheme details, the Government has made available a £100M transition grant to Local Authorities that comply with specified key principles within their Council Tax Support Scheme.
- 4.17 A funding paper issued on 19th October 2012 indicated that Brent Council could receive £641,613 of this funding if it were to meet the specified requirements.
- 4.18 The grant is conditional upon the following:
1. Designing a scheme that ensures those claimants currently receiving 100% support under Council Tax Benefit arrangements pay between zero and no more than 8.5% of their Council Tax liability. (Frequently Asked Questions (FAQ's) issued on 19th October further indicates that it would not be acceptable to have an 8.5% maximum for current 100% rebate cases, with a higher maximum for current non-100% cases – in order to avoid creating “cliff edges” for claimants who may enter work and which could act as a disincentive to employment).
 2. Ensuring that the taper does not increase above 25%
 3. Ensuring that there is no sharp reduction in support for those entering work – for claimants currently entitled to less than 100% support, the taper will be applied to an amount at least equal to their maximum eligible award and
 4. An expectation that local authorities will not impose large additional increases in non-dependant deductions.
- 4.19 In relation to points 1, 2 and 4 in paragraph 4.18 above, the proposed CTS scheme for Brent as set out and recommended in this report does not meet these requirements, instead proposing a 20% minimum liability, a taper of 30% and a doubling in general terms of most existing non dependant deductions.
- 4.20 In the case of point 3 in paragraph 4.18 above, it is unclear as to what this means in practical terms and therefore it is not possible to comment in more detail on this issue at this stage or indeed its financial implications.

- 4.21 Full details on the financial and other implications arising from the above proposals are set out in Appendix F of this report.
- 4.22 Based upon the implications set out within Appendix F, it has been established that if the Council were to accept the offer, it would incur considerable financial cost itself as well as presenting several significant legal and practical risks.
- 4.23 For the above reasons, it is recommended that the offer is declined.

5 The Council's Proposed CTS scheme

- 5.1 The Council undertook consultation concerning its proposed draft scheme which comprised the key principles and features set out below for working age claimants:

Principle 1: "Everyone should pay something"

All working age claimants (unless defined as protected) shall be required to pay a minimum contribution towards their Council Tax – set in the draft scheme at 20%.

Principle 2: "The most vulnerable claimants should be protected" (from the minimum contribution)

Claimants shall be protected from the 20% minimum contribution if they or a dependant in their household are entitled to a disability premium, enhanced disability premium, disabled earnings disregard, Disability Living Allowance or Personal Independence Payment, Disabled Persons Reduction for Council Tax purposes, War Disablement Pension and War Widow's Pension.

Principle 3: "The scheme should incentivise work"

Incentives to work are achieved by letting claimants who are working keep more of what they earn (before means-testing) – the recommended scheme proposes an increase of £10 per week in the earnings disregards for Single Person, Couple and Lone Parent earnings (currently set at £5, £10 and £25 respectively). In this context, a disregard means the amount of weekly earnings that may be ignored when calculating entitlement to Benefit.

Principle 4: "Everyone in the household should contribute"

Other adults in the claimant's household ("non-dependants") should contribute more proportionately to their income – the recommended scheme proposes doubling the existing rates of non-dependant deductions from those in place in 2012/13 and replacing the current nil deduction for other adults in the claimant's household receiving Job Seekers Allowance (Income Based) with a deduction of £6.60.

Principle 5: “Better off claimants should pay relatively more so that the least well off receive greater protection.”

The recommended scheme proposes that the taper used in the Benefit calculation for those above the means-test (i.e. where the claimant's income exceeds their needs) should be increased to 30% from the current 20%. This is the rate at which Council Tax Support reduces where weekly income exceeds basic living needs and will be 30 pence in the pound rather than the 20 pence currently applied for CTB.

Principle 6: “Benefit should not be paid to those with relatively large capital or savings”

The recommended scheme proposes reducing the current savings cut-off limit applied for CTS claims from £16,000 at present for the purposes of CTB to £6,000.

5.2 Other general features of the proposed scheme were as follows:

- 5.2.1 The current second adult rebate scheme (whereby claimants whose own income is too high to receive CTB, but have other adult(s) in the household whose income is low, can receive a Council Tax discount of up to 25%) to be abolished for working age claimants. This is due to its inconsistency with the above principles given that these claimants by definition are not eligible via the normal Benefit means-test.
- 5.2.2 Premiums and personal allowances used to determine basic living needs for a claimant and their family when calculating entitlement to CTS to be held at the rates applied for CTB in 2012/13. This will have the effect of contributing to the required savings by counteracting any inflationary growth in expenditure.
- 5.2.3 Where new working age benefits are introduced by the government (in particular Personal Independence Payments and Universal Credit, both of which are being introduced during the first year of the CTS scheme), treatment of these benefits to be broadly equivalent to treatment of the corresponding current working age benefits within the CTS scheme.

For example, claimants in receipt of Universal Credit shall be treated as being liable to pay a minimum 20% contribution towards their Council Tax unless they are protected.

(Personal Independence Payments will replace Disability Living Allowance; Universal Credit will combine Income Support, Job Seekers Allowance (Income Based), Employment Support Allowance (Income Related), Working and Child Tax Credits and Housing Benefit, and will be rolled out over four years from October 2013).

5.3 Additional proposals were received from the consultation undertaken in relation to protecting claimants and groups of claimants from payment of the minimum 20% Council Tax contribution that included for example the following:

- Job Seekers Allowance and Universal Credit
- Carers
- People not working
- Vulnerable persons
- Disabled
- Terminally ill
- Persons of pensionable age
- Persons resettled from a hostel
- Persons on a low income (including on minimum wage)
- Medical grounds (including Employment Support Allowance Care Component)
- Severe learning disorders
- Other Social Issues (e.g. debt)
- Persons recently unemployed
- Joint Tenants (where the other tenant does not contribute)
- In receipt of Benefits Looking for work
- No savings
- Young adults aged 16 to 30 in full time education or learning and living with parents
- Persons attending courses for education to improve employment prospects
- Young Adults
- Single Parents
- Families
- Care leavers
- Foster carers
- Special Guardian Carers

Each of the proposed options has been considered with regard to their suitability and feasibility. In some cases suggestions have not been progressed as the proposed scheme already provides for protection (e.g. disabled and pensionable age) or because they would be administratively complex to apply, financially unviable, or cannot be achieved due to software constraints. Other suggestions have however been considered and it is proposed that these be included within the proposed scheme as is the case for example in the following two cases:

- Claimants that are carers in receipt of a Carers Allowance and providing care to another person.
- Persons receiving a guaranteed income payment or survivors guaranteed income payment under the Armed Forces Compensation Scheme where they have received an injury or illness from service in the Armed Forces after 6th April 2005.

- 5.4 Other proposals have also been submitted by organisations concerning for example the CTS claims process and alternative minimum contribution levels for claimants (e.g. 10%) but with no protection for vulnerable groups. Each option proposed has been financially evaluated where practicable and considered and reviewed accordingly. The details concerning these cases are set out in the Consultation Report attached at Appendix A to this document.
- 5.5 The Council's proposed scheme has been established with due regard to the Council's statutory obligations, consultation responses and in order to attempt to distribute the reduced funding available amongst those claimants most in need of financial assistance, while still achieving the necessary financial savings to meet the funding deficit. The detailed legal implications concerning these including the public sector equality duty are set out later in this report.
- 5.6 The permutations of options and variations for a localised Council Tax Support scheme are almost infinite and a variety of options and variations were considered prior to the consultation process by officers and through discussions with a Member Working Group. These were used to arrive at the proposed draft scheme which formed the basis of public consultation. The options considered and discounted including those raised during the consultation have been set out in Appendix B together with reasons for their rejection.
- 5.7 The proposed local scheme for consideration by Full Council will consist of both statutorily prescribed requirements as defined for claimants of pensionable age and persons from abroad who are to be excluded from entitlement if they are subject to immigration control and/or not otherwise treated as being in Great Britain. Further changes to the prescribed provisions will be made in the final regulations and will also be included in the Council's local scheme for non-EEA nationals to reflect final Universal Credit regulations. There will also be local requirements for working age claimants which have been developed based upon the Council's set of key principles and accompanying technical mechanisms. These represent variations from the existing CTB scheme for working age claimants.
- 5.8 The local Council Tax Support scheme complies with the Government's key principles of protecting Pensioner claimants from changes in their existing CTB award, supports work incentives and gives appropriate consideration to support other vulnerable groups, including those which may require protection under other statutory provisions including the Child Poverty Act 2010, the Disabled Persons Act 1986 and the Equality Act 2010, amongst others.
- 5.9 The manner in which this is achieved in relation to CLG Policy Statements of Intent is set out below and further referenced within section 4.4 of this report.

5.9.1 Armed Forces Covenant

The Covenant sets out the relationship between the Nation, the State and the Armed Forces and recognises that the whole nation has a moral obligation to members of the Armed Forces and their families, and it establishes how they should expect to be treated.

It exists to redress the disadvantages that the Armed Forces community faces in comparison to other citizens, and to recognise sacrifices made. In some cases this will require special consideration, especially for those who have given the most such as the injured and the bereaved.

In consideration of the above and following comments during the consultation the recommended scheme now proposes that in addition to war widow's, war widower's and war disablement pensions, guaranteed income payments (including survivor's guaranteed income payments under the Armed Forces Compensation Scheme) be disregarded in full for working age claimants thus ensuring that receipt of these incomes does not impact upon their Council Tax Support entitlement.

Additionally, the recommended scheme proposes that claimants be protected from the requirement to pay a minimum contribution of 20% towards their Council Tax where they or a dependant in their household is in receipt of one of these income types.

It is also important to note that under Government regulations for pensionable age claimants that will apply to all Local Authorities, only £10 per week can be disregarded from the receipt of the above pensions. Currently, Brent Council operates a local scheme whereby these pensions are disregarded in full but this will cease under the new prescribed statutory provisions for pensionable age claimants. Whilst there are only currently 12 customers affected by this change and of these, half are in receipt of 100% Council Tax Benefit and will thus continue to be entitled to this amount of Benefit next year, this change will be of importance to all of them.

The Council may consider exercising the provisions of Section 13A Local Government Finance Act 1992 as set out in the financial implications section of this report to address this potential scenario whereby such persons of pensionable age are financially affected.

5.9.2 Child Poverty Act 2010

The principles enshrined within the recommended Council Tax Support Scheme support the objectives of reducing and

mitigating the effects of child poverty through the following means:

Child Benefit shall be completely disregarded as a claimant's income thus ensuring that their entitlement to Council Tax Support is unaffected by the receipt of this income.

Premiums and allowances shall be used to determine a claimant's basic living needs with amounts being determined for each child and young person that is resident in the claimant's household.

The disregard of an additional £10 per week from a claimant's weekly earned income (i.e. through employment) is also likely to contribute towards the achievement of this objective by permitting a claimant to earn an additional £10 per week without it affecting their Benefit entitlement.

