# **Taunton Deane Borough Council**

# **Executive - 9 November 2016**

# **Review of Council Tax Support scheme for 2017/2018**

This matter is the responsibility of Executive Councillor Richard Parrish

Report Author: Heather Tiso, Revenues & Benefits Service Manager

# 1 Executive Summary

- 1.1 This report provides the Executive with information on our existing Council Tax Support scheme and the context for reviewing our scheme for Working Age applicants from 2017/18.
- 1.2 The Council is legally required to give annual consideration on whether to revise its local Council Tax Support (CTS) scheme and to consult with interested parties if it wishes to change the scheme.
- 1.3 Consultation on options agreed by the Corporate Scrutiny Committee for our CTS scheme for 2017/18 has been undertaken. Following consultation, on 20 October 2016, the Corporate Scrutiny Committee recommend the Council amends the current CTS scheme for 2017/18 to align it with changes to other welfare benefits, with the exception that applicants aged 18-21 would continue to be eligible.
- 1.4 The Executive is asked to consider amendments to the scheme for the financial year 2017/18 that will require approval by Full Council by 31 January 2017.

#### 2 Recommendations

- 2.1 The Executive, having regard to the recommendations from the Corporate Scrutiny Committee, the consultation response and the Equality Impact Assessment (EIA see Appendix 4), recommends the Council amends the current CTS scheme to that illustrated in Model 11. This will align the CTS scheme for 2017/18 with changes made by the Government to other welfare benefits with the exception that applicants aged 18-21 would continue to be eligible
- 2.2 The 2017/18 Council Tax Support scheme is recommended for 2017/18 only.

# 3 Risk Assessment (if appropriate)

# 3.1 Risk Matrix

Description	Likelihood	Impact	Overall
The increased complexity of financial planning that could result from growing pressure from the Council Tax Support scheme if funding reductions are not fully addressed	3	4	12
Cautious assumptions on recovery rate and therefore yield from the scheme.	2	4	8
Council incurs an unacceptably high-level of debt because of people's inability to make the payments particularly if the scheme is less generous. Lower Council Tax collection rate and bad debts. The impact of the scheme is that low incomes working age households are now paying more Council Tax. There will be a point if people are asked to pay more Council Tax where the liability is too high for them and they will not pay anything.	4	4	16
Robust arrears management procedures to maximise collection rate and prudent assumptions on collection rates council increases bad debt provision with budget	3	4	12
Higher administrative costs	3	3	9
Maximisation of council tax collected	2	3	6
Potential growth in the number of claimants.	4	4	16
Realistic assumption on caseload growth based on trends in recent years	3	4	12
If Taunton Deane's population increases, including an increase in the population segment that currently receives CTS, demand for CTS could increase against funding from the Government. This would increase the funding gap. Such population migration may occur if Taunton Deane's CTS scheme is more generous than those of neighbouring boroughs. Caseload increases (e.g. Major employer loss) and/or total value of awards exceeds estimates	3	4	12
Details provided to members on a monthly basis	2	4	8
Wider welfare reforms (HB reductions, Universal Credit) cause additional hardship and/or migration of people claiming to Taunton Deane from more expensive areas and impact on Council Tax Collection	3	3	9
Ensure adherence to robust recovery timetable. Maximise take-up of all available discounts/exemptions/ hardship relief. Strict adherence to monthly monitoring of performance against targets.	3	2	6
Council fails to meet obligations under relevant equality legislation in adopting a scheme	3	4	12
Carry out consultation on proposed scheme. Consider the results and findings as part of the approval of any scheme. Make reasonable adjustments through application of any agreed scheme.	2	4	8

### **Risk Scoring Matrix**

	5	Almost Certain	Low (5)	Medium (10)	High (15)	Very High (20)	Very High (25)
po	4	Likely	Low (4)	Medium (8)	Medium (12)	High (16)	Very High (20)
Likelihood	3	Possible	Low (3)	Low (6)	Medium (9)	Medium (12)	High (15)
=	2	Unlikely	Low (2)	Low (4)	Low (6)	Medium (8)	Medium (10)
	1	Rare	Low (1)	Low (2)	Low (3)	Low (4)	Low (5)
		1	2	3	4	5	
		Negligible	Minor	Moderate	Major	Catastrophic	
					Impact	t	

Likelihood of risk occurring	Indicator	Description (chance of occurrence)
1. Very Unlikely	May occur in exceptional circumstances	< 10%
2. Slight	Is unlikely to, but could occur at some time	10 – 25%
3. Feasible	Fairly likely to occur at same time	25 – 50%
4. Likely	Likely to occur within the next 1-2 years, or occurs occasionally	50 – 75%
5. Very Likely	Regular occurrence (daily / weekly / monthly)	> 75%

3.2 In addition to the principle risks outlined on the previous page, a number of other factors have been considered:

**Fairness**: There is also a risk that scheme may be perceived as being unfair. This risk will be studied in line with the Government's commitment to incentivise work, the recommended scheme requires a contribution. To mitigate this, all residents will have access to a discretionary fund.

**Culture of non-payment**: As we are mainly asking CTS recipients to make only a small contribution to their Council Tax bill, collection and recovery strategies may not be cost-effective, and small debts may be written off. This may over time develop into a culture of non-payment, where it becomes increasingly difficult and costly to recover small amounts of Council Tax from those who can least afford to pay it. We have mitigated this risk by minimising the level of contribution which is supported by robust arrears management procedures.

# 4 Background

- 4.1 Responsibility for Council Tax Support (CTS) passed to Local Authorities on 1 April 2013. Government also passed funding for CTS to Local Government through the annual Settlement Funding Assessment (SFA), but reduced the amount of funding available by 10% compared to the costs of the previous Council Tax Benefit (CTB) system. Previously, responsibility for CTB was held by central Government and funded by the Department for Work and Pensions (DWP).
- 4.2 Local Authorities therefore had to decide whether to absorb the funding reduction across other areas of their budget or pass it on to recipients of CTS by requiring them to make a contribution to their overall Council Tax bill.

- 4.3 Billing Authorities were tasked with designing a CTS scheme for people of working age, while rules for people of pension age are set in regulations prescribed by the Government. This means people of pension age continue to receive assistance at no less amount than had been available under the CTB scheme.
- 4.4 While we have some discretion on designing our CTS scheme for people of working age, the Government say we must protect vulnerable groups. There is no definition of which groups are counted as "vulnerable" as each authority has to make its own assessment. However, the Government have highlighted Local Authority statutory duties regarding:
  - Children and duties under the 2010 Child Poverty Act to reduce and mitigate the effects of child poverty
  - Disabled people and duties under the Equality Act 2010
  - Homelessness Prevention and duties under the 1996 Housing Act to prevent homelessness with special regard to vulnerable groups.
- 4.5 Currently, our scheme considers disabled people's needs and those responsible for children. It fully ignores income from a War Disablement or War Widows Pension. Also following the Government's direction, our scheme strengthens work incentives and does not discourage people to move off benefits and into work or to stay in work.
- 4.6 Approaches to the design of local CTS schemes by individual Councils have varied greatly. In designing their local schemes, a few authorities have absorbed the funding reduction passed on by Government, without passing on the cut to residents eligible for CTS by requiring them to contribute to their Council Tax bill. Other Councils have asked households to make a contribution to their annual Council Tax bill for the first time, in some cases as much as 45% of their total bill. In 2015/16, 260 Local Authorities (80%) required everyone to pay at least some Council Tax regardless of income, 30 more than in 2013/14. From April 2016, just 41 Councils (13%) continue to provide support at the level paid under the former CTB scheme.
- 4.7 The Department for Communities and Local Government (DCLG) provides funding through the annual Settlement Funding Assessment (comprising Revenue Support Grant and Business Rates Baseline) to help meet the cost of localised CTS schemes. Each of the major precepting authorities in Somerset received the initial funding based on their share of Council Tax receipts. In Taunton Deane, the initial grant awarded to precepting authorities was £6,110,080, with Taunton Deane Borough Council share of this grant being £587,775 (based on a 9.62% share). From 1 April 2014, funding for localised CTS was incorporated in the LGFS and is not separately identified.
- 4.8 It is now impossible to ascertain funding provided for CTS in the LGFS. Government grants to councils are being phased out and local government will move to 100% business rates retention by 2020. It has not been confirmed, but this may well be how councils will be expected to fund CTS schemes in future.

- 4.9 Whilst it is not possible to identify the level of grant being received the approach taken by many authorities has been to assume the grant is being reduced at the same rate as the Settlement Funding Assessment. The Settlement Funding Assessment reduced by 26.1% in cash terms in the two years up to 2015/16 and by 16.2% from 2016/17. In applying this methodology, the funding available for Localised CTS has reduced by £2,326,217 to £3,783,863.
- 4.10 In 2015/16, we paid CTS of £2,934,244 for people of pensionable age. Based on the assumptions stated above, this would leave just £850k to spend on CTS for people of working age. As our expenditure for working age recipients in 2015/16 was £2,542,213, this leaves a funding shortfall of £1,692,594. Based on our precepting share of Council Tax for 2016/17 of 9.63%, the share of this shortfall in funding for Taunton Deane Borough Council equates to £162,997.
- 4.11 If there are no changes to Single Person Discounts or protection provided to pensioners, CTS is going to become an additional cost pressure to local government. The Council has effectively maximised discounts and exemptions to close the funding gap (see paragraphs 6.2 6.5) and the only significant variable is to adjust the taper (minimum payment), however this needs to be managed carefully so as not to have an adverse impact on collection rates. For example, the review of CTS schemes carried out by Eric Ollerenshaw OBE in December 2015, noted that every Council that set their minimum payment to above 20% saw collection rates drop
- 4.12 Therefore, we need to consider the affordability of our current CTS scheme, and consider the cost of the financial support provided against other service priorities and alternative options to address the overall budget gap.

# 5 Taunton Deane Borough Council's Council Tax Support Scheme

- 5.1 People of pension age are able to claim support at up to 100% of their Council Tax liability. If a person claims Pension Credit (guarantee element) there is no limit on the savings they can have and they will normally not pay Council Tax at all. Pensioners with higher incomes can also qualify, even if they do not get Pension Credit. Depending on their circumstances they can qualify for some help with their Council Tax with an income of £400 a week or more.
- 5.2 In designing our CTS scheme, we considered customers' ability to pay and the collectability of the resultant Council Tax liability. For people of working age, our scheme has the following key elements:
  - Maximum support is 80% of Council Tax everyone of working age has to pay something;
  - Increased non-dependant deductions;
  - No Second adult rebate:
  - Earned income disregards are at increased levels than those offered under CTB;
  - Hardship fund of £35k for short-term help (this is a Collection Fund commitment and not fully funded by TDBC).
- In annual billing for 2016/17, Taunton Deane Borough Council sent Council Tax bills that after the award of CTS, totalled more than £60.7million. Approximately 14% of residents receive financial support through CTS, with under 8% of those liable to pay some Council Tax, being CTS recipients of working age.

5.4 There were 8,513 people who moved from the Council Tax Benefit scheme to the localised CTS scheme. At 31 March 2016, this had reduced to 7,325. Key information on CTS caseload, spending and budgets is shown below:

Claimant type	% of total claims	Caseload at 31 March 2016	% of total spend	CTS Expenditure
Working Age	52%	3,790	46%	£2,542,213
Pension Age	48%	3,535	54%	£2,934,244
Total	100%	7,325	100%	£5,476,457

Table 5.4.1

Authority	* Notional CTS Budget
Taunton Deane Borough Council (9.62%)	£551,044
Parishes and the Unparished Area (1.05%)	£59,868
Somerset County Council (71.67%)	£4,105,656
Avon and Somerset Police (12.19%)	£698,517
Devon and Somerset Fire and Rescue Authority (5.47%)	£313,409
Total Notional Budget	£5,728,495

Table 5.4.2

Comparative data	
Council Tax Benefit awarded 2012/13	£6,896,492
Council Tax Support awarded 2015/16	£5,476,457
Reduction in Council Tax Support expenditure in comparison to Council Tax Benefit (29%)	£1,420,035
Council Tax Benefit claims @ 31 March 2013	8,514
Council Tax Support claims @ 31 March 2016	7,325
Reduction in Council Tax Support caseload in comparison to CTB (14%)	1,189
Council Tax Support – Notional Budget 2015/16	£5,728,495
Council Tax Support awarded 2015/16	£5,476,457
Saving in CTS awarded in 2015/16 in comparison to *notional budget	£252,038

Table 5.4.3

- 5.5 Members will see from the tables above that the cost of our CTS scheme has reduced considerably, both through the implementation of our local policy and the trend in demand / eligibility for financial assistance. The changes to our CTS scheme to reduce support offered to working age applicants in 2016/17 have reduced expenditure. At 30 June 2016 we estimated that the CTS we award this year will be nearly £300k less than our notional budget. However, there are a number of factors potentially affecting the ongoing reduction in costs and CTS recipients, namely:
  - A downturn in the economy generally (as experienced in 2008 until 2013); or
  - A downturn in the local economy such as a local business going into liquidation or a reducing labour force; or
  - An increase in Council Tax above the increase in allowances available under the scheme.
- 5.6 The administration of the current scheme is both cost effective and efficient as for the majority of claims we can use information supplied by claimants for a Housing Benefit claim or direct from the Department for Work and Pensions (DWP).

