	<b>Council</b> 27 February 2025
	<b>Report from the Corporate Director of Partnerships, Housing and Resident Services</b>
	<b>Lead Member – Cabinet Member for Housing &amp; Resident Services (Councillor Fleur Donnelly-Jackson)</b>
<b>Review of working age Council Tax Support Scheme for 2025/26</b>	

<b>Wards Affected:</b>	All
<b>Key or Non-Key Decision:</b>	Council
<b>Open or Part/Fully Exempt:</b> (If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)	Open
<b>List of Appendices:</b>	Seven Appendix A: Impact and cost savings with income bands Appendix B: Impact and cost savings with changes to non-dependant deductions Appendix C: Equality Impact Assessment Appendix D: Scenarios Appendix E (Part 1): Consultation Report Appendix E (Part 2): Consultation Responses Appendix E (Part 3): Consultation Comments Appendix F: Greater London Authority Response Appendix G: Citizens Advice Brent Response
<b>Background Papers:</b>	None
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## 1. Executive Summary

- 1.1 Full Council is asked to consider and approve the revised Local Council Tax Support (CTS) scheme 2025/26. This report sets out:

- A recommended new local Council Tax Reduction scheme (known as Council Tax Support) to be effective from 1 April 2025.
- The reasons why a change of scheme is both necessary and desirable.
- The design options and features considered in the design of the new scheme.
- The findings and outcomes of the consultation arrangements for the proposed scheme which was conducted over an 8-week period between 21 October and 15 December 2024.
- The financial and equalities impacts of the recommended CTS scheme for Brent residents.

1.2 To note alternative scheme options that existed and the reasons for these options being discarded. This option to 'do nothing' – No changes are made to the existing scheme. This option would mean the Council will need to identify £5m of savings elsewhere within the 2025/26 budget. At this point in the budget setting process if no alternative savings can be identified, it is proposed to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process. This is referenced in the Budget and Council Tax 2025/26 report, also on this Full Council agenda.

1.3 Members of Council to agree that the authority is to be delegated to the Corporate Director of Resources and Finance for yearly changes of income bands in line with CPI and any other changes recommended at General Purposes Committee for Council tax and Council Tax Support in consultation with the relevant lead member.

## 2. Recommendation(s)

2.1 Members of the Council are asked to consider and approve the revised Local Council Tax Support Scheme for 2025/26 to incorporate the following:

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their CTS will then be calculated based on their income and this will determine which income band they fall into. This would reduce the cost of the scheme by £7.6m. Detailed explanations and calculations, number of residents impacted and the proposed weekly reduction in CTS are shown in **Appendix A**.
- To consider and agree the simplification of the non-dependant charges and have two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants "out of work" and £20 per week for non-dependants "in work". This would remove the need to verify income for non-dependants for CTS claims and reduce the administrative burden. Adopting this proposal would reduce the cost of the scheme by £0.7m. Detailed explanation and calculations of the proposed non-dependant deduction, number of households affected

and proposed weekly reduction in CTS support are shown in **Appendix B**.

## **2.2 Technical and administrative changes**

- 2.2.1 To consider and agree that the amendments to CTS scheme to include the Universal Credit notification received from DWP for Council tax, as start date of claim for Council tax reduction if there is entitlement to it.
- 2.2.2 To consider and agree the alignment of the backdating rules for new CTS claim with the Housing Benefits and Universal Credit regulations i.e. for a maximum of one calendar month. The backdating request is made at the time of submission of a new claim. This change will reduce the administrative burden, and customers will not lose out as we will accept the start date as per DWP notification date to start date of entitlement. In exceptional circumstances, the Council will consider revising the claim for more than a month e.g. bereavement of close relative.
- 2.2.3 To consider and agree the income bands for households is reviewed every year in line with the Consumer Pricing Index (CPI) from September of previous year to be considered for the new financial year.
- 2.3 To consider and agree that a review and update of section 13A policy for hardship fund for Council tax, including an additional £1.5m fund to support residents, will be considered at Cabinet on 10 March 2025.

## **3. Cabinet Member Foreword**

- 3.1 As we navigate the ongoing challenges of delivering essential services amidst rising costs and growing financial pressures, Brent Council continues its commitment to supporting our most vulnerable residents while ensuring that everyone contributes fairly to the funding of our community. The Council Tax Support (CTS) Scheme, which provides financial relief for many, faces growing costs with a forecasted increase to £21.2 million in 2025/26 for working age.
- 3.2 This year, we are agreeing to the changes to the working-age CTS Scheme that will not only alleviate the administrative burdens but also deliver significant cost savings for the Council. This will allow us to provide significant support for vital services elsewhere in the Council. We have consulted residents and key stakeholders on the proposed changes. Officers have completed the Equalities Impact Assessment, the outcome of the consultation and responded to all enquiries.
- 3.3 These changes reflect our broader priorities as a borough: ensuring financial sustainability, targeting support where it is needed most, and fostering a sense of collective responsibility. While pensioners remain protected by national schemes, the changes for the working-age population include designing the scheme with a standard 35% minimum payment and simplified non-dependant charges. The changes will save up to £8 million, of which £1.5 million will be reinvested into a hardship fund for those in the greatest need.