The provision of disregards for child care costs will be applied within the scheme up to a maximum prescribed level of £175 per week for one child and £300 for two or more children for example where the claimant is a single parent that works 16 or more hours per week, or a couple where both partners work 16 hours or more per week or where one partner is incapacitated, in hospital, in prison or aged 80 or over and the other partner works 16 hours or more per week and relevant child care costs are paid for a child normally up to the first Monday in September after their 15th birthday.

5.9.3 Incentivising Work

The disregard of an additional £10 per week from a claimant's weekly earned income (i.e. through employment) for single claimants, couples and single parents shall permit a claimant to earn an additional £10 per week without it affecting their Benefit entitlement. This will mean that the following weekly earned income amounts shall be disregarded under the recommended scheme:

Single Person - £15

Couple - £20

Single Parent - £35

The provision of extended payments for the first four weeks after a claimant commences work where they meet certain prescribed requirements will also be applied within the recommended scheme.

The provision of a non-dependent deduction for another adult resident in the claimant's home that is in receipt of Job Seeker's

Allowance (Income Based) is also included within the proposed scheme as a work incentive.

5.9.4 Equalities Implications

Section 149 of the Equality Act 2010 sets out the public sector equality duty which requires the Council, when exercising its functions (including those as an employer) to have 'due regard' to the need to eliminate discrimination (both direct and indirect discrimination), harassment and victimization and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who share a 'protected characteristic' and those who do not share that protected characteristic.

Direct discrimination occurs if, because of a protected characteristic, a local authority treats a person less favourably than it treats or would treat others.

Indirect discrimination occurs if a local authority applies the same provision, criterion or practice to everyone, but it puts those in a certain protected group at a "particular disadvantage" when compared with persons who are not in that protected group. Even if a "particular disadvantage" arises, indirect discrimination does not arise if the provision, criterion or practice can be justified – i.e. if it is a proportionate means of achieving a legitimate aim.

The Council must pay due regard to any obvious risk of such discrimination arising in respect of the decision before them. These matters are examined in the Equalities Impact Assessment.

A 'protected characteristic' is defined in the Act as:

- age;
- disability;
- gender reassignment;
- pregnancy and maternity;
- race; (including ethnic or national origins, colour or nationality)
- religion or belief;
- sex;
- sexual orientation.

Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.

Having due regard to the need to 'advance equality of opportunity' between those who share a protected characteristic and those who do not, includes having due regard to the need to remove or minimize disadvantages suffered by them. Due

regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and encourage those who have a protected characteristic to participate in public life.

The steps involved in meeting the needs of disabled persons include steps to take account of the persons' disabilities.

Complying with the duty may involve treating some people better than others, as far as that is allowed by the discrimination law.

Due regard to the need to eliminate discrimination, advance equality, and foster good relations must form an integral part of the decision making process. The Council must consider the effect that implementing a particular policy will have in relation to equality before making a decision.

There is no prescribed manner in which the equality duty must be exercised. However, the council must have an adequate evidence base for its decision making. This can be achieved by gathering details and statistics on who use the facilities. A careful consideration of this assessment is one of the key ways in which the Council can show "due regard" to the relevant matters. Where it is apparent from the analysis of the information that the proposals would have an adverse effect on equality then adjustments should be made to avoid that effect (mitigation).

The duty is not to achieve the objectives or take the steps set out in s.149. Rather, the duty on public authorities is to bring these important objectives relating to discrimination into consideration when carrying out its functions. "Due regard" means the regard that is appropriate in all the particular circumstances in which the authority is carrying out its functions.

There must be a proper regard for the goals set out in s.149. At the same time, the council must also pay regard to any countervailing factors, which it is proper and reasonable for them to consider. Budgetary pressures, economics and practical factors will often be important, which are brought together in the Equality analysis form. The weight of these countervailing factors in the decision making process is a matter for the Council in the first instance.

The proposed council tax support scheme will impact on 24,604 existing working age claimants.

A detailed equalities impact assessment has been undertaken and is attached at Appendix D to this report.

In general terms, as the proposed changes will impact across the working age caseload, the effects of the reductions in entitlement will affect all claimants and the risk of a disproportionate impact on a protected group has thus been minimized.

There has not been any adverse impact currently identified for 7 of the 9 protected groups. However, in terms of “race” and “age” some specific issues have been identified and these are outlined below.

The majority of working age customers (52%) will incur a difference of £3 to £5 per week less in entitlement under the proposed scheme that will have to be paid in their Council Tax.

The ‘black’ ethnic group (60%) in proportionate terms has a greater incidence of a reduction in entitlement of £3 to £5 per week compared to any other ethnic group. However, claimants in this group are less affected by a decrease in entitlement of more than £5.00 per week than other groups. This is because this group has more claimants in receipt of passported benefits (i.e. 55%) compared to the average for the working age caseload (i.e. 46%). Consequently, they would not see a reduction in their benefit under Principle 5 (the effects of the taper) but, like all other groups, would still be affected by Principle 1 - the proposed requirement to make a minimum contribution of 20%.

The ‘Asian’ ethnic group is more affected in proportionate terms by a reduction in entitlement of £5.00 or more per week under the proposed scheme than other groups. One reason for this is that they are more likely to be in the ‘working age other’ group and therefore more likely to be affected by Principle 5 under the proposed scheme and the impact of the taper on income above their basic living needs.

Additionally, there are some other significant factors that contribute towards the variance in the percentage of caseload affected by a reduction in entitlement of more than £5 per week which are as follows:

- ‘Asian’ families have a greater proportion of dependents (i.e. 22% have 3-4 children per household compared to 10% of the ‘white’ group). Consequently, they have larger homes represented by a higher Council Tax Valuation Band and hence more Council Tax to pay for the Valuation Band allocated. For example, 16% of the ‘Asian’ group resides in Band E properties compared to just 9% ‘Black or 10% ‘White’ ethnic groups.

- The 'Asian' group also has significantly more adults other than the claimant and partner residing as part of the household (e.g. 6% 'Asian' households have 2 other adults living as part of the family compared to 3% of any other ethnic group)

The policy intention of the proposed scheme is that a claimant should have a reduction in their proposed entitlement if they have other adults resident in their home that could contribute towards the Council Tax and other household bills. Consequently, the more non-dependants that are resident in a claimant's home who are working for example, the greater the non-dependant deduction that would be made from the claimant's entitlement. There is no deduction made however, where a non-dependant is in receipt of Income Support or where the claimant or partner is receiving the care component of a disability living allowance.

Those most affected by a reduction in entitlement of between £3 and £5 are in the 18 - 24 age group (i.e. 76%). This is because this age group is less likely to receive protection under the proposed scheme towards the minimum 20% contribution as they are less likely to be in receipt of Disability Living Allowance for example and more likely to be in receipt of a passported benefit such as Job Seekers Allowance (Income Based).

As a claimant's age increases, the likelihood of a reduction in entitlement of £3 to £5 per week decreases (with just 37% of 55 - 60 year olds affected by this reduction amount). This variance can be explained by younger claimants being less affected by Principle 4 of the proposed scheme as they are less likely to have non-dependants living with them than older claimants who may have adult sons and daughters still residing with them.

It is also the case that the 55 - 60 year old age group comprises 32% of the £0 to £3 reduction in entitlement to support category. This can be explained by the fact that 30% of 55 - 60 year olds are protected from Principle 1 (i.e making the minimum 20% contribution towards their Council Tax).

Claimants aged 55 to 60 are proportionately more likely to have a difference in their entitlement of £8.00 to £30.00 per week than the younger age groups. For example, in the £8 - £15 category they are represented by 11% rather than the 6% average.

One factor for this variance is because claimants aged 55 to 60 are more likely to live in larger properties. For example, 15% live in Band E properties compared to 3% aged 18 - 24 and 6% aged 25 - 34 than the younger age groups. They are also in

proportionate terms more likely to have more non-dependants living in their home.

Given that one of the key scheme objectives is to incentivise work, the provisions in the proposed scheme to protect the most vulnerable, as well as the strong financial pressure to introduce the scheme and the need to bridge the anticipated funding gap, officers consider that the adverse effects on some groups is justifiable in the circumstances.

6. Consultation Arrangements

- 6.1 The consultation period of 11th June to 10th August (i.e. 9 weeks) was shorter than the 12 weeks recommended in the Government's Code of Practice on consultation. However, the CLG advised that authorities should consider the length of consultation depending upon the impact of the proposals and their ability for example to complete the consultation exercise within budgetary timetables.
- 6.2 Additionally, it was indicated within the CLG Policy Statement of Intent dated 17th May 2012 that if a shortened period was to be applied, that the reasons for this should be given in consultation documentation.
- 6.3 To this extent, the Council included reference to this in its Council Tax Support consultation document that a shortened period had been used to permit sufficient time to evaluate the responses received and to meet the Council's budget setting timetable. The timescale also reflected the need to provided sufficient duration to receive and test software, and prepare for annual billing and year end arrangements. Full detail of the consultation and analysis of results is included in the Consultation report attached as Appendix A to this report.
- 6.4 In compliance with the Council's consultation obligations, a range of approaches were used to obtain views and comments for the proposals of the Council's Local Council Tax Support Scheme as set out below:
 - All consultation documentation including the questionnaire was available on Brent Council's Consultation Tracker website - www.brent.gov.uk/consultation,
 - A specific email address was provided and included on consultation documentation to deal with any requests for information or to log supplementary comments. All correspondence has been logged and has served to inform this report,
 - A text message was sent on two occasions to 2694 existing Benefit customers outlining the nature of the consultation and providing details of how to access the consultation documentation,

- An email was sent on two occasions to approximately 1770 existing Benefit claimants outlining the nature of the consultation and providing details of how to access the consultation documentation,
- A leaflet was issued with 13,000 Council Tax bills to Council Tax Payers in the Borough outlining the nature of the changes and providing details of how to access the consultation documentation,
- Meetings and presentations were held with organisations, including the voluntary sector service user forum comprising representatives (and in some instances members) of Mencap, Citizens Advice Bureau, Help Somalia Foundation, Advocacy Project, Private Tenant Rights User Group, Older Persons Partnership Board, Brent Housing Partnership, Brent Mental Health User Group and representatives from Lynton Close Travellers Site. Proposals were outlined and comments and options were submitted as appropriate and confirmed by Council representatives in writing. Consultation questionnaires were also provided to attendees of meetings held with the Brent Mental Health User Group, Older Persons Partnership Board, Help Somalia Foundation and Lynton Close Travellers Site.
- An email was sent to 600 Area Consultative Forum members and 640 Citizens Panel members on two occasions outlining the nature of the consultation and providing details of how to access consultation documentation,
- Paper copies of the documentation were distributed upon request and were available at each of the Brent Council Libraries (excluding Kilburn that was closed for refurbishment during the consultation period), and Customer Services Local Offices at the Town Hall, Willesden Green and Brent House,
- Alternative formats of consultation documentation were available on request,
- A feature on the consultation was published in both the May and July edition of the Brent Magazine and the consultation was publicised in the local media including the Harrow Times and the Brent and Kilburn Times at the commencement of the consultation,
- Two public meetings were arranged and held at Willesden Mosque and Brent Town Hall respectively for which there were 16 attendees,
- Council proposals were outlined at each of the 5 Area Consultative Forums for which there were 267 attendees,
- A pop up screen outlining the nature of the consultation and how to access the online consultation documentation was activated each

time one of the Brent public library PC's was accessed by a customer. During the consultation period, there were 5,607 customer sessions where this message was displayed,

- Letters outlining the consultation arrangements were sent by post / email to 30 organisations including Housing Associations with a property interest in the Borough, welfare organisations and interest groups to inform them of the nature of the consultation and how they may access the consultation documentation,
- Letters outlining the consultation arrangements were sent by email to 136 voluntary organisation representatives on 11th June 2012 informing them of the nature of the consultation and how they may access the consultation documentation,
- Letters outlining the consultation arrangements and how to access the consultation documentation were also sent to the three Brent MP's and Chamber of Commerce,
- The Voluntary Sector Service Users Forum meeting on 21st June was attended by 20 people representing 18 voluntary organisations where the consultation arrangements were outlined. A briefing note was given to the attendees informing them of how they may access the consultation documentation and attendees were advised to meet with officers as appropriate if they wished to obtain further details about the scheme.
- Posters advertising the consultation and how to access documentation were displayed on 80 advertising hoardings around the Borough for a period of two weeks from 24st July 2012.
- A focus group meeting was arranged for 3rd August 2012 with 9 Council Tax Benefit claimants although only one attended the meeting.

