

Appendix A6

Consultation Comments and Responses from Consultation Questionnaires

Comments from Brent Council Children and Families Service

We would not want relevant families and young people (ie either service users or carers) who currently receive Council Tax Support to experience any additional disadvantage as a result of the proposed changes. We would identify those relevant families and young people to be –

- Care leavers
- Foster carers
- Families with low income or benefit dependent
- Special Guardian Carers – (these are specially assessed family related carers for children who have been in care)

Council Commentary

Care Leavers

Where a person leaves care, they may be able to get housing help from Social Services. Any protection considered for a care leaver under the Council Tax Support Scheme may potentially need to be within a complete financial year as each Local Authority's Scheme has to be reviewed on an annual basis. The income / earning potential for a care leaver is considered to be less likely to be constrained in the same way as that of other protected persons for example and consequently, protection is not proposed for this group. However, they will be able to elect to pay their Council Tax by 12 monthly instalments for next year and payment arrangements may be given in certain circumstances. It may also be possible for such persons to receive assistance under new Social Fund arrangements that will become the responsibility of the Council from 1st April 2013.

Foster Carers

Local authorities are responsible for the maintenance of looked-after children. Where a child is placed in foster care, the cost of caring for the child is often paid to the foster carer in the form of a fostering allowance. To ensure that no foster carer is out of pocket because of their caring role, a national minimum allowance (NMA) was introduced. Rates are published up to 2012-13. Local authorities are expected to pay over the basic NMA if the child needs it and their individual costs are anticipated to be higher. Many fostering services will pay a fee in addition to the allowance in recognition of the foster carer's time, experience and skills. The provision of protection from the minimum 20% contribution to Council Tax is not specifically proposed for such persons as they receive a fostering allowance to ensure that they are not out of pocket and the amount of a fostering allowance will be disregarded as income if it is received from a Local Authority, voluntary organisation or in the case of respite care payments, a primary care trust. Additionally, if the foster carer is in receipt of a carer's allowance, they will be entitled to protection under the

Council's proposed scheme. They will also be able to elect to pay by 12 monthly instalments rather than the 10 that currently exists for Council Tax Payers and payment arrangements may also be appropriate in certain circumstances.

Families with low income or benefit dependent

As a consequence of the funding gap that will arise from the proposed 90% fixed grant and the protection for persons of pensionable age being prescribed by the Government, the proposed changes will affect all working age claimants unless they are protected. Those in receipt of the lowest incomes will potentially receive the greatest support subject to eligibility and those in receipt of the highest incomes will have their rate of entitlement reduced through the effects of the taper. The reduced funding available inevitably means that the numbers and types of claimant protected from the effects of the 20% minimum contribution towards Council Tax needs to be met within the financial resources available. There would be a significant degree of administrative complexity involved in determining what constituted a low income or benefit dependence and the cost of providing protection for this group within such a wide definition is anticipated to be significant. The proposed scheme proposes protection for persons of pensionable age, disabled persons and recipients of war pensions and certain types of income will be ignored when calculating entitlement to support such as child benefit, guardians allowance. This option has therefore not been progressed.

Special Guardian Carers

A Special Guardianship Order gives the special guardian legal parental responsibility for the child which is expected to last until the child is 18. Unlike Adoption Orders, these orders do not remove parental responsibility from the child's birth parents, although their ability to exercise it is extremely limited.

In practice, this means that the child is no longer the responsibility of the local authority, and the special guardian will have more clear responsibility for all day-to day decisions about caring for the child or young person, and for taking important decisions about their upbringing, for example their education. And, importantly, although birth parents retain their legal parental responsibility, the special guardian only has to consult with them about these decisions in exceptional circumstances.

It is not proposed to provide protection for special guardian carers as their earning / income capacity is not considered to be constrained in the same way for example as other protected persons. However, any guardians allowance received will be disregarded as income when calculating entitlement to support. Additionally, they will be able to elect to pay by 12 monthly instalments rather than the 10 that currently exists for Council Tax Payers and payment arrangements may be given in certain circumstances.

Comments from Strategy, Partnerships and Improvement

The Council's child poverty needs assessment has provided a sound evidence base of what child poverty levels are like in the borough. These

suggest an average of 34% of households experience child poverty issues within the Borough which increases in certain neighbourhoods such as Stonebridge and Harlesden.

Supporting people in the most deprived areas is a regeneration strategic priority. Since the welfare changes and particularly the impending Benefit caps next year and Council Tax Support changes, achieving the strategic objectives will be more challenging.

It means that resources will have to be used to support people that are most vulnerable – many of which are already engaging with our services, but also many that are not and will turn to the local authority for support.

Brent is the 35th most deprived borough in the UK and deprivation is spreading into other wards. The Borough has moved up 18 places in deprivation rankings since 2007 thus meaning deprivation levels have got worse.

The Council may be unable to fulfil its vision for reducing child poverty levels by 2021 with families being “squeezed” to pay out more from the limited funds they have.

Less disposable income means that families will have less money to pay for children’s clothing, heat and food in the worst case scenario.

The most vulnerable groups as set out below may be affected the most and thus need to be considered for any additional protection – these being people with mental health, looked after children, young people (18-24), lone parents, large families and those with English as a second language and lacking basic skills and qualifications to enter the competitive jobs market.

There are still many low income families – and for those that will no longer receive a 25% reduction where they have a second adult resident, who is in receipt of Income Support for example, will also make people worse off.

Additional concerns include possible increases in crime which is sometimes evident in these situations – and consequently more costly to public services and the public purse overall.

The capacity of other services including Brent Customer Services, Housing and Citizens Advice Bureau is uncertain. For example, are they equipped with supporting families to find solutions on how they will be able to afford the Council Tax?

Council commentary

Employment and training support within the Borough will be provided (through existing providers including strategic partners at JCP, CNWL and BACES – Work Programme and Brent’s new employment offer) and for which a team of

'navigators' will be established to support people. This is due to commence in 2013). In many ways employment is often the only route out of poverty – but it needs to be work that pays.

Within the proposed Council Tax Support Scheme, the addition of an extra £10 per week earnings disregard for earned income will permit single parents to earn up to £35 per week before it affects their entitlement to support and in the case of couples £20 per week. An additional premium will also be given for each child that is resident in the claimant's household and a weekly child care disregard of up to £175 per week for a single child and £300 per week for two or more children may be given where the claimant or their partner works 16 hours or more per week and qualifying criteria are met. The receipt of Child Benefit and Guardians Allowance will be disregarded when calculating the amount of income that a claimant has. Fostering allowances are also disregarded as income in the support entitlement calculation.

The "Rethink Mental Illness" website indicates the following:

"Many people with mental illness receive Disability Living Allowance (DLA) which is paid in addition to other benefits regardless of capital. It is paid to people who have difficulty in going out alone - the mobility component; and/or who need help with personal care - the care component".

Protection has been proposed within the Council's proposed local Council Tax Scheme from the requirement to make the minimum 20% Council Tax contribution for vulnerable persons including those in receipt of Disability Living Allowance that may be available to persons experiencing mental health issues. Additionally, no non dependent deduction will be made where the claimant or any partner receives the care component of the disability living allowance payable at any rate.

Looked after children are not generally liable for payment of Council Tax as they are not aged 18. However, they may be indirectly affected by proposals and hence the areas of mitigation outlined in the comments above are relevant to such instances. Young people are increasingly remaining at home with their parents according to recent ONS reports. Where this occurs, non dependent deductions may be made from the claimant's support entitlement dependent upon income and circumstances. No deductions are however made where the non dependent is in receipt of Income Support or Employment Support Allowance (income related) for either the main or assessment phase. Where the young adult has a Council Tax liability, the provision of a discount of 25% where they reside on their own may be given and instalments may be paid over 12 months next year rather than the 10 currently offered. Payment arrangements may also be given in certain circumstances. An Equalities Impact Assessment for claimants according to their age has been undertaken and is included in Appendix D to the main Council Tax Support report to the Executive.

An increased awareness of funding and support will be established to assist vulnerable groups such as the ESF Families Project (in addition to an array of other publicly funded projects to support people into employment). Also, the Council's Troubled Families initiative will be rolled out in 2013 and will identify 800 of the most troubled families to give them additional support.

Consideration of funding through the Social Fund will be given. This will become a Local Authority administered fund from April 2013. Consideration will also be given to the promotion and availability of other discretionary funds administered by the Council.

The Council will work closely with key stakeholder organisations such as the Citizens Advice Bureau in preparing for the implementation of the new scheme and reviewing the existing Anti-Poverty Strategy and Council Tax Recovery Policy.

Additional features that will be available for next year include the option for Council Tax Payers to elect to pay by 12 monthly instalments rather than the 10 currently offered. Additionally, payment arrangements may be provided in certain circumstances.

Whilst second adult rebate is proposed to be withdrawn, the Council Tax that may be payable as a consequence may be paid over 12 months from next year rather than the 10 months currently offered. Payment arrangements may also be given in certain circumstances. The Council will review its anti-poverty strategy and recovery policy in consultation with key stakeholders to ensure that statutory obligations and duties are considered and addressed accordingly. The cost of retaining the existing level of support would be approximately £87,000 that would need to be met either from elsewhere within the scheme or from alternative sources of funding.

Comments from Housing

The proposed scheme strikes the right balance between the different needs.

Council Commentary

Brent Customer Services will work closely with Housing Services and related stakeholders including Brent Housing Partnership and Housing Associations to ensure that persons rehoused are aware at that time of the provision of Council Tax Support and complete an application for support where appropriate at the earliest opportunity. The Council Tax Payer will be able to elect to pay by 12 monthly Council Tax instalments next year rather than the present 10 and payment arrangements may be given in certain circumstances.

Comments from Brent Mental health User Group

Council officers attended the Brent Mental Health User Group meeting attended by 18 of their representatives. Representatives requested that the proposed protection for certain claimants currently receiving Council Tax Benefit from the effects of having to pay the proposed minimum 20% Council

Tax be given further consideration. More specifically, it was indicated that consideration should be given to including a remit within the definition of disabled that is wider than physical disability.

Council Commentary

Currently, persons experiencing mental health difficulties may be eligible for Disability Living Allowance or Employment and Support Allowance. The Council's recommended scheme already provides protection for claimants against the minimum 20% Council Tax contribution if they or their dependants are in receipt of disability living allowance or a disability or enhanced disability premium. One of the conditions for an enhanced disability premium is that the claimant is in receipt of an employment and support allowance (support component). Consequently, the receipt of either of these income types would be sufficient to ensure that the claimant was protected from the 20% minimum contribution. Additionally, attendance allowance and disability living allowance will be disregarded as income when calculating entitlement to Council Tax Support. Entitlement to a Disability Premium will also arise where a claimant is incapable of work and has been incapable of work for 52 weeks due to long term sickness. In view of the above features already included within the proposed scheme, this option has not been progressed further.

Comments from Mencap

It was identified from discussions concerning the Council's protection for disabled customers from the proposal to pay a minimum of 20% Council Tax, that some members may not meet the proposed protection requirements as they did not receive disability living allowance although they were registered with Social Services.

Council Commentary

Council Tax statutory provisions exempt the Council Tax Payer from liability to pay Council Tax if they are the only resident and they meet qualifying criteria for severe mental impairment. In general terms, entitlement to this exemption is based upon the following:

- The person is suffering from severe impairment of intelligence and social functioning which appears to be permanent,
- They are in receipt of one of the following benefits:
 - Disability Living Allowance care component at the middle or highest rate
 - Attendance Allowance
 - Constant Attendance Allowance
 - Severe Disablement Allowance
 - Employment and Support Allowance
 - Incapacity Benefit
 - Income Support including a disability premium (this includes anyone whose partner has a disability premium for them included in their income-based Jobseeker's Allowance)

- the disability element of Working Tax Credit
- They are stated to be severely mentally impaired in a certificate issued by a doctor or registered medical practitioner.

Additionally, where a person would normally be jointly liable for Council Tax with another resident and they meet the above conditions, they cannot be held jointly liable and hence Council Tax liability will rest with the other resident or residents who may be eligible in their own right to apply for Council tax Support.

As such, the protection from the minimum contribution of 20% by virtue of the claimant or a dependant in their household being entitled to a Disability Living Allowance or Employment Support Allowance (Support component) may also be relevant in such circumstances.

The disregard of any Independent Living Fund payment from income when assessing entitlement to support will also apply to Council Tax Support claims where appropriate.

Protection from the minimum contribution of 20% Council Tax is also proposed within the scheme where the claimant or their partner are in receipt of a carer's allowance due to providing care to another person.

The above features are intended to ensure that the proposed scheme provides protection for persons not in receipt of disability living allowance as well as those that are.

Help Somalia Foundation

An initial meeting was held with representatives of the Help Somalia Foundation and a further two meetings were held and attended by 29 members of the Somali community organised by a representative of the organisation and attended by a translator from the organisation.

The key findings from the consultation meetings held with this organisation were as follows:

- Protection for families with children
- The proposed 20% minimum contribution required by all Council Tax Payers in receipt of Council Tax Support (unless protected) would be very difficult for the community to achieve due to the combination of other factors already impacting upon their disposable income. This includes for example, the Housing Benefit cap. To this extent, a request was made for the Council to review the potential for reducing the minimum contribution. In conjunction with the above, a request was made to consider extending the protection given to certain groups and individuals. The specific nature of the request was to include couples (including polygamous marriages) and single parents where they have children aged 5 and under within the protected categories.

- In conjunction with the above, a request was made to consider extending the protection given to certain groups and individuals. The specific nature of the request was to include couples (including polygamous marriages) and single parents where they have children within the protected categories. The initial discussions centred on children aged up to 5 although it was the view of the group that consideration should be given to extending this to include couples and single parents for all children aged under 18.
- The reduction in the capital cut-off limit for claiming Council Tax Support from £16,000 to £6,000 was considered (on its own) unlikely to significantly and adversely affect the community.

Council Commentary

The Council's recommended scheme proposes that CTS recipients pay a minimum of 20% towards their Council Tax (unless protected) and has been determined based upon the anticipated funding deficit that the Council is likely to experience from 2013/14 after allowing for proposed changes to Council Tax discounts and exemptions. Any reduction in the level of minimum contribution will need to be met from other sources including the Council Tax Payer.

It is currently understood that the proposed software for administering the scheme may not have the functionality to provide protection for single parents and families with children from the effects of the minimum contribution for Council Tax or for specific ethnic groups within the Borough. However, irrespective of any potential software implications, an analysis has been undertaken to determine the cost for providing protection for families with children under certain ages. In the case of families with a child aged under three years old for example, the following results were obtained:

Passported Caseload	Other caseload	Already protected caseload	Total	Based on Band C Council Tax	Based on Band D Council Tax
1853	2593	195	4641	£4.66 weekly or £1.1M per annum	£5.24 weekly or £1.2M per annum

The potential implications of providing protection to these cases were this option available would be a gross increase in the levels of scheme expenditure as follows:

Band C Council Tax £1.1M
 Band D Council Tax £1.2M

If the protection were to be given to all families with children aged 5 and under, 6486 Council Tax Benefit recipients not already identified as eligible for

protection could qualify. This would represent a gross increase in the levels of scheme expenditure as follows:

Band C Council Tax £1.6M
Band D Council Tax £1.8M

If the protection were to be given to all families with children aged 12 and under, 10,729 Council Tax Benefit recipients not already identified as eligible for protection could qualify. This would represent a gross increase in the levels of scheme expenditure as follows:

Band C Council Tax £2.6M
Band D Council Tax £2.9M

If the protection were to be given to all families with children aged 16 and under, 12,233 Council Tax Benefit recipients not already identified as eligible for protection could qualify. This would represent a gross increase in the levels of scheme expenditure as follows:

Band C Council Tax £2.9M
Band D Council Tax £3.3M

If the protection were to be given to all families with children aged 19 and under, 12,886 Council Tax Benefit recipients not already identified as eligible for protection could qualify. This would represent a gross increase in the levels of scheme expenditure as follows:

Band C Council Tax £3.1M
Band D Council Tax £3.5M

Consequently, the provision of protection for the above groups of claimant would be significant and would need to be offset either by making significant savings through other elements of the proposed scheme or by the use of alternative sources of funding such as through Council Tax levels.

Consideration has also been given to reducing the minimum contribution from the 20% proposed. However, this could require approximately £3M in savings to be found elsewhere within the scheme or from alternative sources of funding.

These options have therefore not been progressed further.

Child benefit and guardians allowance will be disregarded as an income in the proposed scheme, an additional premium will be awarded for each dependant child resident in the claimant's home and a child care disregard will be available for up to a maximum of £175 per week where the claimant has one child and £300 per week where the claimant has two or more children and the qualifying conditions are met.

No response has been made to the reduction in the capital limit as this was considered unlikely to impact significantly and adversely upon the community.

Greater London Authority – GLA

The information below has been taken from the Greater London Authority's formal response to the Council's consultation.

“The GLA recognises that the determination of council tax support schemes under the provisions of the Local Government Finance Bill is a local matter for each London borough. Individual schemes will need to be developed which have regard to specific local circumstances – both in respect of the potential impact of any scheme on working age claimants (particularly vulnerable groups) and more generally the financial impact on the council and local council taxpayers – and the final policies adopted may differ therefore across the capital's 33 billing authorities for legitimate reasons.

This fact notwithstanding the GLA also shares in the risks and potential shortfalls arising from the impact of council tax benefit localisation in proportion to its share of the council tax in each London billing authority. It is therefore important that we are engaged in the scheme development process and have an understanding both of the factors which have been taken into account by boroughs in framing their proposals as well as the data and underlying assumptions used to determine any forecast shortfalls – which will inform their final scheme design.

The Government has expressed a clear intention that in developing their scheme proposals billing authorities should ensure that:

- Pensioners see no change in their current level of awards whether they are existing or new claimants
- They consider extending support or protection to other vulnerable groups
- Local schemes should support work incentives and in particular avoid disincentives to move into work

The GLA concurs with those general broad principles and would encourage all billing authorities in London to have regard to them in framing their final schemes.

It is also essential that schemes are presented in a way which is transparent, understandable and accessible to claimants – and we therefore welcome the inclusion of working examples of the potential affects on different claimant groups on Brent's consultation website. However the current level of awareness amongst working age claimants likely to be affected by the potential changes is relatively low and this may not crystallise until these individuals receive their revised benefit notifications and council tax bills for 2013-14 early next year. This may adversely affect collection rates in the first year of the new system.

According to the consultation paper 'Localising Support for Council Tax in England – Funding arrangements consultation' issued by CLG in May Brent is provisionally estimated to receive £23.7m in council tax support grant in 2013-14 with the GLA forecast to receive £6.9m in respect of the Brent borough area and around £159m for London as a whole. Slightly less than 50% of this funding will be allocated to the business rates retention baseline and will thus have the potential to move in line with the NNDR tax take including the impact of the annual RPI uplift in the multiplier – with the balance being provided through revenue support grant (RSG). The RSG element has the potential to be reduced further over the next CSR period commencing in 2015-16.

In developing its proposals for consultation Brent has identified a potential difference of between £6.4m and £7.6m between the cost of continuing to provide council tax support on the same basis as at present through the 'default scheme' for working age claimants and its expected level of council tax support grant. Its forecast shortfall in respect of the GLA's share is between £1.2m and £1.5m. We welcome the fact that Brent has provided a significant degree of disclosure in relation to its funding shortfalls including a potential range of outcomes.

The Council's draft scheme therefore seeks to identify approaches which would allow it to close the majority if not all of this expected funding gap – with the core element of its proposals being that all working age claimants (excluding certain designated vulnerable or protected groups) be required to pay at least 20% of their council tax liability.

Where boroughs choose not to adopt the default scheme and therefore pass on any shortfalls to claimants they should seek in their scheme to provide an element of protection to the most vulnerable and those in the most difficult circumstances – either within the framework of their scheme or through a hardship scheme.

The GLA notes the intention of Brent to classify the following claimants as being vulnerable and thus protect them from the minimum contribution payable by working age claimants of 20%.

Claimants or their dependants who are entitled to a disability premium, enhanced disability premium or disabled earnings disregard and claimants in receipt of Disability Living Allowance, Disabled Persons Reduction for Council Tax purposes, War Disablement Pension and/or War Widow's Pension.

Ultimately the decision as to which groups are designated as vulnerable is a matter for local determination but in principle the GLA considers that there is a logical rationale for Brent's proposed policy taking into account the policy framework set by central government and the objective that council tax support schemes should be designed in away which does not disincentivise work.

The GLA considers that a key priority for the design of a localised council tax support scheme is to ensure that it does disincentivise those in work or those seeking to move into work. In order to ensure that schemes meet this objective billing authorities should therefore take particular care in determining their policies on earnings disregards and extended payment periods (i.e. run ons).

In principle therefore we welcome the proposal within Brent's draft scheme to protect work incentives by increasing the earnings disregard (i.e. the amount which claimants who are working are allowed to retain before losing eligibility for support) by £10.

The GLA also notes the other proposed elements of Brent's draft scheme as set out below. It has no specific comments on them at this stage as it regards them as being a legitimate matter for local determination:

Claimants will not be entitled to support if they have savings exceeding £6,000;

The proposed doubling of weekly non dependent deduction rates with a minimum weekly deduction of £6.60 for those non dependants in receipt of income support, job seekers allowance (income based) or income related ESA – this change being introduced to deliver on the council's state principle that all working age adults not in protected groups should contribute towards their household's council tax bill;

A notional income of £1 per week shall be assumed for each £250 of capital held between £3,000 and £6,000;

Premiums and personal allowances used to determine basic living needs for a claimant and their family when calculating their entitlement to CTS shall be held at the same rates in 2013-14 as in 2012-13;

The withdrawal of the second adult rebate.

The GLA considers that in formulating its council tax support scheme each billing authority should both consider and address how it intends to take advantage of the technical reforms to council tax which will provide greater flexibility in relation to discounts and exemptions for second and empty homes. The additional revenues from the technical reforms could be used to reduce any shortfalls and thus the sums which need to be recovered from working age claimants via any changes to council tax support.

We note that Brent intends to take advantage of these new powers and proposes to adopt new policies. The GLA notes that the Council estimates that these changes will generate an additional £1.65m in council tax revenues in 2013-14 (comprising £1.3m for Brent and £0.37m for the GLA).

The Council will be required to set a council tax base for 2013-14 taking into account the potential impact of the discounts it will be offering in respect of council tax support and the changes in relation to the treatment of second and empty homes.