<sup>\*</sup> Notional budget calculated in accordance with CTS funding distribution in 2013/14

# 6 Collection Activity and Debt Profile for 2015/16

- 6.1 From 1 April 2013 the Council decided to take advantage of new flexibilities related to second home discounts and short and long term empty properties to generate additional income through Council Tax in 2013/14.
- 6.2 For <u>unoccupied and unfurnished</u> properties the changes meant Council Tax would be payable at 100% of the liability after 3 months. For those remaining unoccupied and unfurnished after 2 years, the Council decided to charge Council Tax at 150% to encourage owners to put those properties back into use. Previously, there was no Council Tax payable for unoccupied and unfurnished properties for the first 6 months and after this, Council Tax was due at 90% of the liability.
- 6.3 For <u>unoccupied furnished</u> properties ("second homes") Council Tax from 1 April 2013 was payable at 100% instead of 90% that previously applied.
- 6.4 The households liable for Council Tax increased from 50,211 in 2012/13 to 52,374 by 31 March 2016. While bringing additional income from Council Tax, this growth has increased the demand for services.
- 6.5 The net collectable amount for Council Tax in 2015/16 increased by over £4.8m in comparison to 2012/13. The collection of Council Tax in year, while at a rate slightly less than achieved in 2012/13, has resulted in additional income for Taunton Deane of £445k based on its preceptor share of 9.62%. Since 2012/13, approximately 50% of the increased income from Council Tax has been derived from growth, with 50% being the consequence of other factors, such as the new flexibilities on second home discounts and short and long term empty properties (technical reform).

	2012/13	2015/16	Difference since 2012/13	% change since 2012/13
Council Tax due	£52,147,230	£56,985,564	£4,838,334	9.3% 🛧
Council Tax Collected (in year)	£51,125,612 (98.0%)	£55,746,919 (97.8%)	£4,621,307	9.0% 🛧

Table 6.5.1

- Oespite our best endeavours, it has not been possible to maintain in-year Council Tax collection at the rate it was before the introduction of CTS. For many customers, having to pay Council Tax has caused them budgeting issues, not least because many have also been affected by other welfare reform, such as the removal of the spare room subsidy.
- 6.7 Overall, the Council Tax outstanding for 2015/16 was £1,238,645. Council Tax outstanding for working age CTS recipients was £375,857. Therefore, while working age CTS recipients represent just 8% of households, the value of their debt equated to 30% of Council Tax outstanding at 31 March 2016.
- 6.8 In some instances, significant effort is required to collect relatively small sums of money and that effort may not be economical when balanced against the value of the debt owed. Furthermore the impact of passing enforcement costs on to residents will only increase the level of the debt further.

### 7 Council Tax Support Scheme 2017/18

- 7.1 The Local Government Finance Act 2012 states that before making a scheme we must consult with any major precepting authorities, publish a draft scheme and then consult with other such persons who are likely to have an interest in the operation of such a scheme. We must set a realistic timeframe for consultation to ensure we can seek feedback from all appropriate individuals and groups in the community.
- 7.2 Consultation with precepting authorities (Somerset County Council, Avon and Somerset Police, and Devon and Somerset Fire and Rescue Authority took place on 24 June 2016. Public consultation started on 4 July 2016 and ended on 11 September 2016. At the closing date, we had received 78 responses. Full details of the consultation are shown in <a href="Appendix 2">Appendix 2</a>. Information below shows a summary of the 4 options on which we consulted, as well as the response received.

### 7.2.1 Option 1 - No Change

# **Consultation Response: 41% in favour**

Under this option we would work out CTS in the same way as we do now. Any shortfall in the funding we get and the CTS we pay in 2017/18 would need to be met from other Council budgets.

### 7.2.2 Option 2 - Reduce maximum CTS offered to working age recipients from 80%

## **Consultation Response: 42% in favour**

This means working age CTS recipients would need to pay more and the Council could reduce the funding required to support the scheme in 2017/18 to assist in off-setting cuts in the Local Government Finance Settlement. Under our current CTS scheme the minimum contribution is 20%. If we were to reduce the maximum CTS offered to working age recipients to 70%, it would result in a potential saving as shown below:

Financial effect in reducing maximum CTS to 70% in isolation	
Current CTS spend based on 80% maximum support	£5,442,331
Revised spend on CTS based on 70% maximum support	£5,090,716
Potential saving	£351,595
TDBC's share (9.63 %) of the saving	£33,859

Increasing the contribution rate to 30% adds an additional Council Tax burden of £150.20 a year for a working age couple on CTS living in a band D property. It is important to consider the impact of increasing the Council Tax burden for those residents who are also likely to be impacted by wider Welfare Reform. Alternative reductions in the maximum CTS offered could be considered, for example, the maximum support provided through CTS could be any value less than 80% of the liability. Nationally, the maximum contribution required in 2016/17 is 45%.

Any reduction in the support offered to working age CTS recipients is likely to negatively impact on in-year collection of Council Tax and lead to a potential increase in administration costs to recover the Council Tax owed.

## 7.2.3 Option 3 - Increase maximum CTS offered to working age recipients from 80%

# **Consultation Response: 11% in favour**

Option 3 would mean all working age CTS recipients could pay less Council Tax, but there would be an additional cost to the Council and precepting authorities. Increasing the level of support carries a high level of risk to the Council in protecting front line services as resources would be diverted to support the CTS policy. This risk is increased in future years as the Council continues to see the funding available for services reducing. If we were to increase the maximum CTS offered to recipients of working age to 90%, it would result in potential increased costs as shown below:

Financial effect in increasing maximum CTS to 90% in isolation	
Current CTS spend based on 80% maximum support	£5,442,311
Revised spend on CTS based on 90% maximum support	£5,800,132
Potential increased cost	£357,820
TDBC's share (9.63 %) of the cost	£34,458

## 7.2.4 Option 4 - Technical changes

### **Consultation Response: 64% in favour**

Option 4 would mean the Council could chose to align the CTS scheme for 2017/18 with some or all of the changes the Government make to other welfare benefits. The changes known or expected to be implemented by the Government would have the following effect:

- The maximum period for which we will backdate CTS for working age recipients would reduce from 6 months to 1 month. This reduction in backdating has applied to working age Housing Benefit recipients since April 2016.
- From 1 April 2017, we would not include a Family Premium within in the applicable amount for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium. The Family Premium has not been included for the same category of Housing Benefit recipients since May 2016.
- When working out CTS, we would not include the Work Related Activity component in the applicable amount for new claimants of Employment and Support Allowance (ESA). New claimants for ESA in the Work-Related Activity Group (WRAG) will receive the same rate of CTS as those claiming Jobseeker's Allowance. The Work Related Activity component will not be included in Universal Credit from April 2017.
- Under our current scheme, we include £66.90 in the applicable amount for every child up to the age of 20. From 1 April 2017, we would remove this amount for third and any subsequent children born after that date to align with revised rules for Housing Benefit, Tax Credits and Universal Credit that are expected to apply in 2017/18. We would continue to include the amount for first and second children. There will be protection for multiple births or women who have a third child as the result of rape or other exceptional circumstances.
- From 1 April 2017 we would align our CTS scheme with changes made to the temporary absence rules in Housing Benefit and Pension Credit on 28 July 2016. This would reduce the allowable period of temporary absence outside Great Britain from 13 weeks to 4 weeks. Northern Ireland, the Channel Islands and the Isle of Man are not part of Great Britain for Housing Benefit purposes. There are exceptions to the general temporary absence rule that we would similarly apply to CTS recipients, for example absences related to the death of a close relative

• From April 2017, 18-21 year olds who are not in work may no longer be eligible for help through our CTS scheme. We would implement this change to align with new rules expected to apply to Universal Credit applicants. Under Universal Credit, 18-21 year olds will be required to participate in an "intensive regime of support from day one of their benefit claim", and after six months they will be expected to apply for an apprenticeship or traineeship, gain work-based skills, or go on a mandatory work placement. There will be a range of exemptions for vulnerable young people, including those in danger of suffering abuse and those receiving disability benefits. People who have been in work for 6 months before making a claim, will continue to be eligible for CTS for up to 6 months while they look for work. Applicants who have previously been in care will not be affected.

All the changes outlined above would mean that some working age CTS recipients would need to pay more and the Council could reduce the funding required to support the scheme in 2017/18 to assist in off-setting cuts in the Local Government Finance Settlement. Making such changes would mean the scheme for Housing Benefit recipients would be less complicated as rules would be aligned as well as easing administration. The potential saving by implementing all the changes outlined above is shown below.

Financial effect in amending the CTS scheme to align with welfare benefit changes			
Current CTS spend based on 80% maximum support	£5,442,311		
Revised spend on CTS based on alignment with other welfare benefit changes	£5,417,054		
Potential saving	£25,257		
TDBC's share (9.63 %) of the saving	£2,432		

## 8 Key considerations applicable to all options

- 8.1 Any of the options to reduce or increase the level of support we offer through CTS will have an adverse or positive impact on certain applicants or groups of applicants. If we need to cut the support offered through our CTS scheme, we need to consider a careful selection of options for our particular demographic unless additional funding can be raised through other Council initiatives or by cuts in services generally. The reality is that any revised scheme that has less funding, needs to establish which applicants are more able to pay an increased level of Council Tax with the reduction in their CTS.
- 8.2 There is no single option or change to the CTS scheme that can deliver sufficient savings to meet the predicted budget gap from the reduced LGFS in 2017/18. The decision will be to choose what options are acceptable to the Council bearing in mind the overall level of finance available.
- 8.3 Although the Council is not legally required to include transitional protection for claimants moving from one CTS scheme to a replacement scheme, the legislation does state that Members must consider if transitional arrangements may be needed and if protection should apply to all groups or just certain groups. Such protection could limit our ability to realise savings.
- 8.4 Should there be any shift in proportions between working age and pension age or an economic downturn resulting in more people relying on some form of state financial support, there would be greater pressure on remaining Council Taxpayers to meet potentially higher outlay.
- 8.5 A decision to reduce CTS for people of working age will mean that Council Tax Collection will be an even harder task. It will result in more pressure on Revenues staff and may require additional capacity to maintain tax collection rates.

8.6 Detailed modelling on the options, is shown in <u>Appendix 3</u>. Financial modelling for Option 4 is based on data derived from customers affected by Housing Benefit changes from 1 April 2016 to 15 September 2016. Modelling illustrates the effect on applicants and potential savings.

# 9 Links to Corporate Aims / Priorities

9.1 Council Tax Support is most closely linked with Key Theme 1 - People where we will 'Work with others to support the wellbeing of an older population and our most vulnerable residents".

# 10 Finance / Resource Implications

- 10.1 As reported earlier in this report, funding for CTS was reduced by 10% in 2013/14. Subsequently the Settlement Funding Assessment reduced by 26.1% in cash terms in the two years up to 2015/16 and by 16.2% from 2016/17. The Medium Term Financial Plan (MTFP) for the Council, as reported to the Corporate Scrutiny Committee on 30 June 2016 reported that we have a projected annual budget gap rising from £527,024 in 2017/18 to £2,531,747 by 2021/22 based on current projections for costs and funding. The plans for transformation will reduce but not fully close the gap and as recognised in the business case, further options will need to be explored to address the residual gap.
- The Council has been required to make significant financial savings in recent years, and faces further cuts in funding and increasing financial risks over the coming years. It is becoming increasingly difficult to preserve core services to local residents. Reducing Council Tax income will increase the Council's budget gap (and increase budget pressures for major preceptors) increasing the challenge for Members in identifying savings required to balance the budget overall.
- 10.3 The financing risk of the scheme is shared with other precepting Authorities through the tax base calculation. The financial impact of the CTS scheme is on the Collection Fund that is used to manage all Council Tax income, before that funding is shared between the various local precepting bodies. As TDBC's share of the Collection Fund is only 9.63%, the major element of the risk is on the other precepting local authorities.
- 10.4 The maximum saving that can be achieved is through implementing Options 2 & 4 combined (Model 10). The illustrative savings for each preceptor, when compared to the estimated shortfall in funding as described in paragraph 4.10 is shown below.

Authority	% CTS budget	Estimated CTS spend with no change	Estimated CTS spend in implementing Options 2 & 4	Estimated saving
TDBC	9.63%	£524,095	£487,969	£36,126
Parishes / Unparished	1.17%	£63,675	£59,286	£4,389
Somerset County Council	72.01%	£3,919,008	£3,648,871	£270,137
Avon and Somerset Police	11.87%	£646,002	£601,473	£44,529
Devon & Somerset Fire Auth.	5.32%	£289,531	£269,574	£19,957
Total	100%	£5,442,311	£5,067,173	£375,139

Table 10.4.1.

10.5 The saving to be achieved by amending the current scheme for 2017/18 to align the scheme with changes to other welfare benefits, with the exception that applicants aged 18-21 would remain eligible for CTS (Model 11), would be £1,059.