6.5 Correspondence with Council officers and records of Question and Answer sessions at public meetings and forums have been logged and have helped to inform the analysis of the consultation feedback and the findings of this report.

7.0 Consultation Responses – Analysis

7.1 The questionnaire used for the consultation was made available on the Council's Consultation Tracker throughout the consultation period and printed copies of the document were distributed at all meetings and forums attended. Printed copies were also available upon request and were available at Brent Council libraries (excluding Kilburn which was closed for refurbishment during the consultation period) and Customer Services Local Offices.

- 7.2 Respondents were asked the following questions:
- To rank in order of importance their preferences for each of the proposed changes,
 - To state whether they agreed or disagreed that each of the proposed changes was fair
 - To give details of any other groups that the Council should protect from the proposed changes and reasons
 - To add any additional comments to support responses given to the ranking of importance and fairness questions or alternative options that the Council should consider
 - To comment on whether the proposed changes are likely to affect particular individuals or groups more than others and if so, how these may be addressed
 - To provide any other additional comments concerning the proposals
- 7.3 There were 184 consultation questionnaire responses received, comprising 97 online responses (52.7%) and 87 paper responses (47.3%).
- 7.4 Additionally however, there were comments and submissions received from organisations including CAB, Mencap, Capita, GLA, Network Housing and Catalyst Housing and the Council's Children and Families Service and Strategy, Partnerships and Improvement.
- 7.5 The size of the consultation questionnaire response represents 0.5 per cent of the total Benefits caseload. It should also be noted that some respondents only answered part of a question or in the case of free text answers, gave more than one response for consideration. In other cases, no responses were given to a question. Consequently, the weight attached to the results obtained from the responses received should be considered accordingly.
- 7.6 A number of the proposals submitted for consideration were proposed by only one respondent, cannot be achieved due to software constraints or are administratively complex to operate. Others proposed have already been included within the draft scheme such as those for pensioners and the disabled.
- 7.7 The top six categories recommended for protection from the minimum 20% Council tax contribution submitted by respondents to the questionnaire were families with children, single parents, pensioners, disabled, persons in receipt of Job Seekers Allowance and persons on low income.
- 7.8 There were also submissions made from organisations proposing for example a flat 10% contribution towards Council Tax with no protection for any groups, protection for care leavers and carers, persons leaving the armed forces and persons subject to domestic violence.

7.9 Each proposal received has been evaluated based upon technical feasibility and suitability in terms of administering the scheme, the potential financial position arising from the funding deficit and the Council's obligations and duties under statutory provisions including the Equalities Act 2010.

7.10 Details of the consultation findings in general may be summarised as follows:

Of the 184 respondents:

121 (i.e. 85.82% of those that responded to the question) indicated that they paid Council Tax to Brent Council and 20 (i.e. 14.18% of those that responded to question) did not.

87 (i.e. 60.84% of those that responded to the question) were currently in receipt of Council Tax Benefit and 56 (i.e. 39.16% of those that responded to the question) were not. There were 41 respondents that did not give an answer to this question.

17 (i.e. 27.87% of those that responded to the question) indicated that they had previously received Council Tax Benefit and 44 (i.e. 72.13% of those that responded to question) had not.

Table 1 below sets out the relevant findings from the analysis conducted.

Table 1

Ethnic Group	Proportion of Borough Population	Proportion of Benefits Caseload	Number of Consultation Responses	Proportion of Responses Received (%)
Asian:Bangladeshi	0.5	0.6	1	0.70
Asian: British	0	0	4	2.82
Asian: Chinese	1.1	0.4	1	0.70
Asian: Indian	18.5	8.0	12	8.45
Asian: Pakistani	4.0	3.6	6	4.23
Asian: Other	4.8	11.3	6	4.23
Black: African	7.8	18.8	12	8.45
Black: Caribbean	10.5	15.2	14	9.86
Black:Somali	0	0	19	13.38
Black: Other	1.6	1.5	3	2.11
Mixed: White and Black Caribbean	1.0	1.1	2	1.41
Mixed: White and Black African	0.7	1.0	0	0
Mixed: White and Asian	1.0	0.7	0	0

Mixed: Other	1.1	1.0	1	0.70
White:British	29.2	15.7	35	24.65
White:Irish	7.0	5.0	1	0.70
White: Other	9.1	11.7	12	8.45
Other	2.3	4.4	8	5.63
Prefer not to say	0	0	5	3.52
Total	100	100	184	100

Notes:

1. The above totals do not equate to 100% in all cases due to rounding differences.
 2. There were 42 respondents that did not answer this question.
 3. Black:British has been included within the group Black:Other in the table above.
 4. Black:Somali has been shown as a separate group for the purposes of the consultation responses although in the census and for the Benefits caseload generally, this group is likely to have been incorporated within Black:African.
- 7.11 Table 2 below shows how the proportions of each group as represented by the Borough population and Benefits caseload compare to that obtained from the consultation responses received. This indicates that Asian: Pakistani, Black: African, Black: Caribbean, and White: Other have the closest representation from the consultation responses to the 2001 census data and that Asian: Indian has the closest representation from the consultation responses to the Benefits caseload allowing for a 10% variance.

Table 2

Ethnic Group	Proportion of Borough Population (A)	Proportion of Benefits Caseload (B)	Proportion of Responses Received (C)	% Difference between Population and Responses	% Difference between Benefits Caseload and Responses
Asian:Bangladeshi	0.5	0.6	0.7	40	17
Asian: British	0	0	2.82	#DIV/0!	#DIV/0!
Asian: Chinese	1.1	0.4	0.7	-36	75
Asian: Indian	18.5	8	8.45	-54	6
Asian: Pakistani	4	3.6	4.23	6	18
Asian: Other	4.8	11.3	4.23	-12	-63
Black: African	7.8	18.8	8.45	8	-55
Black: Caribbean	10.5	15.2	9.86	-6	-35
Black:Somali	0	0	13.38	#DIV/0!	#DIV/0!
Black: Other	1.6	1.5	2.11	32	41
Mixed: White and Black Caribbean	1	1.1	1.41	41	28
Mixed: White and Black African	0.7	1	0	-100	-100
Mixed: White and Asian	1	0.7	0	-100	-100
Mixed: Other	1.1	1	0.7	-36	-30
White:British	29.2	15.7	24.65	-16	57
White:Irish	7	5	0.7	-90	-86
White: Other	9.1	11.7	8.45	-7	-28
Other	2.3	4.4	5.63	145	28
Not declared	0	0	3.52	#DIV/0!	#DIV/0!

Note: In Table 2 above, the reference to #DIV/0! In some instances applies where the denominator used for the purposes of the comparison is zero.

7.12 The tables below set out the composition of respondents that completed the consultation questionnaire:

Table 3

Status of Respondent	Total number of Responses	Responses as Proportion of Total (%)
Pensioner	23	16.67
Student	3	2.17
Employed	37	26.81
Employed Part Time	15	10.87
Unemployed	54	39.13
Disabled	6	4.35
Totals	138	100

The overall response rate to this question was 75% of the total of 184 respondents. There were 46 respondents that did not give an answer to this question representing 25% of the total of 184 respondents.

Table 4

Status of Respondent	Total number of Responses	Responses as Proportion of Total (%)
Living as a Couple	14	16.67
Married	44	52.38
Civil Partnership	1	1.19
Prefer not to say	25	30
Totals	84	100

The overall response rate to this question was 45.65% of the total of 184 respondents.

There were 100 respondents that did not give an answer to this question representing 54.35% of the total of 184 respondents.

- 7.13 An analysis of the age composition of the Borough in comparison to the Benefits caseload is shown in Tables 4 and 5 below:

Table 5 – Borough Census and Benefit Caseload

Age Range	Borough average from Census	Council Tax Benefit Cases
15-24	18.2%	3.24%
25-34	24.2%	14.42%
35-44	19.4%	21.98%
45-54	13.5%	21.11%
55-59	5.5%	7.99%
60+	19.3%	31.26%

Table 6 – Consultation Responses

Age Status of Respondent	Total of Responses	Responses as Proportion of Total (%)
Under 18	0	0
18 to 24	6	4
25 to 34	20	14
35 to 44	48	34
45 to 54	34	24
55 to 60	10	7
61+	20	14
Prefer not to say	4	3
Totals	142	100

The overall response rate to this question was 77.17% of the total of 184 respondents.

There were 42 respondents that did not give an answer to this question representing 22.83% of the total of 184 respondents.

- 7.14 It is not possible to draw any specific conclusions from the above age data as not all of the respondents answered this question.
- 7.15 It is also important to note that as Council Tax is not payable by residents aged under 18 years old, there will not be any data for this age range in respect of Council Tax Benefit. It is also likely that as persons of pensionable age will be protected from the proposed changes to Council Tax Benefit, they were less likely to respond to the consultation proposals.
- 7.16 There does appear however to be a close correlation between the age analysis of consultation respondents and Council Tax Benefit data that may be partially explained by the fact that 60% of respondents were in receipt of Council Tax Benefit and consequently the age data for these persons should be consistent with Benefit data held.

7.17 Table 7 - Gender Status

Gender	Borough Average from Census	Council Tax Benefit Data
Male	48.6%	45.8%
Female	51.4%	54.2%

The profile of gender within the Borough and the existing Benefits caseload is shown in Table 6 above and appears to be broadly comparable. It is important to note that a claimant for Council Tax Benefit can be either partner in the case of a couple.

Table 8 - Consultation Responses

Gender of Respondent	Total of Responses	Responses as Proportion of Total (%)
Male	58	41.43
Female	78	55.71
Prefer not to say	4	2.86
Totals	140	100

The overall response rate to this question was 76.09% of the total of 184 respondents.

There were 44 respondents that did not give an answer to this question representing 23.91% of the total of 184 respondents.

- 7.18 It is not possible to draw any specific conclusions from the above results of the consultation as not all respondents answered this question and some that did, preferred not to state their gender. However, of those that did, there was a 4.3% variance for male

responses and a 2.7% variance for female responses in comparison to the existing Benefits caseload data.

