

# BROMSGROVE DISTRICT COUNCIL MEETING OF THE CABINET

WEDNESDAY 24TH FEBRUARY 2021, AT 4.30 P.M.

MICROSOFT TEAMS - VIRTUAL

#### **SUPPLEMENTARY 2 DOCUMENTATION**

The attached papers contain an additional urgent item to be added to the Agenda previously distributed relating to the above mentioned meeting.

6. To consider any urgent business, details of which have been notified to the Head of Legal, Democratic and Property Services prior to the commencement of the meeting and which the Chairman, by reason of special circumstances, considers to be of so urgent a nature that it cannot wait until the next meeting (Pages 1 - 40)

The Council Tax Support Scheme 2021/22, postponed from the meeting of Cabinet held on 17<sup>th</sup> February 2021, is attached for Members' consideration.

K. DICKS
Chief Executive

Parkside Market Street BROMSGROVE Worcestershire B61 8DA

24th February 2021



# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

## CHANGES TO THE COUNCIL TAX REDUCTION SCHEME WITH EFFECT FROM 1<sup>ST</sup> APRIL 2021

Relevant Portfolio Holder	Cllr Geoff Denaro
Portfolio Holder Consulted	Cllr Geoff Denaro
Relevant Head of Service	Chris Forrester
Ward(s) Affected	All wards
Ward Councillor(s) Consulted	
Key Decision /	

#### 1. <u>SUMMARY OF PROPOSALS</u>

- 1.1 Each year the council is required to review its Council Tax Reduction Scheme in accordance with the requirements of the schedule 1A of the Local Government Finance Act 1992 and to either maintain the scheme or replace it.
- 1.2 Council Tax Reduction (CTR) was introduced from 1 April 2013 when it replaced the central government funded Council Tax Benefit regime. From its inception, the funding available to the council from government has reduced year on year.
- 1.3 As with the majority of authorities within England, the council has changed its scheme each year to for a number of reasons including:
  - Adjust the level of support in line with the funding available from central government; and
  - To aid administration.
- 1.4 This report details the changes and makes recommendation to members for the 2021/22 scheme.

#### 2. **RECOMMENDATIONS**

2.1 The Cabinet is asked to RECOMMEND the introduction a new income banded / grid scheme for working age applicants with effect from 1<sup>st</sup> April 2021 to implement a modern, future proofed scheme and reduce the administrative burden placed on the council by the introduction of Universal Credit

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

#### 3. KEY ISSUES

#### **Financial Implications**

- 3.1 The current Council Tax Reduction scheme costs approximately £4.459m which is borne by the Council's Collection Fund. Costs are shared between the Council and the Major Precepting Authorities in proportion to the share of Council Tax.
- 3.2 The approach and 'shape' of the scheme is changing, and the overall approach will be to provide additional support to those households on the very lowest incomes. There is no intention to reduce the level of support available to other households. Based on current modelling, were the new scheme to be in place at the current time, the costs would be £4.731m.
- 3.3 Financial modelling has been been undertaken and will continue to be undertaken throughout the project and this will be particularly important given the effect of the COVID-19 crisis on the incomes of households within the District Council's area.
- 3.4 Whilst the expected costs of the scheme for 2021/22 are slightly higher, the overall level of Council Tax Reduction as a proportion to Council Tax Base has reduced significantly year on year since 2013 as shown below. The overall proposed costs level for 2021/22 is considerably lower in terms of the percentage of the taxbase than when Council Tax Reduction was introduced in 2013.

Tax Year	Maximum %	Gross Council	Total CTR	CTR as %
	Reduction	Tax £000s	awarded	Gross CTax
			£000s	
2013/14	100	56,471	4,564	8.08
2014/15	100	58,103	4,441	7.64
2015/16	80	59,662	3,896	6.53
2016/17	80	62,371	3,878	6.22
2017/18	80	64,566	3,808	5.90
2018/19	80	68,110	3,831	5.62
2019/20	85	71,847	4,035	5.62
2020/21	85	74,910	4,469	5.97

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

#### **Legal Implications**

3.5 Schedule 1A (3) of the Local Government Finance Act 1992, states:

Before making a scheme, the authority must:

- (a) consult any major precepting authority which has power to issue a precept to it.
- (b) publish a draft scheme in such manner as it thinks fit, and
- (c) consult such other persons as it considers are likely to have an interest in the operation of the scheme.
- 3.6 In addition, in order to set a new scheme, the Council is obliged to make a resolution by 11<sup>th</sup> March of the year prior to the scheme coming into place.
- 3.7 The purpose of this report is to recommend that the new scheme be implemented with effect from 1<sup>st</sup> April 2021

#### **Background / Service Implications**

- 3.8 Council Tax Reduction (CTR) was introduced by Central Government in April 2013 as a replacement for the Council Tax Benefit scheme administered on behalf of the Department for Work and Pensions (DWP). As part of the introduction, the Government:
  - Placed the duty to create a local scheme for Working Age applicants with billing authorities.
  - Reduced initial funding by the equivalent of ten per cent from the levels paid through benefit subsidy to authorities under the previous Council Tax Benefit scheme; and
  - Prescribed that persons of **Pension age** would be dealt with under regulations set by Central Government and not the authorities' local scheme.
- 3.9 Since that time, funding for the Council Tax Reduction scheme has been amalgamated into other Central Government grants paid to Local Authorities and also within the Business Rates Retention regime. It is now generally accepted that it is not possible to identify the amount of funding actually provided from Central Government sources.
- 3.10 The current Council Tax Reduction scheme administered by the Council is divided into two schemes, with pension age applicants receiving support under the rules prescribed by Central Government, and the scheme for working age applicants being determined solely by the local authority.

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

- 3.11 Pensioners, subject to their income, can receive up to 100 per cent support towards their council tax. The Council has no power to change the level of support provided to pensioners and therefore any changes to the level of CTR can only be made to the working age scheme.
- 3.12 When Council Tax Reduction was introduced in 2013, for working age applicants, the Council broadly adopted the previous means tested Council Tax Benefit scheme as the basis of awarding support. Due to the reduction in funding from Central Government, the Council also required all working age applicants, even those on the lowest income, to pay a minimum payment of 20%.
- 3.13 Since that time the minimum payment required has reduced to 15% and other slight changes have been made to bring the scheme into line with either Housing Benefit or Universal Credit.

#### The main issues with the current scheme

- 3.14 There are a number of issues with the current scheme that will need addressing if the system is to continue to provide effective support to low income taxpayers and also if the Council is able to provide the service in an efficient manner. The main issues are as follows:
  - The need to assist low income households and assist in the collection of Council Tax
  - The introduction of Universal Credit for working age applicants; and
  - The need for a simplification of the scheme;
- 3.15 Each of the above are examined in detail below.