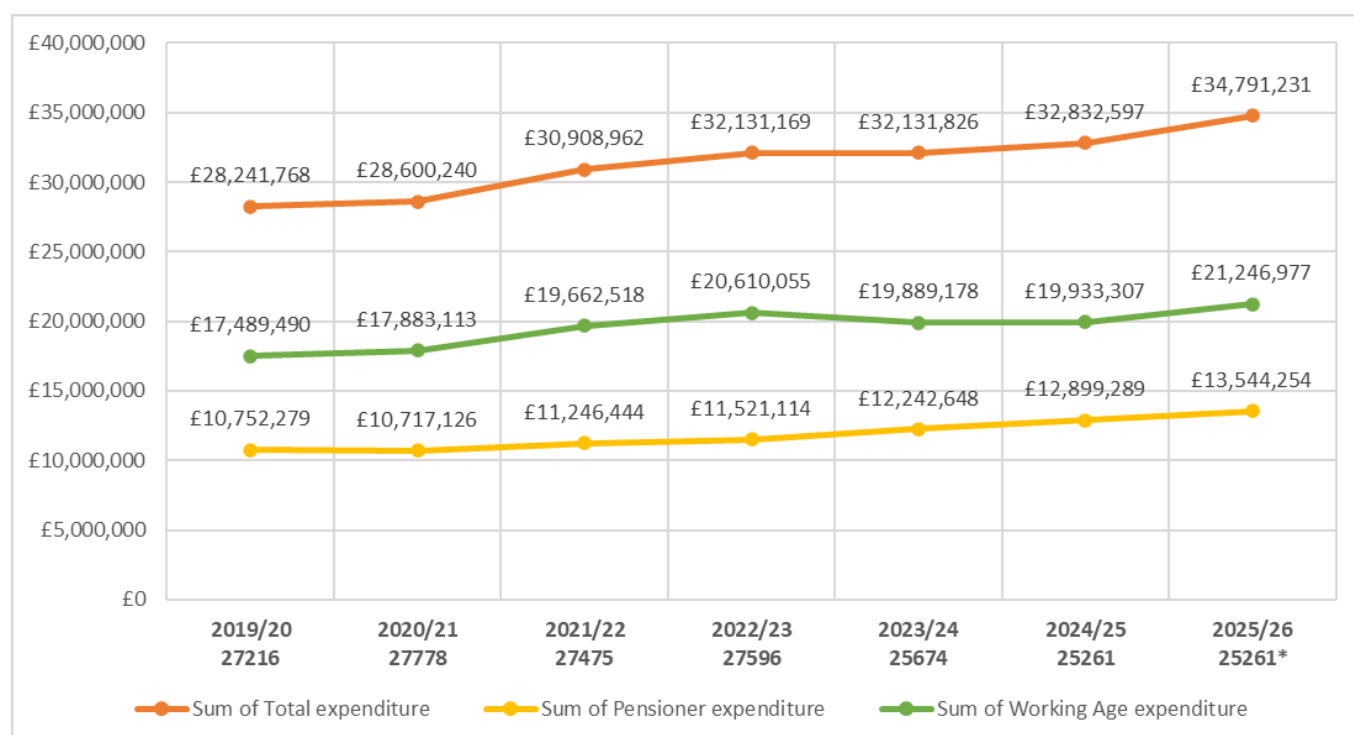
## **4 Background**

- 4.1 As part of the 2010 Spending Review, the Government announced its intention to localise support for Council Tax from 2013 onwards and reduce expenditure by 10%. This would replace Council Tax Benefit, a nationally funded scheme which allowed households in receipt of out of work benefits to receive 100% council tax benefit and therefore not have to pay council tax. The Local Government Finance Act 2012 introduced Council Tax Support. Since this time, Council funding levels have reduced by a third and at the same time the total cost of the scheme has grown to £32.8m (estimated in 2024/25).
- 4.2 This means that unlike other universal benefits which are funded by Central Government, CTS is financed by local authorities, through a combination of council tax, business rates and the balance of the original government grant. The delays in reviewing the way authorities are funded, called the Fair Funding Review, means that funding levels do not reflect the current population demographic needs.
- 4.3 CTS is awarded as a reduction against council taxpayer's gross liability, like a discount or exemption, so the customer pays less. The scheme has two parts, a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact on the non-statutory element of the scheme.
- 4.4 Following Full Council approval, Brent moved to a CTS income banding scheme from April 2020, whereby the level of support provided to a household is assessed based on weekly income against a series of income bands.
- 4.5 Currently, the amount of CTS awarded for 2024/25 totals £32.8m, paid to 16,833 working-age and 8,428 pension-age claimants. (Total caseload 25,261).
- 4.6 The cost of the current CTS scheme is not financially sustainable. Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m, rising to c£30m by 2027/28. This is to be addressed through identifying further savings, efficiencies, and income generation options. The changes will provide an option for Full Council in addressing this budget gap.

## **5 Review of the current trends in CTS claims**

- 5.1 The cost of the CTS scheme for 2025/26 is forecast to be £34.8m of which £21.2m relates to the working age claimants.
- 5.2 The working age caseload has continued to steadily drop since 2023/24 whilst the pension age caseload has remained static.
- 5.3 The table below shows that, based on the current caseload of 25261 and Council tax charge for 2025/26, if no changes are implemented it is projected that the scheme costs would rise to above £34.7m in the financial year 2025/26.

Caseload	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25
<b>Pensionable</b>	8,788	8,578	8,547	8,488	8,482	8,428
<b>Working Age</b>	18,428	19,200	18,928	19,108	17,192	16,833
<b>Total Caseload</b>	27,216	27,778	27,475	27,596	25,674	25,261
<b>Total Expenditure</b>	£28,241,768	£28,600,239	£30,908,961	£32,131,169	£32,131,826	£32,832,596



- 5.4 The recommended changes to the discretionary council tax support scheme will bring the overall scheme costs closer to the London average of £22m. The chart below shows Brent Council Tax Support spend compared to London boroughs it shows an average cost of around £22m for council tax support among London boroughs for 2022/23.

## 6 Council tax Support Scheme - Number of Claimants and average costs in London as at spring 2024

- 6.1 Almost all Councils' current CTS schemes are variations on the former CTB scheme and income banding scheme, with the most widely adopted variation being the "minimum contribution." Contributory amounts currently range from 0% to 50% in London.

6.2 We are aware that eight other boroughs are in the process of reviewing the CTS schemes for 2025/26 and the range of minimum charge currently forecasted is 20% and 50%.