7.19 Table 9 – Gender Assignment

Status of Respondent	Total of Responses	Responses as Proportion of Total (%)
Yes	116	91.34
No	4	3.15
Prefer not to say	7	5.51
Totals	127	100

The overall response rate to this question was 69.02% of the total of 184 respondents.

There were 57 respondents that did not give an answer to this question representing 30.98% of the total of 184 respondents.

It is not possible to compare the data from the consultation responses with the Borough average as this information was not previously collated from the 2001 census.

7.20 Table 10 – Parenting Responsibilities

Status of Respondent	Total of Responses	Responses as Proportion of Total (%)
Yes	62	45.93
No	67	49.63
Prefer not to say	6	4.44
Totals	135	100

The overall response rate to this question was 73.37% of the total of 184 respondents.

There were 49 respondents that did not give an answer to this question representing 26.63% of the total of 184 respondents.

7.21 Table 11 – Sexual Orientation

Status of Respondent	Total of Responses	Responses as Proportion of Total (%)
Heterosexual	99	77.95
Gay Woman / Lesbian	1	0.79
Bisexual	4	3.15
Gay Man	3	2.36
Other	1	0.79
Prefer not to say	19	14.96
Totals	127	100

The overall response rate to this question was 69.02% of the total of 184 respondents.

There were 57 respondents that did not give an answer to this question representing 30.98% of the total of 184 respondents.

It is not possible to compare the data from the consultation responses with the Borough average as this information was not previously collated from the 2001 census.

7.22 Table 12 – Religion

Religion	Borough Average
Christianity	47.7%
Buddhism	1.0%
Hinduism	17.2%
Judaism	2.5%
Islam	12.3%
Sikhism	0.7%
Any other religion	1.1%
No religion	10.0%
Religion not stated	7.7%

Table 13 - Consultation Response

Religion of Respondent	Total of Responses	Responses as Proportion of Total (%)
Baha'i	1	0.75
Buddhism	0	0.00
Christianity	41	30.83
Hinduism	10	7.52
Jainism	0	0.00
Judaism	3	2.26
Islam	45	33.83
Sikhism	1	0.75
Taoism	0	0.00
Agnostic	2	1.50
Humanist	1	0.75
No Religious belief	18	13.53
Other	4	3.01
Prefer not to say	7	5.26
Totals	133	100

The overall response rate to this question was 72.28% of the total of 184 respondents.

There were 51 respondents that did not give an answer to this question representing 27.72% of the total of 184 respondents.

It is not possible to compare the consultation response with the existing Benefits caseload as this data is not currently held.

7.23 It is not possible to draw any specific conclusions regarding respondents' religion from the consultation response as not all respondents answered this question. However, from the responses received, there appears to be an over representation in comparison with census data from respondents whose religion was Islam and an under representation of responses from respondents whose religion was Christianity. There also appears to be an under representation of Hindu respondents.

7.24 Respondents were asked to indicate how important each of the Council's six key principles were to them with 1 being the most important and 6 the least important.

The results shown below indicate the number of respondents that ranked each of the 6 key principles. The final column "Ranking Average" shows the average ranking of importance for each of the 6 key principles concerned based upon responses received and indicates based upon the proportions of responses that principle 2 was most important to respondents (i.e. protecting vulnerable claimants). The principle that "everyone should contribute" was least important to respondents.

It should be noted that whilst there were 161 responses to principle 2, there were only 151 for principle 4 and differing numbers of responses for the other principles. This prevents a direct comparison of results for each principle although the variance between the responses to each principle is no more than 10.

Rank	1	2	3	4	5	6	Total	Ranking Average
Principle 1: Everyone should pay something	51	24	12	13	19	39	158	3.27
Principle 2: The most vulnerable claimants should be protected (from the minimum contribution)	72	32	24	12	7	14	161	2.33
Principle 3: The scheme should incentivise work	19	24	36	30	26	18	153	3.48
Principle 4: Everyone in the household should contribute	13	17	20	40	32	29	151	3.98
Principle 5: Better off claimants should pay relatively more so that the least well off receive greater protection	26	30	28	22	34	14	154	3.32
Principle 6: Benefit should not be paid to those with relatively large capital or savings	32	26	30	19	17	31	155	3.36

Note: The lower the average ranking means the higher the average preference as shown in the overall order of priority below.

Key Principle	Overall Priority
Principle 1: Everyone should pay something:	Second
Principle 2: The most vulnerable claimants should be protected (from the minimum contribution):	First
Principle 3: The scheme should incentivise work:	Fifth
Principle 4: Everyone in the household should contribute:	Sixth
Principle 5: Better off claimants should pay relatively more so that the least well off receive greater protection:	Third
Principle 6: Benefit should not be paid to those with relatively large capital or savings:	Fourth

Total that responded to question:	167
Total that skipped this question:	17
Total:	184

7.25 Respondents were asked to indicate the extent to which they agreed or disagreed that the Council's principles were fair and the results of these are summarised below.

Principle 1 – Every claimant of working age should pay 20% Council Tax

41.07% agreed that principle 1 was fair, 13.69% neither agreed nor disagreed and 45.24% considered the principle to be unfair. Each of the 168 respondents to this question answered this part. The results for this principle indicate that slightly more respondents disagreed that the minimum contribution of 20% was fair compared with those that considered it to be fair.

Principle 2 – Protect disabled claimants from the 20% minimum contribution

75% agreed that the principle was fair, 10.12% neither agreed nor disagreed and 11.9% considered the principle to be unfair. There were five respondents that answered the question for principle 1 but did not answer this part of the question and which account for 2.98%. The results for this principle indicate a majority of respondents considered the protection for disabled persons to be fair although not all of the respondents to principle 1 answered this part of the question.

Principle 3 – Increase earnings disregards by £10 per week

60.12% agreed that the principle was fair, 22.02% neither agreed nor disagreed and 13.69% considered the principle to be unfair. There were seven respondents that answered the question for principle 1 but did not answer this part of the question and which account for 4.17%. The results for this principle indicate a majority of respondents considered the increase in earnings disregards to be fair although not all of the respondents to principle 1 answered this part of the question.

Principle 4 – Double non-dependant deductions and introduce charge for job seekers

38.09% agreed that the principle was fair, 23.21% neither agreed nor disagreed and 34.52% considered the principle to be unfair. There were seven respondents that answered the question for principle 1 but did not answer this part of the question and which account for 4.17%. The results for this principle suggest a small majority of the respondents considered this principle to be fair although not all of the respondents to principle 1 answered this part of the question.

Principle 5 – Increase taper to 30%

27.98% agreed that the principle was fair, 32.14% neither agreed nor disagreed and 31.55% considered the principle to be unfair. There were fourteen respondents that answered the question for principle 1 but did not answer this part of the question and which account for 8.33%. The results for this principle suggest a small majority of the respondents considered this principle to be unfair although not all of the respondents to principle 1 answered this part of the question.

Principle 6 – Reduce savings limit

42.26% agreed that the principle was fair, 17.86% neither agreed nor disagreed and 37.5% considered the principle to be unfair. There were four respondents that answered the question for principle 1 but did not answer this part of the question and which account for 2.38%. The results for this principle suggest a small majority of the respondents considered this principle to be fair although not all of the respondents to principle 1 answered this part of the question.

Feature 1 – Abolish second adult rebate

33.34% agreed that the principle was fair, 25.6% neither agreed nor disagreed and 32.15% considered the principle to be unfair. There were fifteen respondents that answered the question for principle 1 but did not answer this part of the question and which account for 8.92%. The results for this feature suggest a small majority of the respondents considered this feature to be unfair although not all of the respondents to principle 1 answered this part of the question.

Feature 2 – Freeze premiums and allowances

37.5% agreed that the principle was fair, 25% neither agreed nor disagreed and 29.17% considered the principle to be unfair. There

were fourteen respondents that answered the question for principle 1 but did not answer this part of the question and which account for 8.33%. The results for this principle suggest a small majority of the respondents considered this principle to be fair although not all of the respondents to principle 1 answered this part of the question.

- 7.26 It can therefore be seen from the views expressed in the consultation that there was a polarisation of views for principle 1, strong agreement for principles 2 and 3, mixed views on principles 4, 5 and 6 possibly stemming in the case of principles 4 and 5 to an absence of understanding concerning the technical details of the proposal concerned
- 7.27 A sub-analysis has also been undertaken of responses to this question to determine how the results obtained may be affected by a respondent being in receipt of Council Tax Benefit and this is set out in detail in the Consultation Report attached at Appendix A.
- 7.28 In summary, this appears to indicate a clear distinction as to whether principle 1 is fair based upon whether the respondent is in receipt of Council Tax Benefit or not, principle 2 was agreed as being fair by the majority of both sets of respondents, principle 3 was agreed as being fair by the greater majority of both sets of respondents, principle 4 was agreed as being fair by the greater majority of non Benefit respondents than in the case of Benefit respondents, principle 5 was not agreed as fair by Benefit respondents but had an equal split of non Benefit respondents considering it unfair and principle 6 was considered unfair by a greater majority of Benefit respondents than non Benefit respondents.
- 7.29 Features 1 and 2 were agreed as being fair by the greater majority of non Benefit respondents compared to Benefit respondents although in the latter case, there was also a significant proportion of respondents that considered the proposals to be neither fair nor unfair.
- 7.30 From the above results, it would appear that the circumstances of a respondent particularly in terms of entitlement to Council Tax Benefit, influences their perception particularly as to whether the minimum 20% contribution towards Council Tax is fair. The protection proposed for certain claimants such as disabled persons was considered to be fair by the majority of all respondents as was the work incentive of an additional £10 per week earnings disregard. There were generally differing degrees of opinion expressed by Benefit and non Benefit respondents in relation to the other principles and features.

8. Financial Implications

- 8.1 A consultation paper on technical funding arrangements, with indicative allocations, was issued by DCLG on 17th May 2012. The consultation exercise for this ended on 12th July 2012 and the final allocation will be made later this year.