## The need to assist low income households and assist in the collection of Council Tax

- 3.16 Since 2013, the introduction of Council Tax Reduction, the majority of authorities, including the District Council have required all working age applicants to pay a minimum payment. Under the previous scheme (Council Tax Benefit) almost 75% of working age applicants would not have been required to pay any Council Tax and would have received full (100%) support.
- 3.17 As with a large number of authorities, there is a strong view that there should be an increase in the level of support to those households on the lowest of incomes. This view has gained momentum over the past few years but has been reinforced since the COVID-19 crisis which has had a major effect on incomes generally.

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

- 3.18 Whilst the principle of all working age households paying 'something' was initially thought to be an approach that would be central to the design of Council Tax Reduction, the reality is that, since it's introduction, low income taxpayers, the poorest households, have been unable to pay the balance leading to additional costs, court and enforcement action and, in some cases,the amounts demanded have been written off as uncollectable. For information, in 2019 Council Tax of approximately £694,000 has been demanded from working age Council Tax claimants and an amount of £234,000, 33% of the amount demanded is outstanding.
- 3.19 The costs of administration of these cases by the District Council has increased significantly over the years. These costs are borne soley by the District Council. With the difficulties experienced, the relatively low level of payment and the high administration costs incurred, it no longer makes the amounts economically viable to collect. Notwithstanding the negative effects to those poorest households.

#### Council Tax Reduction and the roll out of Universal Credit

- 3.20 The introduction of Universal Credit within the area has, as experienced in all other areas, brought a number of significant challenges to both the administration of Council Tax Reduction and also the collection of Council Tax generally. All Councils have experienced the following:
  - The reluctance of Universal Credit claimants to make a prompt claim for Council Tax Reduction leading to a loss in entitlement;
  - A high number of changes to Universal Credit cases are received from the Department for Work and Pensions requiring a change to Council Tax Reduction entitlement. On average 40% of Universal Credit claimants have between eight and twelve changes in entitlement per annum. These changes result in amendments to Council Tax liability, the re-calculation of instalments, delays and the demonstrable loss in collection; and
  - The increased costs of administration through multiple changes with significant additional staff and staff time being needed.
- 3.21 It is clear that the existing means tested Council Tax Reduction scheme, which is too reactive to change, will not be viable in the longer term now that Universal Credit has been rolled out fully within the area and with the massive increase in Universal Credit claimants due to the COVID-19 crisis. The move to a new more efficient scheme from 2021 is now imperative.

#### **BROMSGROVE DISTRICT COUNCIL**

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

#### The need for a simplified approach to the Council Tax Reduction Scheme.

- 3.22 The existing scheme is based on an 'old fashioned;' means tested benefit scheme. It has major defects namely:
  - It is complex for customers to understand and is based on a complex calculation of entitlement:
  - The administration for staff is complex, with staff having to request significant amounts of information from applicants;
  - Staff have to undergo significant training to be proficient in processing claims;
  - The timescales for processing applications is lengthy, mainly due to the complexity and evidence required to support the applications; and
  - The administration of the scheme is costly when compared to other discounts for Council Tax.
- 3.23 Clearly there is a need now to simplify the scheme, not only to mitigate the effects of Universal Credit, but also make it easier for customers to make a claim and to significantly reduce the costs of administration.

# The recommended approach for the 2021/22 Council Tax Reduction Scheme

- 3.24 In view of the problems being experienced with the current scheme, it is proposed that an alternative approach be taken from 2021/22. The approach has been to fundamentally redesign the scheme to address all of the issues with the current scheme and in particular;
  - (a) The level of support available to the poorest households:
  - (b) The problems with the introduction of full-service Universal Credit; and
  - (c) The significant increase in administration costs due to the high level of changes received in respect of Universal Credit;
- 3.25 Work has been ongoing throughout this year on a new scheme which is now complete. Consultation now needs to be undertaken with the public and the precepting authorities. If accepted by the Council, the new scheme will take effect from 1<sup>st</sup> April 2021.
- 3.26 The proposed new scheme has a number of features as follows:
  - More support shall be given to those households on the lowest of incomes than in the current scheme;
  - The changes can **only be made to the working age schemes** as the current schemes for pensioners is prescribed by Central Government;

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

 The current means - tested schemes will be replaced by a simple income grid model as shown below:

Discount Band	Discount	Single Person	Single person with one child	Single person with two or more children	Couple	Couple with one child	Couple with two or more children
			lr	ncome Ranges			
Band 1	100%	£0 to £95.00	£0 to £150.00	£0 to £210.00	£0to£140.00	£0 to£195.00	£0 to £255.00
Band 2	75%	£95.01 to £115.00	£150.01 to£180.00		£140.01 to £160.00	£195.01 to £225.00	£255.01 to£285.00
Band 3	50%	£115.01 to£135.00	£180.01 to £210.00		£160.01 to£180.00	£225.01 – £255.00	£285.01 to£315.00
Band 4	25%	£135.01 to £155.00	£210.01 to £240.00		£180.01 £200.00	£255.01 to £285.00	£315.01 to£345.00
	0%	Over £155.00	Over £240.00	Over £300.00	Over £200.00	Over £285.00	Over £345.00

- It is proposed that the highest level of discount will be at a maximum level of liability (100%), Band 1, and all current applicants that are in receipt of a 'passported benefit' such as Income Support, Jobseeker's Allowance (Income Based) and Employment and Support Allowance (Income Related) receive maximum discount:
- All other discount levels are based on the applicant's (and partner's, where they have one) net income;
- The scheme allows for variation in household size with the levels of income per band increasing where an applicant has a partner, and / or dependants
- There will be no charges made where an applicant had non-dependents living with them. This is a significant change and means that the administration of the scheme will be more straightforward whilst also protecting low income families where adult sons and daughters for example remain at home;
- To encourage work, a standard £25 per week disregard will be provided against all earnings This will take the place of the current standard disregards and additional earnings disregards. Where a family also receives a childcare

#### **BROMSGROVE DISTRICT COUNCIL**

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

disregard (for childcare costs not paid for by Central Government schemes), the income levels in the 'grid scheme' are set at a higher rate;

- Disability benefits such as Disability Living Allowance and Personal Independence Allowance will continue to be disregarded;
- Where any applicant, their partner or dependant child (ren) are disabled, a further disregard of up to £40 will be given, thereby maintaining the current level of support to those with disabilities;
- Carer's Allowance and the Support Component of Employment and Support Allowance will be disregarded;
- Child benefit and Child Maintenance will continue to be disregarded;
- The total disregard on war pensions and war disablement pensions will continue;
- Extended payments will be removed;
- Second Adult Reduction will be removed; and
- Removal of the income taper an introduction of a capital limit of £6,000.