Borough	Working Age Caseload	Pensioner Caseload	Total Caseload	Working Age Cost	Pensioner Cost	Total Cost
Islington (I)	17994	7021	25015	25.606	10.803	36.409
Tower Hamlets (I)	20371	7366	27737	23.362	8.934	32.296
Haringey	18288	7816	26104	22.921	11.793	34.714
Croydon	18834	7935	26769	22.615	13.264	35.879
Camden (I)	15336	6900	22236	21.701	11.314	33.015
Hackney (I)	18182	8629	26811	20.834	11.511	32.345
Brent	17065	8492	25557	20.216	12.965	33.181
Ealing	15602	7991	23593	19.918	12.186	32.104
Lambeth (I)	15117	8269	23386	18.877	10.807	29.684
Greenwich (I)	15110	6705	21815	17.811	7.94	25.751
Newham	18252	8017	26269	17.166	9.329	26.495
Hounslow	15680	5824	21504	16.222	8.413	24.635
Barnet	19692	7430	27122	16.022	11.138	27.16
Southwark (I)	15320	8243	23563	15.452	10.029	25.481
Enfield	28523	7642	36165	14.825	11.998	26.823
Lewisham (I)	12851	6837	19688	11.941	7.925	19.866
Waltham Forest	9085	5551	14636	11.263	8.156	19.419
Barking & Dagenham	10752	4479	15231	11.013	5.42	16.433
Redbridge	10042	5177	15219	10.354	8.063	18.417
Sutton	8028	3376	11404	9.661	4.955	14.616
Hillingdon	8462	4933	13395	9.421	7.124	16.545
Bexley	8836	4358	13194	9.29	6.093	15.383
Havering	8607	4997	13604	8.965	6.797	15.762
Kingston	5229	2437	7666	8.649	4.328	12.977
Merton	6627	3268	9895	8.509	5.72	14.229
Richmond	5031	2958	7989	8.08	5.119	13.199
Kensington & Chelsea (I)	7000	4497	11497	7.898	5.486	13.384

6.3 For context, the chart above shows the council tax support caseloads for the working-age and pensioner schemes in Brent and London boroughs for the 2024/25 financial year. The data shows that Brent has one of the highest averages of working-age council tax support caseload and costs. Making the recommended changes will mean Brent's overall expenditure is likely to be in the median across London.

- 6.4 The total reduction in the proposed CTS scheme is £8.3m and the contribution towards the Council's budget gap is £5m net. This is, in part, because the CTS scheme applies to funds collected by the Council on behalf of the Greater London Authority (£1.5m). In addition, the Council has prudently estimated that the collection rate for those impacted by the change may be lower.

## **7 Pension age claims**

- 7.1 Pensioners (of state pensionable age) will not be impacted by the proposed changes. Pensioners are protected as CTS is still controlled nationally for this age group and can cover up to 100% of their CTS bill depending on the circumstances of the resident. Therefore, CTS for Pensioners is outside of the scope of this consultation.

## **8 New Scheme Principles**

- 8.1 The proposed 2025/26 scheme will be based on the principles below:
- Ensuring everyone in a household makes a fair contribution towards funding local services via Council Tax, thereby ensuring everyone has a stake in the borough.
  - Universal – Asking all those in receipt of working-age CTS to pay a contribution.
  - Reduced administration costs by removing the need to request payslips or income information for non-dependants.
  - Minimal changes and easy to understand.
  - Increasing financial support through income maximisation, welfare, and financial support
- 8.2 The Council proposes to review the caseload and expenditure every year.

## **9 Rationale for change to the scheme**

- 9.1 Following the Equalities Impact Assessment and outcome of the consultation; the changes to the 2025/26 CTS scheme will contribute towards the budget gap facing the Council, to ensure that the Council remains financially resilient.
- 9.2 One proposed change is to simplify the non-dependant charges and have two flat rates, setting fixed weekly amount £8 per week 'out of work' and £20 per week for non-dependant 'in work'. This change offers significant benefits for households in reporting non dependant circumstances and will streamline the assessment process reducing the administrative burden for the Council.
- 9.3 The introduction of limiting backdating for new CTS claims to one month brings the backdating rules in line with existing regulations for Housing Benefits and Universal Credit regulations. This change will ensure consistency across different types of financial support, simplifying the process for residents and making it easier for them to understand their entitlements.

- 9.4 The introduction of using the Universal Credit (UC) notification date from Department for Work and Pensions (DWP) as the start date for CTS entitlement simplifies the process for households and ensures they receive support promptly and fairly.
- 9.5 The amendment to adjust income bands for households, based on the CPI from September of the previous year, ensures the CTS scheme remains fair, responsive, and reflective of economic realities.

## **10 Proposed Scheme options considered:**

- 10.1 At the outset of the CTS review, the scheme was identified as being a potential area from which savings could be made efficiently. Several options were modelled during the design phase to provide up to £5m net savings. If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore propose to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process.
- 10.2 A range of other options to amend the CTS scheme have been considered. The other options were:
- Minimum CTS award ranging from 20% to 65%.
  - Maximum CTS to be capped to Band D
  - Change the income bands.
  - Apply a cap on a minimum award of CTS of £2/£5 per week.
- 10.3 The above options for various reasons were not viable as it would not give us the necessary savings needed, administratively this would not be efficient, and the number of households impacted by the proposed changes would be significantly higher.
- 10.4 As part of the initial modelling undertaken prior to the consultation, consideration was also given to adopting different levels of minimum payments, of 30%, 40% and 55%. However, the preferred options, which was put out to consultation, was to consult on 35% minimum payment. This was because the budget gap facing the Council is significant. Given the scale of the budget challenge, the Council's preferred option was to consult on the proposal which resulted in the saving level needed.
- 10.5 Consideration has been given to safeguarding vulnerable households, particularly disabled individuals who previously received the maximum award of 100%. However, given the scale of the budget gap faced by the Council, it is not feasible to provide additional universal protection for this group. Instead of implementing a blanket approach, financial assistance will be offered through Section 13A Discretionary Hardship Fund, which has been allocated an additional £1.5m to support these households. This scheme will assess each claim based on individual household circumstances, considering factors such



as income and outgoings. This approach ensures both proactive and reactive support for those most in need, providing a fair and responsive solution within the constraints of the budget.

## **11 Proposals to amend the Council Tax Support scheme in 2025/26.**

11.1 The six proposals for the revised Scheme for 2025/26 are as follows:

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands.
- Simplify the non-dependant charges and have two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”.
- To align the backdating rules for new CTS claim with the Housing Benefits and Universal Credit regulations i.e. for a maximum of one calendar month.
- Review and update the section 13A policy for hardship fund for Council tax with the additional funds of £1.5m
- Update the income bands for customers and non-dependant depending on the Consumer Pricing Index (CPI) from September of the previous year.
- Amend CTS scheme to include the Universal Credit notification received from DWP for Council tax, as the start date of claim for Council tax reduction if there is entitlement to it.