This will require the Council to make a judgement as to the forecast collection rates from those claimants affected by the changes. It is likely in respect of those working age claimants currently in receipt of 100% benefit that the recovery rates will be significantly below the average percentage collection for council tax as a whole. We also note that the Council does not intend at this stage to offer a hardship scheme given the protection it is providing to certain vulnerable groups.

The GLA would encourage the Council to provide it with an indicative council tax base forecast as soon as options are presented to members for approval in December or January (if not before) in order that it can assess the potential implications for the Mayor's budget for 2013-14. This should be accompanied ideally by supporting calculations disclosing any assumptions around collection rates.

The GLA notes the letter received from the Council dated 9 August seeking discussions as to how the budgeting, cashflow and accounting arrangements for council tax support will operate under the new system in order to manage the sharing of risks between the two authorities. These discussions would also need to address the mechanisms and triggers under which billing authorities will be able to vary their instalment payments to preceptors (i.e. the GLA) in year where, for example, council tax collection rates are lower than anticipated or the actual demand for council tax support is greater than budgeted for.

We anticipate that the Government will address these issues in the secondary legislation on council tax support and business rates retention in the autumn – as similar issues are also likely to apply where business rates revenues are lower than forecast.

In the absence of any nationally prescribed policy the GLA would be keen to develop a common wide approach in London on these matters which would apply equally across all 33 billing authorities.

This could for example follow the current approach used for the Crossrail Business Rate Supplement where instalments may be varied no more than once per quarter with the trigger for any variation being where the forecast shortfall in revenues exceeds a set percentage of the total precept instalments payable for the year. This would recognise that there is a balance to be struck between cashflow and resource management and the additional administration which would result for both parties if instalment payments were to be changed.

In practice – where shortfalls are not material – the GLA would envisage that any deficits would be recovered through the collection fund deficit calculation in January in the normal way (and thus recovered in the following financial year in cash terms).

I would like to thank you for consulting the GLA and we look forward to working with the London Borough of Brent over the coming months in order to ensure the successful implementation of the council tax support localisation reforms.

Council Commentary

The Council intends to undertake an extensive and timely communication and publicity programme in advance of annual billing for 2013/14 to ensure that residents are aware of the changes and their impact as well as the wider welfare reforms. Estimated collection rates have been incorporated within the financial modelling undertaken and based where reasonably practicable upon any currently available data and information concerning collection.

The reference by the GLA to the proposed doubling of weekly non dependent deduction rates with a minimum weekly deduction of £6.60 for those non dependants in receipt of income support, job seekers allowance (income based) or income related ESA is incorrect. The Council proposes to retain a nil deduction for non dependants in receipt of Income Support and Employment Support Allowance (Income Related). Only the JSA(IB) deduction will change from nil at present to £6.60 per week.

The reference by the GLA to a notional income of £1 per week assumed for each £250 of capital held between £3,000 and £6,000 is also incorrect. There is no proposal to provide for a tariff income as the capital limit has been reduced to £6,000 within the recommended scheme.

The Council will liaise with the GLA concerning an indicative tax base at an early stage.

The reference to the term “does disincentive work” is assumed to be an error.

Citizens Advice Bureau

The Citizens Advice Bureau submitted the following comments for consideration concerning the proposed scheme that was subject to consultation.

“There have been some concerns around right to reside decision for non-economically active EEA national. DWP’s assessment is usually followed. It is important that non economically active EEA nationals are assessed on a case by case basis and ensure that they are not excluded automatically.

Details of any appeals rights should be specified

Applications: It is not clear whether an application for Universal Credit or Housing benefit would trigger an automatic application for Council Tax Support (CTS). Similarly, it is worth looking at whether reporting a change of circumstances for HB or UC would be forwarded to CTS

Recovery: Is the recovery process of overpaid CTS to remain the same i.e. by clawing it back from the Council Tax account?

Similarly, in cases where a maximum NDD is applied especially for school leavers, it would be best practice for the decision (and how conclusions were reached) is available

There is an opportunity to incorporate the recommendations of the Council Tax Arrears Good Practice Protocol (2009) and the most recent Good Practice protocol on Enforcement of Council Tax arrears (<http://www.irrv.net/forums/alert/documents/BailiffsOutcomesProtocol.pdf> and look at recovery in the light of the proposed changes

There is a need for a public awareness campaign so people understand the changes which are coming. From our experience, many people in receipt of CTB do not think that they are not liable for Council tax. This will require a cultural change

There is no mention of whether interim payment if delays occur has been considered.

There should be a clear policy on the factors that the local authority would take into account in considering requests under section 13(A)

It would be good practice in cases where suspension of CTS falls into one of the categories listed, a similar approach is systematically adopted by the recovery team

Payments to next of kin is at paragraph 22.0 is not clear enough

Brent CAB is concerned and worried about the detrimental impact that the changes to the council tax scheme will have on local residents. 10.3% of Brent's local population are unemployed and nearly 16% receive an out-of-work benefit. There were 30,620 benefit claimants as at 31/03/2011 including over 9,500 JSA claimants and 12,500 ESA/IB claimants. A further 4,000 were lone parents. Kilburn, Stonebridge and Willesden Green wards had the highest count of people on long-term sickness benefits.

Whilst the average income in Brent falls within the government's stated 'median' income of £26,000 which it proposes to use as a 'benefit cap', this masks extremely low incomes in Harlesden, Stonebridge, Kilburn, Willesden Green and other wards which are among the 10% most deprived in the country. Brent CAB fears that being made to pay an additional 20% minimum towards the council tax will bring about a return to the days of the community

charge, when individuals, finding themselves unable to pay the charge, fell into considerable arrears resulting in large sums paid by the local authority in administration and recovery costs.

Whilst we are acutely aware that Brent Council has little choice but to implement a replacement scheme for council tax benefits, we urge you to consider exercising leniency and using the maximum discretion possible in the implementation of the recovery process. We also urge you to enter discussions with the bureau on the procedure and implementation of a fair code for the recovery of council tax debt, at the earliest possible opportunity”.

These were supplemented by a more detailed response for consideration which has been set out below in bold font together with a commentary.

Claimants are often unsure about how to make a claim and believe that once they have submitted a claim for one benefit, this action automatically passports them to payment of another. This must be made clear in the claims process for CTS, and if possible where appropriate, automatic claims should be accepted when a claim is made for housing benefit, or the relevant claim details sent to the claimant.

Council Commentary

The proposed scheme will define the claims process for Council Tax Support. Claims made to the Council from 1st April 2013 for Housing Benefit purposes will be used where applicable as a joint claim for Council Tax Support purposes. Where Housing Benefit transfers to Universal Credit, from October 2103 onwards, such a feature will not be provided.

Recovery: Is the recovery process of overpaid CTS to remain the same, i.e by clawing it back from the Council Tax account? Where a liability order has been obtained in respect of CT arrears for the same financial year and the Council wishes to obtain a new liability order to include the new arrears created as a result of the claw back, we believe the Council should be willing to waive the associated costs of the new liability order. It would be good practice for the Council to have a policy on the circumstances in which it will agree to waive the aforementioned associated costs.

Council Commentary

The Council proposes to recover overpaid Council tax Support from the Council Tax Payer via the Council Tax account in a similar way to the present national CTB scheme. The Council’s recovery policy and anti-poverty strategy are to be reviewed as a consequence of the proposed changes and the issues raised will be considered and evaluated at that time and the Citizens Advice Bureau consulted accordingly. The position regarding costs is not a factor to be incorporated within the Council’s local CTS scheme.

The NDD for those in receipt of contribution-based ESA is high. No NDD will be applied to those in receipt of income based ESA. This does not seem for apply to those on CB-ESA who do not have any capital or any

other income. Those who have made enough contributions should not be treated less favourably. It may be worth considering cases on their individual merits. We believe strongly that no one claimant group should be affected more adversely than another through the introductions of this change, which makes it important for the local authority to adopt a discretionary approach to claims.

We would also want to see the council acting reasonably, ie applying an NDD in full only in circumstances where it is clear this applies to the non-dependant – e.g. where the non-dependant is in full-time employment and earning over a particular level of income. If the non-dependant is a school leaver, the likelihood that the maximum NDD should be applied is remote and the council should act reasonably and apply a more appropriate NDD in such circumstances. Similarly, in cases where a maximum NDD is applied, especially to school leavers, it would be best practice for the decision (and how conclusions were reached) to be available to the claimant.

Council Commentary

Under the existing national Council Tax Benefit Scheme, a non dependent deduction (NDD) is not applied where the non dependent is in receipt of Employment Support Allowance (Income Related). However, a non dependent in receipt of the contribution based element is subject to a weekly deduction of £3.30. The proposed scheme retains this distinction on the basis that the income related benefit is for those persons that have an income below the means test level relevant to their circumstances and are therefore less likely to be able to contribute towards the claimant's household bills. If a person in receipt of the contribution based Employment and Support Allowance has no capital or other income, they may be eligible to apply for the income related benefit. Additionally, the administrative work that would be needed to determine the income and capital of a non dependent in receipt of the contribution based Employment and Support Allowance and the potential onus on the claimant to obtain it may present added complexities that could delay claims and be difficult to enforce in practice. For these reasons, the Council does not intend to revise the proposed deduction levels.

The Council proposes to have a predetermined and consistent approach to the application of non dependent deductions to provide clarity and certainty for claimants concerning entitlement and to ensure that decision making is consistently applied to support claims. A discretionary approach to claims concerning non dependent deductions could result in varying decisions concerning entitlement and create confusion and inconsistency for claimants. Additionally, financing decisions and budgeting would be less certain if cases were considered on individual merits.

The Council will have regard to its scheme, statute, best practice and case law when considering and making decisions concerning non-dependent deductions and will apply these to each case based upon the information available at that time.

Decisions concerning entitlement will be communicated to the claimant and they will be entitled to request a written statement of reasons about matters not contained within the decision notice regarding their claim for support. An appeals process will exist for claimants that are aggrieved by the decision made concerning their claim.

There is an opportunity to incorporate the recommendations of the Council Tax Arrears Good Practice Protocol (2009) and the most recent Good Practice protocol on Enforcement of Council Tax arrears www.irrv.net/forums/alert/documents/BailiffsOutcomesProtocol.pdf and look at recovery in the light of the proposed changes. Indeed, we would welcome discussions with the council on the collection of CT arrears, and would encourage them to follow the best practice of Wiltshire Council which adopted an excellent example of a recovery process in January 2012 (see: <http://www.wiltshire.gov.uk/ctax-wilts-council-code-of-practice-recovery-tax-debt.pdf>). We would also like to see a copy of Brent's code of practice when it is eventually produced. To date, we have not seen this.

Council Commentary

The Council will consider the above documents when reviewing its existing recovery policy in preparation for the proposed changes and will consult with the Citizens Advice Bureau regarding the proposed content and approach.

There is a need for a public awareness campaign so people understand the changes that are coming. From our experience, many people in receipt of CTB do not think that they are liable for Council Tax. This will require a cultural change. This will be required not only by claimants but also, and most importantly, by council officers.

Council Commentary

The Council recognises the importance and magnitude of this work and is currently developing a publicity and communications campaign that will incorporate the above and wider welfare reforms significantly in advance of the annual Council Tax bills being issued in March 2013. The training and development of employees and communication to other work colleagues is a key component of the Council's current projects programme with timescales, activities and responsibilities being defined, implemented, monitored and reviewed.

Also, councils will have a disincentive to encourage benefit take-up, but we would urge Brent to ensure that this is done as widely as possible. There would be advantage to the council in launching such a campaign, as income maximisation will help reduce the impact of the CT changes on household budgets.

Council Commentary

The Council will continue to monitor the take up of Council Tax Support and compare it with national and local statistics available. Take up campaigns are generally developed and implemented in a co-ordinated manner and it is

envisaged that such an approach will be applied to any future take up campaign for CTS purposes.

There is no mention of whether interim payments have been considered for situations where there are delays in assessments for support from the scheme. The current system allows for this when a full decision on claims remains outstanding. Interim payments will avoid the claimant falling into arrears, and recovery action could be delayed until matters are sorted out.

Council Commentary

Interim payments are currently only applicable to Housing Benefit Rent Allowance cases and not to Council Tax Benefit. The Council has an existing recovery policy that sets out its approach to cases where the award of entitlement to CTB has been delayed and this will be reviewed to incorporate the proposed changes for the purposes of the CTS scheme. The Council will consult with the Citizens Advice Bureau concerning the content and approach proposed within this policy.

There should be a clear policy on the factors that the local authority would take into account in considering requests under section 13(A). We would expect such factors to include but not be limited to a) where liability orders in respect of the arrears are more than 6 years old and there has been no contact or part-payment in respect of the arrears within this period; b) where a taxpayer is jointly liable to pay CT with another person but the other has moved out and can no longer be contacted or traced and the remaining taxpayer has paid at least half of the liability and is unable to make further payment due to financial hardship.

Council Commentary

The application of Section 13(A) is considered to be a separate matter to the administration of the Council Tax Support Scheme. However, the Council Tax Support Scheme will set out how an applicant may apply for a discount under this provision in accordance with the proposed statutory Council Tax Support Scheme requirements.

It would be good practice in cases where suspension of CTS falls into one of the categories listed, a similar approach is systematically adopted by the recovery team.

Council response

The Council has an existing recovery policy that sets out its approach to cases where the award of entitlement to CTB has been delayed for example and this will be reviewed for the purposes of the CTS scheme. The Council will consult with the Citizens Advice Bureau concerning the content and approach proposed within this policy.

Payments to next of kin is at paragraph 22.0 is not clear enough

Council commentary

The contents of this section have been reviewed in the proposed scheme to improve clarity.

When considering the impact of the changes, the following groups should be considered as vulnerable and therefore in need of additional support:

- a) age, especially those over the age of 70 or over 60 and in sheltered accommodation;**
- b) disability or other impairment;**
- c) mental health issues;**
- d) long term or serious illness;**
- e) low income, e.g. those who are unemployed and/or on benefits;**
- f) sudden change of circumstances, e.g. bereavement, divorce, illness, loss of employment, recently having given birth or adopted**
- g) caring responsibilities;**
- h) recently having left the armed forces;**
- i) recently being released from a custodial sentence;**
- j) recently suffered or suffering domestic violence;**
- k) being in a refuge or safe house.**

Council Commentary

In considering protection for the groups indicated by the CAB, protection is already proposed within its recommended scheme for claimants of pension credit age (i.e. 61+ at present) and for those with a disability or other impairment.

Mental health issues and long term and serious illnesses are also included within the Council's definition of vulnerable as previously outlined within this report through entitlement to Disability Living Allowance and Employment Support Allowance (Care Component). Additionally, where the claimant or their partner is in receipt of a Disability Living Allowance, no non dependent deduction will be made if there is another adult resident in their home.

Providing protection for claimants on a low income could potentially include the entire caseload. A more specific definition of unemployed and / or on benefits would need to be determined to specify what benefits and unemployed actually meant for the purposes of protection. The administrative complexity involved in determining the types of benefit and unemployment that may be within scope for this proposal, is anticipated to be significant not least due to the potential need to establish reasons for unemployment. As the proposed scheme is intended to provide support for those in receipt of a low income or benefit through the means test and effects of the taper, and other options have been considered elsewhere within this report, no further commentary is added here.

Sudden change of circumstances, e.g. bereavement, divorce, illness, loss of employment, recently having given birth or adopted

Council Commentary

Where a claimant's partner claims Council Tax Support within one month of the claimant's death or their separation from them, and the claimant was in receipt of Council Tax Support at that time, the date of claim will be the date of the separation or death. Additionally, the backdating provisions may permit the date of claim to be an earlier date if good cause can be demonstrated for not having applied sooner. Further provisions are made to ignore a claimant's capital where their former property is occupied by their former partner and the claimant is now a single parent or for up to 26 weeks from the date it ceased to be occupied in the case of estrangement or divorce.

Adoption allowances and Child Benefit are disregarded as income for the purposes of Council Tax Support. Additionally, where a person has given birth, they are awarded an additional premium for their newly born child. Disregards of weekly child care costs of up to £175 for one child and £300 for two or more children may also be given where the qualifying criteria are met.

Protection for sudden illness would be administratively complex to implement as it would potentially require evidence to be obtained of the nature and duration of the illness. Consideration may also need to be given to the number of previous instances of such an occurrence and their reasons and the duration of any protection that may be appropriate. Illness is currently provided for within the protection available to a claimant from entitlement to a disability premium. Additionally, premiums exist for claimants in receipt of the work related activity component and support component of employment and support allowance and personal allowances exist for main phase employment and support allowance.

Protection for sudden loss of employment would be administratively complex to implement as it would potentially require evidence to be obtained of the reason for the loss of employment and nature of the sudden unemployment. Consideration may also need to be given to how temporary employment and voluntary work may feature within any qualifying criteria. Consideration may also need to be given to the number of previous instances of such an occurrence and their reasons and the duration of any protection that may be appropriate. Payments for remuneration in lieu of notice and lump sum redundancy payments may also need to be considered under this option if it is intended that protection should be given to those that are likely to need it most as opposed to everyone that has lost their employment. For the above reasons protection is not proposed. However, they will be able to elect to pay their Council Tax over 12 monthly instalments rather than the 10 currently available and a payment arrangement may be available in certain instances.

Caring Responsibilities

Council Commentary

It has been proposed within the consultation responses in general that carers who are liable for payment of the Council Tax should be protected. Consideration has been given to providing protection to persons in this group and in view of the financial viability of extending the protection as set out in the main report to the Executive, the fact that carers are more likely to have a limited ability to increase their earning / income potential due to providing care for 35 hours per week and to support disabled persons, it is proposed that where the claimant or their partner is in receipt of a Carers Allowance, they should be protected from the requirement to make a minimum contribution of 20% Council Tax.

Recently having left the armed forces

Council Commentary

The Council's proposed scheme provides for protection to be given in those cases where a war pension or war disablement pension are received by the claimant or a dependant in their family. This provides for cases where an injury, illness or death occurs up to 6 April 2005. However, for such cases that occur after this date, the Armed Forces Compensation Scheme provides for Guaranteed Income Payments to be made where the person concerned has a serious injury or illness.

A Survivor's Guaranteed Income Payment (SGIP) may be paid to a partner where the person's death is caused by service in the Armed Forces. Unmarried surviving partners must meet certain criteria to be eligible.

As post April 6th 2005 cases were not addressed within the Council's draft scheme definition for protection, it is proposed that these incomes be included within the criteria for protection and also for a full disregard as income in the assessment of entitlement to support.

Recently being released from a custodial sentence

Council commentary

The type of custodial sentence and the definition of "recently released" may need to be considered to determine potential eligibility for protection to be given to this group. Eligibility for protection may also need to be considered in relation to the status of the applicant having been released from custody (e.g. working, unemployed, etc) and the duration it should continue for.

In view of the administrative complexity that would be likely to arise from determining such cases this option has not been progressed.

Recently suffered or suffering domestic violence

Council Commentary

This would be administratively complex to determine and validate. The definition of “recent” would also need to be more precisely defined in terms of timescale.

Liability for Council Tax is based upon where an adult has their sole or main residence. If a person has left their home but has an intention to return, they are likely to retain their sole or main residence at their former address and consequently Council Tax liability and entitlement to Council Tax Support would be assessed in respect of that place.

The proposed scheme however does provide additional support to such persons to the extent that where they have had to leave their home through fear of violence in the home or from a former member of their family, but intends to return to their home within a 52 week period, entitlement to support will be continued in respect of that place.

Being in a refuge or safe house

Council Commentary

Council Tax is payable at the home where a person aged 18 or over has their sole or main residence. Where the claimant has left their home and is resident in a refuge or safe house, they will continue to be liable for Council Tax at the place where they have their sole or main residence and may be eligible to apply for CTS in respect of that residence. CTAX is understood to not generally be payable for a refuge although rent maybe and consequently Council tax Support may not be applicable in that instant. The position concerning a safe house would depend upon individual circumstances. Council Tax may be payable in respect of the claimant’s sole or main residence and CTS could be applied for in respect of that home. It is unknown how many claimants are currently resident in a safe house as such cases are not identifiable from existing systems.

The proposed scheme however does provide additional support to such persons to the extent that where they have had to leave their home through fear of violence in the home or from a former member of their family, but intends to return to their home within a 52 week period, entitlement to support will be continued in respect of that place.

Consideration may also be given to whether such persons may be eligible for a Social Fund payment under the new arrangements transferring to the Council from the DWP in April 2013.

Network Housing Comments

Network broadly agree with all of the six principles, so long as appropriate safeguards are in place to protect vulnerable households and those on low incomes to enable them to manage their household expenses and avoid unmanageable levels of debt.

However they expressed concerns around Principle 2. In particular, they wished to widen the criteria for a 'vulnerable claimant' to consider inclusion of the following classes of person:

- Those with a medical condition affecting their mental or physical health, but who are not in receipt of disability living allowance
- Those requiring extra support, for example those leaving care services, or those accepted as homeless by Brent council and there is an outstanding duty owed to rehouse them from temporary accommodation
- Those who have benefit only dependent income but who also have severe debt problems

These were elaborated on further in their answer to question 3 (and answer to question 5 below where they also suggested a new 10% liability for all working age classes of person (i.e. have no exemptions for liability to pay a % of council tax for working age persons).

Q.2 To what extent do you agree or disagree that the following proposals are fair?

Principle 1: All working age claimants to pay a minimum of 20 per cent of their Council Tax.

Principle 2: Protect disabled claimants from the 20 per cent minimum contribution.

Principle 3: Increase the earnings disregard by £10 per week

Principle 4: Double the current range of deductions charged for other adults living with a claimant from the 2012/13 charges, and introduce a charge for other adults on job seekers allowance (income based)

Principle 5: Increase the taper from 20 per cent to 30 per cent

Principle 6: Reduce the savings cut-off limit to £6,000 from the current £16,000

Feature 1: Abolish the second adult rebate for working age claimants

Feature 2: Premiums and personal allowances to be frozen at 2012/2013 rates

Network raised concerns with regards to Principle 1. In particular, they stated that not all working age claimants on benefits will be able to pay 20 per cent of the Council Tax without it exacerbating their financial situation further. The working age claimants referred to means those who are already in debt.