## How the new scheme will address the problems with the current Council Tax Reduction

- 3.27 With the simplicity of the proposed new scheme and by taking a more 'Council Tax discount approach', it will address the problems associated with the increased administration caused by failings in the current scheme and Universal Credit as follows:
  - The scheme will require a simplified claiming process. All applicants will see a significant reduction in the claiming process and, where possible, Council Tax Reduction will be awarded automatically. For Universal Credit applicants any Universal Credit data received from the Department for Work and Pensions (DWP) will be treated as a claim for Council Tax Reduction. Where information is received from DWP, the entitlement to Council Tax Reduction will be processed automatically without the need to request further information from the taxpayer. These changes will have the following distinct advantages namely:
    - (a) **Speed of processing** all claims will be able to be calculated promptly and largely automatically without the need to request further information which inevitably leads to delays;

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

- (b) Maximising entitlement to every applicant. As there will no requirement for Universal Credit applicants to apply separately for Council Tax Reduction, and for all other applicants, the claiming process will be simplified significantly. Entitlement to Council Tax Reduction will be maximised with a reduced risk of loss of discount or the need for backdating;
- (c) Maintenance of collection rates the new scheme will avoid constant changes in discount, the need for multiple changes in instalments and therefore assist in maintaining the high collection rates currently achieved. The increased level of discount will assist all those applicants on the lowest levels of income, again improving the overall collection rate;
- The income bands are sufficiently wide to avoid constant changes in discount. The current Council Tax Reduction scheme is very reactive and will alter even if the overall change to the person's liability is small. This is leading to constant changes in Council Tax liability, the need to recalculate monthly instalments and the requirement to issue a large number of Council Tax demands. The effect of this is that Council Tax collection is reduced. The new scheme, with its simplified income banding approach will have the following advantages:
  - o Only significant changes in income will affect the level of discount awarded;
  - Council Taxpayers who receive Council Tax Reduction will not receive multiple Council Tax demands and adjustments to their instalments; and
  - The new scheme is designed to reflect a more modern approach, where any discount changes it will be effective from the day of the change rather than the Monday of the following week;

#### Transition to the new scheme and the Exceptional Hardship Scheme

- 3.28 The Council must be mindful that any change in scheme or a transition to a new scheme may have result in a change to the entitlement of certain applicants.
- 3.29 Inevitably, with any change in scheme, there will be some winners and losers although the proposed scheme has been designed to protect the most vulnerable. It is proposed that the new scheme will contain additional provisions to protect individuals who experience exceptional hardship. Where any applicant is likely to experience exceptional hardship, they will be encouraged to apply for an exceptional hardship payment. The Council will consider all applications for exceptional hardship on an individual basis, taking into account available income and essential outgoings. Where appropriate further support will be given to the applicant.

#### **BROMSGROVE DISTRICT COUNCIL**

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

3.30 This approach will enable individual applicants to be dealt with in a fair and equitable manner. The Exceptional Hardship Scheme will form part of the Council Tax Reduction scheme and fall to be paid through the Collection Fund.

#### Other Options considered

- 3.31 The alternative to introducing a new scheme for Council Tax Reduction from 2021/22 is to leave the existing scheme in place. This would be a short-term option; lead to increasing costs of administration; and in the longer term, significantly affect the collection of Council Tax and the effectiveness of the scheme to support households within the District Council's area.
- 3.32 Failing to adopt the new scheme would mean that the 2,063 claimants who would benefit from the implementation of the replacement scheme would continue to receive a lower level of Council Tax Reduction at an average cost for each claimant of £4.76 per week.

#### **Rationale and Impact of Proposed Changes**

- 3.33 In preparation for consultation on the proposals to replace the existing Council Tax Reduction Scheme modelling of the changes was completed. The modelling identifies the working age claimants that will be impacted by the changes. It is important to note that only working age applicants will be impacted by the changes as the discount for pensioner claimants will continue to be determined by reference to the national schemes for Council Tax Reduction.
- 3.34 The initial modelling indicated that of the 2,450 working age recipients of Council Tax Reduction 72%, almost 3 quarters, would receive an increase in the amounts of Council Tax reduction that they receive.
- 3.35 Additional modelling was completed to reflect the changing claimant base, and to adopt additional changes to the disregarded income within the scheme. The latest modelling indicates that of the current 2,504 working age applicants, 82% will see an increase in the level of support that they receive, 3% will see no change in the level of support and 15% 376 claimants will see a reduction in the level of support.
- 3.36 Where there is a reduction in the level of support a relative majority of these cases fall within the single person and childless couple client groups. The largest group seeing a reduction in support is the single person household, this is consistent with the general principle that Council Tax Reduction schemes should incentivise work, as this client group is that which is most able to return to employment.

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

- 3.37 The replacement scheme retains the provision for exceptional hardship awards to be made; and claimants facing a reduction in the level of support under the new scheme may be considered for transitional protection through the use of the relevant hardship scheme.
- 3.38 The impact and rationale for each of the changes to the scheme is commented on below:

Increase of maximum support to 100% liability; and further discounts based on the applicant and partner's income.

- 3.39 The modelling of the proposed scheme identified that an increase in support from 85% of Council Tax liability to 100% liability, and the implementation of an income banded scheme would provide additional support to 72% of the CTR recipients.
- 3.40 The claimants seeing a reduction in support will be a minority and these claimants will be within the higher household income groupings.
- 3.41 An exceptional hardship scheme will remain in place, in-line with the current scheme and in appropriate cases the hardship scheme can be utilised to provide a transitional support for these claimants.

Removal of Non-Dependant deductions

- 3.42 Non-Dependent Decuctions are applied where there are adult residents other than the partner or claimant within a property and they reduce the amount of Council Tax Reduction.
- 3.43 The current scheme's requirement to apply Non-Dependant deductions creates an administrative drag on the assessment of Council Tax Reduction. This slows the speed of assessment and prevents the movement to automate the assessment of Council Tax Reduction.
- 3.44 The removal of non-dependent deductions from CTR will increase the speed of assessment for all claimants and allow the automation of the initial award from receipt of the notification of universal credit.
- 3.45 The data modelling of the new CTR scheme identified 346 of the 2,512 working age claimants had non-dependants resident within the household. The majority of these cases, 236 in total, have no non-dependant decuction applied as a result of the circumstances of the claimant. The removal of the non-dependant deduction for the remaining 110 cases will provide an average £7.06 increase in CTR, and a cost of £770 per week.

#### **BROMSGROVE DISTRICT COUNCIL**

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

#### Removal of extended payments

- 3.46 Extended payments were a feature of the legacy Council Tax Benefit scheme. The payments were provided when a claimant moves from benefits into employment and were intended to smooth the transition into employment.
- 3.47 The introduction of universal credit and assessment of entitlement on a month to month basis has reduces the requirement to provide extended payments as universal credit is designed to integrate more smoothly with employment and changes to income.
- 3.48 The structure of the proposed banded reduction scheme provides a transparent assessment process for claimants and further reduces the requirement for extended payments to continue. As claimants increase their working hours, or return to employment the impact of their increased earnings on their CTR will be evident.