11.2 Anyone who is liable for Council Tax (tenants and homeowners) can apply for council tax support. An Application for Housing Benefit or Universal Credit can be used as a claim for council tax support, or a separate council tax support application can also be completed. Low-income households (including those that work) will be entitled to some level of support towards their council tax, this depends on the individual circumstances.

11.3 The amount of council tax support in a council tax bill depends on:

- The local council tax support scheme
- Household type – working age (subject to the local scheme agreed) or pension age (subject to prescribed government regulations which must be adhered to)
- Household circumstances (for example single, part of a couple, number of children the household receives child benefit for, residency status)

- Household income - this includes savings, pensions, benefits and earnings for claimant and partner.

11.4 Further information on those aspects which must be followed in all schemes can be found in the Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012 (and subsequent amendments).

## 12 Summary of Changes

12.1 The table below summarises the main changes proposed, how they work in our current scheme and who would be affected by these changes:

Scheme Element	Current Scheme (2024/25)	Proposed Scheme (2025/26)	Who is affected
<b>Income Band</b>  Weekly income of £0-80	Up to a 100% council tax bill reduction is available to these claimants	Up to a 65% council tax bill reduction would be available to these claimants	12402 households currently within this income band.  All households would be affected by the proposed changes.  This has also been referred to as a minimum contribution as these claimants would go from paying 0% to 35% of their council tax liability.
<b>Income Band</b>  Weekly income of £80-110	Up to an 80% council tax bill reduction is available to these claimants	Up to a 50% council tax bill reduction would be available to these claimants	532 households currently within this income band  These households would be affected by the proposed changes.
<b>Income Band</b>  Weekly income of £110-150	Up to a 50% council tax bill reduction is available to these claimants	Up to a 30% council tax bill reduction would be available to these claimants	Nine hundred households currently within this income band  These households would be affected by the proposed changes.
<b>Income Band</b>  Weekly income of £150-250	Up to a 30% council tax bill reduction is available to these claimants	Up to a 20% council tax bill reduction would be available to these claimants	2999 households currently within this income band.  These households would be affected by the proposed changes.
<b>Non-dependant Deductions</b>	Non-dependant deduction amount is based on the level of income	Non-dependant deduction amount would be based on whether a non-	3165 households currently have at least one non-dependant living with them.

	<p>received by the non-dependant and which income band they fall into.</p> <p>Minimum of £5 deduction per week for non-dependants not working &amp; maximum of £20 deduction per week for those earning over £200 per week.</p>	<p>dependant is 'in work' or 'out of work.'</p> <p>Minimum of £8 deduction per week for non-dependants not working &amp; maximum of £20 deduction per week for those working.</p>	<p>These households would be affected by the proposed changes.</p>
<p><b>Universal Credit notifications to be treated as new CTS applications</b></p>	<p>Residents claiming Universal Credit must make a separate application to us to apply for CTS.</p>	<p>Automatically consider notifications received by DWP as applications for Council Tax Support. Thus, removing the need for most working age people to make a separate claim for CTS where they have been awarded Universal Credit.</p> <p>As a result of this change there should equally be less application of backdating rules as most working-age customers will not need to make a separate claim which can cause delays.</p>	<p>All working age residents of Brent that will have an award to Universal Credit and have a Council tax liability.</p>
<p><b>Backdating rules</b></p>	<p>Able to backdate claims up to the beginning of the financial year where the claimant is in receipt of Universal Credit</p>	<p>Maximum backdating period allowed would be one month where the customer is in receipt of Universal Credit or can show good cause as to why they have not applied sooner.</p>	<p>All new working age residents applying for Council Tax Support may see a reduction in the amount of support they receive if they are unable to claim on time.</p>
<p><b>CPI linking</b> Income Bands</p>	<p>Income band amounts are fixed and not linked to CPI.</p>	<p>Set the level of income (within the income bands) to qualify for support for customers in line with the CPI from</p>	<p>All households currently receiving working-age Council Tax Support (Approximately 16833) and future applicants that may</p>

		September of the previous year.	qualify due to higher income bands.  A higher likelihood that the value of the scheme to residents is maintained where household income increases.
<b>CPI linking</b>  Non-dependant deductions	Non-dependant deduction amounts are fixed and not linked to CPI.	Set the non-dependant charges from 1 April each year in line with the CPI from September of the previous year.	3165 households currently have at least one non-dependant living with them.  All households would be affected by the proposed changes.
<b>Section 13A</b>	Current policy allows for an award to be granted where there is evidence of "financial hardship or personal circumstances that justifies a reduction in council tax liability"	Review and update section 13A policy for hardship fund for Council tax to ensure that households who face difficulty may be supported.  Additional funding of £1.5m to further support residents under the Section 13A Discretionary Policy, where justified this will mean reducing residents' council tax liability to zero.	Brent residents experiencing financial difficulty because of their Council Tax bill provided they meet the requirements set out within Section 13A policy would be allowed to make an application for a Section 13A award.