They also stated that consideration should be given to the Universal Credit and benefit caps which are coming in April 2013. Some of these claimants will be exposed to budgeting for the very first time and will have to deal with competing priorities as to what debts and expenditures are serviced. Some of these claimants will find themselves in an impossible situation if needing to find additional funds to meet council tax liability whereas previously they had no personal liability to pay.

Council Commentary

Due to the changes arising from the funding of the Council Tax Support Scheme through a fixed grant based on 90% of the Benefit expenditure for 2010/11, financial modelling of options has identified that a minimum contribution towards Council Tax of 20% would be required to meet the funding gap anticipated as set out in the main report to which this appendix forms a part. Consideration of a lower proportion would be insufficient to meet the level of expenditure reduction required to bridge the funding gap based upon the 90% fixed grant payable from 2013/14.

Whilst it is recognised that there are external factors to the proposed Council Tax support Scheme that will undoubtedly have an impact upon a resident's ability to pay, these have been factored into the financial modelling conducted in terms of anticipated collection rates. These have not been evaluated directly within the Equalities Impact Assessment as they are national policies defined by central government. Council Tax Payers will be able to elect to pay by 12 monthly instalments from next year rather than the 10 offered at present and payment arrangements may also be given in some circumstances.

It is not possible to identify all claimants that may have a debt as only Council Tax debts can be identified from current records and what constitutes a debt may be dependent upon the amount, duration, type of outstanding amount, etc. The Council has an anti poverty strategy and recovery policy that set out arrangements for managing the repayment of debts and the circumstances when they are applied and that is sensitive to the individual circumstances of residents and this will be reviewed in consultation with key stakeholders such as the Citizens Advice Bureau for example in preparation for the implementation of the Council Tax Support Scheme.

Protection from the proposal to make a minimum contribution of 20% towards Council Tax is intended to apply to disabled persons, carers and person in receipt of war pensions and other features such as disregards for child benefit and guardians allowance will mean that entitlement to support is not affected by receipt of these.

3. Please provide details of other groups that we believe should be protected from making the minimum contribution and why.

We think that restricting the criteria for vulnerable working age claimants to just those residents or households with a member with a disability and receiving disability living allowance (or war widow pension) is too restrictive.

We would like to see the eligibility for “Class 3” working age people considered vulnerable widened to include those that are also one of the following:

- Those who have a medical condition (affecting their mental or physical health) but are not in receipt of disability living allowance or any of the other disability premiums listed;**
- Those who are going through some changes that mean they need some extra support (for example leaving care services or have been accepted as homeless by Brent Council and there is an outstanding duty owed to re-house them from temporary accommodation);**
- Those who have benefit only dependent income but who also have severe debt problems (for example, county court judgements, bankruptcy or a bad credit rating, preventing them from using a bank account).**

Network believe that these classes of resident can be considered as vulnerable as residents claiming Disability Living Allowance and War Widow Pensions when it comes to managing the financial affairs of the household and trying to stay out of arrears and debt.

Homeless households living in temporary accommodation provided by Brent Council in particular are going to be affected by the new maximum caps for benefit payments from 2013. As these households are temporarily placed in the private rented sector while they wait for the offer of an affordable home from Brent Council, some households have a rent that is in instances more than or equal to the entire amount of benefit related income the household will be eligible for under the capped payments in 2013. (Currently around 76 temporary accommodation households being housed on behalf of Brent Council have a rent that is equal to or exceeds the household's total income from all sources of benefits under the capped payments, with others left with reduced household income also.) Therefore it will be impossible for these households to also find the 20% contribution toward their council tax which could be around £22.70 per month based on a typical Band D property.

We are also concerned that many vulnerable tenants that may have left care or have medical conditions, drug and alcohol dependency and/or a history of debt and arrears, will struggle to make the minimum contribution. Aside from any financial difficulties of needing to budget their benefit payment to pay their council tax bill, we would be interested

to know what safeguards Brent Council are considering when residents fall into arrears. For example, the housing sector has a definition of vulnerability for claimants of Local Housing Allowance whereby the benefit that covers rent can be paid direct to landlords in certain circumstances as the aim is to help the household sustain their tenancy. But under the local council tax scheme there is no actual benefit 'credit' paid – the resident is expected to cover the 20% council tax liability by finding the money from within their overall benefit payment and make the payment transaction to the council. Therefore what plans does Brent Council have for vulnerable residents such as those we have outlined when they fall into council tax arrears? As direct payments cannot be an option since there is no actual benefit credit being paid, how will the council support residents to make payments easily and without entailing additional costs for the household where it is obvious that they are failing to cope? It cannot be appropriate to take vulnerable residents to court and to push households into unsustainable levels of debt that might cause them to lose their home and/or a court summons/ jail sentence.

Council Commentary

The Council has an anti-poverty strategy and recovery policy that currently sets out how it will support and assist Council Tax Payers that either have or may fall into arrears with their payments and the manner in which payment arrangements and collection of monies due will be collected. This includes the approach to be taken for “vulnerable” persons such as those outlined by Network Housing in their submission above. This will be reviewed as a consequence of the proposed changes in consultation with other key stakeholders in the Borough although it is not a specific feature or requirement of the proposed Council Tax Support Scheme.

Additionally, from next year, 12 monthly instalments will be provided to Council Tax Payers that elect to pay by that method rather than the 10 currently available to assist in spreading the financial effects of the changes.

It will be important to ensure that vulnerable persons claim any entitlement to support at the earliest opportunity to ensure that the potential for arrears is minimised. To this extent, the Council will work closely with the Housing Service and other connected stakeholders to ensure that the scheme is promoted and that persons are able to access and claim support at an early stage. Additionally, backdating provisions will be included within the scheme to enable vulnerable persons to apply for their support to be backdated by up to six months where there is continuous good cause for them not having applied sooner.

The proposed protection for disabled persons, carers and persons in receipt of war pensions extends to those who may have medical conditions that entitle them to a disability premium and may include persons who are long term sick where they are incapable of work and have been for 28 weeks if they are terminally ill or 52 weeks in any other case. Whilst consideration has

been given to protection for other medical conditions in general, this would be administratively complex to establish and maintain and has therefore not been progressed further. Consideration has also been given to extending protection to include care leavers, those that are benefit dependent or with debt, and persons subject to homeless provisions.

In the case of benefit dependency, the administrative complexity and hence potential cost involved could make this option complex particularly as potentially all working age claimants currently in receipt of Council Tax Benefit are benefit dependent. The proposed scheme is intended to provide greater support to those in receipt of a low income through the effects of the taper with protection for specified vulnerable groups.

Protection for claimants with drug or alcohol dependence from the 20% minimum required contribution for Council Tax will be applicable where they are entitled to a disability premium, enhanced disability premium or receive disability living allowance. Where these are not applicable, they will be able to elect to pay their Council Tax by 12 monthly instalments for next year and payment arrangements may be given in certain circumstances. Additionally, the Council's anti-poverty strategy and Recovery Policy will be reviewed in consultation with other stakeholders to ensure that collection and enforcement of Council Tax is sensitive in such circumstances.

Where a person leaves care, they may be able to get housing help from Social Services. Any protection considered for a care leaver under the Council Tax Support Scheme may potentially need to be within a complete financial year as each Local Authority's Scheme has to be reviewed on an annual basis. The income / earning potential for a care leaver is less likely to be constrained in the same way as that of other protected persons for example and consequently, protection is not proposed for this group. However, they will be able to elect to pay their Council Tax by 12 monthly instalments for next year and payment arrangements may be given in certain circumstances.

Where a claimant has debt, protection would be difficult to administer as potentially the debt issue would need to be identified and evaluated and may be difficult to determine. However, the Council has an anti-poverty strategy and will review this and the recovery policy applied to enforcing Council Tax payments in consultation with key stakeholders to ensure that these are consistent and appropriate. The provision of 12 monthly instalments for Council Tax collection increasing from the existing 10 will also assist those Council Tax Payers that take up that option and payment arrangements may be given in certain circumstances. Existing provisions concerning bankruptcy and administration orders that are applied to Council Tax will continue and be unaffected by Council Tax Support provisions.

The impact of the proposed scheme has been considered within the Equalities Impact Assessment included as Appendix D to the main Council Tax Support report.

Q.5. Comment on how the proposals will affect particular individuals or groups more than others and how this might be addressed

Large households who are going to be affected by the benefit capped payments from April 2013 will be affected by Brent Council's proposals. For many households the cap may mean they are already going to receive less money to cover their household expenses, and so meeting the new obligation to pay 20% contribution toward council tax is going to further erode their income.

One option to address this might be to at least consider lowering the minimum contribution from 20% to 10% but to meet the shortfall by requiring class 3 working age claimants on disability living allowance or war widow's pension to also meet a 10% contribution. The maximum capped benefit payments coming into force in April 2013 exclude disability living allowance – so therefore these households actually receive more income in benefits than the classes of vulnerable resident that we have outlined. A typical 10% contribution is likely to be more manageable for vulnerable residents (including those on Disability Living Allowance) – using the Band D council tax example it would be around £11 per month rather than a more unmanageable £22. We think Brent Council should model the 10% liability for all working age persons as opposed to having any exemptions to see if this would prove viable.

Council Commentary

A financial model based upon a minimum contribution of 10% with no protection for any groups has been considered but this would only achieve £2,685,013 gross savings in 2013/14 against a funding deficit likely to be in the range of £2.7M and £3.8M for that year based upon the proposed mitigation by using revenue from Council Tax exemptions and discounts changes being agreed. The potential impact on the gross savings figure arising from estimated collection rates during that year means that the net saving arising from a 10% contribution is likely to be nearer to £2.14M based upon an 80% collection rate. This would mean that a funding deficit would still exist and need to be met from other sources. The 90% fixed grant proposed by the government is based upon 2010/11 expenditure levels and therefore does not take account of growth in caseload and expenditure. It also takes no account of any potential changes in Council Tax levels. Whilst mitigation has been proposed in the form of additional revenue from changes to discounts and exemptions, this still leaves a funding deficit to be addressed.

Council Tax Payers will be able to elect to pay their monthly instalments over 12 months from April 2013 unlike the 10 offered at present and payment arrangements may be available in certain instances to assist with the financial effects of the change.

The Council's anti-poverty strategy and recovery policy for Council Tax will be reviewed in consultation with other key stakeholders to incorporate changes agreed.

Brent Council has said it is doing an equality impact assessment of how the proposals affect particular households, and which percentage of households with a new personal liability to pay 20% of their council tax are also going to be affected by the new capped benefit payments. We think the results of this assessment should be looked at closely in order to determine if there are further classes of people that should also receive exemption from the requirement to pay the minimum 20% contribution. In addition Brent Council should publish the findings of this analysis for organisations submitting a response or expressing an interest in this consultation. We are also concerned about households that have a history of failing to manage their financial affairs and making rent and other household payments on time, and believe they will be negatively impacted by needing to meet council tax payments. To offset this the Council needs to ensure some way of ensuring a direct payment mechanism where it is obvious that a vulnerable resident is failing to cope: although there is no longer to be an actual benefit credit that covers council tax, there needs to be some way that where arrears have reached a dangerous level for the household that they can have their 20% contribution paid directly out of their overall benefit/ Universal Credit payment.

In addition we think that Brent Council could assist with benefit claimants' ability to meet their council tax contribution by aligning the day a households council tax payment is due with the new monthly benefit payment cycle that will be introduced under Universal Credit.

Council Commentary

An Equalities Impact Assessment has been conducted for the proposed Council Tax Support Scheme and this is set out in Appendix D to the main report.

Careful consideration has been given to the level of minimum contribution required to meet the anticipated funding gap as a consequence of the proposed funding changes. However, it is clear that a level set below 20% would not deliver the level of reduction in expenditure needed to meet this.

A financial model based upon a minimum contribution of 10% with no protection for any groups has been considered but this would only achieve £2,685,013 gross savings in 2013/14 against a funding deficit likely to be in the range of £2.7M and £3.8M for that year after the provision of additional revenue anticipated from the proposed changes to discounts and exemptions. The potential impact on the gross savings figure arising from estimated collection rates during that year means that the net saving arising from a 10% contribution is likely to be nearer to £2.14M based upon an 80% collection rate. This would mean that a significant funding deficit would still exist and

need to be met from other sources. (i.e. between £0.56M and £1.66M based upon the above figures).

It is known that there are currently 2,440 Council Tax Benefit claimants that will be affected by the Benefits cap from 1st April 2013 and which represents approximately 10% of working age claims. The introduction of the Benefit caps is a national scheme for which the effects are not therefore incorporated within the Equalities Impact Assessment for the Council Tax Support Scheme. However, a review of the Council's Anti-Poverty Strategy and Recovery Policy will be undertaken in consultation with other key stakeholders to ensure that these incorporate scheme changes agreed. Additionally, 12 monthly instalments will be available to Council tax Payers that elect to pay by that method from 2013 rather than the 10 currently available at present and payment arrangements will also be available in certain circumstances.

Alternative options submitted through the consultation process for additional classes to receive protection have been considered and the results from consideration of these are set out within this report.

The Council will consider the potential for aligning Council Tax payment dates with the new monthly benefit payment cycle for Universal Credit as part of its preparations for next year.

Q.6. Please provide any additional comments.

We think that Brent Council has much to do in terms of awareness raising for affected households that previously had 100% of their council tax covered by council tax benefit. It needs to be made clear to these households that they will have a liability to pay something from next April and they also need to be made aware of the payment options available to them. In addition it would be worth further raising the profile of the current consultations around the draft proposals for the local council tax support scheme before they are considered by Cabinet to ensure that affected households have a further opportunity to raise any concerns before proposals are finalised by Brent's elected councillors.

We also think that Brent Council should publish its proposals for adapting its strategy for tackling council tax arrears for households. There will need to be support and advice given to households that fall into council tax arrears (and may in fact have multiple debts such as rent arrears and utility bills) which will require an approach different to that currently undertaken for the recovery of council tax arrears (ie court summons, private debt recovery agencies, and jail in worst instances).

Council Commentary

A communications and publicity campaign is being developed to ensure that the proposed changes and their impact upon residents and stakeholders are communicated significantly in advance of their effective date next year. This will include instalment payment options and methods of payment and it is

proposed that residents will be offered the option of paying by 12 monthly instalments next year rather than the 10 at present.

As set out earlier in this report, a considerable effort was made to obtain responses and obtain the views of both residents and other stakeholders through the consultation and engagement process that unfortunately was not represented by the volumes of responses received. Further consultation beyond the agreed timescale was not possible due to the need to obtain Full Council approval to the local scheme by 31st January 2013 latest and to fit with the Council's budgetary timescale as well as to obtain the software, test it and prepare for Council Tax annual billing.

The Council will be reviewing its anti-poverty strategy and Recovery Policy in consultation with other key stakeholders to ensure that it incorporates the changes needed as a consequence of implementing the Council Tax Support Scheme.

Capita Comments

The following comments were submitted by Capita under the consultation arrangements conducted:

“We understand that, for many local authorities, the 10% shortfall in funding following the abolition of Council Tax Benefit represents a significant funding gap that cannot be met from Councils' finances. We therefore understand your approach in the design of a localised scheme that addresses the reduction in funding in an equitable manner. We are involved with a number of local authorities in the implementation of Council Tax Support and we are acutely aware of the difficulties that are being faced when designing local schemes.

Having reviewed Brent's proposed scheme we believe that the overarching approach of a minimum contribution for all working age claimants is consistent with many other Councils and that this represents a straightforward mechanism that is clear in its aims, through the structure of the six key principles, and easy to understand.

However, we also welcome the additional elements of the scheme that address the underlying DCLG requirements:

The protection of certain vulnerable groups (disability or war pension) and the funding of the protection through additional scheme design elements; and

Providing incentives to work through an increase in the earnings disregard and the retention of a taper that prevents a cliff edge reduction in entitlement. However, we would like to mention that the DCLG makes specific reference to the requirement to consider the obligations imposed by the Child Poverty Act 2010. We appreciate that this may form part of the Council's Equality Impact Assessment but any

such consideration is not immediately apparent from the consultation documentation. In reviewing the proposed scheme we have also given consideration to the potential impact when the level of support for particular claimant groups is reduced. We are sure that the Council is aware of the likely impact on operational and customer facing resources but want to raise the issue of Council Tax collection as an area that requires further discussion. As a result of reduced support, specific claimant groups will either have increased or new liabilities that will result in an increase in the number of small debts that have to be collected from those with the least ability to pay.

We believe that this will lead to increased collection costs and reduced collection levels and the Council will also need to consider its approach to enforcement in relation to such debts. We would also add that the impact of additional welfare reforms (under occupancy and the benefit cap) also has the potential for one or more of these reforms to adversely affect individual households. The cumulative loss of benefits, for those unable to make up the shortfall, will cause increased financial instability with decisions having to be made as to what is the most important bill to pay including basic household expenditure.

For Councils this is likely to mean that arrears for both Council Tax and rent increase with limited scope for a proportionate improvement in recovery.

Consideration will therefore need to be given to the impact of recovery and operational costs. As stated above, your proposal for the scheme will undoubtedly have an adverse impact on collection performance and lead to increased customer contact. Capita would therefore welcome formal discussions to review the existing contractual requirements and the potential increased costs of collection

Council Commentary

The draft scheme was a proposal for consultation intended to obtain the views and comments of stakeholders concerning the proposals and to enable the Council to give due consideration to these when making its decision on a final scheme for recommendation.

In the main report to the Executive, obligations concerning the Child Poverty Act have been set out. To this extent, the scheme proposes for example to completely disregard Child Benefit income received within a claimant's household. Additionally, the applicable amount to be used for calculating Support entitlement will comprise personal allowances for children thus ensuring that households with children have a higher applicable amount to reflect their basic living needs. The proposed scheme increases the earnings disregard by £10 per week for single parents and families thus enabling them to earn more before their Benefit entitlement is affected. The child care disregard of £175 per week for one child and £300 for two or more children

permitted where the claimant or their partner works at least 16 hours per week and other qualifying criteria are met, also addresses this requirement.

An initial meeting has been held with Capita to review any potential impact arising from the proposals in terms of both contractual arrangements and operational matters and this will continue over the coming months to determine the operational and cost implications of the recommended scheme.

As has been outlined already within this report, there will be the facility for Council Tax Payers to pay their monthly instalments over twelve months next year rather than the ten available at present and payment arrangements may be available in certain circumstances. The anti-poverty strategy and recovery policy will also be reviewed in consultation with key stakeholders in preparation for the implementation of the scheme.

Khalida Khan - An-Nisa Society

We would like to support the Citizen Advice Bureau's response. We are unable to complete the questionnaire due to lack of time.

Council Commentary

The Council commentary to the CAB proposals has previously been set out in this report and applies equally to the An-Nisa Society.

Catalyst Housing Response

Catalyst Housing Association commented upon their concerns with the cumulative impact of Welfare Reform changes on their residents. They stated that households wholly reliant upon benefit were already adversely affected by the Welfare Reform Act and unlikely to be able to cope with additional financial burdens imposed upon them. They also stated that households with four or more dependent children (disproportionately represented by ethnic minority and non-Christian groups) and those who are under-occupying and unable to move due to a lack of suitable alternative accommodation would have significant amounts to pay out of the 'living costs' element of Universal Credit to make up the shortfalls due to the total benefit cap and the 'bedroom tax'.

They did not think it reasonable to reduce the disposable incomes of the poorest further by making them pay a minimum contribution towards their Council Tax and indicated that their experience from Community Charge was that more money was spent recovering arrears from people on benefit (arising from the 20% contribution payable by those receiving Income Support) than was collected and suspect that if the Council were to implement their proposals, this would occur again and not achieve the Council's financial objectives.

They did not consider that the Local Council Tax Support scheme should be used to incentivise work as the design of Universal Credit already does this through larger disregards, absence of total benefit cap for those who work and more generous childcare costs.

They agreed that non-dependent deductions should be increased, and agreed with the abolition of the second adult rebate. They were ambivalent about any change to capital limits.

Council Commentary

The Council's recommended scheme proposes that CTS recipients pay a minimum of 20% towards their Council Tax (unless protected) and has been determined based upon the anticipated funding deficit that the Council is likely to experience from 2013/14 after allowing for proposed changes to Council Tax discounts and exemptions. Any reduction in the level of minimum contribution will need to be met from other sources including the Council Tax Payer and / or reserves. A reduction in the level of the minimum contribution has been modelled but would not achieve the required reduction in expenditure levels to meet the anticipated funding gap without significant changes being made elsewhere within the scheme or alternative sources of funding. Council Tax instalments will be available over twelve months next year rather than the ten at present and payment arrangements may be available in certain circumstances. The anti-poverty strategy and recovery policy will both be reviewed in consultation with key stakeholders in preparation for the implementation of the agreed scheme.

The Council has considered the effects of its proposed CTS scheme within its Equalities Impact Assessment and the results of this are set out in Appendix D to the main report to the Executive.

The Government published draft regulations stating that a Billing Authority must have regard to any guidance issued by the Secretary of State. A Policy Statement of Intent concerning work incentives published by the CLG has been considered and incentives have been included within the recommended scheme accordingly. As such, it is considered that the Council would need to have compelling reasons for not providing a work incentive within its scheme. Consequently, this proposal has been discounted.

As the Council's proposals to increase non dependant deductions and cease second adult rebate for working age claimants has been agreed and the response was ambivalent towards capital limit changes, no further response is required for these comments.

Consultation Questionnaire Responses – Free Text Responses

The following highlighted free text questions were included within the consultation questionnaire and are included within this report for completeness and consideration. A commentary has been made in relation to comments and proposals submitted where appropriate. In some cases, the response may be summarised.

Question 3: With reference to Principle 2 set out above and further explained in Appendix B, please give details of any other groups that you believe should be protected and give reasons why.

There were a range of responses to this question with some respondents giving a range of possible options and other respondents giving no response. Consequently, the number of options provided does not equate to the 184 responses received.

Comments have been grouped into specific themes for the purposes of this report and can be summarised as set out below. Due consideration that has been given to each of the responses below where appropriate and should be cross referenced to the Equalities Impact Assessment conducted for the purposes of the Council's recommended scheme.

Job Seekers Allowance and Universal Credit

There were seven proposals for this option out of the 184 responses received. From October 2013, existing cases of Job Seekers Allowance (income Based) will commence migration across to Universal Credit. Contributory based Job Seekers Allowance will however remain separate. Providing protection merely for contribution based job seekers allowance recipients will not be reasonable and appropriate if income based recipients of job seekers allowance do not receive protection also. As Universal Credit will be for in and out of work claimants, the distinction between the various claimant circumstances will be administratively more complex to identify.