Removal of the Income Taper and introduction of a capital limit of £6,000

- 3.49 The current CTR scheme applies a capital limit of £6,000; where a claimant has over £6,000 in capital a tariff income is applied to assume income of £1.00 per week for every £250 in capital up to £16,000 at which point eligibility for CTR is removed.
- 3.50 The use of tariff income requires the service to obtain evidence of a claimants capital and to periodically review the level of capital for these claimants. This creates an administrative drag on the initial assessment of support and a further burden in the requirement to carry out reviews on income.
- 3.51 The removal of tariff income and introduction of £6,000 capital limit will remove the administrative requirement.
- 3.52 Modelling of the scheme identified 25 applicants estimated to be impacted by the reduction in Capital Limits, with an average Council Tax Reduction of £14.00 per week. The scheme will include an exceptional hardship provision and capacity will exist within the fund to provide transitional protection to customers losing support due to the removal of the tariff income and introduction of the £6,000 capital limit.
- 3.53 It is important to note that the changes to the income taper and capital limites will only impact working age claimants. Pensioners who have accrued savings to meet their needs in retirement will continue to have their eligibility for discount determined by national rules.

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

Retention of disregards for:

- Carer's Allowance and Support Compenent of Employment Support Allowance
- Disability Benefits such as Disability Living Allowance and Personal Independence Allowance
- Child Benefit and Child Maintenance
- War Pensions and War Disablement Pensions
- 3.54 The identified disregards will be maintained within the proposed scheme and maintain the protections that these groups enjoy within the current CTR Scheme

#### CONSULTATION AND COMMUNICATION

3.52 As required by the legislation, the Council has consulted with both major preceptors and also the public. In the case of the public consultation, a full consultation was undertaken until 9<sup>th</sup> November 2020.

#### **Major Preceptors**

3.53 All major preceptors were requested for their views on the recommended new scheme. The Council received the responses shown in Appendix 3

#### **Public Consultation**

- 3.54 The public consultation produced 55 responses full details are provided in Appendix 2.
- 3.55 The Council suggested 11 options for changes and the overall responses were as follows:

Option 1 – The introduction of an income banded scheme to replace the current scheme for all applicants of working age

Yes: 47.83%, No: 26.09%, Don't Know:26.08%

Option 2 - To limit the number of dependant children within the calculation for Council Tax Reduction to a maximum of two for all applicants

Yes: 60.87%, No: 30.43%, Don't Know:8.70%

Option 3 – To remove non-dependant deductions from the scheme

Yes: 47.83%, No: 26.09%, Don't Know: 26.08%

Option 4 – Disregarding Carers Allowance, the support component of the Employment and Support Allowance and the housing element of Universal Credit

Yes: 78.26%, No: 17.39%, Don't Know: 4.35%

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

Option 5 - To reduce the maximum limit of capital from £16,000 to £6,000

Yes: 69.57 %, No: 30.43%, Don't Know: 0%

Option 6 – Removing the current earnings disregards and replacing them with a standard £25 disregard for all working age applicants.

Yes: 56.52%, No: 21.74%, Don't Know: 21.74%

Option 7 - To allow further income disregards where an applicant, their partner or any dependant is in receipt of a disability benefit

Yes: 78.26%, No: 8.70%, Don't Know: 13.04%

Option 8 – Removing the Extended Reduction provision

**Yes: 69.57%,** No: 21.74%, Don't Know: 8.70%

Option 9 - Removal of Second Adult Reduction from the scheme

Yes: 72.73%, No: 18.18%, Don't Know: 9.09%

Option 10 – Any new claim or change in circumstances which changes Council Tax Reduction entitlement will be made from the date on which the change occurs, (rather than on a weekly basis as at present)

**Yes: 90.48%,** No: 9.52%, Don't Know: 0%

Option 11 - Extending the 'backdating' provisions within the scheme

Yes: 90.48%, No: 4.76%, Don't Know: 4.76%

3.56 It can be seen from the above that the overall response to the changes have been positive and that the consultees largely support the recommended new Council Tax Reduction scheme.

#### **Customer / Equalities and Diversity Implications**

3.57 A stage one Equality Impact Assessment is attached within Appendix 1 of this report.

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

#### 4. RISK MANAGEMENT

4.1 The following risks are associated with the project:

Risk	Mitigation	Opportunities
Property No riok	N/A	N/A
Community Support Potential Changes to the support of some working age applicants	Where an applicant may receive less Council Tax Reduction, they may apply for additional support under the Council's Exceptional Hardship Fund  In cases, where applicants have the lowest income, they may receive more support under the proposed scheme.	There is an opportunity to:      Modernise the current scheme;     Enable a scheme that will be fit for purpose; and     Reduce administration.
Timescales It will be essential to meet project timescales if the new scheme is to be introduced for the 2021/22 financial year.	The work has already been completed with scheme design and extensive modelling.	
Project capacity	Resources have already been allocated to the project which are sufficient	
Financial / VfM Changes to the scheme could potentially lead to changes in overall scheme costs	Extensive modelling     has been undertaken     to estimate the costs of     the scheme. This will     continue throughout     the life of the project.	The Council has indicated that it is not looking to make savings from scheme changes. The Council will provide additional support to those households on the

# CHANGES TO THE COUNCIL TAX REDUCTION SCHEME 2021/22 CABINET 24 February 2021

Risk	Mitigation	Opportunities
		very lowest of incomes
Legal Failure to set the scheme in accordance with the legislation and failure to comply with the legal requirements for developing a new CTR scheme	The project has been undertaken strictly in accordance with legislative requirements	
Innovation Failure to maximise the potential of change and automation	<ul> <li>Throughout the implementation, we will look to take advantages of the latest automation of claims and the gathering of data</li> </ul>	There will be more opportunity to enhance customer's online experience by receiving immediate decisions of discounts being granted.
Reputation Failure to implement the new scheme on time or failure to deliver a comprehensive and robust scheme	The project is following previous successful implementations by other Local Authorities  The project is following previous successful implementations by other Local Authorities  The project is following project is following previous successful in the project is following project is following previous successful in the project is followed by the project is followe	<ul> <li>There is an opportunity for the Council to enhance its reputation by developing an up to date an effective Council Tax Reduction scheme</li> </ul>

#### 5. APPENDICES

**Appendix 1 – First & Second Stage Equality Impact Assessment**;

Appendix 2 – Results from the public consultation document

**Appendix 3 – Responses from the Major Preceptors** 

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#### **Equality Assessment Record**



Т	itle of Service, Policy, Procedure, Spending Review being Proposed	Council Tax Reduction Scheme 2021/22
Ν	ame of Service Area	Revenues and Benefits
N	ame of Officer completing this assessment	Lisa Devey
D <sub>D</sub>	ate Assessment Started	19 <sup>th</sup> August 2020
	lame of Decision Maker (in relation to the change)	
D	ate Decision Made	

#### **Overview**

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

To introduce a simplified Council Tax Reduction scheme with effect from 1<sup>st</sup> April 2021 and to increase the level of support to the poorest households.