## Impact of the proposals on households

- 12.2 The impact of these proposals on households across Brent vary significantly, and financial and personal circumstances change frequently, so it is not possible to provide details of the impact for all claimants in 2025/26. All working age households will be impacted by the change. The charts below show the number of CTS claims and a projected estimate of financial loss on the weekly council tax due. The data shows the expected impact of the changes on households by age, council tax band and households' type. The Equality Impact Assessment (**Appendix C**) provides further details on expected impact on households.
- 12.3 The impact on Council Tax Support entitlement by age group is demonstrated as per table below:

Age of Customer	Number	% of Total	Additional to pay per week (average)
<b>18 to 25</b>	490	2.91%	£7.94
<b>26 to 35</b>	2531	15.04%	£7.83
<b>36 to 45</b>	4144	24.62%	£8.33
<b>46 to 55</b>	4701	27.93%	£9.36
<b>56+*</b>	4967	29.51%	£10.43
<b>Grand Total</b>	<b>16833</b>	<b>100%</b>	<b>£9.15</b>

12.3.1 *\*Majority of claimants above the age of fifty-six tend to live in higher banded properties.*

12.4 The impact on Council Tax Support entitlement by Council Tax Band is demonstrated as per table below:

Council Tax Band	Number	% of Total	CTS current Scheme	CTS proposed Scheme	Additional to pay per week (average)
A	1483	8.81%	£17.48	£11.31	£6.17
B	2884	17.13%	£20.39	£12.91	£7.49
C	6656	39.54%	£22.21	£13.64	£8.57
D	4030	23.94%	£24.20	£13.78	£10.42
E	1494	8.88%	£28.48	£15.26	£13.22
F	241	1.43%	£33.17	£17.58	£15.59
G	45	0.27%	£37.17	£20.80	£16.37
<b>Grand Total</b>	<b>16833</b>	<b>100.00%</b>	<b>£22.71</b>	<b>£13.56</b>	<b>-£9.15</b>

12.5 The impact on Council Tax Support entitlement by household type is demonstrated as per table below:

Household Type	Number	% of Total	CTS current Scheme	CTS proposed Scheme	Additional to pay per week (average)
<b>Single</b>	8409	49.96%	£22.77	£13.67	‑£9.10
<b>Lone Parent Family</b>	4780	28.40%	£22.19	£13.43	‑£8.76
<b>Couple</b>	924	5.49%	£26.40	£14.34	‑£12.06
<b>Two Parent family</b>	2720	16.16%	£22.20	£13.21	‑£8.98
<b>Grand Total</b>	<b>16833</b>	<b>100.00%</b>	<b>£22.71</b>	<b>£13.56</b>	<b>‑£9.15</b>

12.5.1 *\*\*Examples showing the impact on different household types can be found in Appendix D\*\**

12.6 On average across all claims, resident will be expected to pay £9.15 (estimated) more a week towards their council tax bill.

12.7 The breakdown of working age CTS scheme by ethnicity is demonstrated as per table below:

Ethnicity	Number	% of Total
<b>White</b>	<b>2272</b>	<b>32.45%</b>
<b>Black or Black British</b>	<b>2067</b>	<b>29.52%</b>
<b>Asian or Asian British</b>	<b>1225</b>	<b>17.50%</b>
<b>Arab</b>	<b>762</b>	<b>10.88%</b>
<b>Mixed Background</b>	<b>430</b>	<b>6.14%</b>
<b>Any Other Ethnicity</b>	<b>205</b>	<b>2.92%</b>
<b>Prefer not to say</b>	<b>41</b>	<b>0.59%</b>

12.8 The breakdown of working age CTS customer by gender is demonstrated as per table below:

Gender of Customer	Number	% of Total
<b>Female</b>	9416	55.94%
<b>Male</b>	7195	42.74%
<b>Unknown</b>	222	1.32%
<b>Total</b>	<b>16833</b>	<b>100%</b>

12.9 **Pensioners (66 years and above).** The proposed scheme changes have no impact on the pensioner scheme as it is a national statutory scheme of 100% support for CTS.

12.10 The modelling above is based on caseloads, household income details, and the Council Tax billing values in Spring 2024. Therefore, this modelling excludes the impact of the proposed increase in Council Tax of 4.99% and the GLA increase in Council Tax and changes in caseloads and income levels of residents.

### **13 How the Council will seek to mitigate the impact of these proposals**

13.1 The specific measures that will be implemented to mitigate the impact of the change in scheme include:

13.2 For the purposes of Council Tax Support, households would be treated as receiving £0.00 income per week as all income from DWP or HMRC benefits is disregarded. Both groups of households will be asked to pay the same Council Tax under the new scheme proposals; although the person with disability benefits has greater income levels (to support their needs) this income is not considered.

13.3 Disability benefits and disability related premiums will continue to be disregarded in the Council Tax Support calculation. This is particularly relevant to those who are currently protected due to being in receipt of disability benefits and/or carers allowance. This ensures that those currently protected and losing their protection, continue to have a higher income than those not protected, to reflect their additional disability related costs.

13.4 The following examples show the difference in income between a single person with disability benefits and a single person who does not have disability benefits:

#### **13.5 Example 1 - Single person protected in 23/24 with disability benefits.**

Income per week in 24/25 will be £280.55/wk., made up of £108.55 personal independent payments disregarded £172.00 Universal Credit calculated from (£81.50 Severe disability premium + £90.50 applicable amount as over 25 years old)

#### **13.6 Example 2 - Single person not protected with no disability benefits.**

Income per week in 24/25 will be £90.50/wk., made up of £90.50/wk. Universal Credit will be calculated from the £90.50 applicable amount as they are over 25 years old.

13.7 As part of wider mitigations, the Council will promote and apply alternative applicable council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the

council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits). These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will proactively identify and contact households to ensure that they are aware of these potential reliefs in advance of the proposed scheme being implemented.

- 13.8 In terms of further mitigations, if anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the Council for financial assistance. The Council proposes to set aside £1.5m to further support residents under the Section 13A Discretionary Policy, where justified this will mean reducing residents' council tax charge.
- 13.9 The Council will enhance their offer with Welfare Advice through our Community Hubs, Libraries and Family Well-being Centres providing residents with comprehensive financial support, including debt management and budgeting guidance. Residents seeking help will receive appropriate advice and financial support aimed at preventing further debt with Credit Union and Citizen Advice Brent.

## **14 Affordability for Brent households**

- 14.1 The Council has considered the affordability for impacted council tax support households, and particularly those previously protected groups where the protection is to be removed under the 2025/26 scheme. The Council does not hold details of household outgoings for the 16833 impacted households and so it is not possible to assess the affordability of the impact on all 16833 households.
- 14.2 The aim of these changes is for all households to contribute towards the Council services that residents in the borough benefit from. However, it is recognised that where a resident is unable to work because of their disability they may face a particularly significant impact, as they may have higher disability related costs and will not have the ability to increase their income. The Council Tax Support scheme seeks to reduce this impact, by disregarding all income from DWP or HMRC benefits in the Council Tax Support calculation. This includes disability related benefits, disability premiums, carer's allowance and much more.
- 14.3 If an individual household is experiencing significant financial hardship because of the increase in council tax the Council will support that household via the Section 13A Discretionary Hardship scheme and benefit advice to maximise income.
- 14.4 The increase in council tax Section 13A Discretionary Hardship scheme of £1.5m is aimed to mitigate the impact of the proposed changes.