As Universal Credit will also include Income Support recipients, Employment and Support Allowance (Income Related) and Working Tax Credit, this would effectively mean that the existing "passport" caseload plus some existing "non-passported" cases could be eligible for protection under this proposal.

Achievement of the savings needed to meet the Council's funding deficit under this proposal would not be met as 60% of the existing caseload is passported.

It is also considered that protection for claimants receiving job seekers allowance would not contribute towards the Council's proposals to incentivise work.

In view of the above, this option has not been progressed.

Carers

Under this category, one respondent proposed an extension of the protection for carers who were aged less than 18 and looking after adults resident in the property. Under Council Tax statute, such carers would not be liable for Council Tax being aged less than 18 and consequently would not be eligible for Council Tax Support. The adults being cared for may be eligible for protection if they are within the classes of persons recommended for protection with the Council Tax support scheme or may entitle the Council Tax Payer to a "status" discount or Disabled Persons Reduction subject to meeting qualifying conditions.

The other 3 responses received concerned carers either in receipt of Income Support or living with the person that they care for. In view of the responses received concerning protection for carers both from individuals and other organisation comments set out above, it is proposed that protection from the 20% minimum contribution be provided to the claimant or their partner where they receive carers allowance on the basis that such persons have a limited capacity to increase their income and earning potential as they are providing care for 35 hours per week and predominantly to disabled persons and that the cost of the protection as set out in the main report to the Executive can be met without significant changes having to be made elsewhere within the scheme or by the need to find alternative sources of funding.

People not working

This proposal from one respondent could potentially apply to a large proportion of the existing caseload and would not therefore achieve the financial savings required from within the scheme to meet the anticipated funding gap. Additionally, provisions to be established for someone not working may need to be determined and would be administratively complex to operate and enforce. This proposal has not therefore been progressed further.

Vulnerable persons

There were 5 proposals concerning protection for this group. The Council has set out within its proposed scheme its definition of vulnerable persons proposed for protection. Consideration to other potentially “vulnerable” groups has also been considered as part of the scheme design with reference to consultation responses, considerations issued by the DCLG in its Policy Statement of Intent and as set out elsewhere within this report and the main report to the Executive. The definition for vulnerable persons entitled to protection has been extended following the consultation undertaken and is now proposed to include recipients of carers allowance and recipients of guaranteed income payments under the Armed Forces Compensation Scheme.

Disabled

There were 12 respondents that suggested protection for disabled persons. The recommended scheme already provides protection for disabled persons.

Terminally ill

There were 2 respondents proposing protection for such persons. The recommended scheme provides protection for terminally ill claimants in receipt of Disability Living Allowance / Personal Independence Payments. A person with a terminal illness will be fast tracked on to a guaranteed payment of the enhanced rate of the Daily Living component of Personal Independence Payment without having to satisfy the qualifying period or the prospective test.

They will also be able to apply for the Mobility component and receive that immediately if they qualify. Consequently, protection from the 20%

contribution towards Council Tax will be applicable at an earlier stage in such cases.

Additionally, entitlement to a disability premium and hence protection from payment of the minimum 20% contribution applies where a claimant is incapable of work and has been for 28 weeks if they are terminally ill. This route helps people to qualify for a disability premium where they are incapable of work but do not get incapacity benefit.

It may also be possible for such claimants to seek financial assistance under new Social Fund arrangements that will be transferring from the DWP to the Council from 1st April 2013.

Persons of pensionable age

There were 15 respondents that proposed protection for this group. The recommended scheme already provides protection for persons of pensionable age.

Persons resettled from a hostel

There was one respondent that proposed protection for this group. Protection for persons resettled from a hostel for a specific period has been considered but it is currently understood that this may not be achievable within the proposed software functionality. Additionally, unlike other groups indicated for protection under the proposed scheme, such persons may not be constrained in terms of their income or earnings potential and therefore protection has not been progressed. However, the Council proposes to extend the minimum number of monthly instalments for Council Tax Payers from 10 to 12 in line with proposed statute change and will work closely with Housing Associations, the Council's Housing Department and Brent Housing Partnership to ensure that an application for Council Tax Support is promptly submitted in such circumstances. Payment arrangements may be applicable in certain circumstances and the anti-poverty strategy and recovery policy will be reviewed in consultation with key stakeholders to ensure that they incorporate required changes in preparation for implementation of the scheme agreed.

Persons on a low income (including on minimum wage)

There were 7 respondents that proposed protection for this group. The proposed Council Tax Support scheme already provides support to persons on a low income with those on the lowest incomes being entitled to the most support. Protection from the requirement to pay the minimum contribution of 20% is to be given for vulnerable persons including disabled persons, carers and war widows and widowers. Persons of pensionable age shall receive 100% Benefit entitlement where they are in receipt of pension credit guarantee credit.

As income increases above basic living needs, the amount of entitlement to support shall be withdrawn at a rate of 30 pence in the pound thus preserving this characteristic.

Additionally, no non dependent deduction shall be applicable for example where a non dependent receives Income Support.

This proposed option would require the definition of a low income to be determined and the provisions to be applied in such cases. It is considered that such a system would be complex to establish and difficult to maintain particularly in the changing environment and economic circumstances. As a consequence, this option has not been progressed.

Medical grounds (inc. Employment Support Allowance Care Component)

There were 5 respondents that proposed protection for this group. The proposed scheme already provides protection for claimants where they are in receipt of Employment Support Allowance with the care component by virtue of their entitlement to a disability premium that is one of the protected groups.

Additionally, where a claimant is long term sick, they may qualify for a disability premium if they are incapable of work for 28 weeks if they are terminally ill and 52 weeks in any other case. In such circumstances, they would also be protected from the requirement to pay the minimum 20% Council Tax contribution. Receipt of Employment Support Allowance (Income Related) is also disregarded as an income in assessing entitlement to CTS.

Severe learning disorders

There were 3 respondents that proposed protection for this group. The proposed scheme already provides protection for claimants in receipt of Disability Living Allowance and Employment Support Allowance (Care Component). Additionally, existing Council Tax statute provides an exemption for a Council Tax Payer that meets the qualifying criteria for “severely mental impairment” where they are the sole adult resident. Additionally, such persons are not jointly and severally liable where they would normally be treated as having a joint liability with other residents. Accordingly, in such circumstances, they would not have any Council Tax liability and hence entitlement to CTS would not be applicable.

Other Social Issues (e.g. debt)

There was 1 respondent that proposed protection for this group. This option would be complex to administer as potentially the “social issue” would need to be identified and evaluated and may be difficult to determine. Additionally, it is currently understood that the proposed software functionality may be unable to support the provision of protection for this group. However, the Council has an anti-poverty strategy and will review this and the recovery policy applied to enforcing Council Tax payments in consultation with key stakeholders to ensure that these are consistent and compliant with equality requirements. The provision of 12 monthly instalments for Council Tax collection increasing from the existing 10 will also assist those Council Tax Payers that take up that option. The Council will also be reviewing its anti-poverty strategy and recovery policy in consultation with key stakeholders to determine the approach to be applied in such cases.

Persons recently unemployed

There was 1 respondent that proposed protection for this group. This option would be complex to administer as potentially the reasons for unemployment and the duration of “recent” would need to be determined to assist in the evaluation of entitlement and the provisions to underpin this are anticipated to be administratively complex to apply and enforce. Protection for this group may also be inconsistent with the scheme aim of incentivising work.

Joint Tenants (where the other tenant does not contribute)

There was 1 respondent that proposed protection for this group. The proposed scheme does not provide protection for joint tenants where the other tenant does not contribute. Existing Council Tax statutory provisions address joint and several liability requirements and this matter is considered to be a civil matter for the respective tenants to resolve between them.

Council Tax statute provides that joint tenants are generally jointly and severally liable to pay Council Tax and the fact that one of the tenants does not pay, does not prevent the Council from enforcing payment against either or both the tenants concerned.

It is also worth noting that the existence of this issue would arise irrespective of the Council Tax Support scheme. It is therefore not proposed that this option be progressed further.

In receipt of Benefits

There were 4 respondents that proposed protection for this group. Without a precise definition of what specific Benefits should be considered for a claimant to be eligible for protection, such a definition would be administratively difficult and potentially costly to operate. The proposed scheme does however provide that certain Benefits received and to be used in the calculations for assessing entitlement will be disregarded in full including for example Income Support and Employment Support Allowance (Income Related) thus ensuring greater entitlement to Support in such cases.

Additionally, non dependent deductions will not be made where the non dependent is in receipt of Income Support for example.

Looking for work

There were 2 respondents that proposed protection for this group. This option would be administratively difficult to administer as the definition of “looking for work” would be difficult to determine and evaluate compliance and thus enforce. This option has therefore not been progressed further.

No savings

There was 1 respondent that proposed protection for this group. The recommended scheme does not provide protection for persons with no savings although there is a cut-off limit of £6,000 above which persons will not be entitled to Council Tax Support. Protection for claimants with no savings is anticipated to be prohibitively expensive due to the volumes of claimants with

no savings, it would be difficult to administer and could have an adverse policy effect with the potential for savings being eroded to gain protection against the 20% minimum contribution and thus requiring an intention in reducing the savings to be established in such cases to prevent abuse of the policy. As such, this option will not be progressed further.

Working class people should pay

There was 1 respondent that proposed protection for this group. It is not intended to progress this request further as the definition of a working class person is subjective and could not be identified using the proposed software functionality. If the respondents comment is intended to refer to claimants that are working, this proposal would also be difficult to administer and may not be achievable within the proposed CTS software functionality. The Council's proposed scheme addresses this requirement by incentivising work through increased earnings disregards. The taper of 30% for higher earners reduces potential entitlement to support and ensures that persons on lower incomes potentially receive a greater entitlement.

Football fans

There was 1 respondent that proposed protection for this group. It is not intended to progress this option further as the definition of a football fan is subjective and may not be identified using the proposed software functionality. Additionally, protection for this group would not support the CLG's suggested groups for consideration as set out in their Policy Statement of Intent.

Young adults aged 16 to 30 in full time education or learning and living with parents

There was 1 respondent that proposed protection for this group. Young adults aged under 18 are exempt from Council Tax liability. If they are aged 18 to 30 and living with their parents, it is likely in many cases that their parents will be the Council Tax Payers for the home. Where the liable person for Council Tax is a student and they live on their own, they will normally be exempt under Class M or N of the Council Tax exemptions. Students will be eligible to apply for Council Tax Support in certain circumstances where they meet qualifying criteria such as in the case of single parents or couples where they are both students with responsibility for a child or young person. Additionally, where students qualify for a disability premium, they will be treated as eligible for protection from the requirement to make a minimum 20% Council Tax contribution. It is not therefore proposed to progress this option further.

Persons attending courses for education to improve employment prospects

There were 2 respondents that proposed protection for this group. Persons attending full time courses of further and higher education that are liable to pay Council Tax may be exempt from Council Tax liability under the Class M and N Council Tax exemptions. Students will be eligible to apply for Council Tax Support in certain circumstances where they meet qualifying criteria such as in the case of single parents or couples where they are both students with responsibility for a child or young person. Additionally, where students qualify for a disability premium, they will be protected from the requirement to make a

minimum 20% Council Tax contribution. It would be administratively difficult to link attendance on a course of education with an intention to improve employment prospects as this could potentially apply to all courses undertaken. It is not therefore intended to progress this option further.

Young Adults

There was 1 respondent that proposed protection for this group. No definition of what constitutes a young adult has been provided and some young adults may possess significantly more capital or income than others. Consequently, protection for this group would be administratively complex and therefore this option has not been progressed further.

Single Parents

There were 19 respondents that proposed protection for single parents.

There was within the 19 responses, a distinction made in some cases between single parents working and those not working and also the ages of the children.

In all such cases, it is currently understood that the proposed CTS software may not permit the protection of single parents although the financial implications of providing protection are set out below.

Working

It has been identified that 2,803 existing Council Tax Benefit recipients could potentially benefit from protection if the software were to permit it.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent a gross increase in expenditure of approximately £510,392 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent a gross increase in expenditure of approximately £574,191 that would need to be found from other sources.

Not Working

It has been identified 5633 existing Council Tax Benefit recipients could potentially benefit from protection if the software were to permit it.

Although it is not possible to identify the precise financial effects of protection for this group, applying a Band C and Band D Council Tax amount to the number of claims potentially affected indicates the following:

Band C

There are 4739 claims where no other adult resides with the claimant and therefore 20% protection for this group would represent a reduction of £862,915 after the application of a single person discount.

There are 894 claims where there is another adult residing with the claimant other than their partner and therefore 20% protection for this group will represent a reduction of £217,048.

Total financial implication of protection for Band C = £1,079,963.

Band D

There are 4739 claims where no other adult resides with the claimant and therefore 20% protection for this group would represent a reduction of £970,779 after the application of a single person discount

There are 894 claims where there is another adult residing with the claimant other than their partner and therefore 20% protection for this group will represent a reduction of £244,180.

Total financial implication of protection for Band C = £1,214,959.

The additional cost of providing protection for this group would need to be found either elsewhere within the scheme or from alternative sources and would represent a significant cost reduction to be found. It is also possible that the application of protection for this group could potentially lead to an adverse policy effect resulting in more cases of single parents in order to benefit from the effects of the protection and single person discount. It has not therefore been progressed further.

Families

There were 11 respondents that proposed protection for families distinguishing in some cases between the ages of the children or whether the parents were in receipt of Income Support.

In all instances, it is currently understood that the proposed CTS software may not permit the protection of families with children irrespective of their age. However, the financial implications of each have been determined to consider whether they could be financially viable.

Aged 3 and under

It has been identified that 4,446 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families with children aged 3 and under.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £1,079,418 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £1,214,344 that would need to be found from other sources.

Aged 5 and under

It has been identified that 6,486 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families with children aged 5 and under.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £1,574,697 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £1,771,534 that would need to be found from other sources.

Aged 12 and under

It has been identified that 10,729 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families with children aged 12 and under.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £2,604,829 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £2,930,433 that would need to be found from other sources.

Aged 16 and under

It has been identified that 12,233 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families with children aged 16 and under.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £2,969,976 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £3,341,223 that would need to be found from other sources.

Aged 19 and under

It has been identified that 12,886 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families with children aged 19 and under.

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £3,128,515 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £3,519,579 that would need to be found from other sources.

In receipt of Income Support

It has been identified that 3,767 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS) could potentially qualify for protection if the software were to permit it for families in receipt of Income Support with children.

Income Support may be used as a means for protecting cases from the minimum 20% contribution but it is currently understood that this may only be applied to all Income Support Cases or none at all within the proposed software functionality. If all of the Income Support cases were to be protected from the effects of paying the minimum 20% contribution, the funding deficit would be increased by a potential gross amount of £1,113,906 and net £891,124 that may need to be found either by reducing the amount of protection for other groups, increasing the minimum contribution payable under the scheme or funding the protection from other sources.

In view of the financial implications as set out above, the protection would be financially unviable unless significant changes were to be made to the scheme elsewhere or other sources of funding were to be identified. In view of the above, this option has not been progressed further.

None / Not applicable

There were 9 respondents in this group. No response is necessary for this option as the respondents had no further comments to add to the Council's draft proposals.

Do not agree with proposals

There were 2 respondents that gave this response. No response is given below to this proposal as the respondents did not give any further comments to support their answer to this question.

Fair principles

There was 1 respondent for this group. No response is necessary for this option as the respondent agreed that the draft proposals were fair.

Everyone should pay

There were 2 respondents for this group. No response is necessary for this option as the respondents merely confirmed what was proposed within the draft scheme by the Council in terms of a minimum 20% contribution unless protected.

Forgot page

There were 2 respondents for this group. No response is necessary for this option as the respondents made no further comments to add to the Council's draft proposals.

Other

There were 10 responses where the respondent expressly indicated that they had no further comments to make.

Please add any additional comments to support your responses to questions 1 and 2 on our proposed changes or any alternative options you would like us to consider and your reasons.

The free text responses to this consultation question are set out below together with a commentary where appropriate. In some cases, the response may be summarised rather than repeated in full.

Jobseekers Allowance is insufficient to pay all the bills now. Whilst £6,000 is too low a threshold, this should be £20,000.

Council Commentary

Alternative options of ensuring that scheme expenditure is within revised funding levels have been explored and are set out within the main report. Reducing the minimum contribution has been explored with a 10% level of contribution applied and no protection for any groups but this would not be sufficient to achieve the level of expenditure reduction required due to other

factors including the effects of growth in caseload since 2010/11 and potential changes in Council Tax levels.

Increasing the capital cut off limit would have the effect of increasing potential eligibility to entitlement and hence expenditure at a time when the funds available for financing the scheme are reducing. It would also have the potential effect of diverting scarce resources (i.e. funds) away from those most in need by providing a situation where someone with significant savings could receive support thus reducing the amount of finance still available to provide support for others.

The cost of providing protection to persons in receipt of Job Seekers Allowance would be an additional £0.6M that would need to be found either from elsewhere within the scheme or from alternative sources of funding. This option has therefore not been progressed.

Most vulnerable in society otherwise alienation = breach of H. Rights.

Council Commentary

The proposed Council Tax Support Scheme provides protection for the most vulnerable including persons of pensionable age, persons in receipt of a war pension or war disablement pension and qualifying disabled persons. As a consequence of the consultation it is also proposed to extend the protection to include carers that are in receipt of a carer's allowance.

Any proposals must be proposals that are not just workable but enforceable too. All evasion of taxes should be pursued. Anyone who claims advice and assistance from a Council service, the adults should automatically be added to the address they use for Council Tax purposes.

Council Commentary

The proposed Council Tax Support Scheme has been designed to be workable and enforceable. The Council will continue to investigate and prosecute cases where appropriate if Fraud is identified. Adults living in a property are added to an address if it would be compliant with Data Protection provisions.

People are going to be on the crisis line as you will be increasing the Council Tax

Council Commentary

The proposed Council Tax Support Scheme will provide support for those most in need within the financial resources available and with protection for

certain groups of claimants. Certain incomes and capital types specified within the scheme will be disregarded either in full or in part such that it will not affect entitlement and an additional £10 per week in earnings will be permitted to be received without it affecting entitlement to support. Council Tax Payers will be able to elect to pay by 12 monthly instalments from April 2013 and payment arrangements will be available in certain circumstances. The Council's Anti-Poverty Strategy and Recovery Policy will be reviewed in consultation with key stakeholders to take account of the proposed changes and ensure that the approach taken to collection represents local need.

People in receipt of means tested benefits must be individually assessed. This means that those most in need should not pay anything like now with Council Tax Benefit.

Council Commentary

The reduced funding available from central government in the form of a 90% fixed grant based upon 2010/11 expenditure means that the existing national scheme provisions need to be reviewed the purposes of the Council Tax Support Scheme. The protection of certain groups of claimants from the requirement to pay a minimum 20% contribution towards Council Tax means that other claimants will have to pay more as a consequence. Alternative options concerning protection have been outlined within this report.

I do realise that the budget is less as the local authority has now taken control and it is not government funded. The most well off should be able to subsidize the less well off residents.

Council Commentary

The proposed Council Tax Support Scheme is intended to ensure that those who have a genuine need receive support and that those who receive a higher income receive less entitlement through the effects of the taper. Protection from the minimum 20% contribution towards Council Tax is given to disabled persons and persons of pensionable age for example where qualifying criteria are met.

In question 1, it was difficult to put in order of importance, as I feel all points are equally important.

Council Commentary

Respondents were asked to rank each of the Council's principles in order of importance. This was to ensure that a consistent approach was adopted and to enable the analysis and evaluation of the results to be more easily determined.

We should not be paying any benefits which total exceeds average earnings, irrespective of how many children are in the family.

Council Commentary

This comment has not been progressed as it would be administratively complex to implement and maintain. Proposed software functionality is currently understood to be unable to apply a single average earnings figure above which entitlement would cease. Additionally, an average earnings figure would be difficult to determine as it would need to potentially have regard to national, local or even ward figures as well as the type of industry, days of work, etc.

Single mothers with a child should not automatically be given a flat.

Council Commentary

As this response does not appear to relate to the proposed Council Tax Support Scheme, no comment has been made.

People claiming Council Tax Benefit do so because they cannot afford to pay the whole amount. They are already on low income. A contribution requirement from them will only cut into their already low incomes.

Council Commentary

The Council will have a reduced amount of funding provided from April 2013 in the form of a fixed grant based upon 90% of the Council Tax Benefit expenditure incurred for 2010/11. In order to provide support to those who most need it within the smaller financial resource available, it has been necessary to review the provisions that are applied to determining entitlement. The Council proposes to provide partial mitigation against the minimum contribution by way of making changes to Council Tax discounts and exemptions. Additionally, 12 monthly instalments will be available to Council Tax Payers from next year rather than the existing 10 and payment arrangements will be available in certain circumstances.

Also, those that are renting will find that landlords may have to lower rents if they want to keep their tenants. This is a push to lower rental areas. This is not good for a diverse population (lower rents would be required as tenants can't pay CTS from their income & rent).

Council Commentary

The reduction in rental levels that has been suggested in this response may assist in the availability of affordable accommodation within the Borough

generally. However, it is uncertain as to whether the introduction of the proposed Council Tax Support Scheme would have the effect of reducing rents within the Borough as other economic and environmental factors are considered more likely to have this impact including for example other proposed welfare reforms.

Working families with children under 16 should be protected, to keep families together and encourage families to work

Council Commentary

The cost of protecting families with children under 16 would potentially affect 12,233 Council Tax Benefit recipients (not already identified for protection under the recommended scheme for CTS).

If a Band C Council Tax of £1213.92 per annum were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £2,969,976 that would need to be found from other sources.

If a Band D Council Tax of £1365.66 pa were to be applied, protection from the effects of the 20% minimum Council Tax contribution for this group would represent an increase in gross expenditure of approximately £3,341,223 that would need to be found from other sources.

The cost of protection for this group would require an equivalent amount of financial savings to be identified from other claims within the scheme and would be in addition to any other protection for groups that may be considered eligible.

As it is currently understood that the proposed software functionality may be unable to provide protection for families with children and the costs of the protection would be significant and require changes either elsewhere within the scheme or from alternative sources of funding, it is not proposed to progress this option further.