- 8.2 In brief, it is proposed that funding will be allocated using the government's forecasts of subsidised CTB expenditure in 2013/14, apportioned using the percentage of the overall spend made by individual authorities in 2011/12 (when audited). No allowance will be made for the proportion of pensioners to working age claimants within each authority. Indicative allocations based on the apportionment of expenditure in 2010/11 have been issued giving Brent £23.725m.
- 8.3 Taking account of the above methodology and using the indicative allocations based on the 2010/11 expenditure, Brent is likely to see a reduction of 13.7% rather than the headline 10%. The funding will be fixed and rolled into the Business Rates reform and will not take account of any growth in caseload or expenditure during 2013/14 or beyond, which will also now have to be fully met by Brent.
- 8.4 It should be noted that the Council will share the financial risk associated with the new arrangements with its major precepting authority (i.e. Greater London Authority – GLA). This is because CTS will be treated as a Council Tax discount, thus reducing the Council Tax base, rather than a rebate coming off a much higher tax base as is the current position. Thus where demand for CTB support increases (or decreases) compared to the forecast, the GLA would share the surplus of deficit arising on the collection fund at the end of the year as a consequence with the Council.
- 8.5 The GLA proportionate share for 2012/13 is 22.46%. On this basis, for every £1M in Council Tax Support costs in 2013/14 due to increases in caseload, the amount that the Council would be required to pay to the GLA would fall by £224,600 (i.e. the 22.46%) and hence the net cost to the Council would be £775,400. Consequently, the risk to the Council in this respect is mitigated to some degree. The relative proportionate share applicable to the Council (and hence the GLA) may vary year to year dependent upon the relative changes in Council Tax levels and this has been factored into the exemplifications contained in this report and shown in Appendix C.
- 8.6 The CTB caseload has grown by 3.3% in the 12 month period ending 31st March 2012 and this has resulted in growth equivalent to a 1.95% expenditure increase of £493,254. Current forecasts for 2012/13 indicate growth of approximately £0.5M which will need to be funded by the Council. A similar increase is currently anticipated for 2013/14 and has been modelled within the funding deficit exemplifications for the scheme shown in Appendix C. Changes in the general economic climate during 2012/13 and beyond will also impact upon the overall caseload trend.
- 8.7 Table 14 on page 30 below exemplifies the potential financial deficit to the Council in 2013/14 and 2014/15 applying a range of potential Council Tax level increases for the Council's share of the Council Tax only ranging from zero to 3.5% for 2013/14, assuming case load growth

in expenditure of £0.25M and £0.5M for 2013/14 and assuming a 2% increase in Council Tax levels for 2014/15 in all cases.

- 8.8 It excludes the effects of the GLA precept which has been removed from both the initial 10% funding reduction and from any subsequent caseload / expenditure increases and assumes that the 90% grant will remain unchanged in cash terms and does not allow for any reductions in the levels of CTS granted as a result of the new scheme.
- 8.9 The tables in Appendix C to this report indicate that dependent upon caseload growth and Council Tax levels set by the Council and applying the assumptions as set out above, the potential deficit to be met will range between £3.9M to £5.1M in 2013/14 and £4.5M to £5.7M in 2014/15. This would represent an average of £4.5M in 2013/14 and £5.1M in 2014/15. (i.e. A further £0.6M in 2014/15).
- 8.10 It is important to note that whilst Council Tax increases clearly generate more revenue for the Council, they will also produce a proportionate increase in CTS expenditure. This proportion is broadly 25% for Brent. Thus any additional revenue generated by a Council Tax increase would be offset by additional CTS expenditure broadly equivalent to 25% of the increase.
- 8.11 There are anticipated to be some consequential costs arising from the implementation of the local CTS scheme that are expected to include the following and which will be finalised once the Council's local Council Tax Support scheme has been determined by the Council.
- Impact on cash flow arising from delays in collecting Council Tax and the payment of the precept to the GLA,
 - Increased levels of Council Tax non collection and hence an increase in the bad debt provision
 - Increased costs of Council Tax collection arising from the need for additional personnel, increased volumes of notices impacting upon paper, enveloping, postage and printing costs, bailiff costs etc
 - Increased local CTS scheme administration costs
- 8.12 Officers are currently discussing the potential impact of the recommended scheme with Capita (i.e. the Council's Contractor for Revenue collection) and how this may be incorporated within contractual provisions together with localised Business Rates collection arrangements.
- 8.13 Potential resource requirements arising from increased workloads and actions to mitigate customer demand arising from welfare changes overall are also being developed with Capita to ensure that enquiries concerning reductions to Council Tax Support and discussions about payments and arrangements for payment are addressed in a "single-touch".

- 8.14 These potential resource requirements will be considered as part of a broader budget requirement for 2013/14 but the outcomes and decisions will have a direct impact upon Capita's ability to maximise collection.
- 8.15 Additional challenges are anticipated in collection arising from the implementation of Council Tax Support and difficulties in achieving full collection on the accounts affected may result in an overall collection rate that is less than the 97.5% currently built into the Council Tax Base. The assumed collection rate used in the Council Tax Base setting for 2013/14 will need to be given careful consideration as any anticipated reduction in future Council Tax collection rates would have the effect of increasing the Band D Council Tax unless a corresponding reduction in Council expenditure were to be provided. An overly optimistic collection assumption could lead to a need to declare a deficit on the Collection Fund in later years. Consideration will also need to be given to the other potential financial effects of the proposed scheme on the Collection Fund to prevent a deficit position from occurring (i.e. the scheme would need to raise sufficient additional Council Tax revenue).
- 8.16 The Government has provided set-up funding of £84K for Brent with a further £27K being provided to the GLA in its capacity as a major precepting authority. It is anticipated that software costs are likely to account for a significant proportion of these funds although the precise amount is currently unknown. The Government is currently evaluating administrative funding as a new burden.
- 8.17 Other financial implications may arise from applications made under existing powers contained within Section 13A of the Local Government Finance Act 1992. In general terms, these permit a Billing Authority to grant a discount where a person is liable to pay Council Tax in respect of a dwelling and to reduce the amount they have to pay to such extent as it thinks fit.
- 8.18 This power includes a provision to reduce the amount payable to nil and can be exercised in relation to particular cases or by determining a class of case in which liability is to be reduced to an extent provided by the determination.
- 8.19 This provision has not been widely used in the past but as a consequence of the changes to Council Tax Benefit, the cessation of Discretionary Housing Payments and the wider welfare reforms, is anticipated to lead to an increase in the number and hence value of such requests.
- 8.20 Any discount that may be granted under this provision will need to be met from the General Fund although this provision has been assumed within the overall collection rates modelled. With reference to section 5.9.1, the Council could consider the application of this section to

existing Council Tax Benefit claims for persons of pensionable age where a war widow's pension, war widower's pension or war disablement pension are received and which cannot be disregarded (i.e. ignored) as income under the new national rules for persons of pensionable age.

Table 14

	0% CTAX increase and £0.25M growth in caseload	0% CTAX increase and £0.5M growth in caseload	1% CTAX increase and £0.25M growth in caseload	1% CTAX increase and £0.5M growth in caseload	2% CTAX increase and £0.25M growth in caseload	2% CTAX increase and £0.5M growth in caseload	3.5% CTAX increase and £0.25M growth in caseload	3.5% CTAX increase and £0.5M growth in caseload
Yr 1	£3,995,550	£4,189,400	£4,269,590	£4,463,860	£4,545,266	£4,739,962	£4,958,768	£5,154,091
Yr 2	£4,548,285	£4,746,370	£4,829,482	£5,027,638	£5,110,671	£5,309,261	£5,532,444	£5,731,672

9. Meeting the funding deficit

- 9.1 There are potentially four permutations available for meeting the potential deficit projected from the implementation of the local CTS scheme and they are as follows:
- 9.1.1 Subsidisation of the current scheme by the Council via savings elsewhere in the General Fund;
 - 9.1.2 Reductions in Council Tax exemptions and discounts to generate more Council Tax revenue to partially offset the deficit;
 - 9.1.3 To devise a new Council Tax Support scheme to reduce projected expenditure levels;
 - 9.1.4 A combination of the above.
- 9.2 CTS Scheme options have been modelled on the assumption that a potential funding deficit would be financed from a combination of the options shown in 9.1.2 and 9.1.3 above thus minimising the potential cost falling on the general Council Tax payer. Thus, any proposed variations to reduce the impact on affected claimants would potentially require compensating reductions or changes elsewhere to meet the deficit from the General Fund or from other claimant groups.

10. Council Tax discounts and exemptions

- 10.1 This section deals with the second important decision which Members are being invited to make at the Special Full Council meeting which relates to the proposed changes to Council Tax discounts and exemptions. Following separate consultations, DCLG are allowing Local Authorities discretion concerning some of the currently nationally-set Council Tax discounts and exemptions and the relevant amendments have been made to the Local Government Finance Act 1992 by sections 11 and 12 of the Local Government Finance Act 2012. The decisions can only be made by Full Council. These are as follows:
- Class A exemptions (i.e. properties requiring major repair works or structural alterations to bring them back into a habitable condition) currently attract up to a 12 month exemption period. The proposal will permit LA's to award a discount within a range of 0% to 100% for the 12 month period.
 - Class C exemptions (i.e. unoccupied and unfurnished properties) currently entitle their owners to up to a six month exemption period. The proposal will permit LA's discretion to award a discount or discounts within the range of 0% to 100% for specified periods of time within the 6 month period.

- Second homes discount (empty furnished properties, including both genuine second homes and rented properties vacant between tenancies) currently entitles owners of the property concerned to a discount of between 10% and 50%. The Council currently awards a 10% discount in such cases. The proposals permit removal of this discount.
- Long-term empty properties currently require their owners to make full payment of Council Tax. The proposals permit LA's to apply a multiplier or premium after the property has been empty for over two years of up to 150% of the Council Tax liability to encourage their owners to bring them back into use.

10.2 Table 15 below shows the effects of the changes (subject to Full Council approval) proposed for Council Tax exemptions and discounts. Subject to approval, and based upon the achievement of a 90% collection rate for the additional Council Tax debit raised where appropriate, the deficit arising from the CTS funding gap may be mitigated by £1.26M. Table 16 shows the effect of the proposals on the potential CTS scheme funding shortfall. It is proposed that the following discounts be applied from 1st April 2013:

- Class A empty properties (requiring major repairs or undergoing structural alterations) – reduce the current 100% exemption to 50% discount for the first twelve months.
- Class C empty properties (vacant and substantially unfurnished) – reduce the current 100% exemption to zero so that the owners of such properties pay 100% of their Council Tax liability with immediate effect from the date of vacation.
- Second Homes – Remove the current 10% discount so that owners of such properties pay 100% of their Council Tax liability
- Long term empty properties – charge a 50% premium after they have been empty and unfurnished for 2 years so that the Council Tax liability for such properties is 150% (after two years).

10.3 In submitting these recommended proposals, the following information is provided in support of the changes concerned:

- There should be a differentiating factor applied to any discount awarded for properties that would otherwise qualify for a Class A or Class C exemption to reflect the physical state of Class A properties and the efforts being made by their owner(s) to bring them back into a reasonable state of repair;
- A 0% discount for properties that would otherwise qualify for a Class C exemption will encourage their owners to have them promptly

reoccupied and thus contribute towards reducing homelessness objectives;

- Landlords will have to pay full Council Tax on their empty properties in between lettings regardless of whether they are furnished or not. Currently, owners of furnished properties pay 90% as the property is treated as being a second home and owners of unfurnished property receive a six month exemption. This proposal will assist in providing an incentive to minimise any “occupation gap” between tenancies. It should be noted that Housing Associations may not be subject to the charge if they are a registered charity as they are likely to be entitled to an exemption for up to 6 months under Class B exemptions.
- It will no longer be necessary to inspect properties that would otherwise qualify for a Class C exemption as such an occurrence will render the owner of the property to payment of full Council Tax.

10.4 It is necessary to consider and make a decision regarding the above proposals at the same stage as the local Council Tax Support Scheme as any variation to the recommendations for these will require alternative sources of funding to be found to meet any resulting shortfall in funding for the local Council Tax Support Scheme.

