



Council Tax Support – Consultation Report

1 Background to CTS and Consultation

Until 2013/14 Council Tax Benefit was a national scheme administered by Councils but fully funded by the Government. In 2013 the Government abolished the national scheme and asked Local Authorities to create their own local Council Tax Support (CTS) Schemes with reduced funding. Local CTS Schemes have to be reviewed annually and this report sets out recommendations following this year's review which was carried out within the context of the substantial financial challenges facing the Council.

Since 2010 central government grant to local authorities has been severely cut each and every year. 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. The Council must address this funding gap whilst demand for services, particularly social care for vulnerable children and adults, is continuing to rise.

As part of the review of the CTS Scheme, the level of potential savings that could be gained by changing the scheme was considered alongside the impact of a variety of options.

The proposals relate only to support for working age claimants (the support provided to pensioner claimants remain unchanged at nationally determined levels).

The options which were selected included making no changes and keeping the current scheme and a further six change options which could be implemented individually or in combination.

Any proposal to change the Council Tax Support Scheme requires the Council to consult with Greater London Authority (GLA) and also to undertake a public consultation exercise. Consultation has been held with the GLA and a public consultation and stakeholder was undertaken over the period 21 October 2024 to 15 December 2024.

2 Consultation Programme

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 including those claimants and non-claimants of CTS.

Overall, there were 397 responses to the consultation of which 176 were currently in receipt of CTS. Although the number of responses was low in comparison with the

volume of communications that were issued, this appears to be above the national response level experienced by the majority of Councils who have consulted since the introduction of CTS and is also a higher level than when the last CTS consultation was undertaken in 2019 when only 194 were received.

The Council followed best practice guidelines by undertaking an 8-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -

- Questionnaire on Council website promoted via email and letter to all claimants, and all other residents.
- Direct engagement by email and letter with Brent Hub partners and CAB with offer to attend dedicated meetings with each organisation.
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- 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 by attend Brent Connect meetings.
- Consultation published in the voluntary sector newsletter.
- Face to face engagement in the Customer Service Centre
- Staff engagement

Consultation with Key Stakeholders

Promotional emails/letters were sent to 16,833 customers and the Greater London Authority (GLA) as well as MP's 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 Bureau (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 a 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.

3 Consultation feedback

The data below shows the full consultation responses following the close of the consultation on 15 December. In total there were 397 responses via the survey on the Council's website, with some additional comments being received via the email account set up for queries.

The full graphs and tables of the consultation responses are contained in [Appendix A](#) and summarised here: -

Consultation responses on the proposed scheme changes

Proposed scheme changes	Agree or strongly agree	Disagree or strongly disagree
To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands.	32.7%	61.1%
Changes to the Council Tax Support non-dependant deductions (£8 deduction for non-dep in household out of work and £20 deduction for non-dep in household in work).	32%	57%
Limit Backdating to one month.	34%	49.2%
The introduction of an additional application process for Council Tax Support (Universal Credit applicants only).	33.3%	44.4%
Linking Income bands to Consumer Pricing Index (CPI)	30.7%	51.6%
Linking non-dependant charges to Consumer Pricing Index (CPI)	27.9%	48.7%

Of the total of 397 responses were received to the consultation which can be broken down into the respondent types as follows; -

Category	Number	%
Brent residents receiving CTS	176	43.8%
Brent residents not receiving CTS	226	56.2%

Responses on the design of the proposed scheme were generally disagreed with the proposals

4. Additional consultation comments

All additional comments received have been reviewed and summarised. The key themes emerging for each of the proposed options were as follows:

Question 1 - To remove the 100% reduction for out of work or low-income households and apply a percentage reduction to each of the other income bands.