Adult sons and daughters do not have the money to pay towards the household bill. Unfair to ask the adult children to pay the money, they may participate in events that are not good for the community e.g. crime

Council Commentary

The level of deduction and the circumstances in which it is applied are based upon whether the non dependent adult resident in the claimant's home is in work and their level of earnings and if not, the type of unearned income received. No deduction is proposed for example where the non dependent is in receipt of Income Support or the claimant is receiving Disability Living Allowance.

Provide more job opportunities

Council Commentary

The Council aims to facilitate economic development and hence job opportunities through the services it provides and the policies it implements. However, this is also dependent upon national and economic circumstances. The provision of job opportunities is outside of the scope of the Council Tax Support Scheme that aims to provide support to persons in genuine need and is required to contain the matters set out in regulations.

Reduce the 20% to 5% contribution.

Council Commentary

A 5% contribution would not enable the funding gap to be bridged and therefore this proposal has not been progressed further.

Everyone should pay 10% rather than the 20% proposed which is more affordable.

Council Commentary

A 10% contribution has been modelled but this would not enable the funding gap to be bridged and therefore this proposal has not been progressed.

Q1 = Only those who have enough earning should pay the 20%,

Q2 = The most vulnerable should be protected

Council Commentary

The Council proposes to provide protection for vulnerable persons including disabled persons, carers and persons receiving war pensions. Persons of pensionable age will also be protected from the requirement to pay 20%. Other claimants will be required to pay the minimum 20% under the proposed scheme but will be able to elect to pay their monthly instalments over 12 months rather than 10 next year and payment arrangements may be available in certain circumstances. The Council's anti poverty strategy and recovery policy will be reviewed in consultation with key stakeholders in preparation for the implementation of the agreed scheme and will set out the manner in which persons experiencing payment difficulties may be supported.

I feel that people on Jobseekers Allowance should not be penalised through these proposed changes. People who live in big properties should contribute more as they can afford to purchase those form of

homes and people on low-income should be helped with housing benefits & council tax to encourage them to stay in work.

Council commentary

Providing protection for persons in receipt of Job Seekers Allowance may not be consistent with incentivising work as it could have an adverse policy effect if all such persons were protected from the proposed requirement to make a minimum 20% contribution. Additionally, job seekers allowance (income based) will become part of Universal Credit in the future and would therefore need to be considered separately to the contribution based form of the same income. The cost involved in protecting cases of Universal Credit in the future and job seekers allowance currently would require significant savings to be found elsewhere within the scheme or from alternative sources and has therefore not been progressed further.

I found having to rank the principles 1 to 6 in q1 a difficult matter. Principles 1 and 4 - everyone should pay something and everyone in the household should contribute I found difficult to separate in my mind. They seem to me to mean that regardless of age and disability everyone must contribute. I do not think this is possible. Therefore my overriding belief that the scheme should incentivise work but protect the vulnerable has got ranking 1 and 2.

Council Commentary

The comment made appears to explain why the respondent answered question 1 in the way that they did. The Council Tax Support Scheme proposes a minimum 20% contribution towards Council Tax by all claimants unless they are of pensionable age or otherwise protected such as if they, or a dependant in their household is in receipt of disability living allowance for example. The principle that everyone in the household should contribute relates to the situation where other adults are resident in the claimant's home and a deduction is then made from the claimant's support entitlement on the basis that those other adults contribute towards the household bills including Council Tax. It does not mean that everyone should pay their own Council Tax.

More Council properties with cheaper Housing Benefit and Council Tax Benefit

Council Commentary

This comment does not appear to relate to the proposed Council Tax Support Scheme as it proposes more Council properties and cheaper Housing Benefit and Council Tax Benefit.

More Council properties and help those in rented accommodations

Council Commentary

The reference to more Council properties does not appear to relate to the proposed Council Tax Support Scheme. Where a Council Tax Payer resides in rented accommodation, they may apply for Council Tax Support that will be determined in accordance with the Council's local scheme.

Consider the impact of single room rents for under 35 year olds on the proposals

Council Commentary

The single room rent for under 35 year old claimants is a central government decision that does not relate to the proposed Council Tax Support Scheme.

Reduce the saving cut-off amount.

Council Commentary

The proposed Council Tax Support Scheme already has a reduced savings cut-off amount as this has been lowered from £16,000 in the existing Council Tax Benefit scheme to £6,000.

Part-time workers should not pay the full amount for Council Tax.

Council Commentary

The proposed Council Tax Support Scheme aims to ensure that those in receipt of a low income (including part time work) receive support if they meet the qualifying criteria. Where a part time worker is in receipt of a higher income, their entitlement to support may be reduced through the effects of the taper. Part time workers may be protected from the requirement to make the minimum 20% Council Tax contribution if they meet the protected groups qualifying criteria. Part time workers will also be able to retain an additional £10 per week from their earnings without it affecting their entitlement under the proposed scheme.

The options you have given are sufficient

Council Commentary

There is no further comment to make on this.

Do not adopt a 20% contribution but instead adopt a 10% contribution

Council Commentary

The financial effects of a 10% contribution would be insufficient to achieve the level of savings required to meet the finding gap. This proposal has been modelled from a financial perspective as a similar proposal was submitted by another respondent and is separately referenced within the report.

Return the £16k threshold for savings and investments and do not reduce this to £6k

Council Commentary

Where comments have been received concerning this proposal, they have generally been ambivalent to the change as many claimants do not have savings above this level. In order to provide financial resources to those most in need, this proposal has not been progressed further.

Parents with young children need to have savings for emergency so I feel the amount is not sufficient.

Council Commentary

Where comments have been received from the consultation concerning the reduction in capital cut off limit to £6,000, they have generally been ambivalent to the proposed change in capital as many claimants do not have savings above this level. Additionally, it is considered that this level should provide a degree of contingency for potential emergencies. In order to ensure that financial resource is available to those most in need, this proposal has not been progressed further.

2 was entered as the disabled and people with long term illnesses should be protected and their carers

Council Commentary

The proposed Council Tax Support Scheme provides protection for disabled and people with long term illnesses where they meet the qualifying criteria. Carers are also to be included for protection as a consequence of the consultation responses received where they meet the qualifying criteria.

If a household has multiple working age adults surely the decent thing that they should do is all share the responsibility (2 responses)

Council Commentary

The Council proposes to increase existing non dependant deduction rates to ensure that where other adults are living in the claimant's household and they are working, that there is a reduction in support entitlement reflecting the additional income received within the household that may be available to contribute towards household bills.

If pay tax to Council they give helping more for futures

Council Commentary

There is no comment to make on this response.

Benefit amount should be based on the amount that the person contributed previously (Tax, NINO, etc.)

Council Commentary

It is not possible to link the amount that a person has contributed by way of tax and national insurance to the Council Tax Support Scheme as details of those contributions are held by the HMRC and not available to the Council. Additionally, Council Tax Support is not a contribution based benefit. Consequently, this proposal has not been progressed.

No, N/A and None (10 responses)

Council Commentary

There is no response required for these.

Single parents should be considered

Council Commentary

Single persons have been considered for protection under the proposed scheme but it is currently understood that proposed software functionality may prevent this proposal from being achieved. Additionally, the cost of extending protection to single parents has been set out previously and would require either significant change to be made to the scheme elsewhere or alternative sources of funding to be identified. However, single parents will benefit from an earnings disregard of £35 per week compared to that of a couple of £20 and that of a single person of £15. They may also be eligible for weekly child care disregards of up to £175 for one child and £300 for two or more children where the qualifying conditions are met.

Could breach equality duties and fundamental human rights

Council Commentary

The proposed local Council Tax Support Scheme is intended to comply with the Council's statutory obligations.

I believe that all the statements in question 1 are of equal importance and would have scored each with a 1 given the choice.

Council Commentary

The consultation questionnaire proposed a ranking system for question 1 to ensure consistency and facilitate ease of analysis and evaluation of responses.

Nobody is supporting people coming back from war (2 responses)

Council Commentary

The proposed Council Tax Support Scheme provides protection for working age claimants where they or a dependent in their household is in receipt of a war widows or war widower's pension or war disablement pension for injuries or disablement incurred before 6th April 2005. For post 6th April 2005 injuries or disablement, the armed forces compensation scheme may be applicable. The proposed scheme has therefore been extended to apply the latter provision for protection purposes.

I think EVERYONE should pay regardless of circumstance.

Council Commentary

The proposed Council Tax Support Scheme will be subject to reduced funding from April 2013 as a 90% fixed grant will be provided by the Government based on 2010/11 Council Tax Benefit expenditure. The proposed Council Tax Support Scheme incorporating the minimum 20% contribution from Benefit claimants (unless protected) has been determined to meet the anticipated funding gap. The level of contribution has been partially mitigated through proposed changes to Council Tax discounts and exemptions.

I do not think people who work hard in order to NOT be a burden on the state should be penalised with a higher Council Tax

Council Commentary

The proposed Council Tax Support Scheme will be subject to reduced funding from April 2013 as a 90% fixed grant will be provided by the Government based on 2010/11 Council Tax Benefit expenditure. The proposed Council Tax Support Scheme incorporating the minimum contribution has been

determined to meet the anticipated funding gap. The level of contribution has been partially mitigated through proposed changes to Council Tax discounts and exemptions.

Only pay housing benefit to one person per household, ignore any adults they live with, and to no-one under the age of 25 whether they have children or not (unless from abusive background or care home)

Council Commentary

This comment appears to relate to Housing Benefit although it has been presumed for this response that it was intended to relate to Council Tax Support. Council Tax Support will only be awarded to the Council Tax Payer or Payers not other adults resident in their home. Providing support only to those aged 25 and over would mean persons aged 18 to 24 inclusive were potentially adversely affected by the proposed scheme and as such, this may breach the Council's Public Sector Equality obligations. This option has therefore not been progressed.

As I have said above being a single working parent is hard enough and calculations on how much more tenants pay towards council tax should be carefully looked at and put into sections on affording it. For example I find it hard enough working the 16 hours paying towards my rent and council tax and don't feel I could afford to pay anymore and support children. People who are working, standards should stay the same charging those who do not work a small fee is a good start to making them realise working you are better off as this was advice I was giving helped back to work and that incentive is working.

Council Commentary

The proposed Council Tax Support Scheme provides that single parents in work shall be able to retain an additional £10 per week from their earnings without it affecting their entitlement. Additionally, a deduction from Council Tax Support entitlement may be made where another adult resident is living in a claimant's household. Claimants may be eligible for protection from the requirement to make the minimum 20% contribution if they meet the qualifying criteria for disablement, are in receipt of a carers allowance or are in receipt of a war widows or war disablement pension. Charging persons that are not working would be administratively complex and costly to enforce and has therefore not been progressed.

You should not change the previous scheme

Council commentary

The existing Council Tax Benefit scheme is to cease with effect from 31st March 2013. In its place, a Local Authority has to establish a local Council Tax Support Scheme. If this is not determined by the Council by 31st January 2013, the Government will impose a default scheme on the Council. Whilst the default scheme incorporates many of the existing Council tax Benefit features, it will not address the funding gap anticipated as a result of the changing financial arrangements. The Council therefore proposes to change the existing scheme to ensure that it can be financed within available financial resources and can provide support to those persons in genuine need.

With the proposed changes coming into effect at the beginning of the next financial year it seems the perfect time to address the issue of some residents not contributing a fair amount to the council tax.

Council commentary

The proposed Council Tax Support Scheme is intended to balance the need to provide support to those who genuinely need it within the context of a reduced amount of funding available for the provision of support.

Please protect people in joint tenancies that are powerless to force flatmates to contribute and therefore made to cover these payments

Council Commentary

The proposed scheme provides for Council Tax Support to be calculated on the share of the joint tenant's Council Tax liability. Where joint tenants live in a home, they are generally jointly and severally liable for payment of the remaining Council Tax balance irrespective of whether they receive benefit for their share of the Council Tax. This is a feature of the Council Tax statutory provisions and not one that is a consequence of the Council Tax Support scheme.

Getting the rich to pay more, and to cut services, ie, magazine, multilingual literature, etc.

Council Commentary

The proposed Council Tax Support Scheme is intended to target support to those who need it most. To this extent, it is proposed that the savings cut-off limit for the scheme will be £6,000 rather than the £16,000 that exists within the current Council Tax Benefit scheme. Additionally, the amount of entitlement to support is intended to be greater for those in receipt of lower

incomes. The reference to services is a matter for the Council to determine having regard to its spending priorities and anticipated income for the year.

I have always believed every one should be paying something, apart from pensioners but at different rates. It should be based on what you earn or get in benefits. I strongly believe if you, your partner or dependant has a disability you should still contribute to Council Tax even if it is at a different rate, such as £2 a week.

Council Commentary

The proposed Council Tax Support Scheme provides protection for disabled persons from the requirement to make the minimum 20% contribution towards Council Tax. It does not mean in all cases that they will not pay Council Tax although in general they will be eligible for a greater amount of support where they meet the qualifying conditions. The Council has proposed protection for disabled persons having given due consideration to its obligations under the Public Sector Equality Duty and other statutory provisions.

Some people who get pension credit only get £217, so obviously they can not afford this scheme.

Council Commentary

As persons of pensionable age are protected from the effects of the changes through a set of national rules and regulations, the Council has no powers to vary this aspect of the local Council Tax Support Scheme.

An alternative option would be to lobby against the Government's cessation of national funding for CTS.

Council Commentary

The Council submitted a response to the Government consultation relating to the scheme and London Councils are separately lobbying the Government in relation to certain aspects of the scheme.

Majority of your working life you pay all your taxes honourably and need support the most when you are on verge of retirement and are sick. Before the benefit system kicks in after appeals one would have exhausted life savings to compensate loss of earnings

Council Commentary

The proposed scheme is intended to provide support to those in genuine need. Where a person has capital in excess of the proposed £6,000 capital

cut off limit, it is proposed that support should not be given to them to enable it to be provided to those in most need.

Protection from violation of their human rights and discrimination

Council Commentary

The proposed Council Tax Support Scheme is intended to comply with the Council's statutory obligations.

"Principle 1: For those living in properties attracting the highest rate of council tax, this would leave claimants liable for £45.52 a month, approximately £10 a week. This is a significant sum for those in receipt of benefits. We believe that the amount of council tax that an individual is liable for should be calculated on the basis of affordability. Given this, we recommend that claimants should be asked to contribute 10% of their standard allowance under Universal Credit, unless this is greater than 20% of council tax – in which case the lower figure should be used. This would ensure that any liabilities for council tax are affordable for individual claimants whilst still enabling the council to reduce spend on the Council Tax scheme. Furthermore, we believe that claimants who have recently left supported housing should receive full Council Tax Benefit for a period of 12 months. These claimants will be undergoing a likely stressful period as they experience independent living for what may be the first time, getting used to paying their own bills and learning to budget for their household expenses. Giving these claimants a 12 month 'grace period' would support them during this stressful period of time, enabling them to get used to their new situation before being asked to contribute towards their council tax.

Council Commentary

It is currently understood that the proposed software functionality may not be able to provide protection concerning the minimum Council Tax contribution payable applying the principles set out above. Additionally, in the case of the 12 month grace period referred to, this would if the option existed potentially need to be limited to within a single financial year as the Council has a statutory obligation to review its scheme on an annual basis and as such, any changes may then be subject to consultation and if determined by the Council, incorporated in its scheme for the following financial year. It is also considered that persons leaving supported housing would not have the same constraints on their earnings / income that other persons protected from the effects of the 20% minimum contribution may have. This option has therefore not been progressed further.

It is proposed that claimants be able to elect to pay their Council Tax over 12 monthly instalments from April 2013 and that a publicity and communications campaign will be effected to publicise the changes and the impact significantly in advance of annual billing in February 2013. Additionally, we will work closely with stakeholders to ensure that those leaving supported and temporary housing are aware of the scheme and submit an application at the earliest opportunity. It may also be possible for such claimants to apply for assistance under new Social Fund arrangements that will transfer from the DWP to the Council from 1st April 2013.

Principle 2: We believe that those claimants who have been resettled from a hostel should be included in the list of protected groups for a period of 12 months. The transition from a hostel into independent accommodation is an unsettling period with a significant risk of tenancy failure. Giving claimants a grace period to allow them to settle in to their new accommodation and get used to budgeting, before asking them to contribute towards the council tax scheme will give them some stability over this period of transition.

Council Commentary

It is currently understood that it may not be possible to provide protection concerning the minimum Council Tax contribution payable in the case of the 12 month grace period referred to. If the option did exist, it would potentially need to be limited to within a single financial year as the Council has a legal obligation to review its scheme on an annual basis and as such, any changes may then be subject to consultation and if determined by the Council, incorporated in its scheme for the following financial year. Additionally, such a person would not be constrained in terms of their income / earnings capacity to the same degree as other protected persons for example. It is therefore not intended to progress this option further.

It is proposed that claimants be able to elect to pay their Council Tax over 12 monthly instalments from April 2013 and that payment arrangements may also be available in certain circumstances. A publicity and communications campaign will be effected to publicise the changes and the impact significantly in advance of annual billing in February 2013. Additionally, we will work closely with stakeholders to ensure that those leaving supported and temporary housing are aware of the scheme and submit an application at the earliest opportunity.

Principle 3: We are concerned that this principle appears to unhelpfully confuse a benefit which supports individuals to contribute towards the costs of local services, with supporting people into work. However, St

Mungo's welcome the proposal to increase the level of disregard of an individual's earnings before calculating their liability for council tax.

Council Commentary

The proposed Council Tax Support Scheme is intended to incentivise work through the provision of an increased earnings disregard of £10 per week and is in response to the Government's objective of incentivising work as set out in the CLG policy statement of intent.

Principle 4: We disagree with the proposal to double the expected contribution from non-dependents, or to introduce an expected contribution from those in receipt of jobseekers allowance. Many of those who are at risk of homelessness may be staying with friends on family on an informal basis. If their expected contribution to council tax is doubled, or introduced, this will put financial pressure on that relationship and may lead to the non-dependent being asked to leave, thereby putting them at serious risk of homelessness.

Council Commentary

Deductions for non dependents have been retained at zero in a number of instances such as where a non dependant is in receipt of Income Support for example. In other cases, deductions have been doubled reflecting the policy intent of reducing entitlement to support where there are other adults in the household able to contribute towards the household bills such as Council Tax. The deduction for non dependents in receipt of Job Seekers Allowance (Income Based) has been introduced to support the policy intent of incentivising work.

Principle 5: We are concerned about the increase in the taper rate from 20 per cent to 30 per cent for those who have recently entered work. Those entering work after a period of unemployment often find themselves in a financially unstable situation, getting to terms with moving off some benefits and learning to budget. For many, there will also be a significant initial cost with starting work, such as purchasing new work clothes and other items as necessary. As such, to support this transition, we recommend that the 20 per cent taper is kept in place for the first year of employment after a period of unemployment, increasing to 30 per cent after one year.

Council Commentary

It is currently understood that the proposed software functionality may not be able to operate the suggested taper arrangements. Additionally, the option, if it were available, would potentially need to be limited to a single financial year

as the Council has a legal obligation to review its scheme on an annual basis and any changes may then be subject to consultation and incorporated with the Council's scheme determined for the next financial year. There would also be administrative complexities associated with this proposal as it would be necessary for example to determine what constituted employment including the duration and hours of work and whether voluntary work was within the scope of employment. Consideration would also need to be given as to whether voluntary unemployment should qualify towards the reduced taper activation.

The proposed Council Tax Support Scheme provides for the provision of extended payments for certain claims as currently contained within the existing Council Tax Benefit framework. Additionally, 12 monthly instalments will be available to Council Tax Payers from April 2013 if they elect to pay by that method.

Principle 6: We do not have a position on this principle – almost all of our clients will not have any savings, let alone meet the new proposed £6000 threshold"

Council Commentary

There is no comment to make for this response.

No Council Tax for the unemployed. The amount of council tax paid should be based on your income which is a fairer system. If someone who is on 20k a year pays the same as someone on 50k a year that is not fair.

Council Commentary

It would be administratively complex to incorporate within the proposed Council Tax Support Scheme full benefit for the unemployed. Such a policy would potentially need to consider as a minimum a distinction between contribution based Job Seekers Allowance and Income Based Job Seekers Allowance, the migration of Income Based Job Seekers Allowance to Universal Credit from next year, reasons for leaving job, duration in job and duration of support to be provided. It is also likely that such a policy would not achieve the financial objectives of the scheme to bridge the funding gap as a consequence of the changes in funding arrangements. The proposed scheme does however ensure that a claimant in receipt of a higher income receives less entitlement than a claimant in receipt of a lower income through the effects of the proposed taper.

It should go up in scales. Perhaps something similar to how HB is calculated

Council Commentary

It is currently understood that the proposed software may prevent the potential for making changes as set out above and this option would be administratively complex to establish and maintain. It is therefore not intended to progress this option.

Consider possible secondment as a compulsory element for incentivising work.

Council Commentary

The administrative work involved in establishing a scheme that incorporated this proposal and within the timescale required as well as the administrative complexity of maintaining it means that this would not be feasible and has not therefore been progressed further.

Protection from violation of their human rights and discrimination

Council Commentary

The proposed Council Tax Support Scheme is intended to comply with the Council's statutory obligations.

Everyone should pay according to their income and it should not be according to the house one lives in. Also it should not be in joint names but working adults should get their own individual bill.

Council Commentary

The Council Tax is set by the Council and payable by the Council Tax Payer according to the valuation band determined for their home by the Listing Officer at the Valuation Office Agency. This is a statutory requirement that cannot be varied by the Council although a Council Tax Payer may pay a lesser amount for their home if they qualify for a discount or exemption for example or receive Council Tax Support based upon their income and circumstances. The Council Tax Bill may be issued in joint names where there is a joint ownership or tenure for the home or where the Council Tax Payers are a couple. There is no statutory provision for working adults to get their own bill.

Can not think of anything to add

Council Commentary

There is no further comment to this response.

If somebody is incapable of working due to disability the person, their family should be protected because they will not be able to pay for the council tax as they have no means of generating income for themselves and their families.

Council Commentary

This response supports the proposed protection for disabled persons where they meet the qualifying criteria and there is therefore no further comment to make.

Please comment if you feel that our proposed changes will affect particular individuals or groups more than others and if so, how you think we may address these.

Comments received to this question have been set out below together with a commentary where appropriate.