### 11 Legal Implications

- 11.1 Section 33 of the Welfare Reform Act 2012 abolished Council Tax Benefit and any replacement scheme is excluded from the scope of the Universal Credit system set up by Section 1 of that Act. The Local Government Finance Act 2012 ("the 2012 Act") amends the Local Government Finance Act 1992 ("the 1992 Act") to make provision for the localisation of Council Tax Support.
- 11.2 The 2012 Act amends the 1992 Act by adding a new section 13A to state that Council Tax will be reduced to the extent set out in an authority's Council Tax reduction scheme and to such further extent as the authority sees fit (new s13A(1)(c) replicating the existing provision for authorities to adopt specified additional classes).
- 11.3 Local authorities must make a Council Tax Reduction Scheme setting out the reductions which are to apply in its area by persons or persons in classes consisting of persons whom the authority considers to be in financial need.
- 11.4 Paragraph 5 of Schedule 1A to the Local Government Finance Act 1992, as inserted by Schedule 4 to the Local Government Finance Act 2012, requires the authority to consider whether, for each financial year, the CTS scheme is to be revised or replaced. Where the scheme is to be revised or replaced the procedural requirements in paragraph 3 of that schedule apply. Any revision/replacement must be determined by 31<sup>st</sup> of January in the preceding year to the year which the changes are to apply.
- 11.5 The council must therefore consider whether the scheme requires revision or replacement and if so, consult with precepting authorities (Somerset County Council, Avon and Somerset Police, and Devon and Somerset Fire and Rescue Authority), publish a draft scheme and then consult with such persons as are likely to have an interest in the operation of that scheme prior to determining the scheme before 31<sup>st</sup> January. If any proposed revision is to reduce or remove a reduction to which a class of person is entitled, the revision must include such transitional provision as the Council sees fit.
- 11.6 Case law has confirmed that consultation must
  - be undertaken when proposals are at a formative stage;
  - include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response;
  - give consultees sufficient time to make a response; and
  - be conscientiously taken into account when the ultimate decision is taken.

Therefore, it is most important that Members in considering amending our CTS scheme for 2017/18, carefully consider such issues, as a failure to do so may render the scheme unlawful.

### 12 Environmental Impact Implications

12.1 There are no environmental implications associated with this report.

### 13 Safeguarding and/or Community Safety Implications

13.1 Safeguarding and community safety implications have been considered, and there are not expected to be any specific implications relating to this report.

### 14 Equality and Diversity Implications

- 14.1 Members need to demonstrate they have consciously thought about the three aims of the Public Sector Equality Duty as part of the decision making process. The three aims the authority must have due regard for:
  - Eliminate discrimination, harassment, victimisation
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it
- 14.2 The public sector equality duty, as set out in section 149 of the 2010 Equality Act, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, and to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic.
- 14.3 The "protected characteristics" are: age, disability, race (including ethnic or national origins, colour or nationality), religion or belief, sex, sexual orientation, pregnancy and maternity, and gender reassignment. Marriage and civil partnership are also a protected characteristic for the purposes of the duty to eliminate discrimination.
- 14.4 The Council must pay due regard to any obvious risk of such discrimination arising from the decision before them. There is no prescribed manner in how the equality duty must be exercised, though producing an EIA is the most usual method. For this reason these matters are examined in the EIA at <a href="Appendix 4">Appendix 4</a>. In addition, debt levels are broken down by claim profile in <a href="Appendix 5">Appendix 5</a>.
- 14.5 Councillors must consider the effect that implementing any changes to the CTS for 2017/18 will have on equality before making a decision. The EIA will assist with this. Where it is apparent the CTS policy would have an adverse effect on equality, then adjustments should be made to seek to reduce that effect and this is known as "mitigation".
- 14.6 Implementing Option 4 to remove CTS entitlement from people aged 18 to 21 will have a disproportionate effect on younger applicants. Under the Public Sector Equality Duty, we have a responsibility to foster good relationships between people who share a protected characteristic and those who do not. There is a risk of harming the relationship between young people and those aged 22 or over, as applicants aged 18 to 21 will receive no support, while older applicants will see no reduction in their CTS through this amendment. In considering to implement this measure, based on current recipients, 23 individuals aged 18-21 would no longer receive any CTS.
- 14.7 The Council has a duty to prevent child poverty under provisions within the Child Poverty Act 2010, but inevitably in aligning our CTS scheme to some of the changes made by the Government to other welfare benefits, there could be a disproportionate effect on applicants with responsibility for children. There are 861 working age CTS recipients with children, accounting for 50% of all working age CTS recipients.

- 14.7.1 In not including a Family Premium this would result in a "notional" weekly loss of CTS of £3.49. As this measure only applies to new claims to CTS, or those who have a first child while claiming CTS, this alignment measure will not result in a reduction in actual support paid. However, this provision has applied to Housing Benefit since 1 May 2016 and so we have undertaken modelling to ascertain the likely effect should we apply this measure from 1 April 2017. This modelling shows there would be 6 CTS recipients who would see the support we provide reduce by an average of £3.28 a week.
- 14.7.2 In limiting dependants' additions to a maximum of two, households who have a third or subsequent child on or after 1 April 2017 will see a "notional" weekly loss of CTS of £13.38 (20% of £66.90). Modelling on the likely effects of implementing this measure shows there would be 13 CTS recipients who would no longer receive CTS, while 12 further applicants would continue to receive CTS, but the support provided would reduce by an average of £9.71 a week.
- 14.8 In mitigating the effects of any reduction to CTS for working age applicants, officers could apply a discretionary reduction in Council Tax liability through exceptional hardship as appropriate and in accordance with our policy
- 14.9 Budgetary pressures and economic and practical factors will also be relevant. The amount of weight to be placed on the same countervailing factors in the decision making process will be for Members to decide.

## 15 Social Value Implications

15.1 There are no social value implications associated with this report.

### 16 Partnership Implications

16.1 CTS costs will increase if any of the precepting Authorities increase their Council Tax.

### 17 Health and Wellbeing Implications

17.1 There are no Health and Wellbeing implications associated with this report.

### 18 Asset Management Implications

18.1 There are no asset management implications associated with this report.

### 19 Consultation Implications

19.1 Before implementing any change to the CTS scheme for 2017/18, we have consulted with the public. Case law has established that consultation must give the public options on how we can keep our CTS scheme at the same level by making funding available from other sources or by reducing other services. A copy of our consultation document is contained in Appendix 2.

# 20 Scrutiny Comments / Recommendation(s)

20.1 The Corporate Scrutiny Committee, at its meeting on 20 October 2016 considered the outcome of consultation and the Equalities Impact Assessment. Their recommendation on the preferred CTS scheme for Working Age applicants from 2017/18 is to amend the current scheme to align the scheme with changes to other welfare benefits, with the exception that applicants aged 18-21 would continue to be eligible. This recommendation is illustrated in Model 11.

### **Democratic Path:**

- Corporate Scrutiny Committee Yes
- Executive Yes
- Full Council Yes

**Reporting Frequency:** ✓ **Annually** 

# List of Appendices (delete if not applicable)

Appendix 1 Taunton Deane's Council Tax Support Scheme

Appendix 2 Public Consultation

Appendix 3 Modelling of impact of options for CTS applicants and financial effect

Appendix 4 Equality Impact Assessment

Appendix 5 Council Tax debt profile @ 31 March 2016

### **Contact Officers**

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Email h.tiso@tauntondeane.gov.uk

# Taunton Deane Borough Council

# Council Tax Reduction Scheme

S13A and Schedule 1a of the Local Government Finance Act 1992

The existing policy document is a large file of 144 pages.

A hard copy is available on request.

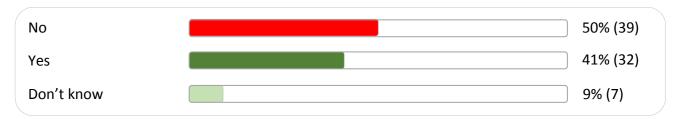
The policy is available on-line through the following web address:

http://www.tauntondeane.gov.uk/irj/go/km/docs/CouncilDocuments/TD BC/Documents/Revenues%20and%20Benefits/LCTSscheme2016-17.pdf

# **Council Tax Support - Consultation for Changes in 2017/18**

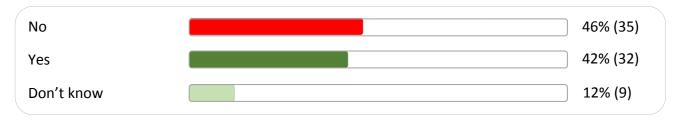
# **Option 1**

Do you agree with the principal that the current CTS scheme is unchanged for 2017/18?



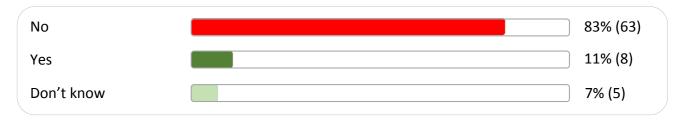
# Option 2

Do you agree with the principle that the Council reduces the maximum support a working age person can receive for 2017/18?



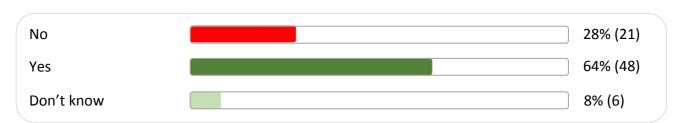
# **Option 3**

Do you agree with the principle that the Council increases the maximum support a working age person can receive for 2017/18?

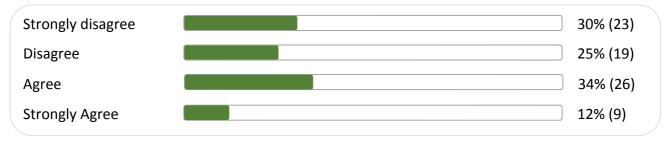


# Option 4

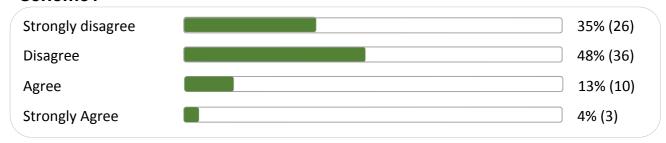
Do you agree with the principle that the Council may change the Council Tax Support scheme to reflect changes made by the Government to welfare benefits?



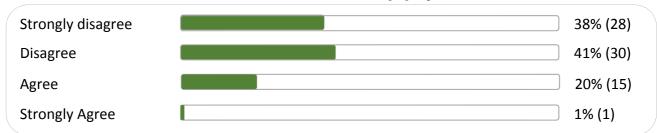
# Should the Council increase Council Tax to help pay for the scheme?



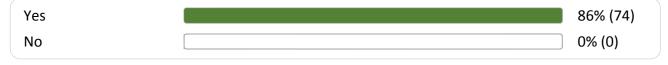
# Should the Council reduce funding to other services to help pay for the scheme?



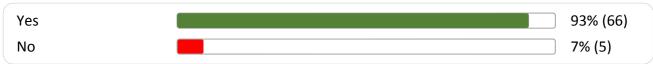
# Should the Council use its reserves to help pay for the scheme?



# Are you a resident of Taunton Deane?



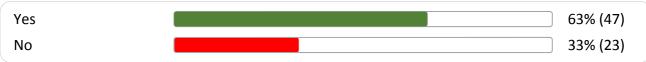
# Do you pay Council Tax?



# Do you currently receive Council Tax Support?



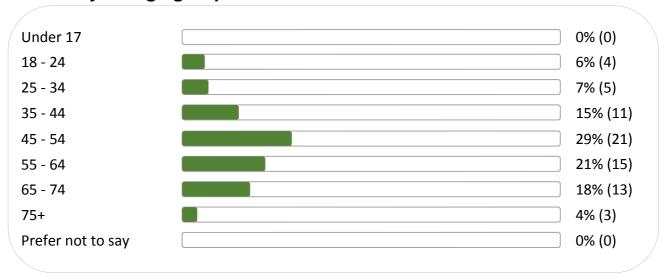
# Do you work, either full or part time?



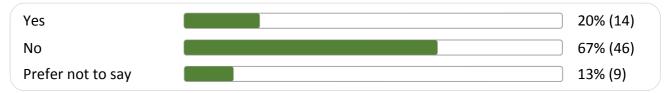
# What is your gender?

Male	49% (36)
Female	51% (37)
Transgender	0% (0)
Prefer not to say	0% (0)

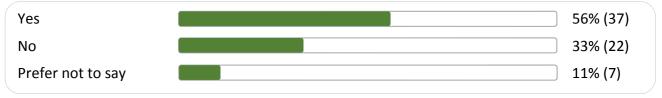
# What is your age group?



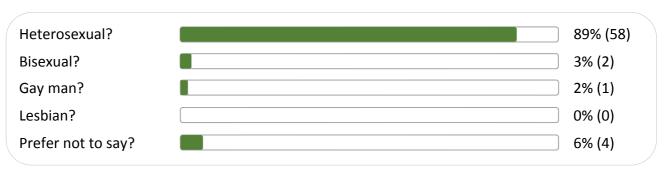
# Do you consider yourself as having a disability or long-term physical or mental health condition?



