

Agenda Item No: 6
Report To: Cabinet
Date: 12 May 2016
Report Title: Review of the Council Tax Support Scheme



Report Author: Council Tax and Welfare Reform Task Group
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Portfolio Holder Cllr Shorter Cllr Shorter Portfolio Holder for Finance & Budget, Resource Management and Procurement

Summary: The Council has had a Council Tax Reduction scheme since 2013. A county wide review has been completed to recommend a common framework for a county wide scheme. This has been reported in detail to the Task Group and this report contains its recommendation on the elements of the scheme that should be included in the Consultation exercise that is planned over the summer. The report includes a stage 1 Equalities impact assessment for members consideration.

Key Decision: No
Affected Wards: All – none specifically
Recommendations: Cabinet be asked to

- i) Note the recommendation that any new Council Tax Reduction Scheme should be based on the current scheme but with a series of potential modifications upon which we should consult;
- ii) Launch a consultation on the potential introduction of a range of modifications to the current Council Tax Reduction scheme for working age claimants as follows:
 - a. Increasing the minimum contribution rate for working age claimants between 10% and up to 20%;
 - b. Introducing a band cap at a band D;
 - c. Removing Second Adult Rebate;

- d. Reducing the capital limit to £6,000;
 - e. Introducing a standard non-dependant deduction of £10 per week;
 - f. Introducing a Minimum Income Floor for self-employed claimants (based upon the Statutory National Living Wage at 35 hours per week for full time or 16 hours a week for part-time workers);and
 - g. Aligning regulations of the current Council Tax Reduction scheme with Housing Benefit and (prescribed) Pension Age Council Tax Reduction scheme.
- iii) Through the consultation, seek views as to whether an Exceptional Hardship Policy should be incorporated as part of the scheme;
 - iv) Through the consultation, seek views on other ways of meeting the demands highlighted through the report other than changing the existing Council Tax Reduction Scheme (as set out in paragraph 24);
 - v) Note the 'first stage' Equality Impact Assessment
 - vi) Agree the proposed arrangements in respect of consultation and give delegated authority to the Head of Finance, in conjunction with the Communications team and Portfolio Holder to agree the final version of the material.

Policy Overview:

The Council Tax Support Scheme was introduced in April 2013 as part of the coalition government's welfare reforms and deficit reduction programme. Under the reform, the national scheme for council tax benefit (CTB) ceased on 31 March 2013 and was replaced by locally determined schemes from 1 April 2013. Local schemes were funded within a grant cap, which was 10% less than assumed subsidised expenditure under the CTB regime. Councils are not totally free to design support schemes as they think fit, but should observe some prescribed principles.

The Major preceptors have requested a review of the scheme in light of the continued level of reductions in their funding.

Financial Implications:

Council Tax Reduction is a discount applied to council tax bills and consequently reduces the tax base of the authority. In total the value of the discount awarded is £7.0m however

approximately only 10% of this cost is the responsibility of the Council with the remainder a cost to the major preceptors.

The costing for the changes to the scheme included within **Appendix A** represent the total cost and not this Council's share. They have been derived through simple modelling and more complex modelling will be completed subject to the outcome of the consultation process.

Equalities Impact Assessment

The changes have the potential to impact upon groups within society and a stage 1 EIA has been attached to this report at appendix C.

Risk Assessment

The risks are outlined in the report. It should be noted that the report is seeking permission to engage in a consultation exercise and therefore a risk assessment will be completed once approval for any changes to the scheme is sought.

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Report Title: Review of the Council Tax Support Scheme

Purpose of the Report

1. To seek Cabinet's approval to consult on the proposed Council Tax Support Scheme as recommended by the Task Group.

Background

2. Local Council Tax reduction Schemes (LCTRS) were introduced in April 2013 when government abolished the old system of Council Tax Benefit and replaced this with a locally agreed discount scheme.
3. Government transferred 90% of the cost of Council Tax Benefit to Local Government and required billing authorities like Ashford Borough Council to establish their own schemes that maintained protection to the elderly and most vulnerable whilst providing an incentive to work.
4. After an extensive consultation process the Council adopted a variation of the Kent scheme (More details are included in **Appendix A**). This scheme was a 'benefits' based means tested scheme and has been in operation of the last 3 years.
5. The major precepting authorities have requested that the scheme be reviewed to ensure that it is still appropriate and seek to reduce the cost of the scheme due to the reductions in government funding.
6. As part of a county wide exercise a review of the scheme was commissioned and reported to the Council Tax and Welfare Reform Task Group. The report to the task group is attached to this paper at **Appendix A**, the detailed appendices are not reproduced but are available on the web site.

Task Group Recommendations

7. To do nothing would not have met the objectives of the review as there are changes in Housing Benefit coming which would mean the Council Tax reduction and Pension Age Council Tax reduction/ Housing Benefit schemes would diverge.
8. The Council could chose to increase the level of support available to Working age claimants to previous Council Tax benefit levels, whilst this would be easier to administer it would exacerbate funding issues and therefore is not a viable option.
9. The task group considered the review and options for the scheme. The options are outlined in the report. The task group concluded that on balance it was recommended to continue with a benefits based scheme similar to the scheme in operation at the moment. Primarily this was because the Council will continue to administer housing benefit for the foreseeable future and therefore it would be easier for staff and claimants to maintain and understand. The current scheme is also compatible with the council's systems and therefore administration would be simpler.
10. In order to meet the challenges of funding pressures, some adjustments to the 'current' scheme will inevitably need to be made. Initially, the major precepting authorities had suggested that we seek to reduce the cost of the scheme through an increase in the minimum contribution rate (currently

10.0% for working age claimants within Ashford Borough Council). Members may be aware that Medway Council has recently increased its minimum contribution rate to 35%. However, evidence from around the country suggests that there is a “tipping point” (somewhere between 20% and 25%) after which collection rates are affected significantly. This ‘tipping point’ tends to affect claimants on low or fixed incomes; particularly single persons and couples with no dependants. Increasing the minimum % that a working age claimant needs to pay beyond a “tipping point” could be counter-productive and unrealistic.