## **15 The Consultation Process**



- 15.1 A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups. This included all claimants in receipt of CTS and all other relevant stakeholders, with the goal of gathering a range of viewpoints.
- 15.2 All households currently in receipt of Council Tax Support were made aware of how the change might impact their household either via email or letter. This also included a link to the consultation webpage where face to face drop-in sessions were advertised to offer support and advice. On this webpage residents could also find an FAQ document detailing where they could get support, e.g. contacting Brent Council directly or a relevant voluntary sector organisations such as Citizens Advice Brent.
- 15.3 The Council followed best practice guidelines by undertaking an eight-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -
- Questionnaire on Council website and consultation portal was promoted for all households and stakeholders.
  - Emails and letters to all households who receive CTS.
  - Direct engagement by email and letter with all partners and CAB with offer to attend dedicated meetings with each organisation.
  - Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
  - Drop-in sessions (in all 6 Libraries across the borough)
  - Banners in Customer Service Centre and at events.
  - Leaflets
  - Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
  - Mailbox set up for CTS-related comments and queries.
  - Promoting consultation via auto reply message for Council Tax & CTS emails
  - Direct engagement through all Brent Connect meetings.
  - Consultation published in the voluntary sector newsletter.
  - Consultation with Adult Social Care Community Event
  - Consultation with Disability Forum
  - Face to face engagement in the Customer Service Centre
  - Consultation with Schools through the School Business Managers by the School Effectiveness and Standards Service
  - Staff engagement
  - Elected Members briefing sessions.

## **16 Consultation with Key Stakeholders**

- 16.1 Emails/letters with the proposed changes and consultation documents link were sent to 16,833 customers and the Greater London Authority (GLA), Citizen Advice, internal and external partners, schools as well as to all Members and major advice agencies. Banners and leaflets placed in Libraries across the borough and the Civic Centre. Consultation was published in the newsletters

by the voluntary sector. Emails sent to all Brent Hub Partners including Citizen Advice Brent (CAB), offering briefing sessions to explain changes. Presentation on proposed changes were present at the Brent Connect meeting. Officers attended a disability event, leaflets on consultation were distributed at an Islamophobia awareness event. Customer contact via email for Council Tax and Council Tax Support services received an auto-reply message referring them to the consultation.

## **17 Consultation Response Summary**

- 17.1 Overall, there were 397 responses to the consultation. Of these, 176 were from households currently receiving Council Tax Support (CTS). Additionally, there were two responses from organizations: one from the Greater London Authority and one from the Citizens Advice Brent.
- 17.2 This is the highest response rate compared to all London LA's who are either currently consulting or consulted last financial year. The response rate is also higher than the previous CTS consultation which was undertaken in 2019 where we had received only 194 responses.
- 17.3 The results of the consultation can be viewed in **Appendix E** which displays the responses to the questionnaire from residents and a summary of the responses from the Greater London Authority (GLA) and Citizens Advice Brent

## **18 Greater London Authority Response**

- 18.1 A more detailed summary of the feedback received from the GLA is contained in **Appendix F**. The GLA acknowledges that local authorities face difficult choices on CTS schemes considering their challenging financial circumstances. This is particularly acute in London boroughs like Brent which are seeing rapid population growth leading to core pressures on services and rising costs in areas such as temporary accommodation due to rising rents and pressures on the supply of housing. The GLA acknowledged that Council funding has not been updated to reflect current need.

## **19 Citizens Advice Brent Response**

- 19.1 Citizens Advice conducted a flash survey of thirty-two working age Brent Residents in receipt of CTS. A summary of their response is outlined below, with the full response detailed in **Appendix G**.
- 19.2 The findings highlight the ongoing financial challenges faced by many Councils Tax Support (CTS) claimants, emphasising the need for adjustments to better assist vulnerable residents while acknowledging the Council's commitment to addressing these issues.
- 19.3 Key Findings:
  - The average council tax bill increase for surveyed CTS claimants was £524.98.

- Out of thirty-two claimants reported not having enough income to cover their monthly costs, even with maximum CTS support.
- Two-thirds of those surveyed will receive new or higher council tax bills they currently lack the monthly income to pay.
- Lower the Minimum Payment: Reducing the current 35% minimum council tax payment, one of the highest in the UK, would help alleviate financial pressure on residents.
- Recognise Financial Vulnerability: Eligibility for CTS already indicates financial hardship and should be considered before enforcement actions are taken.
- Expand Discretionary Support: Making greater use of the Council Tax Discretionary Reduction Policy could offer critical relief to those most in need.
- Enhance Awareness of Support: The council could further refine and promote available support options for residents struggling with council tax bills.
- Maintain Flexible Backdating Rules: Retaining the current backdating policy, which allows claims to be backdated to the start of the financial year for valid reasons, would ensure continued support for vulnerable residents.

## **20 Stakeholder and ward member consultation and engagement**

- 20.1 Members briefings and discussion with lead member were on-going throughout the process. Initially, the Member briefings presented details of current scheme, the various options and workings to achieve the savings, with the option of doing nothing and finding the savings elsewhere. Further Member briefings, to run through the consultation documents and process was conducted. The proposed changes and consultation were also part of budget scrutiny. The lead member has been updated at every stage including the Equalities Impact Assessment and the outcome report.