In addition, the implementation of Universal Credit within the area requires the Council to change its approach to Council Tax Reduction, given the high administrative burden of monthly changes and alterations to applicants' income.

There is a requirement to introduce a simplified, more supportive scheme which can be easily administered without significant additional costs being placed on the Council. The current scheme is too reactive to minor changes in applicant's income leading to constant changes in Council Tax liability.

The scheme changes will only apply to working age applicants, pension age applicants are covered by the Prescribed Requirement Regulations determined by Central Government.

The move to an income-based scheme (without the complexities of a full means tested as required by the current scheme).

The changes will provide the following:

- An increased level of support to households with the lowest income;
- Simplified claiming arrangements for all working age applicants;
- Certainty, at present, multiple changes are leading to some taxpayer's receiving a large number of Council Tax bills per year as their Council Tax Reduction is constantly amended;
- The maximisation of applicant's entitlement with clear straightforward messages to claim;
- Speed of processing applications will be dealt with more efficiently and without the need for significant levels of evidence;
   and
- Reduced administration costs. The changes will prevent the administration costs from rising year on year which would be inevitable under the current scheme.

It should be noted that the overall costs of the scheme will increase however the overall level of Council Tax Reduction as a proportion of the overall Council Tax base, will be less than when Council Tax Reduction was introduced in 2013. The costs to the District Council will be in proportion to the Council's share of Council Tax.

Who is the proposal likely to affect?	Yes	No
All residents		
Specific group(s)	$\boxtimes$	
All Council employees		
Specific group(s) of employees		
Other – Provide more details below		

#### **Details**

Outline who could be affected and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

Working age applicants who are currently in receipt of Council Tax Reduction or those who apply on or after 1<sup>st</sup> April 2021. Pension age applicants will not be affected as their scheme remains unchanged.

#### Evidence and data used to inform your equality impact assessment

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

Modelling of the new scheme has been undertaken throughout and will continue to be undertaken until such time as the 2021/22 scheme is approved.

The indicative modelling data based on a snapshot of cases in February 2021 is shown below:

	Existing Scl	heme		New Scheme			
			Average Weekly			Average Weekly	Average Weekly
	Numbers	Expenditure	Amount	Numbers	Expenditure	Amount	Gain / (Loss)
Single Person	1164	£958,474.66	£16.76	1051	£1,017,184.48	£19.63	£2.87
Couple no children	213	£236,411.86	£22.82	183	£229,783.82	£25.69	£2.87
Single person with one child	347	£279,376.77	£16.80	338	£296,709.74	£18.52	£1.72
Single person two or more children	436	£339,480.48	£16.77	382	£327,227.36	£18.37	£1.60
Couple with one child	92	£88,521.43	£21.07	81	£91,417.24	£24.43	£3.36
Couple with two or more children	165	£162,541.35	£22.44	138	£162,503.32	£26.74	£4.30
Applicant Gender – Male	887	£779,420.35	£18.10	793	£803,544.80	£20.78	£2.68
Applicant Gender -							
Female	1563	£1,309,230.84	£17.66	1380	£1,321,281.16	£20.15	£2.49
		£2,088,651.19			£2,124,825.96		

- The scheme is designed to protect the households with the lowest incomes and will redistribute the levels of support available in a fairer manner. The overall costs of the scheme are marginally higher, and this will allow up to 100% support to those applicants on the lowest incomes and those who receive DWP legacy benefits including Income Support, Job Seeker's Allowance (Income Based), Employment and Support Allowance (Income Related).
- The scheme will protect applicants who are disabled or where any member of their household is disabled;
- The scheme will be more generous to carers and those who have non dependants;
- The scheme will however limit the maximum capital allowable to £6,000 and restrict the calculation to a maximum of two dependants in line with the changes to Universal Credits, Tax Credits and Housing Benefit; and
- All existing income and capital disregards will apply in the new scheme; and
- **All** applicants, if they are detrimentally affected by the new scheme, will be able to apply for an Exceptional Hardship Fund payment from the Council's new Exceptional Hardship Fund which will be effective from 1<sup>st</sup> April 2021.

#### **Engagement and Consultation**

Consultation has taken place with the Major Preceptors (Fire and Rescue, Police and the County Council). Details of their responses are shown within Appendix 3 of the report.

A full public consultation was undertaken in the period to 9<sup>th</sup> November 2020 and the results of which are shown within Appendix 2 of the report

It can be seen that the consultation has received an overall positive response.

	Equality Duty Aims	Evidence
	Eliminate unlawful discrimination, harassment and victimisation How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic	<ul> <li>The new scheme has been designed to support all low-income taxpayers and has been created strictly in accordance with the legislative requirements.</li> <li>The new scheme provides more support to those on the lowest incomes</li> <li>Existing 'protected' categories or persons who are currently determined as vulnerable within the existing scheme, will continue to be protected in the new scheme.</li> <li>A new Exceptional Hardship Scheme has been created to assist any applicant who feels that they require additional support.</li> </ul>
Page 22	Advance equality of opportunity between different groups How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).	<ul> <li>All working age are covered by the scheme and any taxpayer who meets the criteria will be able to apply for support.</li> <li>The scheme will allow easier access to support; maximisation of assistance whilst at the same time maintaining the protections from the current scheme;</li> <li>There will be some applicants with higher levels of capital or higher levels of available income that may receive less support through the new scheme.</li> </ul>
	Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?	<ul> <li>Yes, the scheme is designed to:         <ul> <li>Be easily accessible by all applicants;</li> <li>Avoid multiple changes to entitlement (and Council Tax) throughout the year;</li> <li>Be less complicated and more easily understood.</li> </ul> </li> </ul>

#### Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
  - No, all working age applicants are treated in the same way;

- Does it affect some equality groups or communities differently and can this be justified?
  - o No
- Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified? (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)
  - Yes

#### Impact of proposal

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

Details of the impact of the change have been provided above

୍ଦାf you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise of this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

Protected Group	Impact of proposal	Justification for any actual or potential unfairness identified	If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?
Age	Affects working age applicants only (pension age applicants are dealt with under Central Government Prescribed Scheme)		

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Disability	Protected		
Transgender	N/A		
Marriage and Civil Partnership	N/A		
Pregnancy and Maternity	N/A		
Race	N/A		
Religion or Belief	N/A		
Sex (Male/ Female)		The scheme provides a higher level of support to both male and female applicants. As with the existing scheme, more female applicants will be in receipt of Council Tax Reduction	
Sexual Orientation	N/A		

How will you monitor any changes identified?

The scheme will be constantly monitored by the

The scheme will be constantly monitored by the service throughout 2021 /22 to ensure that its objectives are met.

The actions required to address these findings are set out below.