11. The Task group considered the menu of options for amending the scheme. The task group felt that the Council **should not** seek to make any changes to the level of protection offered to the disabled (and their carers) or changes to income disregarded.
12. However the group felt that it would be appropriate to seek views on the following options:

<p>Increase the minimum % payable</p>	<p>The current scheme requires a minimum payment of 5% deduction for disabled claimants & claimants caring for the disabled with all non-pensioner claimants making a minimum payment of 10% towards their council tax bill.</p> <p>Level of contribution varies significantly over the country. 76 councils having a nil contribution rate with 52 schemes having rates over 20%.</p> <p>Medway Council will be highest in Kent at 35% for 2016/17.</p> <p>Evidence there is a “tipping point” somewhere between 20% and 25% after which collection rates are affected significantly. ‘Tipping point’ severely affects applicants on low or fixed incomes particularly single persons and couples with no dependants. Increasing the minimum % that a working age claimant needs to pay beyond a “tipping point” could be counter-productive and unrealistic.</p> <p><i>Consider option of increasing minimum % to between 10-20%</i></p>
<p>Introduce maximum Council Tax band level within scheme</p>	<p>Any claimant living in a property with a higher Band that is set within the scheme would be limited to that band as far as any CTR support is concerned. For example, if maximum level is set at Band D, a claimant from house banded E,F,G or H would be limited in support they receive to equivalent of Band D.</p> <p>A number of authorities have adopted this option with the banding that is used ranging from a band D to as low as a band A. Within Kent, Band D would seem more appropriate as making this too low could disadvantage larger families.</p>

	<p><i>Consider option of introducing a maximum band cap at Band D</i></p>
Remove Second Adult Rebate	<p>A taxpayer can presently apply for up to 25% reduction on their liability when an adult moves into their home who is on a low income. The applicant would lose their single person discount but could apply for this reduction instead. The reduction is assessed on the income of the second adult and not that of the taxpayer who could have any level of income or capital.</p> <p>This has been removed in a number of authorities across the country and in East Kent. There is a limited number of cases in ABC so impact would be small.</p> <p><i>Consider option of removing Second Adult Rebate</i></p>
Reduce Capital limit	<p>Currently claimants are allowed to have capital (excluding property) of up to £16,000 and still be eligible to claim. This limit could be reduced and it is suggested that this should be reduced to £6,000 or roughly 4 years' worth of council tax. Used in a number of schemes around the country and is relatively simple to administer and is compliant with the system. This will have the effect of removing the entitlement of some claimants.</p> <p><i>Consider option of reducing capital limit to £6,000</i></p>
Introduce changes to non-dependant charges	<p>Introduce a standard charge for non-dependants who live in a property. Currently, non-dependant deductions can vary from £0.00 to £11.45 depending on level of income. A standard charge would be easier to administer and could contribute to savings within the scheme. Suggestion from group is £10 per week.</p> <p><i>Consider option of introducing a standard of £10 per week for non-dependant deduction</i></p>
Introduce Minimum income floor for self-employed claimants	<p>Currently self-employed claimants are asked to declare their own level of income, and it is not unheard of for it to be declared as nil (or close to nil) after taking into account expenses. Claims are difficult to administer and challenging self-declared income levels can be protracted and time consuming.</p> <p>The Universal Credit (UC) assessment criteria includes a clause whereby a self-employed claimant is allowed to declare nil income in their first year of operation and then after that initial period to establish the business they are then assessed at either their declared income or at a minimum income floor calculated at 35 hours per week times the Statutory National Living Wage. It may be necessary to consider an alternative for people who are unable to work full</p>

	<p>time (primarily single parents with young children).</p> <p><i>Consider introducing a minimum income floor for self-employed claimants (after a start-up period of one year) based upon the Statutory National Living Wage at 35 hours per week for full time or 16 hours a week for part-time workers</i></p>
Align Scheme with HB and Pension Age CTR changes	<p>Central Government has announced significant changes to HB including the removal of certain premiums, a limitation on the number of dependants that can be included in the calculation, and the limiting of backdating.</p> <p>If we are to retain a scheme similar to the current one, it will be important to ensure it is aligned with HB as far as possible to aid understanding as well as efficiency of processing. These changes will form part of the prescribed requirements for the Pension Age CTR scheme.</p> <p><i>Consider option of aligning regulations of 'base' CTR scheme with HB and (prescribed) Pension Age CTR scheme</i></p>

13. The Task Group was conscious of the potential that these changes would have to impact upon the most vulnerable residents, it was recommended that the Council consult on the introduction of an exceptional hardship scheme to provide a 'safety net' within the scheme.
14. A combination of some, or all, of these possible options may be required in order to achieve the objective of reducing overall costs. It is intended that the resultant scheme will retain some longevity, certainly until there is more certainty about the full roll-out of UC. An important feature of the new scheme should be the adoption of an Exceptional Hardship policy to protect vulnerable residents in severe financial hardship. This concept needs to be tested as part of the consultation.

Consultation Process

15. During the next few weeks, all of the Kent district councils will report similarly to their Members seeking authority to proceed in the way outlined within this report.
16. Prior to the implementation of any change to the Scheme, authorities are required to consult with the public. There have been a number of legal challenges to LCTRS consultations and it should be noted that a recent judgement handed down by the Supreme Court has defined what is meant by 'good consultation'.
17. The guiding principles which have been established through case-law for fair consultation are as follows:
 - The consultation must be carried out at a stage when proposals are still at a formative stage;

- Sufficient information on the reasons for the decision must be provided to permit the consultees to carry out intelligent consideration of the issues and to respond;
 - Adequate time must be given for consideration and responses to be made; and
 - The results of the consultation must be properly taken into account in finalising any decision.
18. Officers are currently working closely with the consultant in order to prepare robust and consistent consultation material that can be individually 'branded' by each district council within Kent. Each district council must consult on its own scheme and ultimately make its own decisions about the 'final' scheme following the consultation.
 19. Ideally it is hoped that all district councils will go out to consultation at around the same time. The project timetable agreed by all Kent district councils at the start of the review anticipates consultation commencing in early June and completing at the end of August, thus allowing 12 weeks for members of the public and other relevant stakeholders to comment.
 20. At the time of writing, a draft of the consultation material has been completed and is attached at **Appendix B**. Given the tight timescales, **it is recommended that authority be delegated to the Head of Finance, in conjunction with the Communications team and Portfolio Holder to agree the final version of the material.**
 21. It is anticipated that the consultation will be primarily web-site based, but it will be important to write to all claimants to draw their attention to the consultation and encourage them to participate by providing hard copy documents as appropriate. Additionally, it will be important to involve stakeholder groups such as the CAB, local debt advice agencies, registered social landlords and other organisations with a significant interest, to obtain their views.
 22. There is also a duty to consult with the major precepting authorities (County Council, Fire and Police) who are statutory consultees. Work has already commenced with the major precepting authorities and will continue throughout the project. At the time of writing, all major precepting authorities have advised that they are content with the proposals so far.