## **21 Financial Considerations**

- 21.1 An update to the Medium-Term Financial Strategy was taken to Full Council in November 2024 as part of the draft 2025/26 budget, which set out the medium-term risks and uncertainties with regards to the current financial position. These primarily relate to exceptional factors such as high levels of inflation, high interest rates, increased demand for key services and uncertainty in government funding. The Council must therefore continue to assess all aspects of its expenditure to maintain its financial resilience and sustainability. Since 2019/20, the overall cost of CTS has grown significantly by £4.5m. The proposed changes, while addressing the need to update the eligibility criteria, also take account of the overall cost trajectory within the overall budget envelope.
- 21.2 The budget gap for 2025/26 is £16m and savings have been put forward to close this gap, which includes the amendments to the Council Tax Support Scheme set out in this report. This is referenced in the Budget and Council Tax 2025/26 report, also on this Full Council agenda. If the amendments to the

Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will propose to use £5m of reserves to cover the budget shortfall. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium-Term Financial Strategy and 2026/27 budget setting process.

## **22 Legal Considerations**

- 22.1 Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) introduced a duty on every billing authority in England to make a scheme specifying the reductions which are to apply to amounts of Council Tax payable, in its area, by: Person whom the authority considers to be in financial need, or Persons in classes consisting of persons whom the authority considers to be, in general, in financial need.
- 22.2 Schedule 1A of the 1992 Act sets out the requirements in relation to adoption or revision of a scheme. Paragraph 2 confirms a scheme must state the classes of person entitled to a reduction and that this may be reference to income, capital, a combination of income and capital, number of dependents and whether an application has been made. Different reductions may be set for different classes. A reduction may be a discount calculated as a percentage, a set amount, expressed as an amount of council tax to be paid or the whole amount of council tax. The scheme must comply with prescribed matters set out by the Secretary of State in regulations.
- 22.3 Paragraph 5 of Schedule 1A confirms a billing authority must consider whether to revise its scheme or to replace it with another scheme for each financial year. Any revisions or replacements must be made no later than 11th March in the financial year preceding that for which the revision or replacement is to have effect. If any revision or replacement has the effect of reducing or removing reduction to which any class of person is entitled, the revision or replacement must include such transitional provision as the authority thinks fit. In accordance with s 67 of the 1992 Act only Full Council has the power to make or amend a Council Tax Support Scheme.
- 22.4 As the proposed Council Tax Support Scheme for 2025/26 will be a revision or replacement of the current scheme there is an obligation to follow the statutory requirements to consult. The Local Government Finance Act 2012 states that the Council must consult with the GLA, which is a precepting authority, when amending a Council Tax Reduction Scheme and that thereafter, the Council must publish a draft amended Council Tax Reduction Scheme and then consult with other such persons who are likely to have an interest in the operation of such a scheme. This report sets out that the plans to undertake this consultation.
- 22.5 The four basic requirements of consultation are set out in the case of R v Brent LBC ex parte Gunning: (i) consultation must be at a time when proposals are at a formative stage; (ii) the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response; (iii) adequate time must be given for consideration and response; (iv) the product of consultation must be taken conscientiously taken into account in finalising any proposals.

- 22.6 In the 2014 Supreme Court case of R (on the application of Moseley) v London Borough of Haringey, the Court confirmed in its judgment that the demands of fairness in the consultation process are likely to be greater when an authority proposes to deprive someone of an existing benefit than when considering a potential future benefit and that fairness may require that interested persons should be consulted not only on the preferred option but also on discarded options. In that specific case, the Supreme Court ruled that Haringey Council's consultation process regarding its Council Tax Reduction scheme was unlawful as it failed to outline alternative options and methods of dealing with the shortfall and cuts to funding. Requirements for a Council Tax Reduction Scheme
- 22.7 Under the Equality Act 2010, the Council has a duty to have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation and any other conduct prohibited by the Act; advance equality of opportunity between people who share a protected characteristic and people who do not share it; and foster good relations between people who share a protected characteristic and people who do not share it.
- 22.8 The public sector equality duty ("PSED"), as set out in section 149 of the 2010 Act, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. There is no prescribed manner in which the equality duty must be exercised, though producing an Equality Impact Assessment is the most usual method through which a Local Authority can demonstrate that due regard has been paid to the PSED.
- 22.9 The PSED is not to achieve the objectives or take the steps set out in section 149 of the Equality Act 2010. The duty on the Council is bring these important objectives relating to discrimination into consideration when conducting its public functions (in this case, approving a new Council Tax Reduction Scheme for designing a localised scheme for Council tax support within Brent). The phrase "due regard" means the regard that is appropriate in all the circumstances in which the Council is conducting its functions. There must be a proper regard for the goals set out in section 149 of the 2010 Act. At the same time, when the Members of the Council make their decision on what scheme to adopt for localised council tax support, they must also pay regard to countervailing factors which it is proper and reasonable for them to consider. Budgetary pressures and economic and practical factors will often be important. The amount of weight to be placed on the countervailing factors in the decision-making process will be for Members of the Council to decide when it makes its final decision.

## **23 Equity, Diversity & Inclusion (EDI) Considerations**

- 23.1 The proposed Council Tax Support scheme has been reviewed for its effect on groups with protected characteristics under the Equality Act, and a detailed Equalities Assessment has been prepared and is included in Appendix C.

23.2 The EQIA does identify potential negative impacts on working age people, disabled people, women, people from an ethnic minority group and people facing socio-economic disadvantage, and a summary of these impacts is included below. The EQIA identifies several actions to mitigate the impact of the proposals, and these are summarised below. The EQIA also includes findings from the consultation that are relevant to the protected groups.

## **24 Impact of the proposals by equality characteristic**

### **24.1 Age**

24.1.1 The proposed change will impact negatively on working age CTS claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.

24.1.2 This proposal would mean working age claimants would have an estimated additional £9.15 on average per week to pay in Council tax.

24.1.3 However, within the scope of the 2025/26 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts.

24.1.4 Pension age claimants (currently men and women aged 66 and over) will not be affected by the change.

#### **Evidence:**

24.1.5 At present approximately 66.64% of Council Tax Support claimants are working age and 33.36% are pension age.

24.1.6 For comparison, the working age population (18 – 66 years) in Brent is approximately 86.83% and the pension age population (67 and over) is 13.17%.

24.1.7 The proposed changes mean that all working age CTS claimants for the purposes of the scheme will have to pay at least 35% towards their Council Tax.