Action Required	By Whom	By When	Completion Date
Recommended – It is recommended that the new proposed Council Tax Reduction scheme be implemented from 1st April 2021			

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Sign off on completion	Name	Signature	Date
Lead Officer completing assessment			
Equalities Officer			

When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.

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# **Bromsgrove District Council - Council Tax Reduction Scheme 2021/22 Consultation LIVE**

#### 1. Background to the Consultation

1. I have read the background information about the Council Tax Reduction Scheme: This question must be answered before you can continue.

									Response Percent	Response Total
1	Yes								98.18%	54
2	No								1.82%	1
Statisti	cs Minimum	1	Mean	1.02	Std. Deviation	0.13	Satisfaction Rate	1.82	answered	55
	Maximum	2	Variance	0.02	Std. Error	0.02			skipped	0

#### 2. Paying for the Scheme

2. Should the Council keep the current Council Tax Reduction scheme? (Should it continue to administer the scheme as it does at the moment?)

										Response Percent	Response Total
1	Ye	S								21.62%	8
2	No	)								56.76%	21
3	Do	n't Know								21.62%	8
Statist	tics	Minimum	1	Mean	2	Std. Deviation	0.66	Satisfaction Rate	50	answered	37
		Maximum	3	Variance	0.43	Std. Error	0.11			skipped	18

3. Please use the space below to make any comments you have on protecting the Council Tax Reduction Scheme from these changes.

		Response Percent	Response Total
O	pen-Ended Question	100.00%	8
1	It is vital that we continue to support the vulnerable in society. People that are disal spending, e.g. care, that many others in society do not have to fund. The Council T enable this essential spending.		
2	I feel that it should be only discounted to the maximum of 2 dependent children in a people should be given support only on the understanding that one of the adults ar some kind of paid work, or even voluntary work helping the community , for helping funding them	e actively loo	king for
3	Key workers should be given discount on council tax People earning under 30k should have a reduction in tax Council tax bands should be reviewed and lowered to support post covid recovery	for families	
4	Changes need to be made but it needs to be fair. 1 person should not pay the same as there is not the same drain on resources or the same level of income	e as multiple	occupants
5	The options are so in-depth and complicatedly written it's near impossible to provid constructive feedback to this survey. I can't make head nor tail of what you're actual you've probably already made your minds up about the changes you're proposing.	•	

## 3. Please use the space below to make any comments you have on protecting the

		Response Percent	Response Total
6	It seems preferable to educe admin costs so that more can be given as benefit pay	ments	
7	I favour increasing CTR to 100% for those on basic means tested income.		
8	Given the real changes that are affecting employment now id=s not the time to cha	nge support t	o people
		answered	8
		skipped	47

#### 3. Option 1 – The introduction of an Income Grid scheme to replace the current scheme for all applicants of working age

#### 4. Do you agree with this change to the scheme? Response Response Percent Total 47.83% 11 1 Yes 2 No 26.09% 6 3 Don't Know 26.09% 6 23 Statistics Minimum Mean Std. Deviation 0.83 Satisfaction Rate 39.13 answered Maximum 3 Variance 0.69 Std. Error 0.17 skipped 32

		Response Percent	Response Total
	Open-Ended Question	100.00%	7
•	A single adult (particularly with children) should have at least double the ir household outgoings will not be disimilar whether the home is occupied by household income will potentially be half for the single person.		
2	only i disagree with someone having savings of £16,000 being edible, I wo minimum wage and so does my husband and pay mortgage etc and would worked all our lives now 60.		
;	I partially agree with the proposed changes, i feel that bands should be reworkers should be given discount	viewed and lowered a	nd key
4	The earnings thresholds for single people seem rather unfair especially in minimum contribution for all of 5-10% per annum would help pay for a revi		-
;	I honestly can't get my head around what you're actually proposing		
(	I would include people who receive Universal Credit with no earnings in bar generous income threshold across the remaining bands as I believe that no pay council tax alongside other essential costs.		
-	7 keep the existing scheme		
		answered	7
		skipped	48

6. The current Council Tax support scheme requires all working age claimants to make a contribution to their Council Tax liability. The proposed scheme will mean the claimants on the lowest income do not make payments to their Council Tax. Do you think the scheme should require a minimum contribution from each working age resident?

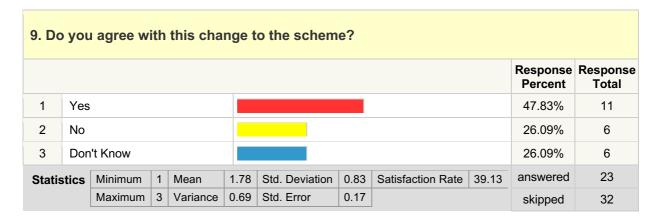
									Response Percent	Response Total
1	Yes								34.78%	8
2	No								60.87%	14
3	Don't Know								4.35%	1
Statistic	Minimum	1	Mean	1.7	Std. Deviation	0.55	Satisfaction Rate	34.78	answered	23
	Maximum	3	Variance	0.3	Std. Error	0.11			skipped	32

4. Option 2 - To limit the number of dependant children within the calculation for Council Tax Reduction to a maximum of two for all applicants

7. Do	o you	ı agree w	ith	this cha	nge t	o the schem	e?			
									Response Percent	Response Total
1	Yes								60.87%	14
2	No								30.43%	7
3	Don	't Know							8.70%	2
Statis	stics	Minimum	1	Mean	1.48	Std. Deviation	0.65	Satisfaction Rate 23.91	answered	23
		Maximum	3	Variance	0.42	Std. Error	0.14		skipped	32

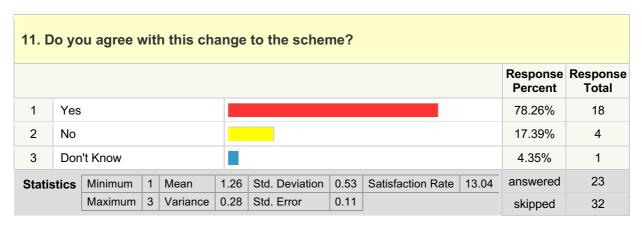
		Response Percent	Response Total
Ор	en-Ended Question	100.00%	5
1	I just think that this places vulnerable women and their children in hardship.		
2	I would increase the number of dependents before the changes are implimented		
3	I don't think families should be penalised when claiming benefits just because they children.	have more th	nan 2
4	I think it is fairer to count each child within the calculation due to the extra costs for	the househol	ld.