Equalities Impact Assessment

23. A stage 1 EIA has been completed with the help of the consultant as part of the assessment of the proposed scheme and is attached at **Appendix C**.

Other Options Considered

24. The Medium Term Financial Plan was reported to the Cabinet as part of the budget setting process. This showed that the Council is having to make savings, seek to generate income and increase council tax to compensate for the reduction in government funding. The Council is restricted by how much it can raise council tax annually without having a local referendum, and our reserves are finite.
25. Through our Corporate Plan, the Council has planned over the medium term to use reserves to deliver upon corporate priorities, including developing income generating assets.

26. The MTFP assumes, in the medium term, that the Council will increase council tax to the maximum it is permitted to do so without triggering a referendum. The Council could increase council tax further, but the costs of holding a referendum would need to be factored in, and the public would need to support the proposed increase.
27. Members will appreciate, therefore, that realistic alternative options to changing the CTR Scheme are somewhat limited. However, in the light of challenges to local CTR scheme consultations elsewhere, the question about alternative funding arrangements does still need to be asked of the public.
28. Thus, whilst it is not the preferred solution, the following questions are posed for completeness. Were any of these options to be supported and implemented, the impact would affect all residents in the Borough.
 - Should Council Tax be increased for all Council Taxpayers (beyond that already planned in the MTFP) to fund the CTR scheme?
 - Should Council reserves be used up to fund the scheme?
 - Should there be further cuts to Council services (over and above those already required) be made to fund the scheme?

Conclusion

29. The tax group has completed a detailed review and has made a sound recommendation to consult upon.

Portfolio Holder's Views

30. To be given at the meeting.

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Report Title: Review of the Council Tax Support Scheme

Purpose of the Report

1. To update members on the progress that has been made on the review of the Council Tax Support scheme.

Issue to be Decided

2. Note the work that has been completed on the review of the scheme
3. To agree the broad scheme framework for public consultation

Background

4. The Council Tax Support Scheme was introduced in April 2013 as part of the coalition government's welfare reforms and deficit reduction programme. Under the reform, the national scheme for council tax benefit (CTB) ceased on 31 March 2013 and was replaced by locally determined schemes from 1 April 2013. Local schemes were funded within a grant cap, which was 10% less than assumed subsidised expenditure under the CTB regime.
5. Councils are not totally free to design support schemes as they think fit, but should observe the following principles:
 - a. Localised schemes should provide support for the most vulnerable, including vulnerable pensioners. Legislation protects eligible pensioners from any cut to their benefit. Pensioners will be protected as national rules will be maintained with eligibility rates defined by regulations.
 - b. Localised schemes should assist with lifting the poorest off benefits and supporting them into work.
6. As part of the settlement for 2013/14 the Council received funding of £778,000. This was split between the locally retained business rates scheme (£311,000) and the formula grant (£467,000). The scheme was designed to be self-funding and not represent an additional burden on the council tax payer. After the first year government rolled this funding into the base figures and it is no longer possible to identify what funding the council receives for this function. However with formula grant being removed and the Business Rates tariff being increased it would be possible to argue that the greater proportion of this funding will have been eroded by the end of the settlement period, 2019/20. Therefore moving forward there will be a level of subsidy by the council tax payer towards the recipients of council tax support.
7. Support for council tax must be fully integrated into the council tax system with support being awarded as a reduction in council tax bills rather than as a benefit. Therefore whilst the scheme is set by the Billing Authority (Ashford BC) it covers the council tax levied by all the major preceptors and parish councils. Accordingly Government provided grants to the major preceptors to compensate them for the introduction of the scheme and made a nominal allocation of the grant paid to billing authorities to compensate parish councils. For the Ashford area government allocated a total of £6.9m. It is important to note that there is a duty on billing authorities to consult on any scheme or changes to the scheme with the major preceptors being consultees.

8. In order to maintain some consistency within the County the districts and major preceptors decided to agree a Kent wide scheme that would be varied subject to local variation. As part of this agreement the preceptors also agreed to fund some of the costs of administering the scheme contributing annually £125,000 to each billing authority. This was agreed for a 3 year period and expires in March 2016.
9. Over the summer KCC sought to reduce the grant that was paid to districts and requested that the billing authorities reduce the cost of the scheme by increasing the contribution rate.
10. District Councils argued that it would not be possible to conduct a thorough review of the scheme in the time scales suggested by KCC. In addition to this there was a great deal of uncertainty created by the unknown timetable for Universal Credit that would affect billing authorities ability to resource and operate any scheme, and the outstanding comprehensive spending review. It was therefore agreed to complete a thorough review of the scheme in time for adoption on 1st April 2017. To achieve this the authorities have agreed to commission an independent review of the scheme to:
 - a. Reduce the overall cost of the scheme
 - b. Consider whether the operation of the scheme could be made more efficient through the scheme design.
 - c. To create a framework of common principles for a new Kent wide scheme maintaining the protection to pensioners and the vulnerable and seeking to assist people into work.

The Kent Scheme and the adopted Local Scheme

11. The approach taken by all Kent Districts is in line with the vast majority of other authorities within England, in that they have decided to maintain a means tested benefit approach, albeit that this is given in the form of a discount.
12. The current Kent Scheme is as follows:

Districts agree a standard deduction (the minimum level of payment from a claimant) of 18.5% on all non-pensioner claimants, or an individual district may produce an alternative scheme that achieves the 10% cost saving of council tax discounts to claimants, AND

Districts agree to [at least] reduce the Class C council tax exemption on short term empty properties from 6 months to 3 months
13. The Scheme that was agreed for Ashford had some variations to the Kent Scheme with:
 - a. a standard deduction of 10% on all non-pensioner claimants
 - b. 5% deduction for disabled claimants & claimants caring for the disabled.
14. Within this scheme there was to be no direct funding of CTS by the council or its major preceptors, this was achieved through:
 - a. the removal of the 10% council tax discount for second homes

- b. the reduction in Class C council tax exemption (for shorter term empty properties) that is equivalent to reducing financial benefit of the exemption period from 6 months to a maximum of 6 weeks
 - c. applying a 50% council tax premium for longer term empty properties (empty for over two years)
15. The level of standard deduction varies across the county as detailed in the table below:

Table 1: Level of standard deductions across Kent

Authority	Standard deduction	Other changes
Ashford	10.00%	5% deduction for disabled and carers
Canterbury	5.00%	Removal of second adult rebate
Dartford	18.50%	
Dover	6.50%	Removal of second adult rebate
Gravesham	18.50%	
Maidstone	13.00%	
Sevenoaks	18.50%	
Shepway	18.50%	
Swale	15.00%	
Thanet	5.50%	Removal of second adult rebate
Tonbridge & Malling	18.50%	
Tunbridge Wells	18.50%	

16. A full list of schemes across England for 2015/16 is provided at **Appendix A**. The vast majority of councils have introduced a scheme similar to the Kent Scheme, with 42 of 326 maintaining 100% support for working age claimants.