Table 15

Type of discount / exemption and number of existing cases	Current position	Proposed change	Additional charges based on 50% discount for Class A and 0% discount for Class C
Class A uninhabitable (403)	12 month exemption	50% discount for 12 months	£390,000
Class C Unoccupied and unfurnished (529)	6 month exemption	0% discount	£938,000
Total Class A & C			£1,328,000
Less 10% bad debt*			-£133,000
Sub Total			£1,195,000
Second Homes (640)	10% discount	0% discount	£80,000
Long Term Empties (460)	100% Council Tax payable	150% Council Tax payable after being empty 2 years	£360,000
Total (2027)			£1,635,000
Less GLA share 22.46%			£367,221
Brent total share			£1,267,779

Notes

*Bad Debt provision – A provision for non-collection of 10% has been included within the financial model representing the fact that taxpayers may no longer be resident inside the Borough following the vacation of their home together with a potential increase in the number of relatively small Council Tax debts arising for short periods of time when the property was unoccupied.

- 10.5 An Equalities Impact Assessment for the recommended Council Tax discounts and exemptions changes has been included at Appendix G to this report.
- 10.6 Limited information is currently available on the Council Tax database and therefore it is not possible to analyse the potential impacts by ethnicity, race, faith, gender and sexuality. Nevertheless the following conclusions can be drawn:
- The changes affect non-resident owners. There is no evidence to suggest any particular group will be disadvantaged by the changes. Of the 2,000 properties affected approximately 65% are owned by private individuals, the remainder being owned by companies or other organisations,
 - The highest density of affected properties are in the least diverse wards within the Borough (e.g. Brondesbury Park and Mapesbury) with the fewest tending to be in those areas that are most diverse, (e.g. Stonebridge and Harlesden),
 - One of the significant effects of the changes is to encourage the use of empty properties and thus increase the housing supply,
 - The changes can only have a positive affect on the most vulnerable people in Brent as it will both ease pressures on the availability of housing as well as helping to negate the impacts of the reductions in funding to Council Tax Support.

11. Proposed Council Tax Support Scheme

- 11.1 The CTS scheme proposed following the consultation process and as outlined within this report is projected to deliver savings of £4,142,488. See section 5 of this report for scheme details and section 12 of this report for risks associated with the projected savings.
- 11.2 It should be noted that without the inclusion of Principle 1 within the Council's proposed scheme (the minimum Council Tax payment of 20%), it will not be feasible to achieve the required financial savings solely by making the other amendments to the CTB scheme. Consequently, removing the recommended minimum contribution of 20% could potentially result in approximately £3M of the funding gap falling on the General Fund with such a cost needing to be met from

compensating financial reductions elsewhere within the Council or by the general Council Tax Payer. Additionally, in the latter instant, if the proposed Council Tax level to be set for a year (including any provision to meet Council Tax Support costs) is more than 3.5% above an existing Council Tax level, a referendum shall be required.

- 11.3 A collection rate of 80% has been estimated for the purposes of the proposed financial model for the additional Council Tax requiring collection from claimants who may never have had to pay Council tax previously, or who are the least able to pay. This cannot be predicted with more precise certainty at this stage due to the uncertainty of future claimant behaviour. However, the financial impact of the proposals prior to the consultation process and subsequently adjusted based upon the responses received can be represented as shown in Table 16 below:

Table 16

	Scheme Proposals Consulted On	Scheme Proposals Recommended
1. Minimum contribution	20%	20%
2. Protection for disabled and recipients of war pensions	Yes	Yes
3. Protection for carers receiving carers allowance and recipients of guaranteed income payments under the Armed Forces Compensation Scheme	No	Yes
4. Increase earnings disregards	Yes	Yes
5. Increase charges for non-dependants	Yes	Yes
6. Increase taper to 30%	Yes	Yes
7. Reduce savings limit to £6,000	Yes	Yes
Estimated Council Tax collection rate	80%	80%
Net saving*	£4,247,909*	£4,142,488*

NB1 * Note should be taken of the financial risks and assumptions in Section 12 below.

NB2 * Projected savings should be viewed in the context of the potential net deficit figure that could range from £2.7M to £3.8M based upon the assumptions given in this report. (See Table 17 below).

Based upon the consultation proposals, an additional contingency of between £0.36M and £1.5M could be achieved respectively. Based upon the recommended scheme proposals, the revised contingency would be between £0.3M and £1.4M.

Table 17

	Col.1 Funding deficit based on nil increase in CTAX and £0.25M growth in cases for 2013/14	Col.2 Funding deficit based on 3.5% increase in CTAX and £0.5M growth in cases for 2013/14	Funding deficit based on Average of Columns 1 and 2
Brent share of CTS funding shortfall	£3,995,550	£5,154,091	£4,574,821
Brent share of increased revenue from Council Tax discount / exemption changes	(£1,267,779)	(£1,267,779)	(£1,267,779)
Net potential funding shortfall for Year 1 (2013/14)	£2,727,771	£3,886,312	£3,307,042
Recommended CTS Scheme Savings	(£4,142,488)	(£4,142,488)	(£4,142,488)
Overall Position 2013/14	£1,414,717	£256,176	£835,446

- 11.4 There are of course other variants to these potential changes, each with differing financial impacts. The intention is to submit a report to Full Council during the current financial year recommending these changes with effect from 1st April 2013 and with the inclusion of a full Equalities Impact Assessment.
- 11.5 The financial savings shown in Table 17 above would appear to achieve the levels of savings identified as required for 2013/14 and indeed show a projected surplus based upon the deficit projections outlined in that table. This provides some contingency in the event of lower than expected Council Tax collection and to meet the additional savings potentially required for year 2 and beyond. Currently, the number of future variances and unknowns – in particular claimants’ behaviour in the light of the welfare changes and caps to Housing Benefit, and the introduction of Universal Credit and other welfare reforms in 2013, make it impossible to adequately model a scheme for 2014/15 or beyond.
- 11.6 The potential contingency outlined above would also assist in meeting the anticipated extra costs for the scheme in 2014/15 arising from caseload growth and any increase in Council Tax levels and will help to reduce the need for revising the scheme in year 2 to make provision for

the increased deficit in that year. This will also assist in ensuring that as far as reasonably practicable, there is a degree of stability for claimants in terms of their eligibility for support and entitlement.

- 11.7 In accordance with statute, the Council will need to determine whether to revise its Council Tax Support scheme for 2014/15 based upon experience during 2013/14. It is considered desirable that if possible the proposed scheme should run for two years, allowing scope for a more radical change in scheme – aligning it more to the Council Tax discount system than the current Benefit system – in Year 3 (2015/16). This should coincide with a point where at least half of the working age benefits caseload will have been migrated to Universal Credit. It is worth noting that any proposals to amend the scheme in year 2 (i.e. 2014/15) would have to be developed by the summer of 2012/13 in order to accommodate consultation and decision making requirements.
- 11.8 Other financial unknowns which may affect the projections stated previously are given in section 12 below. Given the above, it is difficult to quantify with precision the overall financial and business risks or variance to the proposed scheme financial model. Whilst this does incorporate some mitigation for these risks through the removal of the annual uprating of financial amounts to be used in the scheme, it does not eliminate all risks.

12. Risks and assumptions of the recommended scheme

12.1 The following risks and assumptions have been identified:

- 12.1.1 The level of deficit cannot be determined with precise accuracy as the government will not be issuing final funding allocations until after the Autumn statement has been delivered in December. Additionally, certain data will need to be obtained from existing Council Tax Benefit claimants in preparation for the implementation of Council Tax Support. This includes for example whether they are in receipt of Disability Living Allowance.
- 12.1.2 The amendments to Council Tax exemptions and discounts outlined within section 10 of this report have been modelled to mitigate £1.26M of the funding deficit, but clearly collection of this amount cannot be predicted with precise accuracy.
- 12.1.3 It is intended that changes to the Council Tax exemptions and discounts may have a social benefit in bringing more empty properties into use in the borough. While this would reduce the savings quoted in the model, each house brought into occupation would attract a New Homes Bonus equivalent to the Council Tax Band D level for each property. Although the extent of this is difficult to predict as it relies on owners' and

landlords' behaviour, there would be a net gain to the Council for each of the properties affected.

- 12.1.4 The Local Government Finance Act 2012 enables the government to introduce regulations exempting certain types of property from the empty homes premium, for example where owners are genuinely trying to sell or let their property. To date, the Government has not introduced any such regulations regarding exemptions although should these powers be exercised, this may reduce the potential income level for this source.
- 12.1.5 Actual future caseload and expenditure growth cannot be determined with precise accuracy although estimates based on the profiles of current expenditure and caseload has been applied to the financial modelling.
- 12.1.6 The actual Council Tax collection rate for the claimants affected by the changes cannot be predicated with precise accuracy as many have not been required to pay Council Tax previously, and are also on low incomes. To this extent, estimates have been used based on an analysis of current collection rates for the different groups of customers affected and as set out in Appendix C to this report.
- 12.1.7 There will be a significant number of disabled claimants whose entitlement to a Disability Premium may be "hidden" within their DWP Benefit entitlement and therefore not currently visible to Brent's Benefit Section. An administrative exercise will be required to establish the full extent of this but the additional "protected" cases are estimated to reduce the savings figure shown above from the proposed scheme by approximately £250K based upon a sampling exercise undertaken.
- 12.1.8 The impact of the DWP's change from Disability Living Allowance to Personal Independence Payments in 2013/14 is likely to have the effect of reducing the number of protected claimants under the CTS scheme.
- 12.1.9. It is also not currently known how many "passported" claimants (in receipt of a DWP Benefit such as Income Support or Job Seekers Allowance (Income Based) etc), have capital or savings between £6000 and £16000. It is anticipated that the effects of this provision will increase the amount of financial savings produced by the scheme although based upon data from the existing non-passported caseload the numbers and hence savings are anticipated to be relatively small. (There are 336 out of 24,604 non-passported cases (i.e. 1.4%) affected by this recommended change).

- 12.1.10 Financial modelling has been undertaken using a tool provided by the Benefits software suppliers. There are some “bugs” within the tool whereby for example, there is an undercounting of the savings generated from changes to non-dependant charges. Manual work has been undertaken to examine this shortfall and has established that savings are being undercounted by approximately £250K (which would counteract the potential undercounting of disabled protected claims referred to in 11.1.6 above thus achieving a broadly neutral position).
- 12.1.11 Assurances have been sought from our software supplier that they can deliver the changes proposed in our scheme. Whilst they will not commit to definite development work until a final product specification is agreed, (anticipated to be after statute has been passed), they have stated that the provisions allowed for within their modelling tool and included within the Council’s draft scheme proposal will generally be available within their software with potentially one minor exception (i.e. automatic protection for persons in receipt of Disabled Persons Reduction for Council Tax purposes cannot be achieved and will therefore require manual application). Whilst this does provide a degree of assurance concerning the Council’s proposed scheme, it does mean that in the event of a failure to deliver the required software, implementation of the scheme could be compromised and the financial savings anticipated may not be realised.
- 12.1.12 As the IT software will not be available from the supplier until after statute has been passed, it is anticipated that this will not be available for testing purposes until later than normally required to carry out annual billing and year-end testing. There is therefore a risk that testing and application of the software will need to be conducted in a much constrained timescale and that any issues identified as a consequence may not be resolved within the required timescale thus affecting Council Tax bills issued.
- 12.1.13 The impact and effects of Universal Credit (UC) are unclear, especially for Year 2 and beyond. The scheme proposes that claimants in receipt of Universal Credit will be liable to pay a minimum of 20% towards their Council Tax bill unless they are protected within the terms of the scheme.
- 12.1.14 The impact of the recommended scheme on costs of Council Tax collection have not been included within the deficit modelling as they are subject to contract negotiations with Capita, the Council’s contractor for Council Tax collection.