Out of 397 responses, 115 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Reasonable** – *These respondents thought that the changes proposed were reasonable given the Council's financial situation and need to make savings. These respondents in general thought that the scheme was generous and that it was a fair proposal to introduce a minimum contribution for all Council Tax Support recipients.*
- **Scheme Recommendations** – *Some respondents raised suggestions for the new scheme. These included: Reducing the top band to 80% instead of such a steep drop to 65% & reducing last band to 15% (instead of 20%), having council tax support as a monetary value (i.e. £) rather than a % reduction, including a vulnerable group to be exempt from 35% minimum contribution & including other income, capital or savings into the means testing (e.g. property, benefits income, etc.)*
- **Scheme still too generous** – *Some people agreed but thought the minimum contribution should be higher, for example, 50%.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – *These respondents thought that the changes proposed would cause them to fall into further financial difficulty. The cost-of-living struggle was frequently mentioned as well as an inability to pay the additional council tax that would be required. Many people raised concerns around their disability and the inability to find work or increase their income. Some answers highlighted that pushing residents into further financial difficulty could increase the demand on other council services and reduce the actual savings achieved by this change.*
- **Protecting the Vulnerable** – *Many respondents raised concerns around disabled residents, the elderly, carers, or parents all with a reduced ability to find employment and cover the council tax shortfall that will be created because of this change to their support. These answers raised worries that this scheme change would affect those on a low-income unfairly and expects those with the lowest income to find spare income that doesn't exist. Responses highlighted that people were already struggling and this change would only serve to exacerbate their struggle.*
- **Unfair** – *These replies often highlighted that they thought it was unfair to target those in receipt of Council Tax Support who have low-incomes already and an inability to pay council tax often being carers, disabled or in receipt of benefits only. Some answers highlighted that the people receiving this support are already on the poverty line and this change*

could push people into poverty. Some respondents believed that the change would breach Discrimination & Human Rights & Equality Laws.

- **Find savings elsewhere** – These answers highlighted the need for the council to find the savings from somewhere else. Some of the reasons given were that this change would be potentially more costly in the long run due to increased demand on council services or increased outstanding debt. These responses raised that the changes were targeting individuals who don't have the means to contribute more, and many suggestions were received to look to the wealthier residents within the borough for savings. Other suggestions included: advocating for more equitable funding from central government, finding efficiencies in other areas of spending, increase income rather than cut services, targeting outstanding debt/fraud or council tax evasion or reducing Brent employee salaries.

Question 2 - Changes to the Council Tax Support non-dependant deductions (£8 deduction for non-dep in household out of work and £20 deduction for non-dep in household in work).

Out of 397 responses, 88 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – These respondents thought that it was fair to ask non-dependants to contribute towards household bills including Council Tax and sensible to look at household income as a total rather than only the income of a claimant or partner.
- **Simpler** – Comments highlighted that a two flat-rate deduction system is an improvement on the previous system and would be simpler or easier for residents to understand.
- **Unfair** – Whilst these people agreed with the proposal, they believed in general that the £20 deduction for working non-dependants was fair whereas the £8 deduction for non-working was too much of an ask.
- **Scheme Recommendations** – These comments made suggestions to not take non-dependant deductions for students.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – These respondents thought that the charges proposed were too much of an increase especially considering the current cost of living. Some people highlighted that £20/week for a working non-dependant would be over £1000 per annum and a

significant portion of the Council Tax bill. These respondents highlighted that this change would not be affordable, further push families into poverty or struggle and that this change would hit the poorest.

- **Unfair** – *Some of the suggestions received thought that the £8 deduction was too much for non-dependants that are not working, disabled or students. Some people believed that deductions for working non-dependants should be means tested & based on their income level, with higher earners contributing more.*
- **Find savings elsewhere** – *These comments suggested that Brent look to other ways of making the savings or cutting costs. These included looking at efficiency savings within the council, increasing fines for parking penalties/littering/anti-social behaviour etc. or empty property rates.*

Question 3 - To what extent do you agree or disagree with the Council's proposal of limiting backdating of claims to one month.

Out of 397 responses, 81 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – *Many respondents agree with limiting backdating to one month, citing fairness and cost-effectiveness. Several comments highlight the importance of timely applications by claimants and suggest it is reasonable to expect individuals to apply promptly.*
- **Simpler** – *Some comments highlighted that this was an improvement upon previous rules and that it would be both cheaper for the council and easier for claimants to understand.*
- **Scheme Recommendations** – *Some comments emphasize that backdating should only be restricted if the council improves support and communication to ensure people are aware of their responsibilities and deadlines. A few respondents mentioned that delays caused by council inefficiency should still allow backdating to the date of application.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Scheme Recommendations** – *Many comments suggest that one month is insufficient, advocating for longer periods such as 3 months, 6 months, or even a year. This is based on fairness and accommodating individual circumstances like being in the hospital, caring responsibilities, or lack of awareness. Several comments mention that*

the council delays should not negatively affect claimants. A recurring concern is the lack of information about available support. Some respondents feel that limited awareness of Council Tax Support contributes to delayed applications.

- **Protect The Vulnerable** – *Many respondents argue that limiting backdating to one month is unfair, especially for individuals who face barriers such as disabilities, illness, language difficulties, or lack of digital skills. Vulnerable groups mentioned include elderly non-pensioners, non-English speakers, individuals with mental health challenges, and those facing homelessness.*
- **Financial Difficulties** – *Comments suggest limiting backdating could exacerbate financial difficulties for residents already struggling to make ends meet. Respondents highlight that a one-month backdating limit would place undue stress on those with low incomes, pushing some into debt or forcing them to choose between essentials like food and energy. Some respondents suggest the council should provide alternative options to mitigate the financial challenges faced by residents.*

Question 4 - To what extent do you agree or disagree with the Council's proposal of the introduction of an additional application process for Council Tax Support (Universal Credit applicants only)

Out of 397 responses, 82 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – *Many respondents support simplifying the process to ensure it is more efficient, cost-effective, and fair. Respondents highlight the need to improve awareness of available support and emphasize that some people are unaware they must apply separately for Universal Credit (UC) and Council Tax Support. Some respondents raise concerns that implementing these changes might increase bureaucracy and require additional staff, leading to higher administrative costs.*
- **Unclear** – *While there is strong support for automating the process to reduce stress and improve efficiency, there is scepticism about whether this approach will lead to increased bureaucracy or administrative burdens for the council. Effective use of IT systems is emphasized as a key solution.*

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Unclear** – *Upon reviewing the comments we have noticed that many respondents may not have fully understood this proposal and that the introduction of an additional application process would not require more*

administration on behalf of claimants and would be an automated process.

Therefore, claimants raised that introducing another application process is unnecessary and adding more forms and steps would be redundant and counterproductive. There is scepticism about whether this change will lead to cost savings, with some suggesting it may increase overall expenses due to higher administrative demands and potential increases in claims. Many propose incorporating the council tax application into the existing UC process or automating the system entirely to avoid duplication and simplify the process for everyone involved. Some respondents view the proposal as a deliberate tactic to make it harder for people to access support, creating unnecessary barriers and hurdles.

- **Unfair** – Many believe the proposal may breach Human Rights, Equality, and Anti-Discrimination laws, as it disproportionately impacts vulnerable groups, particularly individuals on Universal Credit (UC) or with disabilities. Respondents' express frustration with an already arduous and stressful system. Adding another form or step is viewed as unnecessarily increasing stress and complexity, particularly for those already dealing with challenging personal circumstances.
- **Protect the vulnerable** – Adding more forms or processes creates unnecessary barriers for disabled people who already face significant challenges, often without receiving additional financial support. Respondents emphasize the need for more accessible processes and support to achieve "true fairness" for vulnerable groups.

Question 5 - To what extent do you agree or disagree with the Council's proposal of linking Income bands charges to CPI (inflation)

Out of 397 responses, 68 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – Several comments agree that the proposal is fair and reasonable. One comment suggests that growth in earnings, rather than price inflation, would be a more appropriate measure. Respondents support the idea of linking changes to some form of inflation, whether it's price or another factor.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Financial Difficulties** – Linking income bands to CPI is criticized as disproportionately impacting low- and middle-income households, who already struggle with rising costs of essentials like food, housing, and

energy. Minor income increases for low earners often fail to keep pace with inflation, pushing them out of eligibility for support without significantly improving their financial situation. Many argue that this approach would exacerbate debt, poverty, and homelessness, which are far more costly to address than preventive measures like housing support. Inflation-adjusted income bands fail to reflect the real cost-of-living pressures faced by low-income groups, where wages often do not align with CPI increases.