Welfare Reform and Universal Credit

17. The introduction of Council Tax Support was part of the first wave of the welfare reform agenda, and since then there have been a number of changes to the benefits environment that have been reported through to the welfare reform task group.
18. It has been within this environment of constant change that the Council's CTS scheme has operated and there have been a number of changes made to the scheme to keep the eligibility criteria in line with the national housing benefit scheme.
19. Government has been working on the implementation of Universal Credit, that when fully rolled out will see all of the council's working age Housing Benefits claims transfer to the new benefit. This change will ultimately have a significant impact on the operation of the Council's Revenues and Benefits team as workload and therefore the timetable for this roll out will need to be considered as part of the review of the CTS scheme. Government initially intended the rollout to be complete by 2017, however there are still early trials of the digital platform that is an essential springboard

Options

20. As part of the review an options appraisal was conducted to review the types of scheme that are in operation and to test their suitability for Kent. The full options appraisal is contained in **Appendix B**.

Maintain Current Scheme

21. This proposal would maintain the current scheme with no changes, this scheme has been successfully implemented and operated by all authorities. The scheme is however complicated (being based on the old benefit system) but while Housing Benefit is still in place the schemes can be operated and administered together. There are due to be significant changes to the benefits system over the next 2 years and so there will need to be some modification to the scheme.

Introducing a Total income based discount scheme (banded)

22. This scheme would look to calculate the total income of the applicant and partner and apply their income against a banded discount scheme. Currently no authority has a similar scheme in operation. Whilst the scheme would be relatively straightforward in terms of calculation, the complexity comes when the scheme is established considering the number and size of the bands, whether income should be disregarded (e.g. DLA, Child Benefit, Etc.). Whilst the scheme would be simple it would require additional information to be gathered from claimants, which would need to be updated, and the scheme cannot be properly accommodated within the software systems.

Passported plus income based discount (banded) scheme

23. This is identical to the previous scheme, however any applicant who receives a passported benefit will automatically be placed on the most generous band. There is only one scheme like this in operation. The scheme will have a minimum payment cut-off (like our current scheme) and is relatively simple to understand. However as the majority of claimants would receive a passported benefit so automatically default to a single band the attractions of this scheme are diluted. The current system has been developed to accommodate this scheme but this would need resources to be allocated to test and implement the module should this be an option.

Simplified Means Test with discount outputs

24. This works in the same way as the current system but translates the means test into a discount band. Therefore if a claimant were to change their earnings they may remain in the same band and therefore a new council tax demand notice would not need to be produced. This has the potential to reduce some administration costs but the systems providers are not able to clarify whether their systems could be adapted to support this scheme.

Total Household income scheme

25. This scheme seeks to include all non-dependant (e.g. adult son or daughter) income in the means test based on the ethos that the whole household should contribute towards the Council Tax. One authority has implemented a similar scheme. The scheme would be more complicated to administer as details of all household incomes would need to be collected and the systems would not allow for this information to be entered automatically and so this would become a manual process. However because of the potential for more income to be included in the means test it is expected to deliver savings.

Selecting a preferred option

26. The options appraisal has resulted in the assessment that the most practical option would be to maintain a scheme similar to our current scheme as this is known to our claimants, our systems are adapted for this scheme, and our staff are familiar with the administration of the scheme.
27. One consideration in this has been the roll out of Universal Credit and whether the Council will need to maintain a skill set for the administration of housing benefit. With the roll-out delayed and not likely to be completed until 2021 and the likely retention of pensioner case load, it is anticipated that the council will retain a workforce that has the skills to administer the scheme. In addition to this the council operates a scheme of generic working where staff can process both council tax support and housing benefit and maintaining a synergy between the schemes has certain attractions.
28. There are however a number of amendments that can be made to the scheme to reduce the overall cost of the scheme and to maintain fairness.

Level of contribution

29. Currently the Kent default scheme has a minimum taxpayer contribution rate of 18.5% and Ashford has a contribution rate of 10%. The 18.5% was set at a level to ensure that the scheme would be cost neutral with the income collected from claimants, additional income from changes to exemptions and discounts, offsetting the 10% cut in the funding received. As can be seen from table 1, several Kent Districts have schemes with lower contributions than the default level, this being achieved by local changes to other council tax exemptions and discounts.
30. The major preceptors have requested that we seek to reduce the cost of the scheme and a simple option to do this is to increase the level of minimum contribution rate. The preceptors argue that it is no longer funded to the same level for Council tax support due to reductions in formula grant and therefore the scheme needs to be made less generous. A balance needs to be struck between this view and the need to collect the payments from the taxpayer and maintaining the fairness of the scheme. As this is a discount in the level of council tax due the main beneficiary is the County Council and the billing authority has to manage the collection and recovery of any debts.
31. The level of contribution varies significantly over the country with 76 councils having a nil contribution rate with 52 schemes having rates over 20% with the maximum contribution rate of 30% although Medway Council looking to increase theirs to 35% for 2016/17.
32. It should be remembered that this debt needs to be collected and there is evidence to suggest that once contribution rates exceed 20% the debt become increasingly difficult to collect and beyond a contribution rate of 25% this difficulty increases further.
33. At a contribution rate of 10% our collection levels are good, collecting in total 87% of the balance due although this drops to 80% when looking at only working age claimants.