These discussions will be finalised once a decision on the final scheme has been made by the Council.

- 12.1.15 Diminution of anticipated Council Tax receipts could result in a Collection Fund deficit position at the end of a financial year particularly as precept payments at present have to be paid to the GLA at an agreed monthly rate irrespective of Council Tax sums collected. The potential for entering into risk share arrangements with the GLA has been raised to evaluate whether this option may provide a means of mitigation should such a situation occur. It is currently unclear as to whether this will be regulated by statute or by local agreement although in either case, it is considered likely to have defined percentage trigger points in place to give flexibility to vary in-year precept payments. If a local agreement was required, the GLA would wish to adopt a London wide policy.
- 12.1.16 A potential risk arising from the recommended changes is in terms of Council Tax collection and hence bad debt provision. Any change to the existing bad debt provision will require a review of the provision allocated for that purpose. Reductions to budgeted collection rates also potentially affect the Council Tax base set which is used to determine the Band D Council Tax level for the Borough.
- 12.1.17 The combined effects of the wider welfare reforms and the recommended Council Tax Support scheme may result in demographic changes to the Brent population and influence customer decisions concerning where they live and work. This could potentially impact upon demand for other services such as schools admissions and housing although any impact may not be apparent until the scheme has been in operation for some time.
- 12.1.18 If the Council is unable to agree its scheme before 31st January 2013, the “default” scheme will have to be applied with the effect that the level of financial savings required to meet the funding gap will not be achieved. This would require the shortfall to be found either by making savings elsewhere or increasing Council Tax levels. Budget planning for 2013/14 will be at an advanced stage at this point and there will be limited time to implement plans that would enable full year savings to be achieved from other initiatives.
- 12.1.19 The use of Section 13A discounts under the Local Government Finance Act 1992 may increase as a consequence of the recommended changes and the wider welfare reforms and will need to be met by the General Fund.

13. Legal Implications

13.1 Local Government Finance Act 2012

13.1.1 The Local Government Finance Act 2012 came into force on 31 November 2012. DCLG published Policy Statements of Intent in May 2012 regarding a range of issues regarding Council Tax Support schemes so that local authorities could prepare draft Council Tax Support schemes and consult on them before the Local Government Finance Act completed its stages in Parliament before receiving Royal Assent on 31 October 2012. Regulations on the prescribed requirements of Council Tax Support schemes came into force on 27 November 2012. The key amendment which the House of Lords made to the Local Government Finance Act 2012 (now section 9 of the 2012 Act) was for the Government to independently review the impact of localised Council Tax Support Schemes after three years. The default scheme regulations were laid before parliament on 22nd November and will become effective on 18th December 2012.

13.1.2 Details as to what is set out in the Local Government Finance Act 2012 in relation to local authorities setting up Council Tax Support / Reduction schemes are set out below.

Requirements of Council Tax reduction scheme

13.1.3 In relation to the content that must be set out in a Council tax reduction scheme, that is currently set out in section 10 of the Local Government Finance Act 2012 and in clause 1 of Schedule 4 which inserts Schedule 1A to the Local Government Finance Act 1992 ("LGFA 1992") and paragraph of the new Schedule 1A of the LGFA 1992. Under these provisions, a Council Tax reduction scheme must state the following:

- (1) A scheme must state the classes of persons who are to be entitled to a reduction under the scheme;
- (2) A scheme must set out the reduction to which persons in each class are to be entitled (and different reductions may be set out for different classes);
- (3) A scheme must state the procedure by which a person may apply for a reduction under a scheme;
- (4) A scheme must state the procedure by which a person can make an appeal under section 16 of the LGFA 1992 against any decision of the authority which affects (a) the person's entitlement to a reduction under the scheme, or (b) the amount of any reduction to which the person is entitled;
- (5) A scheme must state the procedure by which a person can apply to the authority for a reduction under section 13A(1)(c) of the LGFA 1992.

13.1.4 As for stating the classes of people who are to be entitled to a reduction under a scheme, classes may be determined by reference to the following:

- (i) The income of any person liable to pay council tax on the authority in respect of a dwelling;
- (ii) The capital of any such person;
- (iii) The income and capital of any other person who is a resident of the dwelling;
- (iv) The number of dependants of any person within paragraph (i) or (iii) above;
- (v) Whether the person has made an application for the reduction.

13.1.5 As for stating the reduction to which persons in each class are to be entitled and if different reductions are set out for different classes, a reduction may include the following detail:

- (a) A discount calculated as a percentage of the amount which would be payable apart from the scheme;
- (b) A discount of an amount set out in the scheme or to be calculated in accordance with the scheme;
- (c) Expressed as an amount of council tax to be paid (lower than the amount which would be payable apart from the scheme) which is set out in the scheme or is to be calculated in accordance with it; or
- (d) The whole amount of council tax (so that the amount payable is nil).

13.1.6 The Local Government Finance Act 2012 states that for each financial year, Councils must consider whether to revise its Council Tax Support scheme or replace it with another scheme and that such decisions need to be made by 31 January in the financial year preceding that for which the revision or replacement scheme is to take effect. If the Council does not make a Council Tax scheme by 31 January 2013, a default scheme will be imposed on the Council which will be effective from April 2013, the effect of which has been set out above in this report. Regulations on the workings of the default scheme were laid before parliament on 22nd November 2012 and will become effective from 18th December 2012. Only Full Council has the power to make a Council Tax Support Scheme.

Consultation

13.1.7 The Local Government Finance Act 2012 states that the Council must consult with the GLA, which is a precepting authority, when preparing a Council tax reduction scheme and that thereafter, the Council must publish a draft Council Tax reduction scheme and then consult with other such persons who are likely to have an interest in the operation of such a scheme. Thereafter, the Council (i.e. Full Council) has to make the Council Tax Support scheme by 31 January 2013 and publish that scheme failing which a default scheme will be imposed on the Council.

13.1.8 Although there is much case law regarding consultation, the four basic requirements of consultation are set out in the case of *R v Brent LBC*

ex parte Gunning (1986) 84 LGR 168, which has been approved by the Court of Appeal in a number of subsequent cases, and they are as follows: (i) consultation must be at a time when proposals are at a formative stage; (ii) that the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response; (iii) adequate time must be given for consideration and response (iv) the product of consultation must be taken conscientiously taken into account in finalising any proposals.

13.1.9 Although the Government's code of practice on consultation states that normally a period of 12 weeks of consultation is appropriate, DCLG has stated in its Statement of Intent that local authorities may wish to consider the appropriate length of consultation depending on the impact of their proposals and the ability to complete the consultation exercise within their budgetary timetables. As set out in this report, the consultation period regarding the Council's Council Tax Support scheme proposals was set for just under nine weeks. This was in order to allow sufficient time for the consultation to be considered and analysed for the Council to go through its internal decision making processes including Executive and then to Full Council. The other reason for the shorter consultation period is so that a decision by the Special Full Council in December 2012 will fit in with the Council's budget cycle as decisions regarding the Council's budget for 2013-14 will be at an advanced stage by December 2012. Officers would have preferred for the decision on the Council Tax Support scheme to be made at November's Full Council meeting but this was not possible because a final scheme could not be put before Members for approval until the Local Government Finance Act 2012 came into force and for consequential regulations on CTS and the default scheme to be published and considered. The deadline for the Council Tax reduction scheme to be approved by Full Council is 31 January 2013. If this deadline is not met, a default scheme will be imposed on the Council, as has been explained in paragraph 3.3 above in this report, and will be effective from April 2013. DCLG has published regulations regarding prescribed requirements for Council Tax Support Schemes and they have been approved by Parliament and have been effective from 27 November 2012. Default scheme regulations were laid before parliament on 22nd November 2012 and will become effective on 18th December 2012. There are anticipated changes to the rates to be applied for pensioner claims for 2013/14 that are expected at some stage in December although a precise date for issues of these is not available.

13.1.10 Sections 11 and 12 of the Local Government Finance Act 2012 also gives billing authorities the discretion to vary the discounts applicable to specific classes of empty property, second homes and long term, empty properties with effect from 1/4/2013 as follows:

- Class A exemptions (i.e. properties requiring major repair works or structural alterations to bring them back into a habitable condition).

These are currently exempt from Council Tax for up to 12 months. The change in statute permits Local Authorities to award a discount within a range of 0% to 100% for the 12 month period.

- Class C exemptions (i.e. unoccupied and unfurnished properties) which currently entitle their owners up to a six month exemption from Council Tax. The change in statute permits Local Authorities to award a discount or discounts within the range of 0% to 100% for specified periods of time within the 6 month period.
- Second homes discount (empty furnished properties, including both second homes and rented properties vacant between tenancies). A discount of between 10% and 50% is currently permitted by statute and the Council currently provides a 10% discount. However the change in state now permits a discount of between 0% and 50% for these homes from 1st April 2013.
- Long-term empty properties currently require their owners to make full payment of Council Tax. The statute permits Local Authorities to apply a multiplier or premium after the property has been empty for over two years of up to 150% of the Council Tax liability to encourage their owners to bring them back into use. However it should be noted that this provision allows the Government to make regulations exempting certain properties from this premium providing certain criteria are met.

The above-mentioned changes to the Council's Council Tax discounts and exemptions can only be made by Full Council.

13.2 Public Sector Equality Duty

13.2.1 The public sector equality duty, as set out in section 149 of the 2010 Act, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic.

13.2.2 Direct discrimination occurs if, because of a protected characteristic, a local authority treats a person less favourably than it treats or would treat others.

13.2.3 Indirect discrimination occurs if a local authority applies the same provision, criterion or practice to everyone, but it puts those in a certain protected group at a "particular disadvantage" when compared with persons who are not in that protected group. Even if a "particular disadvantage" arises, indirect discrimination does not arise if the provision, criterion or practice can be justified – i.e. if it is a proportionate means of achieving a legitimate aim.