### **24.2 Ethnicity**

24.2.1 Our data shows that BAME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support.

24.2.2 There could be a negative impact of the proposals on people from Black, Asian, and Minority Ethnic (BAME) groups.

24.2.3 Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals to mitigate any negative impacts.

#### **Evidence:**

24.2.4 The table above (13.6) show the figures for the breakdown of Brent by ethnicity where they have supplied this information.

### 24.3 **Sex**

24.3.1 Since only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.

24.3.2 However, equalities monitoring indicates that a higher percentage of claims (55.94%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers, and carers are more likely to be women. According to our working-age Council Tax Support data women make up 94.33% of lone parents in receipt of Council Tax Support.

24.3.3 The proposals are therefore considered to have a disproportionate impact on women.

24.3.4 Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals to mitigate any negative impacts.

#### **Evidence:**

24.3.5 The table above (13.7) show the figures for the breakdown of Brent by sex where they have supplied this information.

### 24.4 **Disability**

24.4.1 If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.

24.4.2 Support is also in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals to mitigate any negative impacts.

24.4.3 Pension age Council Tax Support claimants are not affected by these proposals.

24.4.4 It is worth noting that 774 households who have adaptations made to their property receive disabled relief for their Council tax. This means their Council tax band is reduced by a band e.g. someone is Band D, who receives a disabled relief has their liability reduced to Band C.

#### **Evidence:**

24.4.5 In terms of Council Tax Support, disabled claimants are defined as people who receive Personal Independence Payment, Disability living allowance, Attendance Allowance or Universal Credit- Health allowance.

24.4.6 Approximately 40.26% of working age Council Tax Support claimants meet the above definition compared with 14.7% of the working age population of Brent who self-identified as disabled as part of the 2021 Census.

24.4.7 The Council recognises the barriers disabled people face and seek to address them by disregarding Disability Living Allowance, Universal Credit Health allowance awards, and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to.

24.4.8 Currently, there are premiums for severe disability, enhanced disability, and a disabled child rate. Such premiums are granted when Housing Benefits applicants receive a relevant disability related benefit granted and administered by the Department for Work & Pensions.

24.4.9 Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 35% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

## **24.5 Pregnancy and maternity**

24.5.1 The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work due to childcare responsibilities.

## **24.6 Socio-economic deprivation**

24.6.1 The Equality Act 2010 includes a socio-economic duty (section 1) which states that certain public bodies, when making strategic decisions, must consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. However, the UK Government has not implemented Section 1 in England, and the duty remains non-binding in England.

24.6.2 Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on households that are socio-economically disadvantaged.

24.6.3 In relation to the consultation, respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits.

24.6.4 Respondents raised concerns that increases in the amount of council tax due would exacerbate existing financial strains, result in heightened debt, increased poverty, and compromises in meeting essential needs, and negatively impact on overall quality of life and mental health. Respondents also raised concerns



about the inability to pay council tax without sacrificing other necessities such as food and heating.

## **24.7 Sexuality, gender reassignment, marriage and civil partnership and religion**

24.7.1 The proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of sexuality, gender reassignment, marriage and civil partnership and religion.

## **24.8 Analysis**

24.8.1 The proposed changes are expected to have a negative impact on most working age adult claimants, as they will receive reduced council tax support and be required to contribute more towards their council tax.

24.8.2 The next section of the report summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

### **The need to eliminate unlawful discrimination, harassment, victimisation, and any other unlawful conduct prohibited by the act.**

24.8.3 The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working age adults, people with a disability, women, people who are pregnant or in the maternity period, people from an ethnic minority group and people who are socio-economically disadvantaged, and any disadvantage is justified for the reasons set out above in this report.

24.8.4 The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are proportionate considering those budgetary pressures, given the steps taken to limit council tax payments for these groups, and the mitigating measures set out below. This proposal asks all residents to contribute towards Council services that they benefit from.

24.8.5 For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantage suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

### **The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic.**

24.8.6 As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs, and organisations.

**The need to foster good relations between people who share and people who do not share a relevant protected characteristic.**

24.8.7 We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

## **25 Mitigating actions**

- 25.1 The Council recognises that some households will be more adversely affected by these proposals than others and that some will now be required to pay some element of their Council tax for the first time, creating affordability issues for many households. Alternatives to the proposals have been considered, as addressed in the report, but other options do not generate the same level of additional income which is required to help the Council meet its budget deficit. Mitigation measures have been considered, including those mentioned in response to the consultation, but most would add to the cost of the scheme and, again, would not allow the Council to generate the income needed to help balance its budget. Those measures which are in place to mitigate the impact of the proposals on households include:
- 25.2 Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- 25.3 Continuing to offer the Welfare Advice & Debt Support Service that helps to support residents to maximise their income and get their full entitlement to welfare benefits and provide advice and assistance to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation.
- 25.4 Working with voluntary and community sector organisations to promote the Hardship Fund.
- 25.5 Supporting residents to maximise the application of council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits). These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will work with

relevant voluntary groups and the Disability Forum and other partnerships to improve awareness and take up of these provisions.

25.6 There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances. These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- A person whom the authority considers to be in financial need,
- Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

## **26 Climate Change and Environmental Considerations**

26.1 No implications

## **27 Human Resources/Property Considerations (if appropriate)**

27.1 No implications

## **28 Communication Considerations**

28.1 The Council recognises that some households will be more adversely affected by these proposals than others and that some will now be required to pay some element of their Council tax for the first time, creating affordability issues for many households. Alternatives to the proposals have been considered, as addressed in the report, but other options do not generate the same level of additional income which is required to help the Council meet its budget deficit. Mitigation measures have been considered, including those mentioned in response to the consultation, but most would add to the cost of the scheme and, again, would not allow the Council to generate the income needed to help balance its budget.

28.2 The communication plan includes all activities pre and post consultation. Once the Full Council and Full Council decision is confirmed the communication with all households and all stakeholders will start in a timely manner. The communication plan includes information about the cost of living and holistic support for our residents.

### **Report sign off:**

**Corporate Director Name; Peter Gadsdon**  
Corporate Director of Partnerships, Housing and  
Resident Services