Table 2: Collection Level for Council Tax Support Claimants

2015/16	Liability	Paid	% collected at 25.2.16
Pensioner	702,224.40	681,439.20	97.04
Disabled	276,415.39	252,667.49	91.41

Working Age	1,148,630.93	920,569.68	80.14
2014/15	Liability	Paid	% collected at 25.2.16
Pensioner	706,389.24	694,123.17	98.26
Disabled	286,514.53	249,563.65	87.10
Working Age	1,176,382.98	1,017,614.85	86.50
2013/14	Liability	Paid	% collected at 25.2.16
Pensioner	674,259.51	664,344.67	98.53
Disabled	243,296.10	223,189.40	91.74
Working Age	1,090,941.08	1,001,254.98	91.78

34. Neighbouring authorities with contribution rates of 18.5% and 15% are experiencing collection levels of circa 80% for working age claimants. Medway council with a contribution rate of 25% is collecting between 60-70% of the balance due. Other taxpayers must therefore compensate for this difference.
35. Whilst performance can be affected by a number of factors a balance needs to be struck between the needs of the Major Preceptors and the collectability of the debt. Without a significant increase in the resources devoted to the collection of CTS debt it is recommended that the contribution rate be no greater than 20%.

Other options

36. The review so far has concentrated on the type of scheme and contribution rate, but there are a number of other options to reduce the cost of the scheme and to maintain the fairness of the scheme. Below are a number of options that could be built into the current scheme and reduce cost, the cost estimates are broad estimates and based on crude modelling, these options are inter-related and the selection of the options will affect any level of saving generated.

Banding Cap

37. This is a similar basis to the change in liability percentage where the scheme would look to limit the payment of Council Tax support to an agreed banding. The purpose of this would be to not disadvantage those claimants who live in smaller or lesser value properties. A number of authorities have adopted this measure with some success with the banding that is used ranging from a band D to as low as a band A.
38. If an applicant were to reside in a property that was in a banding higher than the cap then they would receive support at the level of the cap.
39. The level of cap is normally determined by the authority and if this were to be adopted on a county wide basis consideration would need to be given to the diverse nature of the county. The majority of applicants that would be affected would live in larger properties and would therefore be either capital rich but income poor or larger families.
40. Setting the level of cap to allow the majority of claimants to be unaffected would limit savings but setting it too low could disproportionately affect larger families.

41. Having reviewed the claimant levels of Ashford BC and other Kent authorities a cap at band D would seem to strike the appropriate balance. The modelling outcomes suggest that this would affect 225 claimants saving approximately £45,000.

Minimum Income Floor

42. Currently self-employed claimants are asked to declare their own level of income. This could be as low as zero. The Universal Credit assessment criteria have a clause where by a self-employed claimant is allowed to declare nil income in their first year of operation and then after that initial period to establish the business they are then assessed at either their declared income or at a minimum income floor calculated at 35 hours per week times the Statutory National Living Wage.
43. It may be necessary to consider an alternative for people who are unable to work full time (primarily single parents with young children). This would be calculated at the Statutory National Living Wage at 16 hours per week.
44. Based on the current scheme this would reduce the cost by approximately £100,000-£150,000 and affect 250 claimants.

Capital limit

45. This option is used in a number of schemes around the country and is relatively simple to administer and is compliant with the system. Currently claimants are allowed to have capital (this excludes property) of up to £16,000 and still be eligible to claim. This limit could be reduced and it is suggested that this should be reduced to £6,000 or roughly 4 years' worth of council tax.
46. This will have the effect of removing the entitlement of some claimants, the modelling suggests that this would save approximately £40,000 and affect 50 claimants.

Non Dependants

47. This seeks to introduce a charge to ensure that non dependants who live in a property contribute to the council tax. Therefore a standard charge would be introduced for non dependants, at a level of £10 per week per non dependant; for a household with two non-dependants the majority of any CTS award would be eroded by this charge.
48. Given the changes with children living at home for longer this amendment will fit in with these changes and therefore maintain the fairness of the scheme but it would require the council tax payer to be responsible for securing a contribution from the non-dependant.
49. The modelling suggests that this could save between £75,000-£100,000 and affect up to 750 claimants.

Disregarded income

50. Within all Council Tax Support Schemes in Kent certain incomes are disregarded in full, which means that they have no impact on the level of support granted. Certain incomes are disregarded that until recently were included within benefits schemes, for example Child Benefit and Child Maintenance, these incomes were included within Council Tax Benefit Schemes until as recently as 2009. Nationally twenty two schemes include this income within the calculation.

51. These incomes have been modelled and Child Benefit would affect 1,500 cases saving £280,000 with child maintenance affecting 200 cases and saving £20,000.
52. Other income that could be considered for inclusion in the calculation are Disability Living Allowance (DLA) and Personal Independence Payments (PIP). These incomes are currently considered when calculating discretionary housing payments but not included within the calculation of Housing Benefit and Council Tax Support. The inclusion of this income could create issues around the equalities impact assessment and at this stage have not been included within the modelling.

Support for the disabled

53. The Council's scheme has a special protection for the disabled, which is unique in Kent. This limits the level of contribution to 5% for the disabled and carers. If this support were to be removed it would save £90,000 and affect 1,700 taxpayers.
54. There is an argument that the support should not be awarded on an arbitrary basis but should be assessed on a needs based approach considering the income of the claimant and taking into account any hardship.
55. The review has found that where an authority does not offer additional support for the disabled but has a hardship fund, the main type of applicant for hardship have been working age people and not disabled people. This seems to be because the welfare changes that have hit young single people harder than other claimant groups resulting in more cases of hardship in that group. This does raise the question of whether the support that is offered in the current scheme for the disabled is correctly targeted. It is suggested that this support be replaced with a hardship fund which all applicants can apply for additional support. This is detailed later in the paper.

Second Adult Rebate

56. This is a change in the discounts that are offered on Council Tax and would be considered outside the CTS scheme in the same way that the removal of the second homes discount or reduction in the class C, empty property, discount was considered.
57. The reduction is where a tax payer can apply for up to a 25% reduction on their liability when an adult moves into their home who is on a low income. The applicant would lose their single person discount but could apply for this reduction. The reduction is assessed on the income of the second adult and not that of the taxpayer who could have any level of income or capital.
58. This has been removed in a number of authorities across the country and locally this has been introduced in the three East Kent authorities.
59. This change has been modelled for Ashford and would affect 50 claimants and save £8,000.