# Do you consider yourself to have a religion or belief?



# Do you consider your sexual orientation to be



# Which of these ethnic groups do you feel you belong to?

White British	95% (62)
White Irish	3% (2)
Other White Background	2% (1)

## Question A1: Should the Council continue with the existing scheme?

- 4: Reduction and changes to in Government assistance and direct grant to local authorities makes this unaffordable and unviable for TDBC
- 23: Working people are fed up with supporting those on benefits. Disabled people need supporting though.
- 28: Although these ideas fall within the confines of balancing budgets and economies (a sliding scale)
- 31: There have been so many cuts and changes to benefits, surely it would be kindest to leave this one unchanged until forced to change.
- 34: Not sure we can afford to without impacting on other services.
- 38: With minimum wage at £288 per week and rent at £100 per week (I'm a landlord) leaves enough to pay you and utilities and living. Better still reduce council tax for ABCD Bands so subsidy is not required saves on admin too.
- 48: Savings need to be made and people who have historically received MIS should not continue to expect to receive it. It should only be provided in the short term and people should look to better their own lives instead of relying on others to do it for them.
- 58: Why change something that works.
- 59: Receiving CTS is a fantastic help, but everyone should try and contribute to our community. 20% is a relatively small amount and should be affordable to most people.
- 68: I think it is best to maintain the current level of support.
- 70: Yes until we know of any changes by the Government and what the merger of West Somerset entails then put all facts to tenants.
- 73: The present arrangements are fair to everyone.
- 74: Present system is fair to everyone after last year's changes.
- 76: System is fair to everyone.

### Question A2: Should the Council reduce maximum CTS from 80%

- 23: Working people should pay their way.
- 28: Possibly but I feel a sliding is more appropriate to reflect the range of capital/savings the community has saved.
- 34: I hope planned incremental increases in living wage may mitigate a reduction for those on low wages. As should increases in basic tax allowance. Those on low wages should then keep more of their earnings. Can you balance reduced CT support with these to ensure most are not worse off?
- 38: With minimum wage at £288 per week and rent at £100 per week (I'm a landlord) leaves enough to pay you and utilities and living. Better still reduce council tax for ABCD Bands so subsidy is not required saves on admin too.
- 48: Definitely. If they are of working age they should be working. If they are looking for work then surely this is what Job Seekers Allowance is for.
- 50: I agree, there should be a reduction in the benefit available to people of working age.

- 59: No. When the 80/20% change came in I had to adjust my budget to afford the 20%. Sadly that meant cancelling my reduced rate local gym membership which had been really good for my mental health. I honestly would have needed to eat less if the bill had been more than 20% per month.
- 60: But perhaps make it 75% for a year to make the change easier to manage for people.
- 63: Not for working people. But I do think the local authority should continue to review them on a case by case basis.
- 68: I think reducing would cause hardship.
- 73: If absolutely necessary do not reduce below 70%.
- 76: If necessary to reduce it no more than another 10% to 70%.
- 79: There are no benefits for someone like me because I go to work every day but don't earn a fortune. I'm fed up with subsidising other people who show no awareness of their situation and no gratitude when they are helped.

#### Question A3: Should the Council increase maximum CTS from 80%

- 4: reduction and changes to in Government assistance and direct grant to local authorities makes this unaffordable and unviable for TDBC
- 28: Maybe a sliding scale would be appropriate based on income or savings eg 0-6000=80%, 6000-10000 = 85%, 10000-16000 = 95%, 16000 + = No CTS
- 34: Minimum 20% contribution should be asked for from each household of working age not less as it currently is.
- 38: With minimum wage at £288 per week and rent at £100 per week (I'm a landlord) leaves enough to pay you and utilities and living. Better still reduce council tax for ABCD Bands so subsidy is not required saves on admin too.
- 48: You're having a laugh aren't you?
- 57: If TDBC can't afford 80%, what is the point of trying to find more?
- 59: Possibly finding 20% meant losing a vital healthy gym membership at Tone Leisure for me, which was a shame because it helped me control my disabilities better. If there was enough money to increase CTS that would obviously be nice, but some CTS is better than none at all.
- 63: I think this is more than acceptable.
- 68: I think we need to be mindful of costs.
- 73: Everyone should be made to pay some Council Tax and not make any payments towards essential services.
- 76: Everyone should pay at least 20% of their council tax liability.

# Question A4: Should the Council modify the CTS scheme to reflect changes made by the Government to welfare benefits?

- 4: It is vital TDBC publish the restrictions placed on it by Central Gov decisions, it's only fair and transparent
- 13: The Government seems to think that people who are legally adults but under 21 should not be treated as such.
- 14: Adoption of this approach would cause further hardship for the poorest and vulnerable people within our communities
- 23: Great idea to reduce benefits.
- 28: Local Government is responsible to local community not to government changes that I feel only reflects a mean average.
- 34: I think so but likely to result in ongoing reduction in CT support? Again might living wage mitigate these? We must make sure it pays to work and not penalise those who do.
- 38: See A1

- 48: Agree
- 50: Elements of this option make sense so I feel they all should be introduced with option 2.
- 53: Councils should not be influenced by government and should try and call the shots themselves. Sometimes however Government will affect all councils. Therefore change to don't know.
- 56: What do you do with Council Tax now.
- 57: There is an element whereby families need to take responsibility, i.e. aim to keep family size the parent(s) can afford financially
- 59: No. The Government is playing daft games with the benefits system. If they stopped changing it every few months they would save £'s on administration same would apply to the Council.
- 60: CTS needs to be flexible for future changes/restrictions on money available.
- 68: I think provision should be made for young people and children.
- 70: Do agree that benefit should not be given for more than two children.
- 73: If there is a substantial change made by Government ensure that everyone who gets CTS at present is notified by TDBC.
- 74: Agree with changes government propose in 2017.
- 76: Agree that TDBC follow government alterations to welfare benefits.

# Please use the space below to make any other comments you have about the Council's preferred options:

- 3: How do you propose to determine if a claimant has a third child as the result of rape? These seems hugely sensitive and unnecessarily complex to determine.
- 23: Option 4 seems good but also option 2. Benefits people should get employment/do voluntary work to help out in society.
- 28: I feel the current rules governing Council Tax Support should be changed for those who have over £6,000 in capital or savings. When you take into account that other organisations allow up to £16,000 in savings for support, namely for example NHS low wage support, I think there needs to be a rethink on this amount particularly those who are on a low wage or below minimum wage (self-employed/starting a business) and OAPs. Maybe a more sliding scale 0-6,000, 5,000-8,000, 8,000-10,000 etc.
- 31: I would like to see Council Tax Benefit increase because the poorest people in society have been subject to some of the greatest cuts. However, I appreciate that this would affect other services, therefore best left as it is for now (knowing that even keeping the status quo needs to be funded from somewhere!)
- 32: Little wonder IDS was trying to simplify the welfare system. I have never read such a complicated explanation to receive so little I shouldn't think most people bother to apply!
- 34: If we accept CT support is to reduce what is the most efficient way to do this between options 2 and 4? If both result in a similar reduction would option 4 be far less admin? If so this would be the better option. Again I hope living wage and rising basic tax allowance will still keep those on lower incomes better off even with reduced CT support.
- 50: The options selected above all promote the concept of you should be better off in work than claiming benefits.
- 54: I have very little money. Answers of resident noted by Cllr Tom Aldridge.
- 55: Another option would be to offer 80% support for a maximum of 1 year then use option 4.

- 59: I am self-employed and this year earned less than in previous years. This wasn't through any fault in the business, it was simply a reflection on the market. I had been receiving CTS but now, when I needed it more than ever because my income had dropped, I was told I had effectively earned under the national minimum wage and so no longer qualified for support and had to try and pay 100% of the bill instead of the usual 20%. I have health issues, exacerbated by stress, so the sudden increase in outgoings at a time when money was already very tight was very difficult to deal with. I ended up having to borrow money to pay the first few months bills which I'm now paying back. So the system seems a bit broken for self-employed people.
- 63: Why are pension age people protected? They are normally the people with capital and savings. I think this is discriminating to working age people who don't have savings, big houses and expendable income.
- 65: Only to people who earn the right by working
- 68: I think the money should be found to maintain the current level of support.
- 71: Option 4 seems most sensible although it hasn't been explained how much would be saved. Cutting CTS by 10% seems like the next best option. Listing the increase CTS by 5% and decrease by 10% shews the figures slightly.
- 73: Fully support removal of applicable support for third and subsequent children. If you decide to have children ensure you can provide for them.

# Part B - Question B1: Should the Council increase Council Tax to help pay for the scheme?

- 4: An equitable society shares the burden and helps those less fortunate
- 8: CT increase shouldn't be used to support scheme
- 20: Council tax has not increased for several years so an increase would be a sensible solution.
- 23: We are then paying for people on benefits twice.
- 27: Yes BUT only to fund a skeleton CT benefit scheme that has been scaled back to absolute minimum levels. Increases need to be affordable going forward.
- 31: Council Tax has been held static for a few years, I believe, therefore a small increase to help the less well-off would be ok.
- 34: Feasible. Collection rate costs versus ability to pay.
- 38: See A1
- 45: I believe Council Tax should equate to need in the District it serves.
- 48: If cuts are being made elsewhere why should the taxpayer have to contribute more to fund this? One suggestion do not merge with West Somerset Council why should we fund this!!
- 53: If that is truly the best solution then try it.
- 55: This would punish many working families who are paid very low wages and are struggling already.
- 56: No way they do not do any work on home we live in.
- 57: This merely has the effect of "shifting the load" on to people who may be just above the CTS level. Taking from "Peter to give to Paul".
- 58: This would seem prudent.
- 59: Yes, but by an affordable amount, otherwise the burden on CTS would increase wiping out the profit.
- 60: But CT increase should not just be used for this but to help other services too e.g. parks, grass verges, toilets etc.
- 63: Everything is more expensive now so it seems logical to increase Council Tax.
- 68: A small increase for everyone should be acceptable.
- 71: Tax increases are fine to increase funding to services however CTS should be lowered if it is unaffordable.

- 73: Most people in TDBC area are finding it a struggle to meet monthly outgoings.
- 74: Council Tax payers incurred a 5% increase last year so why is another increase being considered we are already suffering a loss of services and are not getting value for money.
- 76: Went up 5% last year which has caused problems for many households.

# Question B2: Should the Council reduce funding to other services to help pay for the scheme?

- 8: shouldn't reduce other services
- 14: If the scheme remains unchanged then there should be no need to reduce other services as result of that decision. CTS should remain a high priority in any assessment of cost reduction.
- 27: Needs to be considered and judged against other costs e.g. reduced fire services not ok.
- 34: Other service cuts would be likely to have a wider impact such as collecting litter and cutting grass.
- 38: See A1
- 45: It would depend on the options you were considering.
- 48: Depends on the service and funds as I am sure money is wasted on many things which should be looked at before cutting essential services.
- 50: With the implementation of options 2 and 4 the cost of the scheme should reduce anyway. For any remaining shortfall there is so much waste in spending anyway, I'm sure savings could be made in other areas (e.g. not combining Taunton Deane and West Somerset CC).
- 53: Sorry to be sarcastic if you shut all the services down you wouldn't have to charge council tax. Things just have to balance and the council make decisions.
- 55: Council Tax support should not be a priority. Basic services should always be protected for the benefit of the majority.
- 56: Yes I do agree with that.
- 58: No, other services are already struggling.
- 59: Cuts are nonsensical it's often those who need the CTS who use these services to get back into work and off benefits.
- 63: I think enough cuts have been made to other services like police, fire service etc. as they struggle massively with their work loads.
- 66: It's difficult to know what services might be affected and the impact it would have.
- 67: This would depend on what services would be reduced.
- 68: The elderly and vulnerable should be protected.
- 74: Council Tax payers incurred a 5% increase last year so why is another increase being considered we are already suffering a loss of services and are not getting value for money...

### Question B3: Should the Council use its reserves to help pay for the scheme?

- 4: Absolutely not, reserves should be used to generate future income and stimulate growth which is more sustainable, it should not be used to maintain a status quo. Think of wider electorate, visitors, residents and businesses
- 8: Shouldn't use reserves
- 28: Depends on the amount of reserves if you have too much saved earnings interest this should be spent in part for the support of those in need.
- 34: Unsustainable.
- 35: Use reserves then increase Council Tax.
- 36: Once the reserve is gone then make an increase of 1% as stated in Question B1.
- 38: Basic economics you don't use capital for everyday expenses.

- 45: As long as the Council does not hold excessive reserves reserves are for emergency situations not propping up existing policies.
- 48: No, if the scheme cannot be funded then it shouldn't be in existence or looked to be funded by increasing tax. Run it like a private business where your outlays are less than income.
- 53: Reserves are as they it states they should be used only in emergency.
- 55: Reserves should be used to improve current services not to pay for others support.
- 56: No comments.
- 58: Not wise.
- 59: Possibly.
- 63: Once it's gone, it's gone and the Council need some reserves for a rainy day (so to speak).
- 66: What are they expecting people who need 80% to do?
- 68: This could help till finances improve.
- 71: This would be the worst option in the long run.
- 74: Look at cutting unnecessary costs within TDBC and also WSDC (especially if merger goes through) why should TDBC tax payers bail out WSDC.

# Part C - If you have any further comments or suggestions to make on the Council Tax Support Scheme please use the space below:

- 12: The removal of Council Tax Support to 18-21 year olds from April 2017 is another attack on young people's rights and benefits which seems unfair.
- 19: I am 67 years old. My wife and I have both worked all our lives. We have brought up three children of our own two boys and one girl, of which our daughter works as a nurse and herself has raised three boys on her wage, which she can only work so many hours per week. Her husband has long been retired from work because he is quite a lot older than her. We would like to see more help provided put her way as well as others in this circumstance than what is at the present moment.
- 22: People should pay more and get less CTS. Protection for the disabled though.
- 23: CTS should be cut so none of us working people are affected, we already pay enough.
- 31: How about increasing the ridiculously query rents people (who are in work) are paying for their Council Houses where people in private rentals are seriously struggling.
- 32: How much did the consultation document cost? What pray will be done with the results nothing I assume. Another waste of taxpayers' money. What the devil has my sexual orientation/religion and ethnicity got to do with it?
- 49: Don't join with West Somerset Council.
- 56: Have no comments or suggestions about Taunton Deane Council Tax you need cash to pay for it.
- 60: Why do pension age continue to be protected? Lots of pensioners have large incomes, no mortgages etc. and could well afford to pay full Council Tax.
- 61: I think it's wrong that some pensioners are protected. Some have large houses, no mortgages and pension pots more disposable income.
- 63: Again you seriously need to look into not protecting pension age people. Some of them are really rich and don't need the help and more working age people are skint and need the help.
- 65: Should only be paid to those who work and earn it no layabouts.

Model 1

No change to current Council Tax Support Scheme

	Pension Age	Working age	Total
Number of claims	3,590	4,050	7,640
Total weekly awards	£56,629.22	£47,743.88	£104,373.10
Average weekly award	£15.77	£11.79	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,489,502.13	£5,442,311.48
Estimated expenditure 2016/17			£5,442,311.48
Saving			£0.00
* Notional Budget 2016/17			£5,768,206.00
Estimated underspend in 2017/18 compared to *notional budget for 2016/17			£325,894.52

Working age customers	Number	Average award
Single, no children	1,646	£8.94
Couple no children	275	£12.67
Couple with children	587	£7.36
Lone parent with children	1,542	£8.17
Total	4,050	£11.79
Employed & self employed	1,126	£9.40
Applicants with a disability	281	£12.12
Applicants with caring responsibilities	66	£11.81

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 2

Reduce maximum support through CTS to 70% for all working age recipients

	Pension Age	Working age	Total
Number of claims	3,590	3,968	7,558
Total weekly awards	£56,629.22	£41,000.95	£97,630.17
Average weekly award	£15.77	£10.33	£12.92
Estimated 2017/18 awards	£2,952,809.35	£2,137,906.80	£5,090,716.15
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£351,595.33		
* Notional Budget 2016/17			£5,768,206.00
Estimated underspend in 2017/18	£677,489.85		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	1,632	£1.62	14
Couple no children	270	£2.20	5
Couple with children	563	£2.29	24
Lone parent with children	1,503	£1.74	39
Total	3,968	£1.70	82
Employed & self employed	1,122	£1.89	74
Applicants with a disability	280	£1.94	10
Applicants with caring responsibilities	65	£2.26	4

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 3
Increase maximum support through CTS to 90% for all working age recipients

	Pension Age	Working age	Total
Number of claims	3,590	4,092	7,682
Total weekly awards	£56,629.22	£54,606.18	£111,235.40
Average weekly award	£15.77	£13.34	£14.48
Estimated 2017/18 awards	£2,952,809.35	£2,847,322.20	£5,800,131.55
Estimated expenditure 2016/17	£5,442,311.48		
Additional expenditure			£357,820.07
* Notional Budget 2016/17			£5,768,206.00
Estimated <u>overspend</u> in 2017/18	£31,925.55		

Working age customers	Number increased	Average weekly increase	Additional applicants that would qualify
	increased	increase	that would quality
Single, no children	1,646	£1.61	7
Couple no children	275	£2.20	2
Couple with children	587	£2.31	13
Lone parent with children	1,542	£1.76	20
	4,050	£1.69	42
Employed & self employed	1,126	£1.92	40
Applicants with a disability	281	£1.98	3
Applicants with caring responsibilities	66	£1.79	1

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 4

Current scheme modelled to show CTS payable if backing for working age applicants is reduced to one month

	Pension Age	Working age	Total
Number of claims	3,590	4,050	7,640
Total weekly awards	£56,629.22	£47,741.21	£104,370.43
Average weekly award	£15.77	£11.79	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,489,363.31	£5,442,172.66
Estimated expenditure 2016/17	£5,442,311.48		
Saving			£138.82
* Notional Budget 2016/17			£5,768,206.00
Estimated underspend in 2017/18	£326,033.34		

Working age customers	Number reduced	Average weekly decrease
Single, no children	9	£0.09
Couple no children	3	£0.20
Couple with children	0	£0.00
Lone parent with children	6	£0.22
Total	18	£0.15
Employed & self employed	9	£0.10
Applicants with a disability	6	£0.09
Applicants with caring responsibilities	0	£0.00

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

# Model 5

Current scheme modelled to show CTS payable if Family Premium is withdrawn for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium

	Pension Age	Working age	Total
Number of claims	3,590	4,050	7,640
Total weekly awards	£56,629.22	£47,724.19	£104,353.41
Average weekly award	£15.77	£11.78	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,488,475.39	£5,441,284.74
Estimated expenditure 2016/17			£5,442,311.48
Saving			£1,026.74
* Notional Budget 2016/17			£5,768,206.00
Estimated underspend in 2017/18	£326,921.26		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	0	£0.00	0
Couple no children	0	£0.00	0
Couple with children	2	£3.19	0
Lone parent with children	4	£3.33	0
Total	6	£3.28	0
Employed & self employed	6	£3.28	0
Applicants with a disability	0	£0.00	0
Applicants with caring responsibilities	0	£0.00	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 6

Current scheme modelled to show CTS payable if Work Related Activity Component is withdrawn

	Pension Age	Working age	Total
Number of claims	3,590	4,050	7,640
Total weekly awards	£56,629.22	£47,743.88	£104,373.10
Average weekly award	£15.77	£11.79	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,489,502.13	£5,442,311.48
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£0.00		
* Notional Budget 2016/17			£5,768,206.00
Estimated underspend in 2017/18	£325,894.52		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	0	£0.00	0
Couple no children	0	£0.00	0
Couple with children	0	£0.00	0
Lone parent with children	0	£0.00	0
Total	0	£0.00	0
Employed & self employed	0	£0.00	0
Applicants with a disability	0	£0.00	0
Applicants with caring responsibilities	0	£0.00	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 7

Current scheme modelled to show CTS payable additional allowance for children included in the applicable amount is capped to 2 children

	Pension Age	Working age	Total
Number of claims	3,590	4,037	7,629
Total weekly awards	£56,629.22	£47,555.39	£104,184.61
Average weekly award	£15.77	£11.78	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,479,673.84	£5,432,483.19
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£9,828.29		
* Notional Budget 2016/17	£5,768,206.00		
Estimated underspend in 2017/18	£335,722.81		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	0	0	0
Couple no children	0	0	0
Couple with children	11	£9.57	13
Lone parent with children	1	£11.28	0
Total	12	£9.71	13
Employed & self employed	11	£10.59	13
Applicants with a disability	0	£0.00	0
Applicants with caring responsibilities	1	£4.86	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 8

Current scheme modelled to show CTS payable if there is no assistance is available to unemployed 18-21 year olds

	Pension Age	Working age	Total
Number of claims	3,590	4,027	7,617
Total weekly awards	£56,629.22	£47,470.33	£104,099.55
Average weekly award	£15.77	£11.79	£13.67
Estimated 2017/18 awards	£2,952,809.35	£2,475,238.45	£5,428,047.80
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£14,263.68		
* Notional Budget 2016/17	£5,768,206.00		
Estimated underspend in 2017/18 compared to *notional budget for 2016/17			£340,158.20

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	0	£11.89	23
Couple no children	0	£0.00	0
Couple with children	0	£0.00	0
Lone parent with children	0	£0.00	0
Total	0	£11.89	23
Employed & self employed	0	£0.00	0
Applicants with a disability	0	£13.31	1
Applicants with caring responsibilities	0	£0.00	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 9

Current scheme modelled to show CTS payable if all Government changes to other Welfare Benefits are implemented for working age CTS recipients

	Pension Age	Working age	Total
Number of claims	3,590	4,014	7,604
Total weekly awards	£56,629.22	£47,259.49	£103,888.71
Average weekly award	£15.77	£11.77	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,464,244.60	£5,417,053.95
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£25,257.53		
* Notional Budget 2016/17	£5,768,206.00		
Estimated underspend in 2017/18	£351,152.05		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	9	£0.09	23
Couple no children	3	£0.20	0
Couple with children	13	£8.49	13
Lone parent with children	11	£1.81	0
Total	36	£3.66	36
Employed & self employed	26	£4.87	13
Applicants with a disability	6	£0.09	1
Applicants with caring responsibilities	1	£4.86	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 10

Current scheme modelled to show CTS payable if maximum support through CTS is reduced to 70% and all Government changes to other Welfare Benefits are implemented for working age CTS recipients

	Pension Age	Working age	Total
Number of claims	3,590	3,932	7,522
Total weekly awards	£56,629.22	£40,549.44	£97,178.66
Average weekly award	£15.77	£10.31	£12.92
Estimated 2017/18 awards	£2,952,809.35	£2,114,363.55	£5,067,172.90
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£375,138.58		
* Notional Budget 2016/17	£5,768,206.00		
Estimated underspend in 2017/18	£701,033.10		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	1,609	£1.64	37
Couple no children	270	£2.20	5
Couple with children	550	£2.54	37
Lone parent with children	1,503	£1.75	39
Total	3,932	£1.85	118
Employed & self employed	1,039	£2.04	87
Applicants with a disability	270	£1.95	11
Applicants with caring responsibilities	62	£2.34	4

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

Model 11

Current scheme modelled to show CTS payable if all Government changes to other Welfare Benefits are implemented for working age CTS recipients with the exception of removing entitlement for applications aged 18-21

	Pension Age	Working age	Total
Number of claims	3,590	4,037	7,627
Total weekly awards	£56,629.22	£47,533.04	£104,162.26
Average weekly award	£15.77	£11.77	£13.66
Estimated 2017/18 awards	£2,952,809.35	£2,478,508.28	£5,431,317.63
Estimated expenditure 2016/17	£5,442,311.48		
Saving	£10,993.85		
* Notional Budget 2016/17	£5,768,206.00		
Estimated underspend in 2017/18	£336,888.37		

Working age customers	Number reduced	Average weekly reduction	Applicants that would no longer qualify
Single, no children	9	£0.09	0
Couple no children	3	£0.20	0
Couple with children	13	£8.49	13
Lone parent with children	11	£1.81	0
Total	36	£3.66	13
Employed & self employed	26	£4.87	13
Applicants with a disability	6	£0.09	0
Applicants with caring responsibilities	1	£4.86	0

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

## Summary of the impact of models for working age customers

## Number of claims with reduced or no entitlement

						Model					
	1	2	3	4	5	6	7	8	9	10	11
Single, no children	0	1,646	0	9	0	0	0	23	32	1,646	9
Couple, no children	0	275	0	3	0	0	0	0	3	275	3
Couple with children	0	587	0	0	2	0	24	0	26	587	26
Lone parent with children	0	1,542	0	6	4	0	1	0	11	1,542	11
Total claims reduced	0	4,050	0	18	6	0	25	23	72	4,050	49
Employed & self employed	0	1,126	0	9	6	0	24	0	39	1,126	39
Applicants with a disability	0	281	0	6	0	0	0	1	7	281	6
Applicants with caring responsibilities	0	66	0	0	0	0	1	0	1	66	1

## Average weekly decrease in entitlement

						Model					
	1	2	3	4	5	6	7	8	9	10	11
Single, no children	£0.00	£1.62	£0.00	£0.09	£0.00	£0.00	£0.00	£11.89	£0.09	£1.64	£0.09
Couple, no children	£0.00	£2.20	£0.00	£0.20	£0.00	£0.00	£0.00	£0.00	£0.20	£2.20	£0.20
Couple with children	£0.00	£2.29	£0.00	£0.22	£3.19	£0.00	£9.59	£0.00	£8.49	£2.54	£8.49
Lone parent with children	£0.00	£1.74	£0.00	£0.00	£3.33	£0.00	£11.28	£0.00	£1.81	£1.75	£1.81
Total claims reduced	£0.00	£1.70	£0.00	£0.15	£3.28	£0.00	£9.71	£11.89	£3.66	£1.85	£3.66
Employed & self employed	£0.00	£1.89	£0.00	£0.10	£3.28	£0.00	£10.59	£0.00	£4.87	£2.04	£4.87
Applicants with a disability	£0.00	£1.94	£0.00	£0.09	£0.00	£0.00	£0.00	£11.74	£0.09	£1.95	£0.09
Applicants with caring responsibilities	£0.00	£2.26	£0.00	£0.00	£0.00	£0.00	£4.86	£0.00	£4.86	£2.34	£4.86

	ry of potential savings expenditure	Estimated 2017/18 awards	Saving against estimated spend 2016/17	Estimated saving against notional* budget 2016/17	Net shortfall for TDBC (see para. 4.10)	Estimated saving for TDBC
Model 1.	No change to current CTS Scheme	£5,442,311.48	£0.00	£325,894.52	£162,997.00	£0.00
Model 2.	Reduce maximum support through CTS to 70% for all working age recipients	£5,090,716.15	£351,595.33	£677,489.85	£129,138.37	£33,858.63
Model 3.	Increase maximum support through CTS to 90% for all working age recipients	£5,800,131.55	-£357,820.07	-£31,925.55	£197,455.07	-£34,458.07
Model 4.	Limit backdating for working age CTS recipients to no more than one month	£5,442,172.66	£138.82	£326,033.34	£162,983.63	£13.37
Model 5.	Withdraw Family Premium for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium	£5,441,284.74	£1,026.74	£326,921.26	£162,898.12	£98.88
Model 6.	CTS Scheme amended for working age recipients to withdraw Work Related Activity Component from the applicable amount	£5,442,311.48	£0.00	£325,894.52	£162,997.00	£0.00
Model 7.	CTS Scheme amended to limit additional allowance for children to 2 children for working age recipients	£5,432,483.19	£9,828.29	£335,722.81	£162,050.54	£946.46
Model 8.	No CTS payable to unemployed people aged 18-21	£5,428,047.80	£14,263.68	£340,158.20	£161,623.41	£1,373.59
Model 9.	CTS Scheme aligned with all changes made by Government to other Welfare Benefits for working age recipients	£5,417,053.95	£25,257.53	£351,152.05	£160,564.70	£2,432.30
Model 10.	Reduce maximum support through CTS to 70% for all working age recipients and align CTS Scheme with all changes made by Government to other Welfare Benefits for working age recipients	£5,067,172.90	£375,138.58	£701,033.10	£126,871.15	£36,125.85
Model 11.	As Model 9 with the exception of removing entitlement for applications aged 18-21	£5,431,317.63	£10,993.85	£336,888.37	£161,938.29	£1,058.71

<sup>\*</sup> Notional budget calculated in accordance with initial distribution of funding for CTS in 2013/14

**Equality Impact Assessment Form and Action Plan** 

1									
Officer completing EIA Form	Job Title		Team/Service						
Heather Tiso	Revenues & Benefits Service Manager   Revenues & Benefits Service								
Why are you completing the Equality Impact Assessment? Please √ as appropriate									
Proposed new policy or service	Change to policy or service	New or	Service review						
	<b>✓</b>								

#### 1 Description of policy, service or decision being impact assessed:

#### **Background**

From 2013/14 district councils have operated localised Council Tax Support (CTS) schemes to provide assistance to people on low income. CTS replaced the previous Council Tax Benefit scheme that was administered by the council on behalf of the Department for Work and Pensions (DWP). Councils are responsible for the design and implementation of these schemes and need to consider if they are to be revised or replaced on an annual basis. The subsidy reimbursement for CTS reduced nationally by 10% in 2013/14 with councils having the option of funding the shortfall or designing a CTS scheme that is cost neutral. The Government state any CTS scheme must protect pensioners at the existing level of support. That decision means the burden falls disproportionately upon those of Working Age.

From 1 April 2014, funding for localised CTS is incorporated in Settlement Funding Assessment (SFA) and not separately identified. The SFA has reduced by 26.1% in cash terms in the two years up to 2015/16 and by 16.2% from 2016/17. In applying this methodology, the funding available for Localised CTS has reduced by £2,326,217 to £3,783,863. In 2015/16 we paid CTS of £5,476,457, meaning that if there is no change to the existing CTS scheme, we estimate we will have a funding shortfall of £1,692,594, with TDBC's share of that shortfall being £162,997. The financing risk of the scheme is shared with other precepting Authorities through the tax base calculation. Taunton Deane's share of the collection fund in 2016/17 is 9.63%.

## **Taunton Deane's Council Tax Support Scheme**

On 11 December 2012, the Council adopted the Local Council Tax Support scheme for 2013/14. While those of pension age receive support of up to 100% of their Council Tax liability, from 1 April 2013, the maximum support for those of working age was set at 80%.

On 10 December 2013, the Council decided to continue the 2013/14 CTS scheme for 2014/15.

Taunton Deane Borough Council's Local Council Tax Support scheme is designed to retain the majority of features of the CTB scheme. The CTB scheme recognised the additional financial burden of disability through a system of additional allowances/premiums within the means test. The authority's scheme continues to include the allowances/premiums that featured in the CTB scheme and, as such, the scheme positively recognises disability.

The CTB scheme recognised the additional financial burden those with children have, through a system of additional allowances that recognise each child, child care costs and enhanced premiums for lone parents in the means test. TDBC's CTS scheme continues to include the allowances/premiums that featured in the CTB scheme and, as such, the scheme positively recognises those with caring responsibilities.

In designing our CTS scheme, we considered customers' ability to pay and the collectability of the resultant Council Tax liability. The key changes between our local CTS scheme, for working age claimants, and the former CTB scheme are set out below. Dependent on household circumstances, more than one of these proposals may apply simultaneously to a household.

- Maximum support is 80% of Council Tax everyone of working age has to pay something;
- Non-dependant deductions were increased;
- Second adult rebate ceased for working age applicants;
- Child maintenance was counted as income until 31 March 2015;
- Disregards for earned income are at increased levels than those offered under CTB;
- Exceptional Financial Hardship fund of £35k, through Discretionary Reduction in Council Tax Liability for short-term help (this is a Collection Fund commitment and not fully funded by TDBC).

In December 2014, the Council decided to continue the 2014/15 CTS scheme for 2015/16 with an amendment to no longer treat maintenance received for children as income.

In developing options for our CTS scheme for 2016/17, we worked in collaboration with the County Council (as the major preceptor) and the other Somerset District billing authorities of West Somerset, Sedgemoor, Mendip and South Somerset. On 15 December 2015 Full Council, having regard to the consultation response and the Equality Impact Assessment, agreed to revise support for working age applicants in 2016/17 by:

- removing entitlement to applicants with capital over £6,000;
- applying a Minimum Income for Self-Employed applicants; and
- paying CTS at a level that would be no more than for a Band D property

As a result of the continuing reductions to the Settlement Funding Assessment, continuing to allow the same level of CTS in 2017/18 for working age recipients could impact negatively upon TDBC's budget and the budget of those that levy a precept to it (County Council, Fire, Police Authorities and Parish Councils). An adverse effect on service provision might result in us, and the other major preceptors, having to stop, reduce or seek additional charges for services with a disproportionate effect on the most vulnerable. Therefore, on 2 June 2016, the Corporate Scrutiny Committee agreed on options to take to public consultation for our CTS scheme for 2017/18.

Public consultation on proposals to change the CTS scheme in 2017/18 started on 4 July 2016 and ended on 11 September 2016. Every Council Taxpayer had the opportunity to comment on the proposals. The options on which we consulted were as follows:

**Option 1** - No change - we would work out CTS in the same way as we do now. Any shortfall in the funding we get and the CTS we pay in 2017/18 would need to be met from other Council budgets.

- **Option 2** Reduce maximum support offered under our CTS scheme from 80% for working age applicants.
- Option 3 Increase maximum support offered under our CTS scheme from 80% for working age applicants.

**Option 4** - Align our CTS scheme for 2017/18 with some or all of the changes made by the Government to other welfare benefits. Currently, the changes known or expected to be implemented by the Government would have the following effect:

- The maximum period for which we will backdate CTS for working age recipients would reduce from 6 months to 1 month. This reduction in backdating has applied to working age Housing Benefit recipients since April 2016.
- From 1 April 2017, we would not include a Family Premium within in the applicable amount for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium. The Family Premium has not been included for the same category of Housing Benefit recipients since May 2016.
- When working out CTS, we would not include the Work Related Activity component in the applicable amount for new claimants of Employment and Support Allowance (ESA). New claimants for ESA in the Work-Related Activity Group (WRAG) will receive the same rate of CTS as those claiming Jobseeker's Allowance. The Work Related Activity component will not be included in Universal Credit from April 2017.
- Under our current scheme, we include £66.90 in the applicable amount for every child up to the age of 20. From 1 April 2017, we would remove this amount for third and any subsequent children born after that date to align with revised rules for Housing Benefit, Tax Credits and Universal Credit that are expected to apply in 2017/18. We would continue to include the amount for first and second children. There will be protection for multiple births or women who have a third child as the result of rape or other exceptional circumstances.
- From April 2017, 18-21 year olds who are not in work may no longer be eligible for help through our CTS scheme. We would implement this change to align with new rules expected to apply to Universal Credit applicants. Under Universal Credit, 18-21 year olds will be required to participate in an "intensive regime of support from day one of their benefit claim", and after six months they will be expected to apply for an apprenticeship or traineeship, gain work-based skills, or go on a mandatory work placement. There will be a range of exemptions for vulnerable young people, including those in danger of suffering abuse and those receiving disability benefits. People who have been in work for 6 months before making a claim, will continue to be eligible for CTS for up to 6 months while they look for work. Applicants who have previously been in care will not be affected.
- From 1 April 2017 we would align our CTS scheme with changes made to the temporary absence rules in Housing Benefit and Pension Credit on 28 July 2016. This would reduce the allowable period of temporary absence outside Great Britain from 13 weeks to 4 weeks. Northern Ireland, the Channel Islands and the Isle of Man are not part of Great Britain for Housing Benefit purposes. There are exceptions to the general temporary absence rule that we would similarly apply to CTS recipients, for example absences related to the death of a close relative.

## 2 People who could be affected, with particular regard to the legally defined protected characteristics<sup>1</sup>:

Our localised CTS scheme affects <u>all claimants</u> who are of working age (and those of working age currently not in receipt of CTS but who may apply in the future). Limited equality data is held within TDBC's CTS computer system (as the collection of such information has not been necessary for administering CTS) given the caseload can come from all sections of the community it is likely there will be claimants (and their household members) that contain the full range of protected characteristics <sup>1</sup> as defined within the Equalities Act 2010 and include:

- Age
- Disability
- Gender
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race
- · Religion and belief
- Sexual orientation

The Government expect local authorities to establish schemes that minimise the impact on vulnerable groups. The Council Tax Reduction Schemes (Prescribed Requirements) Regulations 2012 include provisions for those of working age but none of those prescribed requirements set out the level of support to be given.

## 3 People and Service Area who are delivering the policy/service/decision:

Council Staff in the Revenues & Benefits Service

#### 4 Evidence used to assess impact: Please attached documents where appropriate.

We have obtained data relating to people affected from our Council Tax Support processing system. The data available has allowed us to analyse impact on people according to their age, disability, family circumstances and level of income. We have modelled options on scenarios with "live" data based on actual entitlements and CTS recipients at that point in time. We asked general diversity questions as part of the consultation exercise.

In addition, we have undertaken debt profiling against the Council Tax Support (CTS) customer base (<u>Appendix 5</u>) and also against those customer groups impacted most by the key elements of our localised scheme.

We have also considered the following assessments undertaken by the DWP:

- Equality Analysis to remove the Family Premium and limit backdating for Housing Benefit to one month;
- Impact Assessment to remove the ESA Work-Related Activity Component
- Equality Analysis for Housing Benefit (Temporary Absence)(Amendment) Regulations 2015

To raise awareness of our proposals and to encourage participation in the consultation process we requested that every TDBC Members obtain views on the options from constituents within their Wards. We distributed a minimum of 10 consultation questionnaires to each of our 56 Members. Consequently, if every Member obtained the views of one of their constituent each week of the consultation period (4 July 2016 to 11 September 2016 - 10 weeks) we would obtain views of 560 residents across the entirety of the TDBC area. This would provide a confidence level of 95% with a margin of error of 4%. Obtaining only 78 responses increases the margin of error to 11%.

In supplementing Member involvement, we also created a dedicated web page with an online survey, as well as promoting consultation and encouraging participation from customers, staff and external partners.

Should Members decide to align our CTS scheme with changes made to the temporary absence rules in Housing Benefit and Pension Credit on 28 July 2016, this would apply to all customers equally from April 2017 and so will not affect customers differently because of any protected characteristic.

The impact of implementing other changes to our local Council Tax Support Scheme for each of the protected groups, is considered on the following pages.

<sup>&</sup>lt;sup>1</sup> For protected characteristics, please visit: http://www.equalityhumanrights.com/private-and-public-sector-guidance/guidance-all/protected-characteristics

## **Equality Impact Assessment (by protected characteristic)**

#### Age

The proposed scheme for 2017/18 is subject to some national prescription relating to protecting pensioners' entitlements. Therefore we have no discretion about whether or not to follow this principle. The Government is committed to protecting pensioners on low incomes and have prescribed a scheme for pensioners through legislation. This means pensioners will not see any reduction in their CTS in comparison with their former levels of Council Tax Benefit.

Pensioners are still entitled to claim up to 100% of their Council Tax liability through CTS. The Council's general equality duty is lessened to an extent with regard to older people as Government has prescribed that pensioners are not affected by CTS. However, we have a responsibility to foster good relationships between people who share a protected characteristic and those who do not. There is a risk of harming the relationship between pensioners and working age claimants of CTS as pension age claimants are not affected and working age claimants have a greater reduction to their CTS to cover the shortfall in funding.

Our CTS scheme's premiums and personal allowance are linked to the rates set by the DWP. The main rates of working age benefits and tax credits are frozen in cash terms for 4 years from April 2016. Pensioner benefits are excluded from the benefit freeze and will be protected by the 'triple lock'. This means that for pensioners, premiums and personal allowance will rise by the higher of price inflation, earnings growth or 2.5%.

Table 1	Number of claims	Cases with debt	% of cases with debt	Average debt for those in arrears	Total Debt
Pension Age	3,960	42	1%	£212.60	£8,929
Working Age Employed	1,727	540	31%	£338.56	£182,823
Working Age Other	3,528	982	28%	£196.57	£193,034
Total for CTS recipients	9,215	1,564	17%	£246.03	£384,786
Working age	5,255	1,522	29%	£246.95	£375,857

The CTS scheme retains the majority of the former Council Tax Benefit assessment rules, including the use of applicable amount and personal allowances. The personal allowances and applicable amounts used to calculate CTS are the amounts deemed necessary to provide for basic needs based on household composition and disability. These allowances and applicable amounts take the claimant's circumstances into account and mean they are awarded more support if they have children or dependents under the age of 18.

The CTS scheme for 2017/18 will continue to disregard Child Benefit in income calculations meaning that the added income this provides will not reduce the CTS that an applicant receives.

In conducting consultation for our CTS scheme for 2017/18, Option 4 proposes to align our scheme with some or all of the changes the Government make to other welfare benefits. Under Option 4, from April 2017, 18-21 year olds who are not in work would no longer be eligible for help through our CTS scheme. There will be a range of exemptions for vulnerable young people, including those in danger of suffering abuse and those receiving disability benefits. People who have been in work for 6 months before making a claim, will continue to be eligible for CTS for up to 6 months while they look for work. Applicants who have previously been in care will not be affected. Analysis of our current caseload identified just 2 (two) CTS recipients for the period April - August 2016 that were not working and aged 18-21. In considering to implement this measure, based on current recipients, 23 individuals aged 18-21 would no longer receive any CTS.

In mitigating any of the effects under Option 4, officers could apply a discretionary reduction in Council Tax liability through exceptional hardship as appropriate and in accordance with our policy.

#### Disability

Disabled people have a limited ability to work and are likely to have higher level disability related living expenses. This group in particular find it difficult to access and sustain employment and therefore improve on their current financial situation. This group of people is less resilient to the impact of recession and unemployment and are often living in poverty. These further impacts on the individual's mental health.

The personal allowances and applicable amounts currently used to calculate CTS, are the amounts deemed necessary to provide for basic needs based on household composition and disability. These allowances and applicable amounts already take the claimant's circumstances into account and mean that they are awarded more support if they or anyone in their household has a disability than if the household had the same income but contained no-one with a disability.

Disability benefits, the disability-related elements of tax credits and statutory payments including Personal Independence Payment, Attendance Allowance, Disability Living Allowance, Employment and Support Allowance (Support Group only), Maternity Allowance, Statutory Maternity/Paternity Pay and Statutory Sick Pay, are uprated in line with the Consumer Prices Index (CPI). The CPI fell in the year to September 2015 so it meant the benefits mentioned above were not increased from April 2016.

In common with other working age recipients, people with disabilities receive less CTS under the localised scheme than they did under CTB. However, the limited changes between CTB and our local CTS scheme are not such as to introduce disproportionately adverse effects on people based on disabled people as a specific group. Outside of CTS, the Council Tax scheme itself recognises disability by exempting those with a severe mental impairment. The CTS scheme does not impact upon that exemption and it will continue to apply where appropriate. Additionally, the Council Tax scheme also recognises disability where a dwelling occupied by a disabled person has a room that is adapted or additional to meet the needs of that resident. In those cases the band attributable to that dwelling for the purposes of Council Tax is reduced in advance of any further reduction under CTS.

In consultation for our CTS scheme for 2017/18, Option 4 proposes that new claimants for Employment and Support Allowance in the Work Related Activity Group will receive the same rate of CTS as those claiming Jobseeker's Allowance. Analysis of our current CTS caseload has not identified any applicants where we include the Work Related Activity Component within the Applicable Amount and so implementing this measure is unlikely to have a disproportionate negative impact for working age customers with disabilities.

The average level of debt for working age CTS recipients in 2015/16 receiving the disability premium was £222.16 - lower than the scheme average of £246.95 for working age claims, with only 11% of CTS recipients with a disability premium were in arrears with their Council Tax - significantly less than the scheme average of 29%.

Table 2

CTS recipients with disabilities	Number of claims	Cases with debt	% of cases with debt	Average debt for those in arrears	Total Debt
Working Age Employed	168	22	13%	£258.36	£5,684
Working Age Other	247	23	9%	£187.52	£4,313
Working age	415	45	11%	£222.16	£9,997

#### Gender

There are a greater number of female recipients of CTS within our caseload (either single, lone parents or part of a couple) than male recipients. Consequently more females will be impacted by changes made to our CTS scheme than males. This is not deliberate but is simply a product of the makeup of our caseload. However, gender will not be a direct factor in any part of the assessment of CTS as it is not considered to be a characteristic that requires a higher applicable amount when assessing support.

The majority of lone parents in receipt of CTS are female. Under Option 4, aligning the backdating period from six months to one month means the potential entitlement period changes, but there is no actual reduction in CTS to the applicant. This measure would apply to all CTS applicants regardless of any protected characteristic. There is no evidence that reducing the period for which CTS can be backdated for working age applicants would change the gender profile of the caseload.

In reducing the period for which a person can be absent from Great Britain and still receive CTS to 4 weeks, the DWP consider there will be small cases of claimants impacted (mainly women) who leave their homes through fear of violence in that dwelling. Currently those fleeing domestic violence are allowed CTS during a period of temporary absence for up to 52 weeks. Under the changes if they decide to flee to a place of safety outside Great Britain, for example to Northern Ireland, then their CTS will be stopped after 4 weeks. Due to the relatively low numbers likely to be affected officers could apply a discretionary reduction in Council Tax liability through exceptional hardship as appropriate and in accordance with our policy.

The average level of debt for working age lone parents in 2015/16 was £279.16 - greater than the scheme average of £246.95. See table 3 detailing debt levels for this group.

Table 3

Lone Parents	Number of claims	Cases with debt	% of cases with debt	Average debt for those in arrears	Total Debt
Working Age Employed	925	230	25%	£280.62	£64,543
Working Age Other	1,083	278	25%	£277.95	£77,269
Working age	2,008	542	25%	£279.16	£141,812

#### **Gender Reassignment**

We hold no data on our Council Tax system to identifying the names or numbers of current CTS applicants who share this protected characteristic. Gender reassignment is not a factor in any part of the assessment of CTS and it is not considered to be a characteristic which requires a higher applicable amount when assessing support. In common with other working age CTS applicants, transgendered people may receive less CTS under the proposals for change in 2017/18. However, these are not such as to introduce disproportionately adverse effects on transgendered people as a specific group.

## **Marriage and Civil Partnership**

Marital or civil partnership status is not currently a factor in determining CTS as it is not considered to be a characteristic that requires a higher applicable amount. Our CTS scheme will continue to recognise and retain the treatment rules for those in Polygamous marriages. Options for changing our CTS scheme for 2017/18 do not introduce disproportionately adverse effects on people based on their marriage or civil partnership status.

#### **Religion and Belief**

We do not gather data on religion or belief as part of the CTS application process; we do not hold full data specific to religion or belief within our caseload. Religion and belief is not a factor in any part of the assessment of Council Tax Support as it is not considered to be a characteristic which requires a higher applicable amount.

Some working age CTS applicants, people of all or no religion or belief, may receive less CTS under the proposals for change in 2017/18. However, these are not such as to introduce disproportionately adverse effects on people based on their religion or belief status.

#### Race

Race is not a factor in the assessment of CTS and it is not considered to be a characteristic that requires a higher applicable amount. Some people of all races, may receive less CTS under the proposals for change in 2017/18. However, these are not such as to introduce disproportionately adverse effects on people based on their race status.

#### **Pregnancy and Maternity**

For the purposes of CTS, pregnancy and maternity must be considered as two separate characteristics as while the applicants is pregnant, her applicable amounts and personal allowances are lower (as for a person without children). Once a child is born, it becomes part of the household composition and increased allowances are applied. Pregnancy alone is not a factor in the current assessment of CTS as it is not considered to be a characteristic that requires a higher applicable amount. Providing that the child (or children) forms part of the mother's household composition once it is born, the application for CTS will then include the child (or children) as part of the household and the applicable amount will increase which, once other income changes have been taken into account may provide for a more generous assessment of CTS and reduced Council Tax payments. The CTS scheme will retain the current disregard of Child Benefit in income calculations, meaning the income that Child Benefit provides will not reduce the amount of CTS that a recipient receives as a result of having a baby.

In considering our CTS scheme for 2017/18, Option 4 proposes that we will not include a Family Premium within in the applicable amount for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium. This would result in a "notional" weekly loss of CTS of £3.49 (20% of the current Family Premium of £17.45). As this measure only applies to new claims to CTS, or those who have a first child while claiming CTS, this alignment measure does not result in a reduction in actual support paid.

#### **Sexual Orientation**

Sexual orientation is not be a factor in any part of the assessment of CTS as it is not considered to be a characteristic which requires a higher applicable amount when assessing support. Some working age CTS applicants may receive less CTS under the proposals for change in 2017/18. However, these are not such as to introduce disproportionately adverse effects on people based on their sexual orientation.

#### Children and duties under the 2010 Child Poverty Act

The minimum age for receiving CTS is 18 and so people under the age of 18 will not be impacted directly by the CTS scheme. Indirect impact has been considered as people under the age of 18 are included as part of a claimant's household and the Council has a duty to prevent child poverty as outlined in the Child Poverty Act 2010. There are 2,811 working age CTS recipients with children, accounting for 53% of all working age CTS recipients. Of those with children, 30% (856) have debt totalling £226k with these arrears making up 60% of all Council Tax debt for those of working age getting CTS.

In conducting consultation for our CTS scheme for 2017/18, Option 4 proposes to align our scheme with some or all of the changes the Government make to other welfare benefits. In not including a Family Premium within in the applicable amount for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium, this would result in a "notional" weekly loss of CTS of £3.49 (20% of the current Family Premium of £17.45). As this measure only applies to new claims to CTS, or those who have a first child while claiming CTS, this alignment measure does not result in a reduction in actual support paid.

Within the current scheme, applicants who have children are awarded a dependants addition of £66.90 for each child within the calculation of their needs (Applicable Amounts). There is no limit to the number of dependants' additions that can be awarded. From April 2017 the Government will limit dependants' additions in Universal Credit, Housing Benefit and Tax Credits to a maximum of two. This will only affect households who have a third or subsequent child on or after 1 April 2017. This measure only applies to new claims for CTS, or those who have a third child on or after 1 April 2017 and so does not result in a reduction in actual support paid. However, it would result in a "notional" weekly loss of CTS of at least £13.38 (20% of £66.90). We would continue to include the amount for first and second children. There will be protection for multiple births or women who have a third child as the result of rape or other exceptional circumstances.

In mitigating any of the effects under Option 4, officers could apply a discretionary reduction in Council Tax liability through exceptional hardship as appropriate and in accordance with our policy. Analysis of debt levels for existing working age applicants with children is shown in Table 4 below

Table 4

Working age claims with children	Number of claims	Cases with debt	% of cases with debt	Average debt for those in arrears	Total Debt
Working Age Employed	1,693	418	25%	£331.49	£138,564.00
Working Age Other	1,118	438	39%	£199.69	£87,465.00
Total	2,811	856	30%	£264.05	£226,029.00

#### Other Groups (non-statutory)

#### **Employment**

The number of working age CTS recipients in employment is 1,727, accounting for 33% of all working age recipients. Those CTS recipients without employment are 3% more likely to have Council Tax arrears, although the average value of their debt (£196.57) is less than for those with employment (£338.56) - see Table 5.

#### Table 5

	Number of claims	Cases with debt	% of cases with debt	Average debt for those in arrears	Total Debt
Working Age Employed	1,727	540	31%	£338.56	£182,823
Working Age Other	3,528	982	28%	£196.57	£193,034
Total for working age	5,255	1,522	29%	£246.95	£375,857

Couples in employment with no responsibility for children have the greatest average debt at £405.42, while non-working applicants with children have the lowest average debt of £63.73 - see Table 6.

#### Table 6

Average debt for those in arrears	Couples with children	Couples, no children	Single, no children	Lone parent	Disabled
Working Age Employed	£393.73	£405.42	£329.91	£280.62	£258.36
Working Age Other	£63.73	£363.02	£285.10	£277.95	£187.52
Total for working age	£242.00	£386.07	£298.74	£279.16	£222.16

The National Living Wage is currently £7.20 an hour for those 25 or over from April 2016 and will increase to £9.00 an hour by 2020.