They will leave those on Jobseekers allowance unable to pay other bills

Council Commentary

The provision of support is intended to be directed to those most in need. Vulnerable persons as defined within the proposed scheme are proposed to be protected from the requirement to pay the minimum 20% Council Tax. In other instances, certain incomes such as child benefit for example may be ignored when calculating entitlement to support. There will be an opportunity for Council Tax Payers to elect to pay by 12 monthly instalments next year and payment arrangements may be available in certain circumstances.

Most vulnerable in society otherwise alienation = breach of H. Rights. Deep distrust of the system

Council Commentary

The proposed Council Tax Support Scheme provides protection for the most vulnerable including persons of pensionable age, persons in receipt of a war pension or war disablement pension and qualifying disabled persons. As a consequence of the consultation it is also proposed to extend the protection to include carers that are in receipt of a carer's allowance.

I think child carer households should be looked at carefully. Adults who are on high percentage of state (benefit) help should be asked about their travel plans if longer than 3 weeks.

Council Commentary

It is unclear as to the precise nature of this comment although a claimant or partner who is a carer will be protected within the proposed scheme if they receive carers allowance. Child carers are not eligible to pay Council Tax and therefore will not be eligible for support.

The remainder of the response is unclear in intention and therefore no further comment is submitted.

Comment against Principle 1: NO - THIS IS ""POLL TAX"".

Council Commentary

This comment appears to be made as a misunderstanding to the proposals. The proposed Council Tax Support Scheme provides for non dependent deductions to be made from a claimant's potential entitlement to support where there are other adults resident in their home. This is proposed on the basis that the other adults should contribute towards household bills. It does not propose that each adult should pay their own Council Tax.

Should resemble current systems, comment against proposed changes: no: Council Tax should be based on property as now? (2 responses)

Council Commentary

The Council Tax will continue to be payable by an adult resident based upon the valuation band allocated to their home by the Listing Officer at the Valuation Office Agency as this is a statutory requirement. There is the potential to retain a similar system to that operated for Council Tax Benefit. However, this would not deliver the financial savings needed to meet the anticipated funding gap arising from the changes.

As mentioned those who live on means tested benefits are going to suffer. I have to pay water rates, television licence, gas, electric and little left over will now have to go on council tax.

Council Commentary

The proposed scheme provides protection from the minimum contribution of 20% for vulnerable persons including disabled persons and carers. For other claimants, certain types of income may be disregarded when calculating their entitlement such as child benefit for example. The means test calculation will ensure that those with the least income receive the greatest support.

Council Tax Payers will be able to elect to pay by 12 monthly instalments from next year rather than the 10 available at present and payment arrangements may be available in certain circumstances.

The ant-poverty strategy and recovery policy will be reviewed in consultation with key stakeholders to ensure that the required changes arising from the agreed scheme are incorporated.

The availability of other discretionary funds such as the Social Fund may also be considered in certain circumstances.

Why do the people on income support not need to pay anything?

Council Commentary

This is the current arrangement for Council Tax Benefit. Under the proposed Council Tax Support Scheme, such persons will be required to pay a minimum 20% contribution towards Council Tax unless they are protected.

The Department of Work and Pensions will not increase the benefits to subsidize the claimant.

Council Commentary

It is not possible to comment on policies concerning benefits that are payable outside of the control of the Council.

Parents with children over 18, not working

Council Commentary

It is unclear as to whether this response is suggesting that the occurrence of such instances should provide protection for a claimant from the requirement to make the minimum 20% contribution where they have children aged 18 or over not working.

However, in general terms, where a claimant has a non dependent resident in their home such as a child aged 18 or over, a non dependent deduction may be applicable. However, where the non dependent is in receipt of Income Support or Employment Support Allowance (income related) for example, no deduction will be made. A deduction will also not be applicable where the claimant is in receipt of a disability living allowance

A non dependent deduction will be made under the proposed scheme where the non dependent is in receipt of job seekers allowance (income based) to provide a work incentive.

It is not intended that protection will be applied in such instances as suggested because the existing proposal already incorporates the provision of a nil deduction in circumstances such as those outlined above.

This attitude that we owe them a living has greatly increased in the last 10-15 years amongst people who cannot be bothered to work and look after their own families.

Council Commentary

The Government proposes to provide a set of rules and regulations governing the approach to be taken under local Council Tax Support Schemes.

I am proud of the way we care for people but reducing the benefits we pay out, must encourage people to look for work.

Council Commentary

There is no further comment to make on this response as the proposed scheme seeks to incentivise work through the increased earnings disregard and to target financial support to those most in need.

Those in genuine need will be affected by another cost to their living which CTS is. It is hard to define which group is more in need. If it is means tested, why are pensioners exempt?

Council commentary

As the proposed scheme for persons of pensionable age is subject to national rules and eligibility, it is not possible to vary the scheme for such persons. Consequently, the changes proposed to meet the anticipated funding gap need to be found either from within the scheme itself or from other sources of funding.

The proposed scheme will provide the greatest support to those in receipt of the lowest income through the means test calculation and application of the taper and provide protection for vulnerable persons.

People receiving income support or with children they will be affected so should be taken into account

Council Commentary

Protection for claimants in receipt of Income Support would have the effect of reducing the scheme savings by approximately £1M and protecting those with children would have a similar £1M minimum financial effect that would be variable dependent upon whether protection was conditional upon the child's age.

As such, both of these would require significant changes to be made either elsewhere within the scheme or through the provision of alternative sources of finance.

In terms of the proposed scheme, in the case of claimants with children, an additional premium is to be given for each dependant child that resides with the claimant and both child benefit and guardians allowance are to be disregarded from a claimant's income. Child care expenses of up to £175 per week for one child and £300 per week for two or more children may be given where the claimant or a partner works 16 hours or more per week and qualifying conditions are met.

Lone parents in receipt of Income Support and Job Seekers Allowance will be affected more by these changes and I feel that these people in these groups should be protected.

Council Commentary

Consideration has already been given to protecting single parents in receipt of Income Support and Job Seekers Allowance earlier in this report.

Combination of council tax support and caps for local housing allowance will affect some groups more than others.

Council Commentary

The Benefit caps are being introduced by central government and as such, do not form part of the impact assessment for Council Tax Support.

An Equalities Impact Assessment has been conducted for the proposed scheme and the results of this are included as Appendix D to the main report to the Executive.

It will have big impact on people who are in full benefit and do not work.

low income, single parent, with children under 16, full benefits, people with children under age of 18 - should pay a reduced amount of 10% rather than 20%, people in receipt of income support, people with large families ie 6 children - should be required to pay 10% only not 20%"

Council Commentary

Each of the above has been considered in relation to the scheme within this consultation report and commented upon accordingly with the exception of large families with 6 children paying only 10%. Providing protection for large families would need further consideration to determine what constitutes a large family and the administrative provisions concerning this. The presence

of a large family does not necessarily restrict the earning / income capacity of a claimant and in general, such persons would normally receive a greater household income reflecting the additional living needs of their family. The application of protection for large families could also potentially have a reverse policy effect. It is also currently understood that as proposed software may not provide a feature to protect specific numbers of children, this option may not be administratively easy to implement. Income from child benefit, guardians allowance and fostering allowances are all disregarded as income when calculating support entitlement, additional premiums are given for each dependent child in the claimant's home and child care disregards of up to £175 per week for one child and £300 per week for two or more children may be given where the claimant or their partner works 16 or more hours per week and qualifying conditions are met. This option has therefore not been progressed further.

I think these proposed changes are not well thought and should be prepared with participation of all party to include different fabric of the society.

Council Commentary

A consultation and engagement process has been carried out to obtain the views and comments of residents and other stakeholders concerning the proposed changes.

The proposed changes will affect a lot of people who are suffering through job loses and could not get another job. People on Income Support and Long-Term sickness benefit should be assessed especially people on Income Support, they are the ones who do not want to look for a job. People who claim Disability Benefit should be assessed on the basis of each individual case. Help should be given to people who are genuinely looking for work and on job-seekers allowance until a job is found.

Council Commentary

The proposed Council Tax Support Scheme is intended to provide support for those who genuinely need it with appropriate protection included for disabled persons, persons in receipt of carers allowance and persons of pensionable age. Protection for disabled persons shall be based for example upon receipt of Disability Living Allowance or entitlement to a disability premium. The protection has been considered with due regard to the Council's statutory obligations and with reference to the DCLG Policy Statement of Intent.

Lone parent with children under age of 18 and people on benefits

Council Commentary

It is presumed that this comment is intended to refer to the protection for certain groups and has been commented upon accordingly. It is currently understood that it may not be possible to provide protection for single parents with children under the age of 18 under the proposed software functionality. However, such persons will, where they are in work, be able to retain an extra £10 per week of their earnings without it affecting their entitlement. The provision of protection to single parents will require significant changes to be made to other aspects of the proposed scheme or for alternative sources of funding to be identified. The definition of people on benefits would need to be more specifically defined to determine protection for the second part of the comment as potentially all existing claimants are within the scope of this definition and would therefore be administratively complex to establish and maintain. The proposed scheme ensures that those in receipt of a low income are eligible for a greater entitlement than those in receipt of a higher income through the effects of the taper. The cost of providing protection to single parents would be financially significant as has already been indicated within this report and would require significant savings to be made elsewhere in the scheme or from alternative sources of funding

Single parents with children under the age of five and also parents with children who have a disability

Council Commentary

It is understood that it may not be possible to provide protection for single parents with children under the age of five under the proposed software functionality. However, such persons will where they are in work be able to retain an extra £10 per week of their earnings without it affecting their entitlement. Parents with children that have a disability may be eligible for protection from the requirement to pay the minimum 20% contribution to Council Tax if they meet the qualifying criteria. The cost of providing protection for this group would require significant changes to be made to other aspects of the scheme or alternative sources of funding to be identified.

Disabled and parents with disabled children and lone parents

Council Commentary

The proposed Council Tax Support Scheme provides protection for disabled persons and parents with disabled children where the qualifying conditions are

met. Consideration has also been given to providing protection for single parents. However, it is currently understood that the proposed software functionality may not be able to provide protection for single parents although an additional £10 per week will be disregarded for single parents in work. The cost of protecting single parents has already been identified and commented upon elsewhere within this report.

People with low income and on benefits, people who do not work and disabled people

Council commentary

Disabled persons will be protected within the proposed scheme. Persons in receipt of a low income or on benefits could potentially include the entire Council tax Benefit caseload and would not be feasible in terms of cost. Additionally, there would potentially be significant administrative complexity involved in determining and maintaining the rates for what constituted a low income. Providing protection for people who do not work would be a significant cost that would need to be met either from making substantial changes to other parts of the scheme or by using alternative sources of funding. These options have therefore not been progressed.

However, such persons will be able to elect to pay their Council tax by 12 monthly instalments from next year rather than the 10 available at present and payment arrangements may be available in certain circumstances.

The impact of the proposal on people with low incomes will cause financial hardship, particularly where there are children and during the winter period when household heating bills are higher.

Council Commentary

The Council has made provision within its local scheme for features that will assist claimants with children. These include the disregard of child benefit and guardians allowance as income when performing the means test and additional premiums for each child resident in the claimant's household. Additionally, child care expenses may be disregarded up to a maximum of £175 per week for one child and £300 per week for two or more children where the qualifying conditions are met. Additionally, vulnerable persons will be protected from the requirement to make the minimum 20% Council Tax contribution including for example disabled persons.

There will be an opportunity for Council Tax Payers to pay their monthly instalments over 12 months from next year rather than the 10 available at present and payment arrangements may be available in certain circumstances.

Additionally, the Council's anti-poverty strategy and recovery policy will be reviewed in consultation with key stakeholders and will set out the manner in which payments may be collected where specific circumstances apply.

I think these changes will affect the poor people the most. The Government needs to look into the changes which will affect us.

Council Commentary

The Government has devolved the establishment of a local scheme to each Local Authority. Whilst certain aspects of a scheme such as for persons of pensionable age will be maintained centrally, they must be included within each local scheme. There is no current provision for the government to review individual local authority's schemes as these are a matter for each authority to determine.

The proposals will affect families and they now will have to make payment of which they have previously not had to pay.

Council Commentary

The cost of providing protection for families would require significant changes to be made elsewhere to the scheme or the provision of funding by alternative means as previously outlined within this report.

However, an additional £10 per week compared to the current Council Tax Benefit Scheme will be disregarded from earnings thus enabling single parents and couples to earn £35 and £20 per week respectively without it affecting their entitlement to Council Tax Support. Child Benefit will be disregarded as an income and additional premiums will be given for each dependant child resident in the claimant's home. Child care disregards may also be applied up to a maximum of £175 per week for one child and £300 per week for two or more children where conditions are met.

Additionally, 12 monthly instalments will be available to Council tax Payers for next year rather than the 10 available at present and payment arrangements will be available in certain circumstances.

People on low incomes such as income support, job seekers allowance, incapacity benefit. Protect the above from the effects of the changes

Council Commentary

The Council would be unable to meet the funding gap if protection were provided for people in receipt of Income Support, Job Seekers Allowance and Incapacity Benefit. This option has therefore not been progressed further.

Seems to be a fair balanced change

Council Commentary

No comment is required for the above

Young Adults - Get a year tax free.

Council Commentary

This proposal would require a definition for a young adult to be determined and the provision of a single free tax year may not be achievable within the proposed software functionality and would be administratively complex to establish and maintain. Additionally, as the Council has a legal obligation to review the scheme on an annual basis, such a provision within a scheme may only be applicable within the scope of a financial year.

Disabled People - may not be able to afford it.

Council Commentary

The proposed Council Tax Support Scheme provides protection for persons that are disabled within the qualifying conditions.

Elderly people - vulnerable and on pension

Council Commentary

The proposed Council Tax Support Scheme provides protection for persons that are of pensionable age through a set of national rules and regulations.

The proposals will have a disproportionate impact on low income families and reduced contributions should be sought.

Council Commentary

Consideration has been given to reducing the level of contribution but this would not meet the anticipated funding gap as a consequence of the changes to the funding arrangements. An Equalities Impact Assessment concerning the proposed changes has been carried out and is attached as Appendix D to the main report.

Those receiving working age benefits and those on low incomes appear to be adversely affected by these proposals making them vulnerable.

Council commentary

Persons on a low income and on benefits potentially includes the entire Council tax Benefit caseload and would not be feasible in terms of cost. Additionally, there would potentially be significant administrative complexity involved in determining and maintaining the rates for what constituted a low income. Providing protection for people who do not work would be a significant cost that would need to be met either from making substantial changes to other parts of the scheme or by using alternative sources of funding. These options have therefore not been progressed.

However, protection will exist for disabled persons for example and certain incomes will be disregarded when calculating entitlement to benefit such as child benefit for example. Additionally, 12 monthly instalments will be available for payment of Council tax next year and payment arrangements may be given in certain circumstances.

Those who have young children, especially working parents

Council Commentary

The cost of providing protection for families especially working parents with young children would require significant changes to be made elsewhere to the scheme or the provision of funding by alternative means as previously outlined within this report. Additionally, it is currently understood that protection for this group may not be available within the proposed software functionality.

However, an additional £10 per week compared to the current Council Tax Benefit Scheme will be disregarded from earnings thus enabling single parents and couples to earn £35 and £20 per week respectively without it affecting their entitlement to Council Tax Support. Child Benefit will be disregarded as an income and additional premiums will be given for each dependant child resident in the claimant's home. Child care disregards may also be applied up to a maximum of £175 per week for one child and £300 per week for two or more children where conditions are met.

Additionally, 12 monthly instalments will be available to Council tax Payers for next year rather than the 10 available at present and payment arrangements will be available in certain circumstances.

People who care for one or more disabled people within household would be unfairly treated by making them pay a charge on a low income because they can not work because of being a carer or is still looking after a member of the family in a caring role but have retired and are over 65 years old. These groups should be exempt from charges.

Council Commentary

Where a claimant or a dependant in their household is disabled within the qualifying criteria, they will be protected from the requirement to make the minimum 20% Council Tax contribution. Carers will be included within the protected groups as a consequence of the consultation where they are in receipt of a carers allowance and provide care to another resident in their home. Persons of pensionable age will be protected through a set of national rules and conditions of eligibility.

Q3. I am concerned that single parents and students could be hit disproportionately hard and don't forget that those with an illness or disability will naturally have higher living expenses (2 responses)

Council Commentary

The proposed Council Tax Support Scheme will provide eligibility to claim support for students such as for example a single parent who is a student. Other students may not however be eligible for support.

Where a domestic property is occupied solely by a student, the property will generally be exempt and no Council Tax will be payable. Additionally, a student will not be jointly and severally liable for payment of Council Tax and thus will have no liability for payment of Council Tax where they have a joint ownership or tenancy of the property.

There is protection proposed for claimants where they or a dependant in their household are disabled within the qualifying criteria set out in the scheme and this includes certain instances where a disability premium is awarded because of illness.

I agree to principle 2

Council Commentary

Principle 2 refers to protecting the most vulnerable persons from the requirement to make the minimum 20% Council Tax contribution. No further comment is made regarding this response.

The benefit cap will not affect those who were working until now and can't afford to pay any more.

Council Commentary

The Benefits cap is not a feature of the proposed Council Tax Support Scheme.

However, next year, a Council Tax Payer will be able to elect to pay by 12 monthly instalments rather than the 10 available at present and payment arrangements may be available in certain circumstances to take account of the financial circumstances of a customer.

The anti-poverty strategy and recovery policy will also be reviewed in consultation with key stakeholders to ensure that financial circumstances and other relevant factors are considered when determining the payment requirements for a specific customer.

Consideration may also be given to the use of other potential sources of finance available to the claimant including discretionary funds such as the Social Fund for example.

People with many children and who do not have money for rent and food then become homeless

Council Commentary

As the comment has not been elaborated upon, it is presumed that it relates to protection for single parents and families with a large family. It is currently understood that proposed software functionality may mean that it is not possible to provide protection for this group. Additionally, the cost of protection would require significant changes to be made elsewhere to the scheme or the provision of funding by alternative means. However, an additional £10 per week compared to the current Council Tax Benefit Scheme will be disregarded from earnings thus enabling single parents and couples to earn £35 and £20 per week respectively without it affecting their entitlement to Council Tax Support. Child Benefit will be disregarded as an income and additional premiums will be given for each dependant child resident in the claimant's home. Child care disregards may also be applied where conditions are met.

"Non – dependent"

Council Commentary

As the comment has not been elaborated upon, it is presumed that it relates to protection from the requirement to make a minimum 20% contribution towards Council Tax. However, it is currently understood that the provision of protection for claimants with non dependents may not be achieved with the proposed software functionality. The proposed non dependent deductions are intended to represent the fact that other adults resident in a claimant's

household should contribute towards the Council Tax bill for the property. Additionally, the amounts of deduction range from nil to £19.80 per week in recognition of the differing circumstances of the non-dependent concerned. The highest deduction of £19.80 per week would apply where the non dependent has a gross earned income of greater than £394 and is in recognition of the greater income potentially available to the claimant concerned. The protection of this group would require significant changes to be made either elsewhere within the scheme or to be found from alternative sources of funding.

Single parent and single parent with a large family (2 responses)

Council Commentary

As the comment has not been elaborated upon, it is presumed that it relates to protection for single parents and single parents with a large family. It is currently understood that proposed software may mean that it is not possible to provide protection for this group and the cost of this provision would require significant changes to be made to the scheme elsewhere or via alternative sources of funding as outlined previously within this report. However, an additional £10 per week compared to the current Council Tax Benefit Scheme will be disregarded from earnings thus enabling single parents to earn £35 per week without it affecting their entitlement to Council Tax Support. Child Benefit will be disregarded as an income and additional premiums will be given for each dependant child resident in the claimant's home.

N/A, NO, No comment, None (6 responses)

Council Commentary

There is no further comment to these responses.

Those on benefits such as jobseekers or Employment and Support Allowance (1 response)

Council Commentary

As the comment has not been elaborated upon, it is presumed that it relates to protection from the effects of paying the minimum 20% contribution towards Council Tax. Where a claimant is in receipt of Employment Support Allowance (support component), they will be protected from the 20% minimum contribution as they will qualify for an enhanced disability premium.

As Job Seekers Allowance and Employment and Support Allowance are currently split into contribution based and income based benefits and the income related components will be combined into Universal Credit along with

other benefits such as tax credits from October 2013, the provision of protection will potentially become more complex to determine.

It is also the case that the provision of protection for these categories (assuming it could be achieved) would exceed the financial provision needed to meet the funding gap arising from the funding changes.

Working Class (1 response)

Council Commentary

It has been presumed that this is in relation to the protection for persons meeting the criteria that has already been considered in relation to responses received.

Will affect people on benefits (1 response)

Council Commentary

As Council Tax Support is a benefit for claimants in receipt of a low income, the proposed changes will affect claimants on a low income including both benefits and earnings. The Council proposals are intended to address both the financial implications arising from the changes to funding and to ensure that those with the greatest need receive the greatest assistance.

It could be argued that disabled people may have more disposable income and more likely to pay their council tax as compared to other working age customers who may be affected, but then not able to or won't pay their council tax. (1 response)

Council Commentary

The protection for claimants where they meet the proposed disabled criteria cannot be linked to disposable income within the proposed software and would be administratively complex to administer and enforce as it may require information about outgoings as well as income.

Protection from violation of their human rights and discrimination (1 response)

Council Commentary

An Equalities Impact Assessment for the proposed scheme has been conducted and is included in Appendix D to the main report. The proposed Council Tax Support Scheme is intended to comply with statutory obligations.

Protect pensioners and single occupants - the savings threshold is unrealistic - anyone earning over £55,000 could pay more to cover these groups. (1 response)

Council Commentary

Persons of pensionable age will be protected from the changes through the national rules and regulations to be prescribed by the Government. Single residents will continue to benefit from the 25% single person discount thus meaning that they will have a reduced Council Tax liability of 75% before any entitlement to Council Tax Support is determined. The proposed scheme already provides for claimants with a higher income to receive less entitlement through the effects of the taper, thus ensuring that those on a lower income can receive greater assistance. It is therefore not intended to progress this option further.

Any changes made will always affect one group more than others. That does not mean they are necessarily disadvantaged when compared to none claimants. It's merely putting right the over generosity of the previous system.

Council Commentary

An Equalities Impact Assessment has been conducted for the proposed scheme and is included as part of the main report. Due consideration has been given to other Council obligations in designing the proposed scheme.