Dealing with cases of Hardship

60. It is proposed that an Exceptional Hardship Fund is introduced as part of the scheme. Applications would be accepted where claimants have qualified for Council Tax Support but are in need of further support due to severe financial hardship.
61. Typically these schemes have an application process, applicants will need to:

- a. Undergo a separate application process to the CTS application
 - b. Provide details of their income and expenditure
 - c. Satisfy the authority that they are unable to meet their council tax liability in full or in part.
 - d. Accept assistance from the council or other bodies to support them in managing their finances more effectively. E.g. reviewing outgoings to reduce tariffs on utilities, etc.
 - e. Identify changes in payment arrangements to assist the claimant.
 - f. Assist the authority in minimising the liability by ensuring that all discounts, exemptions and reductions are properly granted.
 - g. Demonstrate that all reasonable steps have been taken to pay the liability
 - h. The applicant has no access to assets that could be realised to pay the liability
 - i. The applicant has maximised their income through claiming other benefits.
62. The administration of the scheme will be the responsibility of Ashford BC and as part of the assessment officers would consider:
- a. Current household composition and specific circumstances including disability or caring responsibilities
 - b. Current financial circumstances
 - c. Determine what actions have been taken to alleviate the situation.
 - d. Consider alternative means of support that may be available to the applicant by:
 - i. Re-profiling council tax and other debts
 - ii. Applying for DHP or housing benefit
 - iii. Maximising other benefits
 - iv. Consider whether spending priorities can be re-arranged.

Recommended scheme for consultation

63. It is recommended that the basis of the schemes within the Kent Districts remain the same in the short and medium term (until full roll out of Universal Credit and the move to localised Housing Benefit). This will retain the standard means tested approach until at least 2019/20. It is recommended that this will allow the schemes to evolve alongside the welfare reforms and that consideration will be given at that later time as to whether a more radical approach should be taken.
64. That the current schemes be amended in line with the proposed changes to Housing Benefit to align both schemes and to avoid increases in administration costs
65. It is recommended to consult upon a maximum level of contribution up to 20%.
66. It is recommended to consult upon the following proposed changes:
- a. Introducing a band cap at a band D

- b. Introducing a minimum income floor for self employed based upon the Statutory National Living Wage at 35 hours per week for full time or 16 hours a week for part time work.
 - c. Reducing the capital limit to £6,000
 - d. Introducing a standard non dependant deduction of £10 per week.
 - e. Including Child Benefit and Child maintenance in the assessment of income
 - f. Removing the additional support for the disabled.
67. To provide a 'safety net' for all households that are deemed vulnerable through the introduction of an Exceptional Hardship Fund.

Equalities Impact Assessment

68. The Public Sector Equalities Duty requires the Council to have 'due regard' to the equality impact of any proposal which involves the change (or reduction) of service provision to residents. The principal way by which compliance with equalities law can be demonstrated is by completing an Equalities Impact Assessment (EIA), to be made available to members when taking the final decision on the proposals.
69. If an EIA contains insufficient data or evidence that equalities issues have been taken into account when preparing final recommendations to members, the decision runs a risk of later legal challenge.
70. One of the key means to develop the equalities assessment needed at the time of final decision is through the results of the planned public consultation on the options under consideration. These outcomes will be used alongside other relevant equalities data which the Council holds. This will ensure that members are aware of the equalities implications of proposals when making their decision.
71. In agreeing the recommendations, Members are asked to note the potential impacts on the protected characteristics of age, sex and disability (including carers) at this stage. As decisions about the modifications to the scheme will not be taken until after the consultation, it is not yet possible to identify if any mitigating actions are required. A full equality impact assessment will be completed and the results will be reported to Cabinet, following the completion of the consultation.

Consultation

72. There is a statutory requirement for the council to consult on changes to the scheme and
73. The lead authority is required to consult with the major precepting authorities as they will share the risk of the new scheme. Consultation must also take place with the public and other interested parties. A minimum 8 week consultation period is recommended.
74. When the last scheme was introduced a full consultation exercise was completed that complied with the standards set by the institute of consultation. It is proposed to follow a similar process as before.

Handling

75. The Task Group is asked to consider the proposed scheme for consultations and make a recommendation to Cabinet that the Council consults with residents and stakeholders on the scheme as presented in the report.
76. A Communications plan for the consultation exercise will be drafted.
77. The Consultation period will be for 12 weeks and be run concurrently with other Kent Districts over June - August.
78. The Task Group will receive a report in the autumn with the outcome of the consultation exercise with a view to making final recommendations to Cabinet for the 2017/18 scheme in the autumn.

Ashford Borough Council

Changing our council tax support scheme – the details

Accompanying document to provide guidance to those responding to the council tax support scheme consultation for the financial year 2017-18

Published [date tbc]

Foreword

Council tax support is an essential safety net for thousands of individuals and families across the borough. For the people who receive it, council tax support is just that – support in paying their council tax, helping them with any financial shortfall until they are able to return to work. It is a localised system that reduces the amount of council tax charged for those whose combined income, savings and investments fall below a certain level.

The existing scheme has been in place, with some minor changes, for four years. Our existing scheme is as fair as possible, upholding the principles of the government's welfare reforms while offering greater support to those who will find that returning to work is more challenging (such as disabled claimants).

Now Ashford Borough Council and all other local authorities in Kent have been asked to undertake a comprehensive review of our schemes and ask existing claimants and other interested residents and organisations for their views on a revised version of the scheme.

With public-serving organisations facing shortfalls in funding from central government, we have been asked by the major preceptors (such as Kent County Council and Kent Police) to consider revising our scheme so that the money available to fund the services that are provided to you by them stretches further.

My colleagues and I at Ashford Borough Council have been faced with some difficult choices about what options to consult on. Not everyone will receive the same level of support as they do now and you will note that we have had to be pragmatic about who will receive our financial support, and how much they will get, in the forthcoming financial year.

This document gives you greater background to the proposed changes, tells you what our thought processes have been in trying to devise a system that is as fair as possible, while ensuring that services across the county – our own services, education, adult and social care and highways services provided by Kent County Council, and Kent's policing and fire and rescue services – can continue to be maintained.

We have clearly indicated what decisions we have already taken and what remains up for debate. Now it is over to you.

We believe we have revised the system fairly, and that it remains in line with the needs of our communities. In addition to supporting the most vulnerable, it still incentivises work, upholding the principal aims of the government. Now we want your views on the proposals we are putting forward.

This consultation runs from **6th June – 29th August** and we want to know what you think of the proposed revisions. We want to hear from as many people as possible – from those of you who are directly affected to those of you who have an interest in this topic because of the organisations you represent.

Your views are very important to us so please get involved so we can ensure we still have in place a fair local system that works for those in Ashford who need the

support most.