For people of working age that are not in employment, the benefit cap restricts the amount in certain benefits that a household can receive. Any household receiving more than the cap will have their Housing Benefit reduced to bring them back within the limit. The Benefit Cap will be cut from £26,000 to £20,000 for households living in the Taunton area and will be phased-in gradually from November 2016. We estimate up to 150 households will be affected. This reduction in income may mean Council Tax is more difficult to collect from those households.

#### **Carers**

Larger families or people with disabilities may be in larger properties to cater for disability needs and so carers are able to stay overnight.

#### **Armed Forces**

Veteran Benefits will continue to be fully disregarded in the means test for Council Tax Support. Our scheme does not appear to have a differential impact but we are aware some ex veterans experience mental health issues and have physical disabilities.

#### 5 Conclusions on impact of proposed decision or new policy/service change:

In considering options to change our CTS scheme we have tried hard to balance the reality of a significant cut in Central Government funding to protecting the most vulnerable members of our community as far as practicable. The proposals acknowledges that recipients of CTS need to contribute more to meet the funding shortfall but also looks to protect people with protected characteristics as much as possible.

In mitigating any disproportionate effect through implementing any of the proposed options to change our CTS scheme, officers could apply a reduction in Council Tax liability through exceptional hardship as appropriate and in accordance with our discretionary policy.

#### 6 Recommendation based on findings. These need to be outlined in the attached action plan.

Adjust the policy/decision/service.

Group	Action required	Expected outcome of	Person to undertake	Service Plan -	Expected
Affected		action	action	for monitoring	Completion date
Age	Young people aged 18 to 21 that are not working will receive no help with either their housing costs (rent) or with paying Council Tax. It will be important to work closely with DWP colleagues in ensuring such people receive the "intensive regime of support" stipulated by the Government to increase their skills and confidence in gaining for employment.	Flagging affected individuals as "vulnerable" with Revenue IT systems to ensure collection of debt is appropriately managed	DHP/Welfare Reform Officer	Revenues & Benefits	On-going
Disability	No issues identified that would result in a disproportionate effect through proposed changes.	No issues identified that would result in a disproportionate effect through proposed changes.	Not applicable	Not applicable	Not applicable
Marriage and Civil Partnership	No issues identified that would result in a disproportionate effect through proposed changes.	No issues identified that would result in a disproportionate effect through proposed changes.	Not applicable	Not applicable	Not applicable
Pregnancy and Maternity	In not including a Family Premium within in the applicable amount for new working age CTS applicants, or existing recipients who would otherwise have had a new entitlement to the premium, there will be less CTS available to those affected. In addition, limiting dependant additions to a maximum of two children is similarly likely to reduce support.	Provide short-term help for instances of hardship.	DHP/Welfare Reform Officer	Revenues & Benefits	On-going
Race	No issues identified that would result in a disproportionate effect through proposed changes.	No issues identified that would result in a disproportionate effect through proposed changes.	Not applicable	Not applicable	Not applicable

Gender Re- assignment	No issues identified that would reside disproportionate effect through proportional effect through proportion	oposed changes.	would disprop throug change			applicable		Not applicable	Not applicable		
Religion and Belief	No issues identified that would res disproportionate effect through pr		would disprop throug	No issues identified that would result in a disproportionate effect through proposed changes.			Not applicable	Not app	licable		
Sex	There are a greater number of female CTS recipients within our caseload (either single, lone parents or part of a couple) than male recipients. Consequently more females will be impacted by changes made to our scheme However, gender is not a direct factor in any part of the assessment of CTS as it is not considered to be a characteristic that requires a higher applicable amount when assessing support.			e short-term help cances of ip.	DHP/Welfare Reform Officer			Revenues & Benefits	& On-going		
Sexual Orientation	No issues identified that would res disproportionate effect through pr		would disprop	res identified that result in a portionate effect h proposed	Not applicable			Not applicable	Not app	licable	!
Rurality	No issues identified that would result in a disproportionate effect through proposed changes.		No issues identified that would result in a disproportionate effect through proposed changes.		Not applicable			Not applicable	Not app	licable	!
Author's Signature:	ONLY P.SO	Report Review of Title	Report Review of CTS scheme for 2017/18		Date 20/10		0/2016	EIA Versio	n	1.1	
Contact Details:	Tel:	01823 356541		Email:	h.tiso@tauntondeane.gov.uk						

## **Appendix 5**

# Council Tax Support – Debt Profile @ 31 March 2016

Table 1 – Profile of claims with arrears										
	Number of cases with cases with debt cases									
Pension Age	3,960	42	1%	£212.60	£2.25	£8,929.00				
Working Age Employed	1,727	540	31%	£338.56	£105.86	£182,823.00				
Working Age Other	3,528	982	28%	£196.57	£54.71	£193,034.00				
Total	9,215	1,564	17%	£246.03	£41.76	£384,786.00				
Total for working age	5,255	1,522	29%	£246.95	£71.52	£375,857.00				

Table 2 – Profile of claims – Claim numbers										
Total claims Passported Children Couple Single Lone parent Disabled										
Pension Age	3,960	2,397	43	526	1,008	3	198			
Working Age Employed	1,727	0	1,693	879	392	925	168			
Working Age Other	3,528	2,757	1,118	677	896	1,083	247			
Total	9,215	5,154	2,854	2,082	2,296	2,011	613			
Total for working age	5,255	2,757	2,811	1,556	1,288	2,008	415			

Table 3 – Total arrears										
	Total arrears	Passported	Children	Couple	Single	Lone parent	Disabled			
Pension Age	£8,929.00	£3,097.00	£53.00	£1,536.00	£4,296.00	£0.00	£27.00			
Working Age Employed	£182,823.00	£0.00	£138,564.00	£85,949.00	£32,331.00	£64,543.00	£5,684.00			
Working Age Other	£193,034.00	£172,927.00	£87,465.00	£64,617.00	£63,863.00	£77,269.00	£4,313.00			
Total	£384,786.00	£176,024.00	£226,082.00	£152,102.00	£100,490.00	£141,812.00	£10,024.00			
Total for working age	£375,857.00	£172,927.00	£226,029.00	£150,566.00	£96,194.00	£141,812.00	£9,997.00			

Table 4 – Number of claims with arrears										
	Total with Passported Children Couple Single Lone parent Disabled									
	arrears									
Pension Age	42	17	1	5	20	0	1			
Working Age Employed	540	0	418	212	98	230	22			
Working Age Other	982	886	438	178	224	278	23			
Total	1,564 903 857 395 342 508 46									
Total for working age	1,522	886	856	390	322	508	45			

Table 5 –Percentage of claims with arrears										
	Total Total with Passported Children Couple Single Lone Disabled									
	claims	arrears					parent			
Pension Age	43%	1%	1%	2%	1%	2%	0%	1%		
Working Age Employed	19%	31%	0%	25%	24%	25%	25%	13%		
Working Age Other	38%	28%	32%	39%	26%	25%	26%	9%		
Total	100%	17%	18%	30%	19%	15%	25%	8%		
Total for working age	57%	29%	32%	30%	25%	25%	25%	11%		

Table 6 – Average arrears per case									
	Total	Passported	Children	Couple	Single	Lone parent	Disabled		
Pension Age	£212.60	£182.18	£53.00	£307.20	£214.80	£0.00	£27.00		
Working Age Employed	£338.56	£0.00	£331.49	£405.42	£329.91	£280.62	£258.36		
Working Age Other	£196.57	£195.18	£199.69	£363.02	£285.10	£277.95	£187.52		
Total	£246.03	£194.93	£263.81	£385.07	£293.83	£279.16	£217.91		
Total for working age	£246.95	£195.18	£264.05	£386.07	£298.74	£279.16	£222.16		

Table 7– Average arrears across scheme									
Total Passported Children Couple Single Lone parent Disabled									
Pension Age	£2.25	£1.29	£1.23	£2.92	£4.26	£0.00	£0.14		
Working Age Employed	£105.86	£0.00	£81.85	£97.78	£82.48	£69.78	£33.83		
Working Age Other	£54.71	£62.72	£78.23	£95.45	£71.28	£71.35	£17.46		
Total £41.76 £34.15 £79.22 £73.06 £43.77 £70.52 £16.35									
Total for working age	£71.52	£62.72	£80.41	£96.76	£74.68	£70.62	£24.09		

	Table 8 – Total Arrears by Council Tax Band									
	A B C D E F G									
Pension Age	£4,219.00	£2,148.00	£2,073.00	£415.00	£0.00	£74.00	£0.00			
Working Age Employed	£38,388.00	£84,541.00	£40,593.00	£15,446.00	£3,543.00	£312.00	£0.00			
Working Age Other	£77,834.00	£92,569.00	£17,051.00	£5,828.00	£0.00	£0.00	£0.00			
Total	£120,441.00	£179,258.00	£59,717.00	£21,689.00	£3,543.00	£386.00	£0.00			
Total for working age	£116,222.00	£177,110.00	£57,644.00	£21,274.00	£3,543.00	£312.00	£0.00			

Table 9 Number of cases with arrears by Council Tax Band										
A B C D E F G										
Pension Age	14	12	4	1	0	1	0			
Working Age Employed	63	138	61	16	3	1	0			
Working Age Other	346	342	70	15	4	0	0			
Total	423	492	135	32	7	2	0			
Total for working age	409	480	131	31	7	1	0			

Table 10 – Average Arrears by Council Tax Band									
	Α	В	С	D	Е	F	G		
Pension Age	£301.36	£179.00	£518.25	£415.00	£0.00	£74.00	£0.00		
Working Age Employed	£609.33	£612.62	£665.46	£965.38	£1,181.00	£312.00	£0.00		
Working Age Other	£224.95	£270.67	£243.59	£388.53	£0.00	£0.00	£0.00		
Total	£284.73	£364.35	£442.35	£677.78	£506.14	£193.00	£0.00		
Total for working age	£284.16	£368.98	£440.03	£686.26	£506.14	£312.00	£0.00		

Table 11 – Claims with Children – Arrears Analysis										
	Number of cases	lumber of cases Cases with Average arrears Average arrears Total arre								
		arrears	case	across scheme						
Pension Age	43	1	£53.00	£1.23	£53.00					
Working Age Employed	1,693	418	£331.49	£81.85	£138,564.00					
Working Age Other	1,118	438	£199.69	£78.23	£87,465.00					
Total	2,854	857	£263.81	£79.22	£226,082.00					
Total for working age	2,811	856	£264.05	£80.41	£226,029.00					

Table 12 – Lone Parent Claims – Arrears Analysis										
	Number of cases									
		arrears	case	across scheme						
Pension Age	3	0	£0.00	£0.00	£0.00					
Working Age Employed	925	230	£280.62	£69.78	£64,543.00					
Working Age Other	1,083	278	£277.95	£71.35	£77,269.00					
Total	2,011	508	£279.16	£70.52	£141,812.00					
Total for working age	2,008	508	£279.16	£70.62	£141,812.00					

Table 13 – Claims with a Disability Premium – Arrears Analysis						
	Number of cases	Cases with arrears	Average arrears	Average arrears	Total arrears	
			case	across scheme		
Pension Age	198	1	£27.00	£0.14	£27.00	
Working Age Employed	168	22	£258.36	£33.83	£5,684.00	
Working Age Other	247	23	£187.52	£17.46	£4,313.00	
Total	613	46	£217.91	£16.35	£10,024.00	
Total for working age	415	45	£222.16	£24.09	£9,997.00	

Table 14 – Passported Claims – Arrears Analysis						
	Number of cases	Cases with arrears	Average arrears	Average arrears	Total arrears	
			case	across scheme		
Pension Age	2,397	17	£182.18	£1.29	£3,097.00	
Working Age	2,757	886	£195.18	£62.72	£172,927.00	
Total	5,154	903	£194.93	£34.15	£176,024.00	

Table 15 – Couples claiming CTS – Arrears Analysis						
	Number of cases	Cases with arrears	Average arrears	Average arrears	Total arrears	
			case	across scheme		
Pension Age	526	5	£307.20	£2.92	£1,536.00	
Working Age Employed	879	212	£405.42	£97.78	£85,949.00	
Working Age Other	677	178	£363.02	£95.45	£64,617.00	
Total	2,082	395	£385.07	£73.06	£152,102.00	
Total for working age	1,556	390	£386.07	£96.76	£150,566.00	

Table 16 – Single People Claiming CTS – Arrears Analysis						
	Number of cases	Cases with arrears	Average arrears	Average arrears	Total arrears	
			case	across scheme		
Pension Age	1,008	20	£214.80	£4.26	£4,296.00	
Working Age Employed	392	98	£329.91	£82.48	£32,331.00	
Working Age Other	896	224	£285.10	£71.28	£63,863.00	
Total	2,296	342	£293.83	£43.77	£100,490.00	
Total for working age	1,288	322	£298.74	£74.68	£96,194.00	

Table 17 – Comparison of Working Age cases – Arrears Analysis						
	Number of cases	Cases with arrears	Average arrears	Average arrears	Total arrears	
			case	across scheme		
Working age (working)	1,727	540	£338.56	£105.86	£182,823.00	
Working age (not working)	3,528	982	£196.57	£54.71	£193,034.00	
Total for working age	5,255	1,522	£246.95	£71.52	£375,857.00	