5. Option 3 – To remove Non-Dependant Deductions from the scheme



		Response Percent	Response Total
0	pen-Ended Question	100.00%	4
1	All non-dependant adults should make a contribution unless they are on qualifying I	benefits also.	
2	Current principles of a reduction should apply.		
3	Keep non- dependent deductions Some households have non-dependant children non-dependants are in receipt of Benefits or have no income, do not implement the work impose a non-dependant deduction based on earned income.		U

## 6. Option 4 – Disregarding Carers Allowance, the Support Component of the Employment and Support Allowance and the housing element of Universal Credit



12. If you disagree what alternative would you propose?								
	Response Percent	Response Total						
1 Open-Ended Question	100.00%	1						
1 Take it into account but have an appeals system for special har	rdship - or include a % of instead							

12. If you disagree what alternative would you propose?					
	Response Percent	Response Total			
	answered	1			
	skipped	54			

#### 7. Option 5 - To reduce the maximum level of Capital from £16,000 to £6,000

13. Do you agree with this change to the scheme?										
								I	Response Percent	Response Total
1	Yes								69.57%	16
2	No								30.43%	7
Statistics Minimum 1 Mean 1.		1.3	Std. Deviation	0.46		answered	23			
		Maximum	2	Variance	0.21	Std. Error	0.1		skipped	32

14.	4. If you disagree what alternative would you propose?								
			Response Percent	Response Total					
1	Op	pen-Ended Question	100.00%	3					
	1	ne temporary	help due						
	2	With negative interest rates likely assumed returns from investments will also becomes the wrong level - suggest £10k as a more reasonable level.	me negative	so £6k					
I'm not sure what you actually mean but if the proposal is to reduce support to people with a household income of £6,000 or less I object and don't think most households with an income of £16,000 or below ca afford council tax payments.									
			answered	3					
			skipped	52					

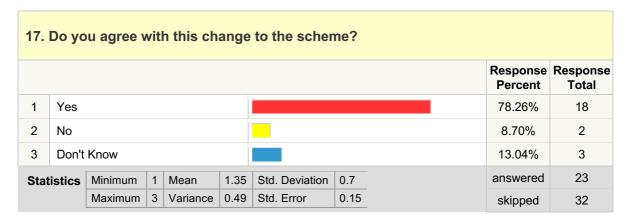
# 8. Option 6 – Removing the current earnings disregards and replacing them with a standard £25 disregard for all working applicants

15. Do you agree with this change to the scheme?							
		Response Percent	Response Total				
1	Yes	56.52%	13				
2	No	21.74%	5				
3	Don't Know	21.74%	5				
		answered	23				

15. Do yo	15. Do you agree with this change to the scheme?									
									Response Percent	Response Total
Statistics	Minimum	1	Mean	1.65	Std. Deviation	0.81	Satisfaction Rate	32.61	skipped	32
	Maximum	3	Variance	0.66	Std. Error	0.17				

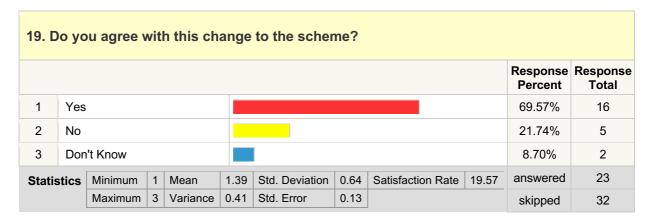
16	16. If you disagree what alternative would you propose?								
			Response Percent	Response Total					
1	Ор	en-Ended Question	100.00%	3					
	1	Help people with children.							
	2	A fairer system that doesn't penalise larger families							
	3	The circumstances of he claimants should be taken into account when calculating t paid	he benefit th	ey will be					
			answered	3					
			skipped	52					

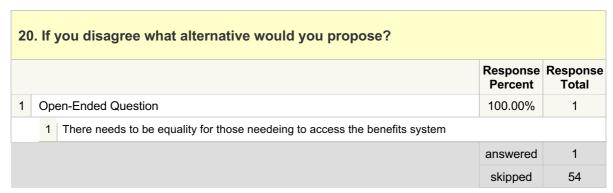
9. Option 7 - To allow further income disregards where an applicant, their partner or any dependant is in receipt of a disability benefit



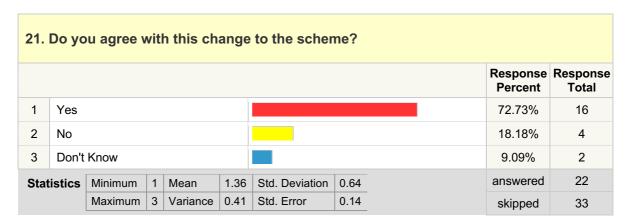
18. If you disagree what alternative would you propose?							
	Response Percent	Response Total					
1 Open-Ended Question	0.00%	0					
No answers found.	'						
	answered	0					
	skipped	55					

10. Option 8 – Removing the Extended Payment provision





#### 11. Option 9 - Removal of Second Adult Reduction from the scheme



22. If you disagree what alternative would you propose?									
Response Response Percent Total									
1	Op	pen-Ended Question	100.00%	1					
	1	Single occupancy discount should continue, i would find it difficult to be able to pay single person and wouldn't be able to remain in my current home	more counci	l tax as a					
			answered	1					
			skipped	54					

12. Option 10 – Any new claim or change in circumstances which changes Council Tax Reduction entitlement will be made from the date on which the change occurs, (rather than on a weekly basis as at present)

23. Do you agree with this change to the scheme?											
							Response Percent	Response Total			
1	Yes									90.48%	19
2	No									9.52%	2
3	3 Don't Know									0.00%	0
Statistics Minimum 1 Mean			1.1	Std. Deviation	0.29	Satisfaction Rate	4.76	answered	21		
Maximum 2 Variance				0.09	Std. Error	0.06			skipped	34	

24. If you disagree what alternative would you propose?								
		Response Percent	Response Total					
1	Open-Ended Question	0.00%	0					
	No answers found.		,					
		answered	0					
		skipped	55					

13. Option 11 – Extending the 'backdating' provisions within the scheme

25. Do you agree with this change to the scheme?											
								Response Percent	Response Total		
1	Yes									90.48%	19
2	No									4.76%	1
3	3 Don't Know									4.76%	1
Statis	Statistics Minimum 1 Mean			1.14	Std. Deviation	0.47	Satisfaction Rate	7.14	answered	21	
Maximum 3 Variance				0.22	Std. Error	0.1			skipped	34	

26.	. If y	you disagree what alternative would you propose?		
			Response Percent	Response Total
1	O	pen-Ended Question	100.00%	1
	1	Often claimants are late in claiming CTR because they dont understand that they n of circumstances necessitates that they do. By this time they can often be several r liability.		
			answered	1

26. If you disagree what alternative would you propose?		
	Response Percent	Response Total
	skipped	54

#### 14. Alternatives to changing the Council Tax Reduction Scheme

#### 27. Increase the level of Council Tax to cover the additional administration costs Response Response **Percent Total** 4 1 Yes 19.05% 2 No 80.95% 17 3 Don't Know 0 0.00% 21 Mean answered **Statistics** Minimum 1.81 Std. Deviation 0.39 Satisfaction Rate | 40.48 Maximum 2 Variance 0.15 Std. Error 0.09 skipped 34