Cllr Neil Shorter

Portfolio Holder for Finance & Budget, Resource Management and Procurement

Introduction

Council tax support is a localised system that means households whose combined income, savings and investments are below a certain level qualify for a reduction in the amount of council tax they have to pay.

Ashford Borough Council was required to set up a new, local system on 1st April 2013. That scheme has run, with some minor changes, for four years. It upholds the principles behind the government's introduction of the scheme – i.e. to encourage people who are of working age to return to work and show that work pays.

The scheme asks those people of working age who are eligible for council tax support to contribute something towards their council tax bill, while protecting vulnerable groups.

The council has adopted these principles within its localised scheme – indeed it is proud to have been the only borough in the county to offer disabled claimants additional support, as they will obviously find returning to work more difficult.

With the government continuing to address the level of national debt the amount of money it provides to all public-serving organisations is reducing – hence why Ashford Borough Council has been proactive in securing additional revenue streams, such as purchasing International House and setting out its intention to acquire the town centre cinema and leisure complex at Elwick Place.

The major precepting authorities (for example, Kent County Council and Kent Police) have asked us to consider revising our schemes as they too are facing reductions in funding from central government and are keen to ensure that they can maintain their services to you by increasing the money they receive through council tax payments.

(diagram to be included here from council tax bill leaflet)

Remember, that when you pay your council tax to Ashford Borough Council, we only keep 10p from every £1. We distribute the rest to Kent County Council (73p in every £1), Kent Police and Crime Commissioner (10p), Kent Fire and Rescue Services (5p) and if you live in a parished area, your town or parish council (2p).

We want your views

If you are in receipt of council tax support currently, if you are likely to be affected by the proposed changes, or if you are just interested in the welfare reform agenda (as an individual or as part of your involvement with a charity or other public-serving organisation) we want to know what you think.

Only by asking for your views can we then use your responses to consider the impact of the revised proposals we are setting out. Once we have taken your considered views on board our councillors (at public meetings that you can attend) will then determine the revised localised system that will be formally agreed by 31st January

2017 and will come into effect on 1st April 2017.

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What has been determined so far?

From the outset, back in 2012, the government has said that pensioners must receive similar support to that which they currently receive so that they are not affected by the introduction of council tax support. Therefore, they will not be affected by any of the changes that we are proposing here.

We want to end up with a revised council tax support scheme that minimises the impact of the reduction in government funding on our tenants, residents and the other stakeholders in our borough. It is important that our revised scheme strikes the right balance and that those in receipt of council tax support, other taxpayers and other groups feel that our scheme is as fair as possible.

We feel it is reasonable for us to approach the consultation with some well-informed decisions already having been taken. This is because:

- We have to bear in mind what the scheme is and is not allowed to include
- We feel we should continue to uphold the government's underlying principles in encouraging claimants of working age to return to work
- We have to bear in mind the current situation with public finances and how this affects other organisations that provide services to residents of our borough.

In order to protect Ashford Borough Council against the economic pressures that all councils continue to face we have policies in place that have been pre-agreed through long-term and medium-term financial strategic planning. Reports on our finances are presented to our senior councillors (known as cabinet members) at the monthly cabinet meetings that are open to the public.

Some elements of the revised localised scheme have therefore already been provisionally agreed. **The following points, therefore, are not being considered as part of the consultation** and so cannot be influenced by any comments we receive during the consultation process:

Our strategic thinking

- We agree that we must ask working-age council tax support claimants to contribute an additional sum towards their council tax to make all public services delivered in our borough sustainable
- We will not be significantly increasing our element of council tax to fund this as we are committed to delivering the lowest council tax in Kent
- No other council services will be reduced, as we must preserve those council services that residents have told us they value and want us to provide
- Fees and charges for other services, for example parking, licenses or burials, will not be increased to fund this shortfall

Specific decisions already taken

- We are going to continue to exclude pensioners from the scheme
- We will proudly continue to offer disabled claimants additional support
- While we have considered completely different schemes based on an applicant's or household's total income, a simplified means-tested assessment of all applicants, and considerations for those claimants on what are referred to as 'passport benefits' (through existing entitlement to other

benefits or tax credits), we believe the best and most reasonable way forward is to just revise the existing scheme, which has worked well

- We have considered but agreed to not proceed with taking into account incomes such as child benefit and child maintenance. Across the country, 22 authorities do include these two incomes within an overall income assessment but Ashford Borough Council will continue to disregard them and not take them into account when assessing the income of a household
- The council will set up a hardship fund as part of the revised scheme in order to provide additional support to those who are facing severe financial hardship. Each case will be considered on its own specific circumstances.

The council's proposed revisions

These are the specific proposals that the council is considering revising as part of its council tax support scheme from the financial year 2017-18, and that form the basis of this council tax support consultation.

- Previously, the maximum level that anyone in receipt of council tax support was asked to pay towards their council tax was up to 10% - under the revised scheme they will be asked to pay between 10% and 20%
- Those claimants who live in a property that is classified for council tax as being in Band E, F, G or H will only receive the same support as claimants living in a Band D property
- Those claimants who state they are self-employed will be presumed to be earning the statutory national living wage (NLW) – so their minimum income will be deemed to be the NLW x 35 hours (for full-time self-employed claimants) and the NLW x16 hours (for part-time self-employed claimants)
- Previously, claimants with savings up to £16,000 were eligible for council tax support – the revised scheme states that the maximum amount of savings claimants can have is £6,000
- Those claimants with adult sons/daughters living at home will receive a deduction of £10 per week per non-dependent child

What can still be influenced by those consulted?

The proposed revisions to the council tax support scheme (listed above) are elements of the revised system that have not yet been determined. We are open to being influenced by your responses and will carefully consider your opinions. The consultation questionnaire does ask those who respond to suggest alternative solutions and to express why they disagree with the proposals, so that we can clearly see the thoughts and threads that are put forward.

When we consulted in 2012 about the original council tax support scheme, we did amend the preferred option we consulted on in the light of some of the many considered and constructive comments made by our residents.

Examples

To help you understand how the council's proposed local system for council tax support would work we have made up the following examples.

(Two pages of sample case studies to be produced by Revenues and Benefits and included in the document to illustrate how the proposed changes could affect claimants)

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How to get involved

Between **6th June – 29th August** Ashford Borough Council is asking residents, public-serving organisations and charities who will have an interest in the proposed changes what they think of the council's revised scheme.