- **Unfair** – The proposed measures are seen as particularly unfair to low-income workers whose wages do not increase with inflation. Many of them, like cleaners, cannot raise their prices without risking job loss, making the proposal seem inequitable. There's a call for the council to reduce its own spending instead of burdening citizens further.
- **Unclear** – Respondents highlighted the need here for further explanation and overall respondents may have misunderstood this proposed change that would effectively increase the number of eligible claimants or amount of support available. Inflation is seen as unpredictable and volatile, adding to the uncertainty of the economic situation, and making it difficult for individuals to plan financially.

Question 6 - To what extent do you agree or disagree with the Council's proposal of linking the non-dependant charges to CPI (inflation)

Out of 397 responses, 51 respondents also left comments.

For the people that Agree or Strongly agree, the top themes that emerged were:

- **Fair** – Many agree that the proposed charges are fair, with some emphasizing that tying charges to inflation is reasonable and justifiable. A recurring concern is the high cost of charges, with some expressing that the financial burden is too expensive.

For the people that Disagree or Strongly disagree, the top themes that emerged were:

- **Unfair** – There is concern that CPI-linked charges could impose unsustainable financial burdens on those already struggling, such as low-wage earners, part-time workers, or the unemployed. There's a sense that people who have contributed to the system for years should not be penalized when they fall on hard times. The council's approach is criticized as being unhelpful and unfair, with some suggesting it will increase debt and poverty.

- **Scheme recommendations** – *There is a call for a more equitable system that assesses actual income and circumstances, rather than automatically increasing charges based on CPI. Comments suggest that charges should be set annually based on individual circumstances, rather than being automatically linked to inflation. There are suggestions to end non-dependant charges except for in-work individuals.*
- **Financial difficulties** – *This approach is seen as exacerbating financial pressures and creating tension within households. Many express the view that increasing charges in this manner would further strain already struggling households, forcing people to make sacrifices in essential areas like food and energy. There is a strong sense of frustration with the council's actions, with some seeing it as another attempt to make money from those who can least afford it.*

Question 7 - Do you have any other comments on the proposed changes to the Council Tax Support scheme?

Out of 397 responses, 113 respondents also left comments.

There was no option here to Agree/Disagree only a free text box to submit comments. Out of the comments received, the top themes that emerged were:

- **Scheme recommendations** – *Many comments express strong opposition to proposed changes, arguing that reducing council tax support for the poorest residents will exacerbate financial struggles. The 100% discount for low-income households should be maintained to protect vulnerable individuals, including those with disabilities, full-time carers, and low-income working families. Some respondents highlight the large amount of council tax arrears in 2023/24 and question how much of this is due to poverty and an inability to pay. Concerns are raised about whether reducing support will lead to a further increase in arrears or a higher demand for assistance from the Resident Support Fund. There are suggestions to save money by addressing inefficiencies within the council, such as cutting wasteful spending or reducing the number of unnecessary staff. Some also advocate for raising taxes for wealthier individuals, landlords, or property developers, rather than penalizing low-income residents. Some suggest introducing a tapering system like Universal Credit, where council tax liabilities increase gradually as income rises, reducing the sudden financial burden caused by small income increases.*
- **Financial Difficulties** – *Many argue that reducing support will push already vulnerable groups into deeper financial difficulty. This includes people on low wages, disabled individuals, and those relying on benefits. These respondents highlight that the cuts could lead to severe*

consequences, including homelessness, worsened health, and increased reliance on other public services, such as the NHS.