People on reduced circumstances are in enough difficulty

Council Commentary

The proposed scheme is intended to ensure that those least able to afford the Council Tax receive the greatest assistance. Additionally, 12 monthly instalments will be available for Council Tax Payers next year rather than the 10 provided at present. Additionally, payment arrangements may be given in certain circumstances. The Council's anti poverty strategy and recovery policy will be reviewed in consultation with key stakeholders to incorporate required changes arising from implementation of the agreed scheme.

There are enough people currently living below the poverty line without adding to it

Council Commentary

The proposed local Council Tax Support Scheme is intended to provide support to those who genuinely need it within the context of reduced funding available. Protection has been proposed for certain groups of claimant and a higher entitlement to support will be available to those in receipt of lower incomes than those on higher incomes as a consequence of the taper.

Additionally, there will be the option for Council Tax Payers to elect to pay their monthly instalments by 12 monthly instalments next year rather than the 10 presently offered thus helping to ease the financial impact of the proposals.

Payment arrangements may also be available to Council Tax Payers within the provisions set out in the Council's Anti Poverty Strategy and Recovery Policy.

It will affect everyone but this is for the good of the borough, and so everyone needs to pay.

Council Commentary

There is no comment to make to this response.

The current benefits system is far too generous. There should be a limit to how long people can receive benefits, and these should steadily decrease so that people are motivated (ie have) to find work.

Also, those on benefits should only receive benefits help for up to 1 child.

Those on benefits should be made to do community service

Council Commentary

There is no proposed fixed period for entitlement to support and the application of such a period may adversely affect those most vulnerable and with the greatest need for support. This proposal has not therefore been progressed further. Similarly, a steady reduction in benefits may have a greater affect on vulnerable persons by reducing their entitlement at a time when they need it most. Providing benefits for only one child would potentially have an adverse effect on families and impact upon child poverty levels within the Borough. This proposal has not therefore been progressed further.

Community service in relation to receipt of benefits has not been progressed further. Council Tax Support is a means tested benefit that is based upon a claimant's income and circumstances. It would be administratively complex and hence costly to apply community service in return for the receipt of benefits as not all claimants for example would be able to carry out the work

and it would be necessary to record and maintain details of work performed to enable benefits to be paid.

An increase in Council Tax, however small, could easily be too much for most people in these difficult and challenging times

Council Commentary

The proposed Council Tax Support Scheme is intended to provide fairness to those claiming support and to the taxpayer, protect the most vulnerable and create the right incentives to get more people into work within the context of reduced funding provision for the scheme. It is also intended to ensure that the cost of the scheme is contained within the proposed funding level for future years. Consideration has been given to a lower contribution amount towards the Council Tax and extending the protection proposed for the options suggested as set out within this document.

The proposed scheme will increase the amount of earnings that can be retained by a claimant by £10 per week, disregard some forms of income such as child benefit and guardians allowance and protect claimants where they or a dependant in their household for example are disabled. Council Tax Payers will also be able to elect to pay by 12 monthly instalments next year and payment arrangements will be available in certain circumstances.

It is unfair that pensioners will be excluded from the changes

Council Commentary

Protection for pensioners is proposed by the Government within a national scheme of rules and regulations and must be included in a Local Authority's local Council Tax Support Scheme. The Council therefore has no powers to vary the scheme for persons of pensionable age.

There is growing inequality in this country which is bad for us all

Council Commentary

As this response does not directly relate to the proposed Council Tax Support Scheme, no further comment is made.

It will hit savers the hardest

Council Commentary

The proposed scheme is intended to provide support to those most in need within the context of reduced funding. In order to ensure that financial support

is directed to those most in need, a capital cut off limit of £6,000 has been defined within the proposed scheme

It will also hurt working single parents so double the childcare costs they still pay after working tax credit should be deducted from their income means test

Council Commentary

It is proposed that there will be no increases in rates and allowances from those applicable for Council Tax Benefit purposes in 2012/13 except where stated as in the case for example of non dependent deductions for job seekers allowance (income based) that is intended to support incentives to work and earned income disregards that are intended to support the same aim. This is intended to ensure that as far as reasonably practicable, there is potential capacity to meet the increased funding gap for 2014/15 without having to make substantial scheme changes in year 2.

Young people who are unemployed will have to stay with parents for longer

Council Commentary

Council Tax is generally payable by a resident owner or tenant with Council Tax Support being awarded to the Council Tax Payer. If the Council Tax Payer is a “young unemployed person” they may be eligible for Council Tax Support in respect of the home where they are resident. This same principle will apply to any working age claimant. There is no evidence at this stage to suggest that the proposed scheme will cause young unemployed people to stay with their parents for longer as recent research suggests that this is a trend that already exists. According to ONS figures, one in three men and one in six women aged 20 to 34 still live at home due to high rents, house prices and other costs.

Single working parents, if an increase is put on top of what they are already paying, a lot of them will not see the benefit in working and trying to contribute in the first place. Women and children are vulnerable in the first place and are protected against how much they will pay so by adding anything on top to what I myself pay already is not going to make me feel I am benefiting better to be back at work. This could make people feel very different about working instead of encouraging people to work.

Council Commentary

It is currently understood that the proposed software may mean that it is not possible to provide protection for this group.

However, irrespective of this, the cost of protecting single working parents would be significant as set out previously in this report and would either need to be found elsewhere within the scheme or from alternative sources of funding.

The proposed Council Tax Support scheme permits an additional £10 per week earnings thus enabling single parents to earn £35 per week without it affecting their entitlement to Council Tax Support. Child Benefit will be disregarded as an income and additional premiums will be given for each dependant child resident in the claimant's home. Child care disregards may also be given of up to £175 per week for one child and £300 per week for two or more children where qualifying conditions are met.

From next year, 12 monthly instalments will be available for payment of Council Tax compared to the 10 at present and payment arrangements may also be given in certain circumstances.

It is not therefore proposed to progress this option further.

You should pay the Council Tax for all claimants

Council comment

The Council does not have the financial resources available to pay the Council Tax for all claimants and such a proposal would not take into account the differing levels of income and capital available to each claimant. This option has therefore not been progressed.

The cuts being proposed to CTB should affect all residents. We all need to be made aware of the difficult situation the council finds itself in.

Council Commentary

The localisation of Council Tax Support and the financial implications of the changes were clearly indicated in the consultation documentation, at meetings held with stakeholders and on the Council website. A campaign for publicity and communications is being developed to encompass the wider reforms as well as those for Council Tax Support and to ensure that changes are effectively communicated with customers prior to annual billing in February 2013.

It will continue to unfairly affect people in joint tenancy agreements

Council response

The proposed scheme provides for Council Tax Support to be calculated on the share of the joint tenant's Council Tax liability. Where joint tenants live in a home, they are generally jointly and severally liable for payment of the remaining Council Tax balance irrespective of whether they receive benefit for their share of the Council Tax. This is a feature of the Council Tax statutory provisions and not one that is a consequence of the Council Tax Support scheme.

People on benefits and low incomes and even those with moderate incomes are already suffering and doing without basic goods, ie, food, etc. Why should they suffer more

Council Commentary

The proposed Council Tax Support Scheme is intended to provide fairness to those claiming support and to the taxpayer, protect the most vulnerable and create the right incentives to get more people into work within the context of reduced funding provision for the scheme. It is also intended to ensure that the cost of the scheme is contained within the proposed funding level for future years. Consideration has been given to a lower contribution amount towards the Council Tax and extending the protection proposed for the options suggested as set out within this document.

The proposed scheme will increase the amount of earnings that can be retained by a claimant by £10 per week, disregard some forms of income such as child benefit and guardians allowance and protect claimants where they or a dependant in their household for example are disabled. Council Tax Payers will be able to elect to pay by 12 monthly instalments next year and payment arrangements will be available in certain circumstances.

It will be hard for single parents on benefits and working single parents. because it is hard bringing up children. Just because the government states you must live off so much a week, does not mean you can. Being a single parent and looking for work and trying to get a job that allows you to take your kids to school in the morning and pick them up is very hard to find. Excluding disabled persons from the scheme is unfair.

Council Commentary

The proposed Council Tax Support Scheme is intended to provide protection for disabled persons in recognition of the fact that they generally have a limited capacity to increase their income. Consideration has been given to

extending protection to single parents which would cost approximately £0.6M for working single parents and £1.2M for non working single parents and would require compensating adjustments to be made elsewhere within the scheme. Additionally, the qualifying criteria for protecting such persons may need to be defined to prevent potential abuse of the scheme. It is also currently understood that protection of single parents may not be achievable within the proposed software. In view of the above, this option has not been progressed. An additional £10 per week will however be disregarded from a single parents earned income and up to £150 per week for a single child and £300 per week for two or more children may be made from earnings where the claimants works 16 or more hours per week and the qualifying criteria are met. Disabled persons have been considered for protection with due regard to DCLG Policy Statements of Intent and other statutory provisions.

It can affect people individually and in groups.

Council Commentary

The Council has conducted an Equalities Impact Assessment for the proposed scheme and has sought to ensure fairness and equity in the proposed changes.

We believe that the government should look after the elderly

Council Commentary

As this response appears to suggest that persons of pensionable age should be protected and the proposed scheme incorporates such protection, no further comment is made.

I see no indication how most of the burden will be carried by the better off

Council Commentary

The Council proposes to protect claimants from the requirement to make the minimum contribution of 20% of Council Tax if they meet certain qualifying criteria. Additionally, the effects of the revised capital limit being reduced from £16,000 to £6,000 and the effects of the taper for increased income will ensure that those who are least well off will receive greater support.

It's always the most vulnerable members of society who suffer.

Council Commentary

The local Council Tax Support Scheme is being introduced as a consequence of changes to statute. If the Council does not establish a local scheme, it will

be subject to the imposition of a default scheme that will potentially be more expensive to operate and will not meet the anticipated funding shortfall.

The Council proposes to provide protection from the effects of the changes for persons of pensionable age and claimants where they or a dependant in their household are disabled or in receipt of a war pension.

The benefit system is difficult and full of expensive appeals this will just add more confusion.

Council Commentary

The Council is proposing as far as reasonably practicable to include within its proposed scheme many of the features that are currently provided for within the national Council Tax Benefit scheme. Additionally, within the available timescale and the proposed software functionality, the scale of change is limited. An appeals system has been incorporated within the proposed local scheme.

You will destroy the quality of life for the lower paid and disabled.

Council Commentary

A claimant will be protected from the effects of the minimum required contribution of 20% for Council Tax if they or a dependant resident in their home is disabled as set out in the Council's proposed scheme. Additionally, claimants receiving lower levels of pay will generally be eligible for greater support than those in receipt of higher incomes. An additional £10 per week will be disregarded from earnings for single persons, couples and single parents.

By keeping the 100% discount they will have more of a chance to get on and either train or get more work. Taking the money from them will stop them having enough for postage or internet to apply for jobs."

Council Commentary

Consideration has been given to retaining the 100% support for claimants. However, the cost of this option would mean that the funding gap anticipated from the introduction of the fixed grant would not be achieved leaving a shortfall to be met from other sources or found from elsewhere within the scheme.

It won't get people back into work if they have to pay 20% because there are no jobs there to get back into.

Council Commentary

The proposed scheme is intended to create the right incentives to get more people into work and is in compliance with the Government's objective as set out within the Policy Statement of Intent for incentivising work. The 20% contribution is intended to ensure that the cost of the scheme is contained within the proposed funding level for future years. Work incentives are achieved by increasing the amount of earnings that can be retained by a claimant by £10 per week. Additionally, some forms of income will be disregarded such as child benefit and guardians allowance and some claimants will be protected from the requirement to pay the minimum 20% contribution where they or a dependant in their household for example are disabled.

Excluding pensioners of course, but those who have more experience but within the age brackets of 40-60 often find it difficult to get jobs because employers prefer to use 30 somethings

Council Commentary

The proposed Council Tax Support Scheme is intended to provide support for those who genuinely need it. Persons of pensionable age will be protected from the effects of the changes by a set of national rules and regulations. Working age claimants will be entitled to support calculated according to the proposed scheme. The Council will be working collaboratively with other stakeholders to assist residents with finding work in specified circumstances as set out in the main report.

Protection from violation of their human rights and discrimination

Council Commentary

An Equalities Impact Assessment for the proposed scheme has been conducted and is included in Appendix D to the main report. The proposed Council Tax Support Scheme is intended to comply with statutory obligations.

It will affect those already on low incomes and benefit, when there are very few jobs on the market. Once again, if after the council has taken 20% off someone on benefit, are they left with a liveable wage?

Council Commentary

The proposed scheme is intended to provide fairness to those claiming support and to the taxpayer, protect the most vulnerable and create the right incentives to get more people into work. It is also intended to ensure that the

cost of the scheme is contained within the proposed funding level for future years. This is achieved by increasing the amount of earnings that can be retained by a claimant by £10 per week, disregarding some forms of income such as child benefit and guardians allowance and protecting claimants where they or a dependant in their household for example are disabled. Council Tax Payers will be able to elect to pay by 12 monthly instalments next year and payment arrangements will be available in certain circumstances.

Changes might affect some individuals on low income such as domiciliary home care workers etc working and living in the Borough

Council Commentary

It is proposed that as a consequence of the consultation carried out, that protection from the minimum 20% contribution be extended to include carers in receipt of a Carers Allowance.

Presentations and welfare advice support at older persons residences

Council Commentary

A publicity and communications campaign is being developed and consideration of this proposal will be included within that activity.

Please provide any other additional comments you wish to make concerning the proposals

The following responses were received to this free text question and may be summarised in some instances. A commentary to each response is also provided where appropriate.

Wealthy disabled people should be asked to contribute something in Council Tax but when calculating this any money they have to finance support needs should be ignored – 2 responses

Council Commentary

On a general point, the proposed scheme restricts eligibility for applying to claimants with capital less than £6,000 thus ensuring that those with higher savings do not qualify for support and that support can be directed to those least able to afford to pay. Disabled people that meet the qualifying conditions will be protected from the minimum contribution of 20% towards Council Tax recognising the fact that such persons are often not able to increase their income. This principle has been determined with due regard to the Council's obligations under the Equalities Act 2010. There were 2 respondents that gave this response

Large capital (e.g. a house does not equate to money in pockets. Be clear about this. Part time employee with income of £20K or less. These people are very rarely entitled to benefit help.

Council Commentary

As persons of pensionable age will be protected from the changes by national rules, the rules on the holding of capital shall remain consistent with those already in place. Part time employees will be eligible for an earned income disregard that will be increased by an additional £10 per week in comparison with the existing CTB scheme.

I just hope that this will not turn into a farce like the poll tax.

Council Commentary

This comment may have been made on the misapprehension that each adult in a household would be required to pay a minimum 20% contribution towards their Council Tax. This is not the case and only the Council Tax Payer for a home will be required to pay Council Tax at an amount according to their circumstances. The collection of Council Tax from residents who may not previously have had to pay it will be addressed within the Council's anti poverty strategy and recovery policy.

Long term unemployed should do voluntary work whilst receiving benefits.

Council Commentary

The definition of long term unemployed and receipt of benefits would need to be defined for the purposes of the comment submitted and this proposal would be administratively complex to operate to ensure that the voluntary work was carried out. Potentially withdrawing entitlement where voluntary work was not carried out would need to have regard to the reasons for non compliance and the duration as well as previous history. In view of the complexities involved in such a scheme, it is not proposed to progress this further.

The Brent Magazine should be used more productively to inform people of these new proposals.

Council Commentary

The Council included details about the proposed changes in the May and July editions of the Brent Magazine and will consider further updates in future editions as part of a wider publicity and communications campaign prior to undertaking annual billing in February 2013. Other medias for communicating

the changes and the campaign timetable are currently being considered and developed.

I strongly feel it is our duty to work and contribute to the society which provides us with everything.

Council Commentary

No further comment is required.

If think that CTS in principle is a good idea as it incentivises low income earners into work. However, those at the very bottom may need compensating through other means if they are to survive in a climate that helps those that can and do work. Those with social problems or other issues who cannot work and live only on public funds will be squeezed to the extent that crime may be the only option.

Council Commentary

The Council proposes to offer 12 monthly instalments for payment of Council Tax next year in addition to the 10 currently available and will work in collaboration with other stakeholders to assist claimants with either obtaining work or seeking support from other sources. The proposed Council Tax Support Scheme is intended to provide greater support to those that need it by reducing the amount of entitlement awarded for higher income claimants through the provision of the taper.

I do feel that each household in Brent should pay towards the Local Council Tax. I also feel very strongly that LB Brent should enforce this & 'claw' back monies owing.

Council Commentary

The Council Tax Payer for each domestic property in Brent is currently required to pay Council Tax unless an exemption is granted, or they (or a partner in the case of a couple) are in receipt of a "passported benefit". Where Council Tax is payable but remains outstanding, a range of collection and enforcement measures may be used to obtain payment. This will continue to be the case under the proposed Council Tax Support Scheme with the exception that working age claimants in receipt of "passported" benefits will be required to make a minimum contribution of 20% towards their Council Tax unless they are protected by the proposed qualifying criteria applicable to persons of pensionable age, disabled persons or recipients of war widows pension.

If the Tories win the next election & scrap Senior citizens Freedom Passes, charge for prescriptions etc, charge for TV licences & so on and cannot afford to increase the pension then Brent should bear this in mind, there are a lot of people who fall into this category.

Council Commentary

The proposed scheme generally protects persons of pensionable age from the effects of the changes through a set of national rules and regulations. There is no provision to vary the provisions of the Council Tax Support Scheme for this group of claimants as it is regulated nationally by the Government.

People will suffer from depression and stress.

Council Commentary

The Council is developing a publicity and communications campaign to ensure that claimants are informed of the changes significantly in advance of annual billing next year. Additionally, 12 monthly instalments will be available for Council Tax Payers that elect to pay by this method to assist in spreading the financial implications of the changes. The Anti Poverty Strategy and Recovery Policy will also be reviewed to ensure that they incorporate the effects of the changes and these will be subject to prior consultation with key external stakeholders.

I felt today was a very good informative group.

Council Commentary

No further comment is required.

No job opportunities and people on benefits cannot afford to pay 20% it is unfair.

Council Commentary

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme seeks to achieve this by increasing the level of earnings disregarded for single claimants, couples and single parents by £10 per week to £15, £20 and £35 respectively. Additionally, it proposes an increase in the level of non dependent deductions for other adults resident in the claimant's home from nil to £6.60 where they are in receipt of Job Seekers Allowance (Income Based). The minimum contribution of 20% has been determined to meet the anticipated funding gap arising as a consequence of the proposed funding changes next year. This is intended to be partially

mitigated through proposed changes to the Council Tax discounts and exemptions.

There will be an opportunity for Council Tax payers to pay the Council Tax in 12 monthly instalments from next year rather than the present 10 available and payment arrangements will be available within the scope of the Council's Anti Poverty Strategy and Recovery Policy.

No additional income from anywhere else and expected to pay council tax in addition to all currently increasing bills and difficulty to find jobs.

Council Commentary

The minimum contribution of 20% has been determined to meet the anticipated funding gap arising as a consequence of the proposed funding changes next year. This is intended to be partially mitigated through proposed changes to the Council Tax discounts and exemptions. Additionally, some claimants will be protected from the effects of the changes where they meet the qualifying criteria.

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme seeks to achieve this by increasing the level of earnings disregarded for single claimants, couples and single parents by £10 per week to £15, £20 and £35 respectively. Additionally, it proposes an increase in the level of non dependent deductions for other adults resident in the claimant's home from nil to £6.60 where they are in receipt of Job Seekers Allowance (Income Based).

There will be an opportunity to pay the Council Tax in 12 monthly instalments from next year rather than the present 10 available and payment arrangements may be available within the scope of the Council's Anti Poverty Strategy and Recovery Policy.

With benefit reduction and utilities increase how can someone with full benefit afford 20% contribution

Council Commentary

The minimum contribution of 20% has been determined to meet the anticipated funding gap arising as a consequence of the proposed funding changes next year. This is intended to be partially mitigated through proposed changes to the Council Tax discounts and exemptions. Additionally, some claimants will be protected from the effects of the changes where they meet the qualifying criteria.

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme seeks to achieve this by increasing the level of earnings disregarded for single claimants, couples and single parents by £10 per week to £15, £20 and £35 respectively. Additionally, it proposes an increase in the level of non dependent deductions for other adults resident in the claimant's home from nil to £6.60 where they are in receipt of Job Seekers Allowance (Income Based).

There will be an opportunity to pay the Council Tax in 12 monthly instalments from next year rather than the present 10 available and payment arrangements may be available within the scope of the Council's Anti Poverty Strategy and Recovery Policy.

The proposals should be scrapped.

Council Commentary

The Government is intending to bring the relevant statute into effect later this year and if the Council does not determine a local scheme by 31st January 2013, latest, the savings required to meet the funding gap will not be achieved and will need to be found elsewhere. This suggestion will not therefore be progressed.

Here we are talking about Council Tax SUPPORT. However, these will radically change in future whereby forthcoming valuation of ALL properties in Brent will affect house pricing at market values.

Council Commentary

It is considered that this response relates to the revaluation of Council Tax Valuation Bands that are currently based upon market values at 1st April 1991. There is no scheduled provision to revalue domestic properties at present and therefore no further comment is made.

People who are near retirement age and still looking for a job will suffer a lot due to the changes and the proposals Brent Council is undertaking. Instead of helping them while they are trying hard to get a job, this new proposal is making life much harsher. The job-seekers allowance is not even sufficient to pay bills and put food on the table and the person would have to live on very little means of buying food to eat. I hope each council will assess people according to their needs and help, instead of punishing them even though they do not have the financial ability to cope with everyday living expenses.

Council Commentary

The proposed Council Tax Support Scheme is intended to provide support to those in genuine need within the financial resources available with protection available to those that meet certain qualifying criteria. In other instances, certain incomes may be disregarded such as child benefit for example.

Council Tax Payers will be able to elect to pay by 12 monthly instalments next year rather than the 10 currently available and payment arrangements may be available in certain circumstances.

More council properties and bigger properties

Council Commentary

This comment will not be progressed further as it is unclear as to the nature of the additional comment and does not appear to be appropriate to the local Council Tax Support scheme.

The government to be more understanding especially for those with low incomes

Council Commentary

The Government is proposing to provide a set of rules and regulations for determining support for persons of pensionable age. The proposed Council Tax Support Scheme is a local scheme that is intended to determine the levels of support for working age claimants and include the national rules and regulations for persons of pensionable age. Greater entitlement to support will be available for persons in receipt of a low income in comparison to those with a higher income through the effects of the taper and means test.

The government and council to be more considerate

Council Commentary

As the comment is partially directed towards the Government rather than the Council's proposed local Council Tax Support Scheme, no further comment has been submitted on this element. In relation to the Council's proposed scheme, it is intended to provide support for those who genuinely need it within the context of the funding gap and having due regard to the Council's obligations as set out within the main report. To this extent, certain groups of claimants are protected from the effects of the minimum contribution towards Council Tax of 20% and certain income types are to be disregarded.

Consider the effects on children and young people under the proposals especially due to all the other charges including Housing Benefit and student fees.

Council Commentary

The Council proposes to disregard Child Benefit and Guardians Allowance as an income meaning that entitlement to Council Tax Support will be unaffected by the receipt of these incomes. Additionally, a premium will be added to a claimant's applicable amount (i.e. basic living needs requirement) for each dependant child that lives with them and child care disregards may be given in certain circumstances. Consideration has also been given to the proposed Council Tax Support Scheme and Child Poverty Act requirements and this has been addressed within the main report to the Executive and this report.

This is harsh and it would be good if the Council could give extra help to people who receive Benefit.

Council Commentary

The local Council Tax Support Scheme will affect all working age claimants currently in receipt of Council Tax Benefit as well as claimants becoming entitled to support from 1st April 2013. The Council proposes to provide protection for persons of pensionable age and claimants where they or a dependant in their household is disabled as set out in the qualifying criteria or in receipt of a war disablement or war widow pension. The funding gap to be met means that it is not possible to give extra help to people receiving Benefit as that could include all of the current Benefit caseload. However, consideration has been given to disregarding certain types of income in whole or in part such as Child Benefit and Guardians Allowance to ensure that entitlement to Council Tax Support is not affected by receipt of such incomes.

All Council Tax should be one price not due to area

Council Commentary

The Council Tax is currently set by each Local Authority based upon its local spending requirements and income from other sources. As this is a statutory framework, there is no current provision to address this request.

Principle 3 – Very limited work at the moment

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme seeks to achieve this by increasing the level of earnings disregarded for single claimants, couples and single parents by £10

per week to £15, £20 and £35 respectively. Additionally, it proposes an increase in the level of non dependent deductions for other adults resident in the claimant's home from nil to £6.60 where they are in receipt of Job Seekers Allowance (Income Based).

Principle 6 – Unfair to those who have worked and saved

Council Commentary

This principle refers to the reduction in the capital limit from £16,000 to £6,000 for working age claimants only. As there will be less funding available, the Council needs to ensure that those with the greatest need receive the greatest help. To this extent, it is proposed that the capital limit be reduced to allow more support to be directed to those on lower incomes and to protect the most vulnerable.

Disabled should not be protected if income is high

Council Commentary

It is currently understood that there may not be a software provision that links the protection for disabled to the level of income as it is dependent upon receipt of a premium or income type. Additionally, this proposal would be administratively complex to establish and maintain. This proposal has not therefore been progressed further.

Will Council Tax prices increase over the years?

Council Commentary

It is not possible to respond on this comment as the levels of Council Tax for future years will be set by the Council dependent upon local spending requirements and income received from grants, fees and charges, Council Tax, etc.

Need more support for working adults with children

Council commentary

The proposed Council tax Support Scheme provides that claimants will be able to retain an additional £10 per week from their weekly earnings without it affecting their entitlement to support. Additionally, child care expenses of up to £175 per week for a single child and £300 for two or more children may be disregarded from earned income where the claimant or their partner works 16 or more hours per week and qualifying criteria are met.

Protection for families with one or more disabled people should be protected if they have no other income than what they receive as a carer which is a minimum amount.

Council Commentary

A claimant will be protected from the minimum contribution of 20% towards their Council Tax if they or a dependant in their household receive Disability Living Allowance, a Disability Premium or Enhanced Disability Premium, Disabled Earnings Disregard or Disabled Person's Reduction for Council Tax purposes. Consequently, the presence of a disabled person within the definition outlined above would be sufficient to ensure protection irrespective of whether there is a carer also resident in the home. As a consequence of the consultation, it is proposed to extend protection to include a carer where they are in receipt of a Carers Allowance.

Would it be possible to offer those struggling to pay the opportunity to receive a reduction / discount in return for labour on community projects – (2 responses)

Council Commentary

This proposal cannot be accommodated within the proposed software functionality and would not be deliverable within the timescale available for determining the scheme (i.e. by 31st January 2013). Additionally, such a scheme would be administratively complex and hence costly to establish and maintain. However, there will be a potential for Council Tax Payers to pay their monthly instalments over 12 months from April 2013 rather than the 10 permitted at present if they elect to take up that option.

There should be no nil income option at all. People not trying to get a job because they get enough benefit for all their children they do not have to work.

Council Commentary

It is unclear as to what this comment is suggesting. However, the proposed Council Tax Support Scheme incentivises work through an extra £10 per week earnings disregard. Where a claimant appears to have no income, further enquiries are undertaken to establish how they are meeting their day to day living expenses.

People that have lots of cash and cars should pay but not poor people!

Council Commentary

The proposed Council Tax Support Scheme reduces the capital limit for eligibility from the £16,000 in the current Council Tax Benefit Scheme to £6,000 and ensures that claimants in receipt of a higher income are entitled to less support than those in receipt of a lower income through the effects of the taper. Additionally, the Council proposes to protect certain claimants from the effects of the change through the scheme including persons of pensionable age and disabled.

Just concerned about single parents

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme therefore seeks to achieve this for single parents by increasing the level of earnings disregarded by £10 per week to £35.

Additionally, child benefit and guardians allowance shall both be disregarded as income from the means test calculation carried out and an additional premium shall be given for each child resident in the claimant's home. Where the claimant or a partner is working at least 16 hours per week and qualifying criteria are met, up to £175 for one child and £300 for two or more children may be disregarded towards the payment of child care expenses.

The cost of providing protection for this group has already been set out previously within this report and would require significant savings to be made elsewhere within the scheme or from alternative sources of funding.

It is currently understood that the proposed software for administering the scheme may not be able to achieve protection for single parents from the effects of the minimum contribution for Council Tax or for specific ethnic groups within the Borough.

Council Tax Payers will also be able to elect to pay their Council Tax by 12 monthly instalments next year rather than the 10 permitted at present and payment arrangements may also be given in certain circumstances as set out in the Council's Anti Poverty Strategy and Recovery Policy.

Did not know about this

Council Commentary

There is no response required for this comment.

There should be a head count of the people living in the house.

Council Commentary

Information to support a claim including occupancy of the claimant's home is required and validated as part of the initial application process.

This comment would be administratively difficult to achieve through a visit that would require additional resources to be available to undertake such a task and may not provide a reliable outcome anyway. If there are concerns about the status of a claim and / or the accuracy of information provided by a claimant, these will be subject to further enquiries and investigation as appropriate to ensure that entitlement is genuine and to prevent fraud and error from occurring. Certain information can already be obtained from the Electoral Register and other permitted information sources without the need for a visit to the premises concerned.

You use the term 'customer'. We are not your customers. Our relationship with the council is not that of a commercial transaction. We are residents, or citizens, or similar.

Council Commentary

There is no response required for this comment.

Everyone should pay ' A Poll Tax ' not pay a tax because of the value of their home. Council Tax should be like road taxation the Mini car owner pays the same as the Rolls Royce. I believe with everybody paying the same tax the people of Brent would certainly feel they are equally sharing the cost of running Brent services

Council Commentary

The Council Tax is payable for each domestic property within the Borough and is valued by the Listing Officer at the Valuation Office Agency in accordance with defined statutory provisions. There is therefore no provision for Brent residents to pay the same level of Council Tax across the Borough. The proposed Council Tax Support Scheme intends that each claimant pays a minimum 20% Council tax contribution unless they are protected and it is possible that this comment has been erroneously attributed to that principle.

Could breach equality duties and fundamental human rights

Council Commentary

An Equalities Impact Assessment has been carried out for the proposed Council Tax Support Scheme and this is included as Appendix D to the main

report. The scheme is intended to comply with statutory obligations including the Human Rights Act.

This questionnaire is badly constructed - forced choice on page 1 does not reflect how I want to fill this in.

Using preference numbers 1-6 each number only once is silly and might distort the final result, two different things could be of equal importance.

Council Commentary

The instructions for the consultation questionnaire were designed to obtain the information required and ensure consistency in its completion that would aid the analysis and evaluation process. This would not be achieved if the questionnaire could be completed without instructions and consistency.

I think the proposal should go further. The Council should make its own assessment of entitlement rather than relying on evidence of other agencies as assessments are not always religiously undertaken. I know of many families on income support and housing benefit that should not be receiving them.

Council Commentary

Where another Government agency carries out an assessment of a claimant's means, that information may be shared with the Council under statutory provisions relating to data sharing. Where a statutory provision provides for this facility, the Council will apply it as it minimises delays for customers that may be otherwise experienced whilst information is sought, it reduces administration costs and ensures consistency in terms of data usage. Where inconsistencies arise or new information is received, claims may be reviewed and / or investigated where appropriate to ensure that entitlement is correct. If the respondent is aware of many families receiving Housing Benefit and Income Support that should not be receiving them, they should report these to the Council using the confidential helpline available for that purpose.

if we do not give support where it is needed people will slip through the net and there are enough children and adults below the poverty line

Council Commentary

The proposed scheme intends to provide support to those who genuinely need it through a means test applied. Consideration has been given to Child Poverty Act implications and other obligations and these are addressed within the main report to the Executive regarding the proposed scheme.

How shameful that Brent is 7th from bottom (Liverpool being the last)in Council Tax evasion!` A rose by any other name is still a rose` therefore `Council Tax Benefits by any other name is still Council Tax Benefits - Who really cares what it`s called just so long as the owed Council Tax is paid and the cuts remain unaffected !

Council Commentary

The Council seeks to recover unpaid Council Tax through the range of statutory enforcement measures available to it. The changes to central government funding from a subsidy for expenditure incurred to a fixed grant and based upon 90% of Council Tax Benefit expenditure in 2010/11 mean that a funding gap exists irrespective of Council Tax collection rates attained. The Council has considered within its scheme design potential collection rates and will continue to collect and enforce payment of Council Tax in the future to ensure that these are maximised.

Everyone should pay council tax and no benefit should be available. This will save millions of pounds every year, which can be spent on improving safety and reducing the high crime rates in the Borough of Brent.

Council Commentary

The Council has a legal obligation to provide a local Council Tax Support Scheme. If a scheme has not been determined by the Council by 31st January, a default scheme will be imposed on the Council by the Government that will not meet the funding gap arising from the financing changes.

Rather than looking to squeeze every last penny out of residents, why not look at how big, local businesses can help/contribute more

This comment is not appropriate to the proposed Council Tax Support Scheme. It relates more specifically to the financing of Council expenditure plans.

What is the point of incentivising work when people can't find any?

Council Commentary

The Government set out in its Policy Statement of Intent that one of its key objectives from the localisation of Council Tax Support was to incentivise work. The proposed scheme seeks to achieve this by increasing the level of earnings disregarded for single claimants, couples and single parents by £10 per week to £15, £20 and £35 respectively. Additionally, it proposes an increase in the level of non dependent deductions for other adults resident in

the claimant's home from nil to £6.60 where they are in receipt of Job Seekers Allowance (Income Based).

A panic is going to happen for people such as myself and help and organising should be set out now and we should all be explained to how we have to deal with these changes and how much we pay explained now. Instead of having these changes start and everyone bombarding phone lines offices in April next year as seems to me this is all rushed considering it starts in April and Councils are still trying to organise who pays what!!!!

Council Commentary

It is currently intended that the proposed Council Tax Support Scheme will be considered and made by Full Council in November 2012 and that following the decision, a campaign of communication and publicity will be undertaken to ensure that claimants are aware of the changes and the implications for Council Tax payments in the next financial year.

The new proposal will affect poor people and they will be the poorest.

Council Commentary

The proposed scheme affects all working age claimants unless protected. As the proposed scheme is intended to be applicable to all current recipients of Council Tax Benefit, it will impact upon those with a low income. However, the effects of the changes have been mitigated in part through the proposal to partly finance the funding gap from other means subject to Council approval and to protect certain groups of claimants from the requirement to make the minimum 20% contribution. Additionally, certain income types will be disregarded either in part or in full to ensure that receipt of these does not affect entitlement. Non dependent deductions will also not be applicable in certain circumstances such as where the claimant is in receipt of a disability living allowance or the non dependant is in receipt of Income Support.

I already can't afford to feed myself, my dog and pay the electricity bill - now you want me to pay an extra 250 quid a year.

The minimum contribution of 20% has been determined to meet the anticipated funding gap arising as a consequence of the proposed funding changes next year. This is intended to be partially mitigated through proposed changes to the Council Tax discounts and exemptions. Additionally, some claimants will be protected from the effects of the changes where they meet the qualifying criteria.

There will be an opportunity to pay the Council Tax in 12 monthly instalments from next year rather than the present 10 available and payment arrangements may be available within the scope of the Council's Anti Poverty Strategy and Recovery Policy.

JSA is set at the absolute minimum one needs to survive. In my case, it's not even enough for that. How can a reasonable person expect someone living on the breadline to increase their payments so substantially?

The minimum contribution of 20% has been determined to meet the anticipated funding gap arising as a consequence of the proposed funding changes next year. This is intended to be partially mitigated through proposed changes to the Council Tax discounts and exemptions. Additionally, some claimants will be protected from the effects of the changes where they meet the qualifying criteria.

Protection for claimants in receipt of Job Seekers Allowance has been considered as set out within this document but would be administratively complex due to the distinction between Income Based and Contribution Based Job seekers Allowance and the migration of income based cases to Universal Credit from October next year. Additionally, the cost of affording protection to such claimants has been considered previously within this report and would require significant changes to be made elsewhere to the scheme or alternative sources of funding to be identified.

There will be an opportunity to pay the Council Tax in 12 monthly instalments from next year rather than the present 10 available and payment arrangements may be available within the scope of the Council's Anti Poverty Strategy and Recovery Policy.

Please protect people in joint tenancy arrangements

Council Commentary

The proposed scheme provides for Council Tax Support to be calculated on the share of the joint tenant's Council Tax liability. Where joint tenants live in a home, they are generally jointly and severally liable for payment of the remaining Council Tax balance irrespective of whether they receive benefit for their share of the Council Tax. This is a feature of the Council Tax statutory provisions and not one that is a consequence of the Council Tax Support scheme.

Non passport holders should pay more than UK residents

The Government will be prescribing the circumstances in which persons from abroad may be eligible for entitlement to Council Tax Support through a set of national rules and regulations. UK residents will be eligible for support according to the conditions of the Council Tax Support Scheme for persons of working age.

I also think if you have a non dependant in your home you should not assume that they are making a contribution to the house hold and it should be the council responsibility to get any rent council tax from non dependants. How can Brent council create the right incentives to get people into work, when you got rid of a lot of jobs and kept the temps on. If you are asking people to pay under this new scheme then your staff have to work. Currently living in Neasden I find it very dirty. Neasden shopping centre is dirty there is always rubbish bags everywhere. if you want people to pay you have to be on top of these things

Council Commentary

The proposed Council Tax Support Scheme provides for a deduction to be made where there is another adult, or adults, resident in the household according to their circumstances and / or in certain instances, the circumstances of the claimant. The level of deduction varies in general terms according to the gross earnings of the claimant with other rates of deduction provided where the non dependant is not in paid employment. These represent the policy intent that where a claimant has other adults living in their household that have an income, that an assumed level of contribution towards bills would be anticipated. The remaining part of the comment appears to be unrelated to the Council Tax Support proposals and therefore has not been considered further.

We think that, you should definitely pay Council Tax to those who are on pensions or low income.

Council Commentary

Persons of pensionable age will be protected from the effects of the proposed changes by virtue of national rules and regulations. Claimants in receipt of a low income may be eligible for Council Tax Support where they meet the qualifying criteria. The proposed scheme is intended to provide support to claimants in receipt of a low income by providing protection for the disabled, persons of pensionable age and recipients of war pensions. Claimants in receipt of higher rates of income will receive less support through the effects of the taper.

The Council has given bigger houses to those who have a small family and in that case they have to pay extra tax. For example I have 3 children and the Council has provided me with an 8 bedroom house and I have to pay £280 council tax although I am a pensioner and I cannot afford it.

Council Commentary

The Council Tax Support available for persons of pensionable age will generally be unaffected by the proposed changes as there will be a set of national rules and regulations governing such cases that replicate existing provisions. The separate matter of accommodation size provided to a person as a consequence of Housing provisions is not a matter applicable to the Council Tax Support Scheme.

All persons that are sick should be 100% discounted.

Council Commentary

The Council is proposing to protect claimants from the requirement to pay the minimum 20% contribution for Council Tax where they, or their dependants, are in receipt of Disability Living Allowance, a Disability Premium or Enhanced Disability Premium. A Disability Premium may be given in some circumstances where a person is defined as long term sick. The definition of sickness in the respondents comment submitted would need to be defined as it could potentially include persons who are temporarily unavailable to work as well as those who are permanently unable to work. In view of the additional administrative complexity that would be created from the need to establish sickness details, this proposal has not been progressed further.

It is hard enough without being penalised further. When working we/they all pay full rate. What else are our taxes for? Apart to assist when in distress. After all when working we pay for others.

Most of us do not enjoy getting state benefits until there is no other option why test us more when we have worked hard all our lives to pay taxes and exhaust and tire us more to prove that we deserve and we are entitled to it.

Council Commentary

Council Tax Support is a means tested benefit and not contribution based. As there is reduced funding available, the funding deficit either needs to be met from within the scheme itself or from alternative sources. The proposed scheme incorporates a minimum contribution of 20% with protection for certain groups such as disabled persons.

"Feature 1: We are extremely concerned by this proposal. The increase in the age threshold of the shared accommodation rate up to 35 means that there will be an increase in the number of individuals looking for shared accommodation. In many areas there is significant competition for these properties. This feature reduces the incentive for individuals to let spare rooms to individuals on low incomes, thereby potentially reducing the supply of properties further. Furthermore, if an individual on a low income were to move into a property with someone on a higher income, it is likely that the claimant would charge the low income tenant half of the council tax amount, which is likely to be unaffordable for the individual on a low income, risking either them going into debt or a breakdown in the relationship, possibly leading to being asked to leave and subsequent possible homelessness.

Council Commentary

This comment relates to the cessation of second adult rebate proposed within the scheme. The continued provision of this aspect of the existing national Council Tax Benefit scheme would cost £87,000 that would need to be funded from elsewhere within the scheme or via alternative sources of funding. The above comment appears to relate to a scenario whereby there may be a rental agreement of some description and / or rent payable by a tenant to a landlord.

Council Tax is normally payable by an adult (i.e. aged 18 or over) who has their sole or main residence in a dwelling. Where the Council Tax Payer lets a room to a tenant, the tenant will not generally be liable for payment of the Council Tax to the Council and therefore Council Tax Support will not apply in that instant.

Entitlement to Second Adult Rebate is also unlikely to be applicable under the current Council Tax Benefit scheme as it cannot be awarded where a claimant receives a rent from anyone that is resident in their home.

Second adult rebate is often considered within the existing Council Tax Benefit scheme where a claimant has a non dependant son or daughter living with them who is not a "disregarded person" for Council Tax purposes. In this context, a disregarded person could include a carer, care worker, apprentice, or student for example.

As entitlement to second adult rebate cannot occur in any situation where a rent is payable to the claimant by someone else resident in their home, it is considered that the proposed cessation of second adult rebate would not give rise to a different outcome to that of the present national scheme for the scenario given. As the claimant by definition would have sufficient income to

pay the Council Tax without recourse to Benefit, it is considered that the cessation of second adult rebate would not unduly penalise such persons.

Council Tax Support rates should be increased in line with the cost of basic living needs as these are currently rising rapidly, and any calculations should take this into consideration in order not to cause unnecessary hardship.

Council Commentary

The effects of the reduced scheme funding and growth in expenditure / caseload have been modelled to determine the likely funding gap for year 1 and year 2 of the proposed Scheme. Applying the increases to the rates proposed by the respondent would require the Council to fundamentally review its scheme provisions in year 2 to enable the potential funding gap to be achieved or to find alternative sources of finance to meet the costs of the scheme. In the former case, this could compromise consistency for claimants in terms of the local scheme provisions as they would need to be revised. Additionally, they would also require transitional protection to be considered for any claimants that may be worse off as a consequence of any proposed changes to the scheme in that year. In the latter case, the source of alternative funding to meet the potential funding gap would need to be determined and may have an opportunity cost.

The Council should reduce spending elsewhere to meet the funding gap.

Council Commentary

Consideration has been given to mitigating the extent of the Council Tax Support Scheme funding gap through alternative sources of finance available. To this extent, it is proposed that changes will be proposed to levels of discounts / exemptions available for specified Council Tax exemption classes subject to Council approval. Spending decisions will be determined by the Council having regard to its proposed future income and expenditure plans including those of the Council Tax Support Scheme.

The proposal should be fair

Council commentary

The proposed local Council tax Support scheme affects all working age claimants although with protection provided for those that are disabled, in receipt of a war pension or of pensionable age. This comment should also be considered in relation to the results obtained from the consultation process undertaken.

The expectation of someone living alone to pay 100% of Council Tax with the loss of the 25% discount would effectively mean they will be subsidising others and may force some into poverty and onto benefits?

Council Commentary

The discount for single resident adults of 25% will not be affected by the proposed changes. A single adult currently in receipt of 100% Council Tax Benefit will still receive their 25% discount from 1st April 2013 but may be required to pay a minimum of 20% of the remaining Council Tax amount payable unless they qualify for protection under the Council's proposed eligibility criteria.

Will there be an appeals procedure?

Council Commentary

There will be an appeals procedure and this is included in the recommended scheme.

Elderly people/pensioners are being hit in several areas - I would ask the Council to pay particular attention to this group

Council commentary

As claimants of pensionable age will generally be protected from the effects of the changes through a set of national rules and regulations, this comment is already addressed within the proposed scheme.

There were 11 responses that did not make any comment for this question.