- 13.2.4 The Council must pay due regard to any obvious risk of such discrimination arising in respect of the decision before them. These matters are examined in the EIA.
- 13.2.5 The “protected characteristics” are: age, disability, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, pregnancy and maternity, and gender reassignment. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.
- 13.2.6 Having “due regard” to the need to “advance equality of opportunity” between those who share a protected characteristic and those who do not includes having due regard to the need to remove or minimise disadvantages suffered by them. Due regard must also be had to the need to take steps to meet the needs of such persons where those needs are different from persons who do not have that characteristic, and to encourage those who have a protected characteristic to participate in public life. The steps involved in meeting the needs of disabled persons include steps to take account of the persons’ disabilities. Having due regard to “fostering good relations” involves having due regard to the need to tackle prejudice and promote understanding.
- 13.2.7 The Council’s duty under section 149 of the Equality Act 2010 is to have “due regard” to the matters set out in relation to equalities when considering and making decisions on the provision of localised council tax support for the area of Brent. Due regard to the need to eliminate discrimination, advance equality and foster good relations must form an integral part of the decision making process. When the decision comes before the Executive, Members of the Executive must consider the effect that implementing a particular policy will have in relation to equality before making a decision. An Equality Impact Assessment will assist with this.
- 13.2.8 There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method. The Council must have an adequate evidence base for its decision making. This can be achieved by means including engagement with the public and interest groups and by gathering detail and statistics on who claims Council tax benefit and who benefits from certain discounts and exemptions which may be under consideration for changing.
- 13.2.9 Where it is apparent from the analysis of the information that the policy would have an adverse effect on equality, then adjustments should be made to avoid that effect and this is known as “mitigation”.
- 13.2.10 The public sector equality duty is not to achieve the objectives or take the steps set out in section 149 of the Equality Act 2010. The duty on

the Council is bring these important objectives relating to discrimination into consideration when carrying out its public functions (in this case, designing a localised scheme for Council tax support within Brent). The phrase “due regard” means the regard that is appropriate in all the particular circumstances in which the Council is carrying out its functions. There must be a proper regard for the goals set out in section 149 of the 2010 Act. At the same time, when the Members of the Council make their decision on what scheme to adopt for localised council tax support, they must also pay regard to countervailing factors which it is proper and reasonable for them to consider. Budgetary pressures and economic and practical factors will often be important. The amount of weight to be placed on the countervailing factors in the decision making process will be for Members of the Executive to decide when it makes its final decision.

13.2.11 The detailed Equality Impact Assessment for the proposed Council Tax Support Scheme is set out in Appendix D to this report.

13.2.12 The detailed Equality Impact Assessment for the Council Tax Discount and Exemptions proposals is set out in Appendix G to this report.

13.3 Other duties

In addition to the Public Sector Equality Duty, the Department for Communities and Local Government advises that the following should also be taken into account when setting up a Council Tax Reduction Scheme:

- Child Poverty Duty under the Child Poverty Act 2010;
- Homelessness Act 2002;
- Armed Forces Covenant;
- Chronically Sick and Disabled Persons Act 1970,
- Disabled Persons (Services, Consultation and Representation) Act 1986,
- and the Children Acts 1989 and 2004.

These are set out in more detail below.

13.4 Child Poverty Duty

13.4.1 Under section 21 of the Child Poverty Act 2010 (“the 2010 Act”), the Council must make arrangements to promote co-operation with each of its partner authorities (which include the Metropolitan Police, Transport for London, a strategic health authority, primary care trust and a youth offending team established under section 39 of the Crime and Disorder Act 1998) and other persons as it sees fit with a view to reducing, and mitigating the effects of, child poverty, in the Council’s area. In doing this, the Council must have regard to any guidance given to them by the Secretary of State in exercising their functions under this section.

13.4.2 Under section 22 of the 2010 Act, it states that the arrangements which the Council makes under section 21 of the Act (as set out in the previous paragraph) must include arrangements to prepare and publish an assessment of the needs of children living in poverty in its area, which is known as a “local child poverty needs assessment”. The Council must also have regard to any guidance given to it by the Secretary of State when exercising these functions.

13.4.3 Under section 23 of the 2010 Act, it states that the arrangements which the Council makes under section 21 of the Act (as set out in two paragraphs above) must include arrangements to prepare a joint child poverty strategy in relation to its area. Section 23(2) of the Act states that the joint child poverty strategy must set out measures that it proposes to take for the purpose of reducing, and mitigating the effects of, child poverty in its area. The Council must have regard to any guidance given to it for this purpose by the Secretary of State and the Council must have regard to its joint child poverty strategy when exercising its functions.

13.4.4 Under section 24 of the 2010 Act, it states that the Council’s sustainable community strategy (which is prepared pursuant to section 4 of the Local Government Act 2000 under its “well-being” power) must include the following: (i) any arrangements made under section 21 of the Act to co-operate to reduce child poverty in the Council’s area; (ii) any local child poverty needs assessment prepared under section 22 of the Act (local child poverty needs assessment) and (iii) any joint child poverty strategy prepared under section 23 of the Act (joint child poverty strategy for the area).

13.4.5 Officers consulted with colleagues in the Council department for Children and Families and Strategy, Partnerships and Improvement to ensure that their views and input, especially regarding the duty to mitigate the effects of child poverty, are taken into account.

13.4.6 The responses received from these services in relation to the proposed scheme and the consideration applied to these is contained in Appendix A to this report.

13.5 Homelessness Act 2002

13.5.1 Under section 1(1) and 3(1) of the Homelessness Act 2002, local housing authorities have a duty to formulate a homelessness strategy in order to enable them to prevent homelessness and secure sufficient accommodation for those who are or may become homeless within their district and secure the satisfactory provision support for those persons in their district who are or may become homeless, or have been homeless and need support to prevent them from becoming homeless again.

13.5.2 DCLG has provided the following guidance to local authorities in its May 2012 document entitled: “Localising Support for Council Tax: Vulnerable people – key local authority duties”:

“In considering how to promote their local reduction schemes, local authorities will want to consider how information about council tax reductions is made available to these households once they are secured accommodation;

Taking into account the Equality Duty, local authorities will want to have regard to vulnerable individuals for whom the local authority secures accommodation, or who are at risk of becoming homeless – for example, young people or individuals suffering from mental illness.”

13.5.3 Officers consulted with colleagues in the Housing Service for their views and input and the response received and consideration applied to this is contained in Appendix A to this report.

13.6 Armed Forces Covenant

13.6.1 DCLG has also given guidance to local authorities regarding the Armed Forces Covenant.

13.6.2 Under the existing Council Tax Benefit Regulations 2006, local authorities have been required to disregard the first £10 per week of War Pension Scheme and Armed Forces Compensation Scheme payments when assessing entitlement to Council Tax Benefit. In addition, local authorities currently have discretion to top-up the disregard to the full amount and they have encouraged by DCLG to do so in line with Armed Forces Covenant Principles and this option is still open to local authorities in designing a new system.

13.6.3 The Council proposes to provide protection to claimants where they or their dependants are in receipt of a war widow’s pension, war widower’s pension, war disablement pension or a guaranteed income payment or survivor’s guaranteed income payable under the Armed Forces Compensation Scheme.

13.7 Chronically Sick and Disabled Persons Act 1970

13.7.1 The duties relating to disabled persons come under the adult social care functions of the Community Care department of the Council under the National Assistance Act 1948 and the related legislation under this 1970 Act. Section 1 of the 1970 Act states that it is the duties of Councils (including Brent) that have functions under section 29 of the National Assistance Act 1948 to inform themselves of the number of persons to whom that section applies within their areas and of the need for the making by the Councils of arrangements under that section for such persons. Under section 29 of the National Assistance Act 1948, a local authority may make arrangements for promoting the welfare of

persons to aged eighteen or over who are blind, deaf or dumb, or who suffer from mental disorder of any description and other persons who are substantially and permanently handicapped by illness, injury, or congenital deformity or such other disabilities as may be prescribed by Parliament.

13.7.2 Under section 2 of the 1970 Act, where a local authority has functions under section 29 of the National Assistance Act 1948 is satisfied that in the case of any person to whom that section applies who is ordinarily resident in their area that it is necessary to meet the needs of that person for that authority to make arrangements for a number of matters which are listed in that section. These include practical assistance for the person in their home, providing or assisting in obtaining recreational facilities (including wireless and TV) and provision of meals where the person would need assistance from the Council because they are sick and/or chronically disabled.

13.8 Disabled Persons (Services, Consultation and Representation) Act 1986

13.8.1 Under section 2 of this 1986 Act, a Council must permit an authorised representative of a disabled person, if so requested by the disabled person: (a) to act as the representative of the disabled person in connection with the provision by the Council of any services for him in the exercise of any of their functions under the welfare enactments; and (b) to accompany the disabled person (otherwise than as a representative) to any meeting or interview held by or on behalf of the Council in connection with the provision by them of any such services. The remainder of section 2 of the 1986 Act sets out further details.

13.8.2 Under section 3 of the 1986 Act, on any assessment carried out by the Council under the 1986 Act or any other occasion, where it falls on the Council to decide whether the needs of a disabled person call for the provision by the Council (in accordance with its welfare enactments) of any statutory services for that person, the Council shall afford an opportunity to the disabled person or his authorised representative to make (within a reasonable period as the Council may allow for the purpose) representations to an officer of the Council as to any needs of the disabled person calling for the provision by the Council of any statutory services for him (in accordance with any of the welfare enactments).

13.8.3 Under section 4 of the 1986 Act, when requested to do so by a disabled person, his authorised representative or his carer, a Council must decide whether the needs of the disabled person call for the provision by the Council of any services under section 2(1) of the Chronically Sick and Disabled Persons Act 1970, which have been set out above.

13.8.4 Section 5 of the 1986 Act deals with disabled persons leaving special education and section 7 deals with persons discharged from hospital.

13.8.5 These adult social care functions are carried out by the Adult Social Care department of the Council.

13.9 Children Acts 1989 and 2004

13.9.1 The basic child care functions of the Council are set out in section 17 of the Children Act 1989 which places a general duty on every Council: (a) to safeguard and promote the welfare of children within their area who are in need; and (b) as far as is consistent with that duty, to promote the upbringing of such children by their families by providing a range and level of services appropriate to those children's needs.

13.9.2 Under section 10 of the Children Act 2004, the Council is under a duty to have arrangements in place to co-operate with relevant partners with a view to improving the well-being of children in the Council's area. Section 11 of the Children Act 2004 states that the Council must make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children.

14. Timetable of Events

14.1 The timescales for approval and implementation of the localised Council Tax scheme are extremely tight. The First Reading of the Local Government Finance Bill took place on 19th December 2011 and little information had been provided to authorities until May 2012. The Local Government Finance Act 2012 only received Royal Assent on 31 October 2012. Indeed, the regulations concerning pensioner claims and other prescribed requirements of local schemes were laid before parliament on 22nd November 2012 and became effective on 27th November 2012. Default scheme regulations were laid before parliament on 22nd November 2012 and become effective on 18th December 2012.

14.2 As previously set out in this report, if the Council is unable to agree its scheme before 31st January 2013, the "default" scheme will have to be applied with the effect that the level of financial savings required to meet the funding gap will not be achieved. This would require the shortfall to be found either by making savings elsewhere or increasing Council Tax levels.

14.3 A timetable of key dates leading to full implementation of the scheme is provided as Appendix E to this report.

For more details please contact:

David Oates

Head of Benefits

Ext 1578

David.Oates@brent.gov.uk

MICK BOWDEN

Deputy Director of Finance

Appendices

Appendix A – Consultation Report

Appendix B – Scheme Options Considered

Appendix C – Financial Modelling of Scheme

Appendix D – Equalities Impact Assessment Council Tax Support Scheme

Appendix E – Timetable of Key Events

Appendix F – Council Tax Reduction Scheme Transition Funding

Appendix G – Equalities Impact Assessment Discounts / Exemptions

Appendix H – Council Tax Support Scheme (to be issued under separate cover)