- **Unfair** – Critics believe the changes unfairly target those who can least afford it. They suggest that property owners and landlords, who are more financially able, should be taxed more heavily, rather than penalizing low-income individuals. Several comments point out that reducing support at a time when people are already struggling with rising costs and bills is unfair. There's a call to delay these changes, particularly during the ongoing cost of living crisis.
- **Protect the vulnerable** – Several individuals express concern that people with disabilities, those on PIP, and full-time carers should not be expected to contribute 35% of their council tax. Some respondents highlight the negative impact on families, particularly single-parent households, and children. The proposed cuts to council tax support could result in a significant loss of income, potentially pushing families into deeper poverty, with adverse effects on children's well-being.
- **Unhappy With Council Services** - Multiple responses criticize the council for its inability to manage finances properly, suggesting that resources should be allocated more efficiently.

More detail can be found in [Appendix B](#). Some comments made by respondents raised several remarks therefore have been categorised under multiple themes where appropriate. If request a full list of all the comments can be provided. If requested, a full breakdown of all comments received can be provided.

In addition to resident's responses, we received feedback from Citizen Advice Bureau and the GLA.

Citizens Advice Bureau comments

Citizens Advice conducted a flash survey of 32 working age Brent Residents in receipt of CTS. A summary of their response is outlined below, with the full response detailed in [Appendix C](#).

Key Findings

- The average council tax bill increases for the CTS claimants that were surveyed was £524.98.
- 13 out of 32 CTS claimants surveyed did not have enough income to cover their monthly costs, despite receiving the maximum level of CTS.
- 2 in 3 CTS claimants surveyed will receive a new or increased council tax bill that they currently do not have the monthly income to pay.

Recommendations proposed:

- Reduce the minimum Council Tax payment of 35% - Deemed to be one of the highest in the UK.

- Use existing protections for financially vulnerable residents claiming CTS – Eligibility for CTS is in and of itself evidence of some level of financial vulnerability, and this should be taken into consideration wherever the council considers initiating enforcement action.
- Make greater use of the Council Tax Discretionary Reduction Policy to assist the most financially vulnerable residents.
- The council should refine and promote other forms of support that may offer help to residents struggling with their council tax bills.
- The council should consider retaining the current backdating rules, in which claims can be backdated to the start of the financial year in cases where there has been a good reason for claimants to have delayed making an application.

The question asked by CAB:

- Clarify the rules on backdating CTS claims and allow for circumstances in which CTS should be backpaid for more than one month.

GLA Comment

The GLA was informed and provided with the CTS consultation paper on 18 October 2024, ahead of its release for public consultation with Brent residents. A summary of their response is outlined below, with the full response detailed in [Appendix D](#).

GLA response to proposed changes:

- The GLA acknowledges Brent faces financial challenges in designing its Council Tax Support (CTS) scheme, particularly given demographic pressures and rising service costs.
- Proposed changes would require many residents to pay at least 35% of their council tax liability, potentially increasing administrative challenges and household debt.
- The GLA recommends a thorough analysis of household ability to pay and socio-economic impacts to optimize revenue and minimize non-payment risks.
- Brent plans to review its hardship fund policy, with support accessible via its website, and has asked the mayor to contribute to the fund, with a response expected in the New Year.

Providing Information on Schemes

- The GLA supports Brent's publication of scenarios illustrating the impact of CTS changes on households and urges this practice for the final scheme before March 2025.
- It recommends detailed analysis of household ability to pay using reliable methodologies and platforms. Additionally, the Council should provide a clear breakdown of expected costs and savings from the final scheme to ensure transparency for residents, taxpayers, and stakeholders.

Setting the Council Tax Base for 2025-26 and Assumptions in Relation to Collection Rates

- The Council must set a council tax base for 2025-26, considering potential impacts from changes to its council tax support scheme, empty homes policy, and new powers on second homes.
- It will also need to forecast collection rates from affected taxpayers.
- The GLA urges the Council to share an indicative tax base forecast with supporting calculations as soon as options are presented, to inform the mayor's 2025-26 budget planning for police, fire, and other services.

Respondents were asked to provide their equality characteristics data, which is captured on [Appendix A](#).