To take part in the consultation you need to complete our council tax support questionnaire. This, and the more detailed document, is available at: www.ashford.gov.uk/counciltaxsupport

If you have any further questions please:

- Email counciltaxsupport@ashford.gov.uk
- Phone 01233 331111
- Visit the Civic Centre, Tannery Lane Ashford

Following the consultation

Once the consultation has closed we will evaluate all of the responses we receive and consider them, providing they comment on the elements of the proposed system that have not yet been determined.

We will publish the results of the consultation on our website (via a link on the council tax support web page mentioned above) and anticipate that a report will be reviewed by our cabinet members in November 2016.

Their recommendations will be referred to all of our council members for consideration at our full council meeting in December 2016. The report considered by our elected members will set out clearly what has been taken into account following the consultation and will detail what has changed as a result of your responses.

The final revised system will be explained to residents in the report that is presented to the cabinet meeting, in our residents' e-publication *Ashford Voice* (www.ashford.gov.uk/voice), in our council tenants' magazine *Housing News*, on our website and social media pages, and through the local media.

We believe that we are being open and accountable about the process involved and what the outcomes are.

Difficulty in understanding this leaflet? Need it in Braille, large print or on audio tape? For translations or interpretations please contact us and we will do our best to help.

Telephone: 01233 331111 Email: customer.care@ashford.gov.uk

(Ashford Borough Council logo, line of people from previous consultation literature in 2012)

Appendix C – Equalities Impact Assessment

Scope of the Equality Impact Assessment

A full Equality Impact Assessment will be produced after consultation and will examine the potential effects of each of the changes if any of the options were to be considered by the Council.

Pensioner protection will be achieved by keeping in place national rules, which broadly replicate the current council tax benefit scheme, which existed prior to 1st April 2013.

It is not proposed to affect the protection for the disabled and carers that is currently within the scheme although the entitlement of some disabled people may be effected by changes such as the non-dependency charge, banding cap, and capital limit.

The Council must give consideration to the effects of the options on working age claimants, in particular, vulnerable groups.

Central Government has not been prescriptive in how it does this but points to the Council's existing responsibilities including the Child Poverty Act 2010, the Disabled Person Act 1986 and the Housing Act 1996 as well as the public sector equality duty in section 149 of the Equality Act 2010.

Method of Consultation

The Council will use the following methods to obtain the view of taxpayers.

Stakeholders	Methodology
1. Existing claimants (both working age and pensionable age)	Web based questionnaire Claimants to be directly notified of consultation Hard copy documents to be provided as necessary
2. Council taxpayers and service users generally	Web based questionnaire Hard copy documents to be provided as necessary
3. Interested organisations and groups.	Web based questionnaire Organisations with significant interest to be notified directly Hard copy documents to be provided as necessary
General Awareness	
Provision of information and awareness raising of changes and proposals	News releases Face to face communication at customer service points Information in libraries/surgeries and other public venues The Council's Website and Social Media

Analysis and Assessment

A full analysis and assessment will be made after public consultation when the impact of these changes will be fully modelled and the impacts assessed. Details of responses will also be provided as part of the second stage Equality Impact Assessment.

First Stage – Potential Impacts

Area of impact	Is there evidence of negative, positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
Age	Negative Impact	There may be a reduction in support given to certain working age groups based on the changes. This will be subject of public consultation	<p>The Council will ensure that it operates within a lawful and balanced way. The financial impact on the Council due to the reduction in the grants received from central government require the Council to adopt a local scheme that takes into account the need to protect the most vulnerable in our community and all local taxpayers.</p> <p>The introduction of changes will provide the Council with the opportunity to apply the principles to ensure that the Council meets the public sector equality duty under the Equality Act 2010.</p> <p>The reduction in financial support is necessary to protect the interests of taxpayers in general and to preserve the ability for the provision of key services.</p>	<p>Should any of the proposals be adopted there will need to be safeguards. This will take the following forms:</p> <ul style="list-style-type: none"> • The existing means tested scheme will be maintained and the most support will be given to those on lowest income. • Certain groups will continue to receive additional help under the scheme through the provision of premiums and allowances, e.g. Disability Premium, Severe Disability Premium, Enhanced Disability Premiums etc.; • The Council is proposing the adoption of an exceptional hardship policy which would be available for those claimants in most severe financial need
Disability	Negative Impact	<p>It is not proposed to change the level of contribution for disabled claimants so this element of the scheme will be unchanged from the existing scheme.</p> <p>However if changes are agreed that will limit capital, banding caps, etc there is the potential that this will impact upon the eligibility or entitlement of disabled claimants.</p>	<p>The scheme treats people with disabilities and carers more favourably by disregarding some incomes, resulting in a higher council tax reduction.</p> <ul style="list-style-type: none"> • All claimants (including those with protected characteristics) have received a reduction in their benefit amount. • People with disabilities now receive more per week, on average, than people without disabilities. • Claimants with a carer in the household continue to receive more per week, on average, than claimants without a carer in the household. 	<p>The Council is under no obligation to offer protection to those of working age who are in receipt of any disability benefits.</p> <p>The Council's existing scheme that provides additional premiums to disabled persons limiting the level of contribution to 5%. It is not proposed to alter this at this time</p> <p>All applicants will have access to the exceptional hardship policy should they experience exceptional hardship.</p>

Area of impact	Is there evidence of negative, positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
		This group may tend to have more non-dependents in their household due to their care needs.		
Gender Reassignment	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		
Marriage & Civil Partnership	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		
Pregnancy & Maternity	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		
Race	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		
Religion / Belief	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		
Sex (male or female)	Possibly - Eligibility for council tax support is not based on a person's sex	There is the potential that changes to non-dependants and second adult rebate could effect a greater proportion of female claimants		
Sexual Orientation	No impact – Eligibility not affected by this area	Other than that for working age claimants generally		

Area of impact	Is there evidence of negative, positive or no impact?	Could this lead to adverse impact and if so why?	Can this adverse impact be justified on the grounds of promoting equality of opportunity for one group or any other reason?	Please detail what measures or changes you will put in place to remedy any identified impact (NB: please make sure that you include actions to improve all areas of impact whether negative, neutral or positive)
HR & workforce issues	Not known at this stage		<p>The overall scheme design is similar to the existing scheme and it is not anticipated that the changes included in this consultation will impact on the staffing levels required to administer this discount.</p> <p>The Council will, in any event, monitor the overall impact of work and resource accordingly if the preferred scheme is adopted and undertake a full EQIA screening on the impact of HR workforce issues.</p>	
Human Rights implications if relevant	n/a			