28. F	Find t	he additi	on	al admin	istra	ition costs b	y cut	ting other Council	Services	
									Response Percent	Response Total
1	Yes								4.76%	1
2	No								90.48%	19
3	3 Don't Know								4.76%	1
Statistics Minimum 1 Mean		2	Std. Deviation	0.31	Satisfaction Rate 50	answered	21			
		Maximum	3	Variance	0.1	Std. Error	0.07		skipped	34

			Response Percent	Response Total
1	Op	pen-Ended Question	100.00%	4
	1	CTR is a vital element of support for the low paid and vulnerable. Bromsgrove residenough to bare a small increase in council tax to support those in more need.	ents are afflu	ıent
	2	Q28 seems rather odd in view of the fact that the Council asserts that the proposed administration.	changes wil	I simplify
	3	Anything that makes the calculation easier for council staff, support agencies and rewelcomed.  Council Tax is a burden on all residents and should not be increased further. More available for those who genuinely need it		
	4	I realise that saying no to both options isn't realistic - it is my belief that the central gincrease funding to councils. I know this may be wishful thinking!	government s	hould
			answered	4
			skipped	51

## 30. Please use the space below if you would like the Council to consider any other options (please state).

		Response Percent	Response Total
1	Open-Ended Question	100.00%	1
	1 If people are able bodied this should be investigated at all levels in the household f	•	,

work to benefit the community. If doesn't incourage people to get up with a routine. Benefits ie tax payers money should be treated as a last resort not a right to have. Money should be going to fund carers that are doing the low paid work at homes, and people that genuinely carnt work with a disability. People should not class it a right to keep having children when they no they carnt provide for them, why should everyone else work twice as hard to put the money in. I no a lot of people that work long hours who don't have children who would love them but don't because THEY CARNT AFFORD THEM

answered	1
skipped	54

## 31. Please use the space below if you would like the Council to consider any other options (please state).

	Response	Response
	Percent	Total
1 Open-Ended Question	0.00%	0
No answers found.	<u>'</u>	
	answered	0
	skipped	55

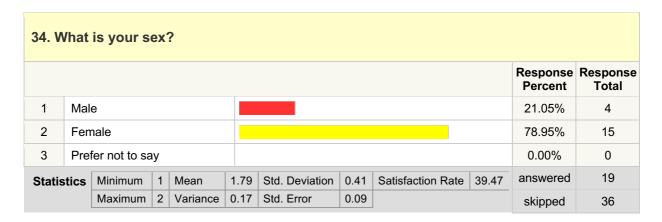
# 32. If you have any further comments or questions to make regarding the Council Tax Reduction scheme that you haven't had opportunity to raise elsewhere, please use the space below.

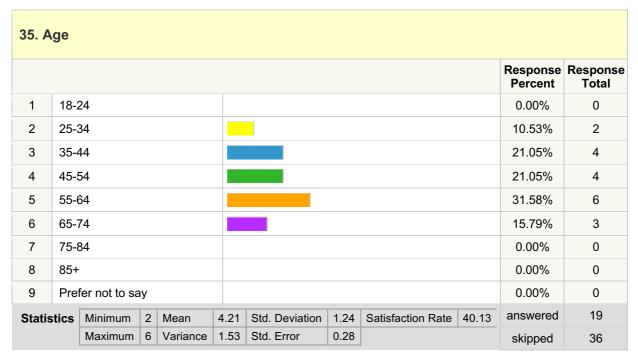
			Response Percent	Response Total
1	O	pen-Ended Question	100.00%	1
	1	Simplify benefit award letters. The current ones can be lengthy and confusing to all		
			answered	1
			skipped	54

#### 15. About You

#### 33. Are you, or someone in your household, getting a Council Tax Reduction at this time?

									Response Percent	Response Total
1	Yes								26.32%	5
2	No								73.68%	14
3	Don	't Know							0.00%	0
Statis	stics	Minimum	1	Mean	1.74	Std. Deviation	0.44	Satisfaction Rate 36.84	answered	19
		Maximum	2	Variance	0.19	Std. Error	0.1		skipped	36





		_	_	_				because of a heal t least 12 months?	•	r
									Response Percent	Response Total
1	Ye	s							21.05%	4
2	No	)							73.68%	14
3	Do	n't know							0.00%	0
4	Pre	efer not to s	ау						5.26%	1
Statist	tics	Minimum	1	Mean	1.89	Std. Deviation	0.64	Satisfaction Rate 29.	82 answered	19
		Maximum	4	Variance	0.41	Std. Error	0.15		skipped	36

									Response Percent	Response Total
1	Prefer r	not to say							5.26%	1
2	White E	British							94.74%	18
3	White I	rish							0.00%	0
4	White C	Sypsy or Iris	sh T	Traveller					0.00%	0
5	Any oth	er White ba	ack	ground					0.00%	0
6		Multiple eth							0.00%	0
7		Multiple eth							0.00%	0
8	Mixed/N White 8	Multiple eth	nic	groups -					0.00%	0
9	Any oth	er multi miz	xed	backgrour	nd				0.00%	0
10	Asian o	r Asian Brit	ish	Pakistani					0.00%	0
11	Asian o	r Asian Brit	ish	Indian					0.00%	0
12	Asian o	r Asian Brit	ish	Banglades	hi				0.00%	0
13	Asian o	r Asian Brit	ish	Chinese					0.00%	0
14	Any oth	er Asian ba	acko	ground					0.00%	0
15	Black A	frican							0.00%	0
16	British (	Caribbean							0.00%	0
17	Black B	ritish							0.00%	0
18	Any oth	er Black ba	ackę	ground					0.00%	0
St	atistics	Minimum	1	Mean	1.95	Std. Devi	ation	0.22	answered	19
		Maximum	2	Variance	0.05	Std. Erro	r	0.05	skipped	36

38. Other Ethnic Group		
	Response Percent	Response Total
1 Open-Ended Question	0.00%	0
No answers found.		
	answered	0
	skipped	55

16. Next steps....

#### Appendix 3 – Responses to Consultation from major preceptors

Consultation with major preceptors on the proposals for a revised Council Tax Reduction scheme was carried out in prior to the development of the draft scheme.

The following response was received from Worcestershire County Council [personal contact information has been removed]:

... whilst we would support in principle the ambition for many of the changes to your Council Tax Support Scheme, the net council tax income would reduce and that would mean the impact, however small, would ultimately be felt on the overall resources available across other district areas outside of Bromsgrove DC. We would not encourage any cross subsidy and would ask that its impact is minimised or avoided if possible.

Thank you, I appreciate the info you sent regarding this and wish you the best with implementing the proposals.

Kind Regards,

Chief Accountant

**Finance** 

Worcestershire County Council

County Hall, Spetchley Road, Worcester, WR5 2NP

Office:

Email:

Suspected frauds can be reported to our dedicated fraud hotline:

