

# **Impact Assessment for Council Tax Support**

## **London Borough of Bromley**

### **Part 1: Description of policy change and its relevance to equality**

**Category of trigger for Impact Assessment:** Re-adoption of existing policy

#### **Background**

Council Tax Benefit (CTB) was abolished on the 01 April 2013. The Local Government Act replaced CTB for working age claimants with a scheme to be designed by the local authority – Council Tax Support (CTS). Funding was no longer demand led, but based on an estimate of Borough caseloads, with an initial overall budget 10% lower than that of CTB. Residents meeting the state pension credit age being eligible for a separate national scheme to "leave them no worse off than they are now".

#### **Reason for review**

Bromley adopted a 2 year scheme in January 2013 for the financial years 2013/14 and 2014/15. The scheme was based on a minimum liability of 8.5% for 2013/14 and 19% for 2014/15. This scheme was retained for 2015/16 before revision to a 25% minimum contribution for 2016/17. It remained at this level for 2017/18 and 2018/19 it is proposed that the minimum contribution remains at 25% for 2019/20

CTS is a local scheme to assist those who are on a low income to meet their Council Tax liability. Individuals apply for CTS and if their income is below a certain level, which takes account of their circumstances, they are eligible for a reduction on their Council Tax bill.

The "generosity" of the scheme has a direct impact on the Authority's finances. Therefore, the cost of the scheme will influence service provision in other areas, reserves and/or the Council Tax level.

#### **Consultation on the scheme for 2019/20**

Views on the retention of the proposed scheme have been sought from the Greater London Authority and a sample of Bromley households. These households included those currently in receipt of CTS as well as those meeting their Council Tax liability from their own means.

## Part 2: Collection of Evidence — what do we know?

### Description of data used

In order to assess the impact of this policy change, Bromley has used information from a variety of different sources including:

- Data collected from records from the Council Tax and Housing Benefit systems;
- Consultation responses – including equality monitoring data;
- Census 2011 first release data;
- Bromley's Budget Strategy & other financial information about the service
- Office for National Statistics (NOMIS)
- Bromley Joint Strategic Needs Assessment 2017

### Financial Information and Impact

The impact of this proposed scheme will affect all working-age claimants from the 1/4/19. For the financial year 2019/20 it is proposed that the maximum amount of assistance available to working-age claimants under the CTS scheme will be unchanged. Calculations have been supplied based on a minimum liability of 25% using the current years (18/19) Council Tax levels.

**Table 1 - Financial Impact of Introduction of Local Scheme**

	<b>2018/19 Liability</b>	<b>2018/19 Maximum assistance Pensionable Age</b>	<b>2018/19 Maximum assistance under proposed CTS (75%)</b>	<b>2018/19 Minimum weekly amount to pay (25%)</b>
<b>Band A - Full Charge</b>	£968.47	£968.47	£726.35	£4.64
<b>Band A - with 25% discount</b>	£726.35	£726.35	£544.76	£3.48

<b>Band B - Full Charge</b>	£1,129.89	£1,129.89	£847.42	£5.42
<b>Band B - with 25% discount</b>	£847.42	£847.42	£635.57	£4.06
<b>Band C - Full Charge</b>	£1,291.30	£1,291.30	£968.48	£6.19
<b>Band C - with 25% discount</b>	£968.48	£968.48	£726.36	£4.64
<b>Band D - Full Charge</b>	£1,452.71	£1,452.71	£1,089.53	£6.97
<b>Band D - with 25% discount</b>	£1,089.53	£1,089.53	£817.15	£5.22
<b>Band E - Full Charge</b>	£1,775.53	£1,775.53	£1,331.65	£8.51
<b>Band E - with 25% discount</b>	£1,331.65	£1,331.65	£998.74	£6.38
<b>Band F - Full Charge</b>	£2,098.36	£2,098.36	£1,573.77	£10.06
<b>Band F - with 25% discount</b>	£1,573.77	£1,573.77	£1,180.33	£7.55
<b>Band G - Full Charge</b>	£2,421.18	£2,421.18	£1,815.89	£11.61
<b>Band G - with 25% discount</b>	£1,815.89	£1,815.89	£1,361.92	£8.71
<b>Band H - Full Charge</b>	£2,905.42	£2,905.42	£2,179.07	£13.93

<b>Band H - with 25% discount</b>	£2,179.07	£2,179.07	£1,634.30	£10.45
---------------------------------------	-----------	-----------	-----------	--------

## Breakdown of current claimants

In order to understand how the proposed changes will impact on different protected groups Bromley has examined data, where available, based on the current benefit caseload. Data is available on the following: age, gender and disability which are noted in Table 2. There is very limited data available on the ethnic breakdown of current claimants as the appropriate section is seldom completed on the application form.

**Table 2 - Breakdown of Current claimants Council Tax Support**

Type	Total	Female	Male	Disabled	Disabled female	Disabled male	DLA/PIP Income
<b>Working age - Passported (equalisation definition)</b>							
Single no child dependant	3246	1668	1578	977	506	471	1674
Single with child dependant	2243	2171	72	177	165	12	665
Couple no child dependant	269	114	155	84	33	51	201
Couple with child dependant	395	209	186	66	24	42	247
<b>Working age - Non Passported</b>							
Single no child dependant	875	479	396	131	71	60	194
Single with child dependant	1186	1137	49	26	26	0	126
Couple no child dependant	119	38	81	26	7	19	54
Couple with child dependant	482	230	252	18	9	9	92
<b>Total Working age</b>	<b>8815</b>	<b>6046</b>	<b>2769</b>	<b>1505</b>	<b>841</b>	<b>664</b>	<b>3253</b>
Pensioner- Passported	3889	2609	1280	1083	798	285	736
Pensioner- Non Passported	2022	1122	900	470	273	197	243
<b>Total Pensioner</b>	<b>5911</b>	<b>3731</b>	<b>2180</b>	<b>1553</b>	<b>1071</b>	<b>482</b>	<b>979</b>
<b>Overall Total</b>	<b>14726</b>	<b>9777</b>	<b>4949</b>	<b>3058</b>	<b>1912</b>	<b>1146</b>	<b>4232</b>

The table below provides some additional evidence by protected characteristic that has been used to complete this EIA.

Protected Characteristic	Evidence																																																							
Age	<p>Please see table 2 for detailed breakdown</p> <p>8,815 (59.86%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on Oct 2018 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 3429 (39%) of current working-age claimants are single parent families with child dependents</p>																																																							
Disability	<p style="text-align: center;"><b>Bromley's population</b></p> <p>The following table shows the number and percentage of working-age residents in receipt of benefits, including those related to sickness and Disability (latest identified data – November 2016).</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: center;">Brom (numbers)</th> <th style="text-align: center;">Brom (%)</th> <th style="text-align: center;">London (%)</th> <th style="text-align: center;">Gt Bri (%)</th> </tr> </thead> <tbody> <tr> <td>Total claimants</td> <td style="text-align: center;">16,520</td> <td style="text-align: center;">8.1</td> <td style="text-align: center;">9.3</td> <td style="text-align: center;">11.0</td> </tr> <tr> <td colspan="5" style="text-align: center;"><b>By statistical group</b></td> </tr> <tr> <td>Job seekers</td> <td style="text-align: center;">1,740</td> <td style="text-align: center;">0.9</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">1.1</td> </tr> <tr> <td>ESA and incapacity benefits</td> <td style="text-align: center;">8,270</td> <td style="text-align: center;">4.1</td> <td style="text-align: center;">4.8</td> <td style="text-align: center;">6.1</td> </tr> <tr> <td>Lone parents</td> <td style="text-align: center;">1,920</td> <td style="text-align: center;">0.9</td> <td style="text-align: center;">1.0</td> <td style="text-align: center;">1.0</td> </tr> <tr> <td>Carers</td> <td style="text-align: center;">2,400</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">1.3</td> <td style="text-align: center;">1.7</td> </tr> <tr> <td>Others on income related benefits</td> <td style="text-align: center;">240</td> <td style="text-align: center;">0.1</td> <td style="text-align: center;">0.2</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td>Disabled</td> <td style="text-align: center;">1,590</td> <td style="text-align: center;">0.8</td> <td style="text-align: center;">0.7</td> <td style="text-align: center;">0.8</td> </tr> <tr> <td>Bereaved</td> <td style="text-align: center;">350</td> <td style="text-align: center;">0.2</td> <td style="text-align: center;">0.1</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td>Key out-of-work benefits'</td> <td style="text-align: center;">12,180</td> <td style="text-align: center;">6.0</td> <td style="text-align: center;">7.2</td> <td style="text-align: center;">8.4</td> </tr> </tbody> </table> <p>Source: DWP benefit claimants - working age client group</p> <p>Key out-of-work benefits include the groups: job seekers, ESA and incapacity benefits parents and others on income related benefits.  Note: % is a proportion of resident population of area aged 16-64. Figures do not yet include Universal Credit</p> <p style="text-align: center;"><b>Breakdown of current claimants</b></p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <ul style="list-style-type: none"> <li>• 1505 (17.1%) of current claimants below pension credit age have declared a disability</li> <li>• 3253 (36.9%) are receiving DLA/PIP</li> </ul>		Brom (numbers)	Brom (%)	London (%)	Gt Bri (%)	Total claimants	16,520	8.1	9.3	11.0	<b>By statistical group</b>					Job seekers	1,740	0.9	1.2	1.1	ESA and incapacity benefits	8,270	4.1	4.8	6.1	Lone parents	1,920	0.9	1.0	1.0	Carers	2,400	1.2	1.3	1.7	Others on income related benefits	240	0.1	0.2	0.2	Disabled	1,590	0.8	0.7	0.8	Bereaved	350	0.2	0.1	0.2	Key out-of-work benefits'	12,180	6.0	7.2	8.4
	Brom (numbers)	Brom (%)	London (%)	Gt Bri (%)																																																				
Total claimants	16,520	8.1	9.3	11.0																																																				
<b>By statistical group</b>																																																								
Job seekers	1,740	0.9	1.2	1.1																																																				
ESA and incapacity benefits	8,270	4.1	4.8	6.1																																																				
Lone parents	1,920	0.9	1.0	1.0																																																				
Carers	2,400	1.2	1.3	1.7																																																				
Others on income related benefits	240	0.1	0.2	0.2																																																				
Disabled	1,590	0.8	0.7	0.8																																																				
Bereaved	350	0.2	0.1	0.2																																																				
Key out-of-work benefits'	12,180	6.0	7.2	8.4																																																				
Sex	<p style="text-align: center;"><b>Bromley population</b></p> <p>According to nomis official labour market stats Bromley's population (2015) is 51.95% female and 48.05% male</p> <p style="text-align: center;"><b>Breakdown of current claimants</b></p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <p style="text-align: center;">68.59% of current claimants under pensionable age are female</p> <p style="text-align: center;">Indicates that women are over represented amongst our CTS claimants</p>																																																							

Gender reassignment	The Council does not anticipate this policy will have a particular equality impact on this protected group.
Pregnancy & Maternity	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Race	<p style="text-align: center;"><b>Bromley population - Current claimants</b></p> <p>As advised earlier, there is very limited data available on the ethnic breakdown of the current claimants as only a few complete the non-mandatory section of the form.</p> <p style="text-align: center;"><b>Borough wide information</b></p> <p>The 2017 GLA population projection estimates show that 19% of its population is made up of black and minority (BME) groups. This percentage does not include Gypsy Travellers, Bromley has a large settled Gypsy Traveller community living in “brick and mortar” concentrated chiefly in the Crays.</p>
Religion & Belief	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Civil Partnerships & Marriage	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Sexual Orientation	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.

### Part 3 - Analyse of evidence and description of the impact

Characteristic	Actual or likely impacts (negative/positive/no impact) and justification	Actions to be taken to mitigate potential negative impacts (include name of lead and estimated date of completion)
Age	<p>Neutral impact for pension age claimants as the Government has stipulated this group must have their claims assessed as they are now.</p> <p>Given the large number of CTS claimants that are single parent families with dependent children increases in the minimum contribution would have a negative impact on levels of child poverty. It is not possible to evaluate the scale of this impact.</p>	<p>It is proposed a hardship fund be retained for those faced with exceptional circumstances. It is further planned to retain all aspects of the current CTS scheme that provides assistance by way of disregards of income and increased allowances.</p> <p>The Council will monitor the impact on this Client group through monitoring of communications, complaints, appeals, request for discretionary awards</p> <p><b>Responsible Officer(s)</b> Welfare Reform Manager &amp; Head of Revenues &amp; Benefits —</p>

		Monitoring to be ongoing
Disability	<p>Any increased level of 'contribution' will have a negative impact on current and future disabled CTS claimants as working age claimants will have to pay more towards their council tax bill.</p>	<p>The proposed Council Tax Support scheme allows for the complete disregard of certain income types such as Disability Living Allowance/PIP and the award of Disability premiums in the benefit calculation. These will be retained to mitigate the impact on those who are disabled. The planned continuation of the hardship scheme for those faced with exceptional circumstances will further alleviate any impact on the disabled.</p> <p><b>Responsible Officer(s)</b> Welfare Reform Manager &amp; Head of Revenues &amp; Benefits — Monitoring to be ongoing</p>
Sex	<p>Females are disproportionately represented amongst current CTS claimants.</p> <p>Any reduction in the level of assistance given would have a negative impact on current and future working age CTS claimants (regardless of gender) as claimants would have to contribute more towards their council tax bill than they have had previously.</p> <p>Although any change in the scheme would be applied universally (i.e. men and women would face the same reduction in CTS) our evidence makes clear that a greater proportion of current CTS claimants are women and therefore as a protected group women would feel the impact of any change in greater numbers.</p>	<p>Monitoring of the impact on women who claim Council Tax Support will continue. In order to mitigate impact it is proposed that the scheme retains the income disregards and allowances that are predominately received by females for example allowances in respect of child care costs. The planned continuation of the hardship scheme will provide a further safeguard for those faced with exceptional circumstances.</p> <p><b>Responsible Officer(s)</b> Head of Revenues &amp; Benefits — Monitoring to be ongoing</p>
Gender reassignment	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Pregnancy & Maternity	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	



Race	Any reduction in the level of assistance provided would have a negative impact on current and future CTS claimants (regardless of race) as some claimants will have to contribute more towards their council tax bill than they have had previously. There is very limited evidence available to quantify if there will be a differential impact on the different ethnicities.	In order to mitigate any adverse impact is proposed that a hardship fund is retained for those faced with exceptional circumstances.  <b>Responsible Officer(s)</b> Head of Revenues & Benefits — Monitoring to be ongoing.
	There is evidence to indicate that BME communities are more likely to be unemployed or in lower paid employment and, therefore, possibly more reliant on CTS. However, there is insufficient evidence on current claimants to demonstrate this is in fact the case in Bromley.	
Religion & Belief	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Civil Partnerships & Marriage	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Sexual Orientation	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	

### Part 5 — Completion and authorisation

<b>Officer completing assessment</b>	John Nightingale, Head of Revenues and Benefits
<b>EIA completed</b>	20/10/18
<b>Officer responsible for monitoring impact</b>	John Nightingale
<b>Date EIA is scheduled to be reviewed</b>	November 2019

**GREATER LONDON AUTHORITY**  
RESOURCES GROUP FINANCE

City Hall  
The Queen's Walk  
More London  
London SE1 2AA  
Switchboard: 020 7983 4000  
Minicom: 020 7983 4458  
Web: [www.london.gov.uk](http://www.london.gov.uk)

John Nightingale  
Head of Revenues and Benefits  
London Borough of Bromley  
Civic Centre,  
Stockwell Close  
Bromley  
BR1 3UH

**Our ref:** CTS  
**Your ref:**  
**Date:** 8 October 2018

Dear John

**LONDON BOROUGH OF BROMLEY COUNCIL TAX SUPPORT SCHEME 2019-20  
RESPONSE TO CONSULTATION**

Thank you for your letter of 25 July informing the GLA about the Council's consultation on proposals for the draft council tax support (CTS) scheme for 2019-20. The GLA notes that the Borough wishes to retain the current level of minimum contribution paid by working age council tax support recipients. This letter sets out the GLA's response to the key issues raised in the consultation.

**Introduction**

As in previous years, the GLA recognises that the determination of council tax support schemes under the provisions of the Local Government Finance Act 2012 are a local matter for each London borough. Individual schemes need to be developed which have regard to specific local circumstances, both in respect of the potential impact of any scheme on working age claimants (particularly vulnerable groups) and, more generally, the financial impact on the council and local council tax payers – and therefore the final policies adopted may, for legitimate reasons, differ across the capital's 33 billing authorities.

This fact notwithstanding the GLA also shares in the risks and potential shortfalls arising from the impact of council tax benefit localisation in proportion to its share of the council tax in each London billing authority. It is therefore important that we are engaged in the scheme development process and have an understanding of both the factors which have been taken into account by boroughs in framing their proposals, as well as the data and underlying assumptions used to determine any forecast shortfalls which will inform the final scheme design.

**Framing Proposals**

As part of the introduction of council tax support in 2013-14, the Government set out its expectation that, in developing their scheme proposals, billing authorities should ensure that:

- Pensioners see no change in their current level of awards whether they are existing or new claimants;
- They consider extending support or protection to other vulnerable groups; and

- Local schemes should support work incentives and, in particular, avoid disincentives to move into work.

The GLA concurs with those general broad principles and would encourage all billing authorities in London to have regard to them in framing their schemes.

#### **Proposed 2019-20 Scheme**

Under Bromley's current 2018-19 scheme, the maximum level of CTS available to working age claimants is 75% of their council tax liability, after any other discounts or exemptions. The Council is consulting on maintaining this level of support, whilst continuing to uprate benefit levels in line with changes to Housing Benefit, including the level of non-dependant deductions.

The GLA notes if the minimum level of contribution was to be lowered, the Council states there would be a financial cost to the council which would have to be met through council tax increases, reduce spending or the use of reserves.

The Council currently operates a hardship scheme to provide additional support to residents who are experiencing exceptional financial hardship and are unable to pay their council tax. An allocation of £100,000 is made available for the fund. The consultation seeks views on whether the hardship scheme should be retained and whether the current level of funding remains correct.

The proposal to maintain the minimum contribution at 25% is in line with several other schemes in London. However, the Council's scheme remains amongst the schemes that require the highest level of contribution from working age claimants. In total, 5 of 33 billing authorities in London require a minimum contribution of 25%, with an additional 3 requiring a higher minimum contribution level.

The GLA welcomes the proposal to continue to make a hardship fund available at the same level as previous years. We would encourage the Council to take a proactive approach to informing those council tax support claimants who are facing difficulties paying council tax bills about this policy.

Notwithstanding the above comments and recognising that the proposed scheme is in accordance with the general principles set out by Government (as listed above), the GLA is content to endorse the broad approach taken by Bromley.

It is however the GLA's view that the proposed changes should be considered in the whole. If one proposed change results in greater savings for the Council that could be used to reduce the need to apply other proposals, then we would encourage the Council to consider doing this as it would help to reduce the financial burden on individuals and families in Bromley who see their Council Tax Support entitlement reduced.

The GLA considers that, before finalising their 2019-20 schemes, all billing authorities should re-examine the challenges which they will face in collecting relatively small sums of money from claimants on low incomes, who may not be able to pay by direct debit or other automatic payment mechanisms, based on their experiences in the first five years of the localised system. In some cases, the administrative costs of enforcing such payments may outweigh the cost saved by reducing support.

### **Financial Implications of the Proposed 2019-20 Scheme**

It would be helpful for the GLA's planning purposes if Bromley could provide us with a forecast total cost for the proposed scheme in 2019-20, based on the forecast 2018-19 caseload, taking into account any developments since the public consultation was launched – ideally apportioning all elements between the GLA and the council having regard to 2018-19 council tax shares. This would also allow the GLA to calculate its share of the cost of the scheme proposed by Bromley.

### **Technical Reforms to Council Tax**

The GLA considers that in formulating its council tax support scheme each billing authority should both consider and address the impact of the additional revenue it is expecting to raise from the technical reforms to council tax introduced in the Local Government Finance Act 2012, which provide greater flexibility in relation to discounts, exemptions and premiums for second and empty homes. The additional revenues from the technical reforms could be used to reduce any shortfalls and thus have a bearing on the overall minimum contribution level for council tax support claimants.

The GLA understands that, in 2018-19, Bromley has the following policies in place:

- For properties requiring or undergoing major repairs or structural alterations (former class A): a 0% discount
- For properties unoccupied and substantially unfurnished (former class C): a 0% discount
- Second homes: 0% discount
- Long-term empty properties: It is not clear from the information on Bromley's website whether a premium is charged on properties that have been unoccupied and substantially unfurnished for a continuous period of two years.

The Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Bill is currently progressing through its legislative stages in Parliament and is expected to receive Royal Assent before the end of 2018. It is expected that the Bill will become law in time to enable councils from April 2019 to charge 100% premiums on properties which have been empty for more than two years. The legislation, as currently amended, will also give councils the ability to charge higher premiums in subsequent years for properties which have been empty for longer periods of time.

The legislation as currently amended will also give councils the ability to charge higher premiums in subsequent years for properties which have been empty for longer periods of time. Again, the GLA would encourage councils to take into account potential additional revenues from these reforms when considering the detail of council tax support schemes.

We would encourage the council to inform us as soon as possible if any changes are proposed to its discount and premium policies, in order to assist us in assessing the potential impact on the Mayor's funding and tax base for 2019-20 and future years.

### **Council Tax Protocol**

In recent years the issue of council tax collection practices has become more high profile. The GLA, of course, recognises the importance of ensuring council tax arrears are collected wherever possible. However, in some instances poor collection practices can worsen debt problems for vulnerable residents.

Citizens Advice, in partnership with the Local Government Association, has developed a council tax protocol<sup>1</sup>, which outlines a number of practical steps for early intervention to support people struggling with payments. In summary, the Protocol asks that councils:

- work with enforcement and advice agencies to help people pay their council tax bills while accessing debt advice;
- ensure all communication with residents about council tax is clear;
- use the Standard Financial Statement when calculating repayment plans;
- offer flexible payment arrangements to residents;
- do not use enforcement agents where a resident receives council tax support;
- publish their policy on residents in vulnerable circumstances

In London, eight boroughs have now signed up to the protocol and the GLA would encourage all boroughs to consider adopting the protocol.

### **Providing Information on Schemes**

Whilst we recognise that the detailed rules on council tax support schemes are inevitably complex, the GLA would encourage all boroughs to make every effort to set out information on their schemes as clearly as possible. Information that may help potential claimants could include an online calculator, to identify whether potential claimants are likely to be entitled to support, as well as 'Frequently Asked Questions' and a summary document outlining concise details of the scheme. In addition, for existing claimants, we would encourage boroughs to consider how the process for reporting changes in circumstances can be made as straightforward as possible.

### **Setting the Council Tax Base for 2019-20 and Assumptions in Relation to Collection Rates**

The council will be required to set a council tax base for 2019-20 taking into account the potential impact of the discounts the Council may introduce in respect of council tax support and any potential changes the Council may implement regarding the changes to the treatment of second and empty homes.

The Council will need to make a judgement as to the forecast collection rates from those claimants and council taxpayers affected by any changes to council tax support, taking into account the experience in the first six years of the council tax support arrangements.

The GLA would encourage the council to provide it with an indicative council tax base forecast as soon as options are presented to members for approval, in order that it can assess the potential implications for the Mayor's budget for police, fire and other services for 2019-20. This should ideally be accompanied by supporting calculations disclosing any assumptions around collection rates and discounts granted having regard to the final council tax support scheme design.

### **Collection Fund and Precept Payments**

By 23 January 2019 the council is required to notify the GLA of its forecast collection fund surplus or deficit for 2018-19, which will reflect the cumulative impact of the first six years of the localisation of council tax support. The GLA would encourage the council to provide it with this information as soon as it is available.

---

<sup>1</sup><https://www.citizensadvice.org.uk/Global/CitizensAdvice/campaigns/Council%20Tax/Citizens%20Advice%20Council%20Tax%20Protocol%202017.pdf>

I would like to thank you again for consulting the GLA on your proposed council tax support options for 2019-20.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin Mitchell', written in a cursive style.

**Martin Mitchell**  
Finance Manager

London Borough of Bromley

Council Tax Reduction – Consultation Report

23<sup>rd</sup> October 2018

## 1. Details of Recommendations

The council is asked to agree the following:

- 1.1 To note the proposed Council Tax Reduction Scheme for Bromley residents is to come into effect from 1st April 2019.
- 1.2 To note the outcome of the consultation exercise undertaken with regard to the proposed scheme.
- 1.3 To note the findings on equalities and other impacts arising from the proposed Scheme.
- 1.4 To approve the local Council Tax Reduction Scheme for Bromley at Full Council on 10 December 2018. A consultation exercise was undertaken to seek resident's views as to whether to continue to grant Council Tax Reduction for working-age claimants at a maximum of 75% of Council Tax liability.

## 2. Report Summary

The Welfare Reform Act 2012 abolished the previous system of Council Tax Benefit with effect from 31<sup>st</sup> March 2013. Its replacement, Localised Support for Council Tax, was introduced from 1<sup>st</sup> April 2013 through Council Tax Reduction.

Bromley formally approved a scheme limiting increases to 8.5% of Council Tax liability for 2013/14, rising to 19% in 2014/15 and 25% for 2016/17, 2017/18 and 2018/19.

This report is to approve the new scheme, this will be required to be formally approved at full council on 10<sup>th</sup> December 2018 for the next financial year commencing 1<sup>st</sup> April 2019.

The proposal is to retain the scheme rules from 2018/19 for the financial year 2019/20 and continue to grant Council Tax Reduction under the scheme to a maximum of 75% of Council Tax liability.

This reports sets out:

The background to the design of a local scheme of Council Tax Reduction for 2018/19 for the London Borough of Bromley and details of the interaction with legislation and guidance supplied by the Department of Communities and Local Government (DCLG).

Details the proposed scheme of Council Tax Reduction for Bromley, recognising that the matter is one which will need to be approved by full Council.

Details of the consultation exercise undertaken on the proposed Council Tax Reduction Scheme during a period from 30<sup>th</sup> August 2018 until 14<sup>th</sup> October 2018.



The financial implications of the proposed scheme for Council Tax Reduction for the residents of Bromley and risks associated with the design of a local scheme.

### **3. Reason for Decision and Options Considered**

The Welfare Reform Act 2012 abolished the existing system of Council Tax Benefit with effect from 31<sup>st</sup> March 2013. Its replacement, Localised Support for Council Tax was introduced from 1<sup>st</sup> April 2013 and was contained within the Local Government Finance Act which received Royal Assent on 31<sup>st</sup> October 2012

There are a number of key differences between the two schemes of assistance with Council tax liabilities. These include the fact that responsibility has changed from the Department of Work and Pensions (DWP) to the Department for Communities and Local Government (DCLG).

In addition the funding regime changed from being demand-led Annual Managed Expenditure (AME).

While Bromley was able to design its own scheme to support working age applicants, the Government desire to protect those of state pension credit age resulted in centrally provided legislation covering those in this group.

These Prescribed Regulations introduced a Statutory Scheme, similar to the previous Council Tax Benefit scheme, for those of pensionable age and also maintain previous provisions with regard to limiting entitlement to those classed as Persons from Abroad and deal with minor administrative issues. These provisions are replicated for 2019/20 subject to any legislative amendments that may be imposed by Central Government.

Once a local Council Tax Reduction scheme has been made by the Council, it cannot be revised for at least one financial year. A Billing Authority must however *consider* whether to revise or replace its scheme with another one on an annual basis.

Any revision to a scheme must be made by the Council by the 31<sup>st</sup> January immediately preceding the financial year in which it is to take effect and will require consultation arrangements to be applied. Additionally, consideration must be given to providing transitional protection where the support is to be reduced or removed.

### 3. Key Implications

The proposed Council Tax Reduction scheme for Bromley for 2019/20 has been established with due regard to the Council's statutory obligations, consultation responses and in order to attempt to distribute the reduced funding available amongst those claimants most in need of financial assistance, while still achieving the necessary financial savings to meet the funding deficit.

Bromley again proposes to follow the DCLG Prescribed Scheme for those who have reached pensionable age, ensuring that they are protected from the effects of the funding reduction and continue to receive assistance with their Council Tax liability as now.

It is intended that the working age scheme will continue to be based on the rules introduced for 2013/14. This largely mirrored the previous Council Tax Benefit scheme with the exception of protecting the level of support relevant classes of individual's receive. This adjustment was required in order to pass on the reduction in funding received.

The outline principles for the Bromley working age Council Tax Reduction (CTR) scheme for 2019/20 are:

- All working age customers will have to make some payment towards their council tax as the maximum help under the Council Tax Reduction scheme available for residents of London Borough of Bromley will be limited to 75% of the charge.
- The scheme will be reviewed annually.
- Non-dependant deductions will be aligned with any increase supplied by DCLG in the Prescribed Requirement Regulations updates and will be in line with the pensioner claims.
- Applicable amounts will be up-rated or frozen in line with Housing Benefits for working age claimants.

The scheme will also be adapted to meet any further legislative requirements imposed by DCLG and consideration will be given as to how to determine income from benefits established under the Welfare Reform Act 2012.

#### **Other requirements**

A number of other scheme principles introduced in 2013/14 will be carried forward to 2019/20;

- New customers will be required to complete an application form for all new claims from 1 April 2019, existing awards under the 2018/19 scheme will continue in payment, where entitlement remains.
- The scheme allows for a review period. The period will be agreed and failure by the customer to provide details requested may mean their entitlement to CTS is ended.

- Any award or adjustment will be confirmed in the council tax bill but the bill itself will not be formal notification and a separate notification of entitlement will be supplied.
- Where awarded the notification letter will also:
  - a) inform the applicant that there is a duty to notify the authority of the relevant change in circumstances
  - b) explain the possible consequences (including prosecution) of failing to comply with that duty; and
  - c) set out the circumstances in which a change of circumstances might affect entitlement
- Any “overpayments” of CTR will be reclaimed by recovery through the council tax billing process
- Where an applicant is aggrieved about a decision regarding entitlement they may appeal under Section 16 of the Local Government Finance Act 1992.
- A person may only appeal to the Valuation Tribunal where:
  - a) They are notified in writing by the authority that it believes the grievance is not well founded, but they are still aggrieved;
  - b) They are notified in writing that steps have been taken to deal with the grievance, but they are still aggrieved; or
  - c) The period of two months, beginning with the date of service of their notice being ended, has elapsed and they have not received notification under paragraph a) or b) above.

### **Level of Entitlement**

Bromley made a decision, for the 2018/19 scheme, to pass on a maximum of 25% of the cost (resulting in a maximum entitlement, for working age claimants, of 75% of their liability).

The proposal for 2019/20 is to continue with this level of support and limit working age recipients to 75% of their council tax liability.

## **4. Financial Details**

### **Financial Impact On The Budget (Mandatory)**

#### **Costs of 2019/20 Scheme**

Specific central government grant levels for Council Tax Reduction now form part of the overall Revenue Support Grant and are not therefore distinguishable.

## 5. Equalities, Human Rights and Community Cohesion

### Equality Impact Assessment

The Council has to give due regard to its Equalities Duties, in particular with respect to general duties arising pursuant to the Equality Act 2010, section 149. Having due regard to the need to advance equality involves, in particular, to the need to remove or minimize disadvantages suffered by persons who share a relevant characteristic that are connected to that characteristic.

The Council's tax system is programmed to identify all Council Tax Reduction accounts. The Council keeps under review the impact of the revised Council Tax Reduction Scheme and has found no evidence to indicate that any equalities protected groups have been disproportionately affected by the operation of the scheme.

Specific regard has also been paid to the guidance provided by DCLG which will also provide mitigation to minimise disadvantage to those most likely to experience disadvantage.

The previous Equalities Analysis has been updated to reflect the options proposed in the consultation exercise. This can be found as enclosure 1 to the Executive Report entitled "Council Tax Support/Reduction scheme 2018/19". For information, the document is on the Council's website via the URL link below:

[www.bromley.gov.uk/CouncilTaxSupport](http://www.bromley.gov.uk/CouncilTaxSupport)

### Incentivising Work

It is again intended that Bromley will incentivise work by continuing the disregards of weekly income currently offered which are dependent upon the applicant's status:

- Lone parent £25 per week
- Disabled individual or carer £20 per week
- Single person £5 per week and Couple £10 per week

Where the applicant pays child care costs in order to achieve employment an additional weekly disregard of up to £175 (for 1 child) or £300 (for 2 or more children) from earnings will apply subject to the circumstances of the applicant and age of the child.

Where the applicant works in excess of 30 hours per week a further disregard of at least £17.10 will apply.

Customers who have been out of work, and receiving an appropriate benefit for 26 weeks, will receive an Extended Payment of Council Tax Reduction, at the same rate as they received when out of work, for the first 4 weeks of their new employment.

### Child Poverty

It is intended that Child Benefit and Guardian's Allowance will be disregarded as income types during the means tested assessment of Council Tax Reduction.

Access to relevant dependants allowances and family premiums within the applicable amount calculation will continue where applicants have responsibility for children and have been continuously in receipt of CTR since prior to 1<sup>st</sup> April 2016.

#### Armed Forces

Income derived from war widow's/widower's pensions, war disablement pensions or Guaranteed Income Payments from the Armed Forces/Reserve Forces Compensation Fund will be fully disregarded during the means tested assessment of Council Tax Reduction, whether for working or pensionable age applicants.

#### Disabled Applicants

Income derived from Disability Living Allowance or its replacement (Personal Independence Payments) and Attendance Allowance will be fully disregarded but receipt of such benefits will allow access to premiums within the applicable amount calculation.

There will be no non-dependant deduction taken as a result of the claimant or partner receiving Disability Living Allowance (care component), Attendance Allowance, the daily living component of PIP or where the claimant or partner is registered blind.

## **6. Consultation**

A public consultation exercise was undertaken for the 18/19 Council Tax Reduction Scheme during a period from 30<sup>th</sup> August 2018 until 14<sup>th</sup> October 2018.

The survey was available through a variety of channels:

- A link was available on the Bromley website
- A paper copy was issued to 2,000 households comprising of a mix of CTR recipients and non CTR recipients (1,000 households not in receipt of CTR, 500 recipients of working age and 500 recipients of pensionable age)
- A paper flyer enclosed with all Council Tax Bills issued during this period advising of the link on the website.

In total there were 211 responses received with the majority, 173, being by post and 38 via the website.

Supplementary questions were asked, for monitoring purposes, to determine whether respondents were currently in receipt of Council Tax Reduction or were completing the consultation on behalf of a representative body.

Of those who chose to respond to these questions, 45% stated that they were not currently in receipt of CTR.

The consultation exercise was based on 6 simple questions to residents of the Borough, 3 of which required specific responses with the remaining 2 being less direct and allowing a degree of free text response.

Of those that were specific, they sought responses in respect of:

**Q1: Whether it was agreeable to maintain the level of assistance at 75%**

**Q2: If LBB were to increase the level of support, how should this be funded?**

**Q3: Whether there should be a hardship fund available and whether the sum of £100,000 was reasonable.**

Standard Equality and Diversity questions were also asked but it was made clear that providing this information was voluntary.

## 7. Outcomes.

Details of the full consultation question and analysis responses, both overall and broken down, are detailed below.

### Question 1

**Q1** The current maximum level of support for working-age claimants is 75% of the household's Council Tax liability after any discounts or exemptions have been applied. This would require working age claimants to pay a minimum of 25% of their liability.

	Yes	No
<b>Please confirm whether you:</b>		
<b>a. Agree with maintaining the assistance at 75%</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>b. If NO do you think Council Tax Support claimants should;</b>		
<b>Pay more Council Tax e.g. receive less support</b>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pay less Council Tax e.g. receive more support to</b>	<input type="checkbox"/>	<input type="checkbox"/>

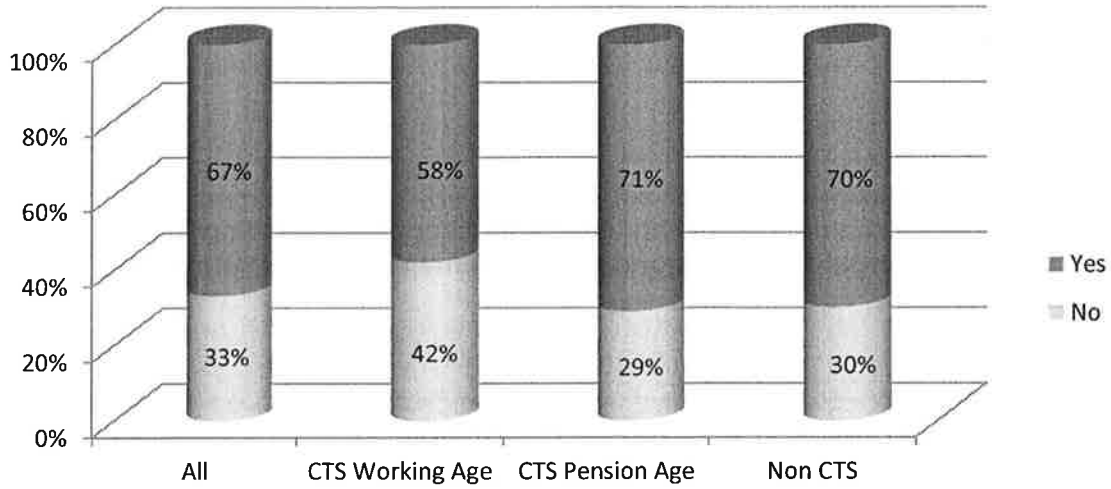
**If you disagree with maintaining assistance for working-age claimants at 75%, please state why:**

.....

### Overall response.

Of those who responded the *overall* outcome was that they wished to keep the scheme the same with 67% confirming this to be their preference. This was a lower percentage when this question was asked last year as in 2018/19 it was 68%. The responses were weighted in favour of keeping support at this level irrespective of whether the respondent was in receipt of Council Tax Reduction or not.

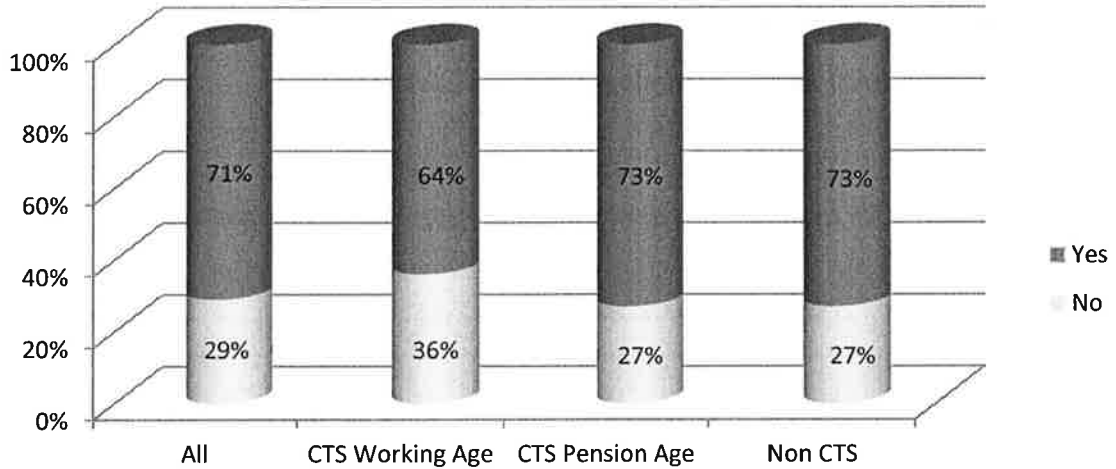
**Total Respondents: Do you agree with maintaining Council Tax Support at 75% for working age claimants?**



**Analysis of Respondents by Survey Type.**

Of the postal responses received, overall 71% were in favour of retaining the level of support at a maximum of 75%. Again the result was irrespective of whether they were in receipt of Council Tax Reduction or not.

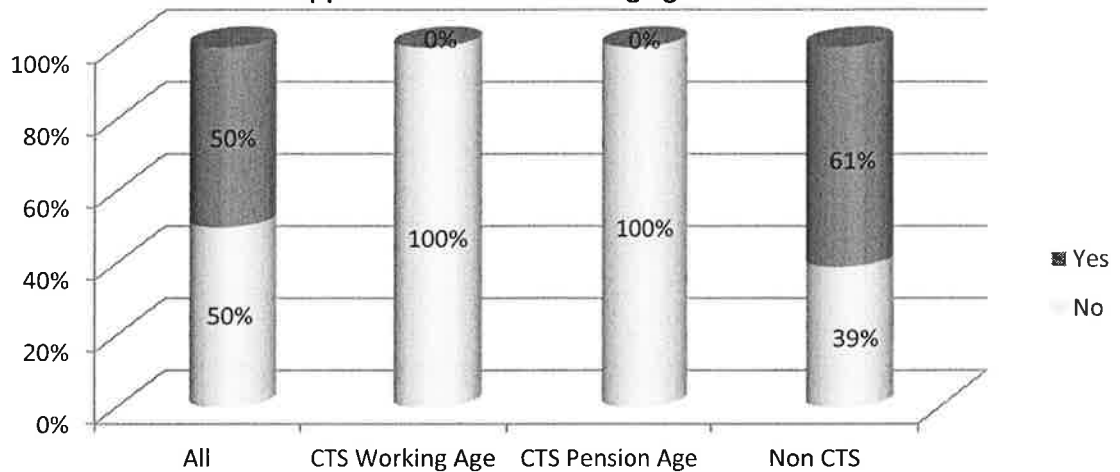
**Postal Respondents: Do you agree with maintaining Council Tax Support at 75% for working age claimants?**





For on-line there was a split for all respondents overall and this included both working age and pension age stating they don't agree with paying 25%, although the number of CTS working and pensioner age accounted for only 6 replies. However for non CTS claimants a similar situation was recorded with those who completed the survey on-line.

**On-line Respondents: Do you agree with maintaining Council Tax Support at 75% for working age claimants?**

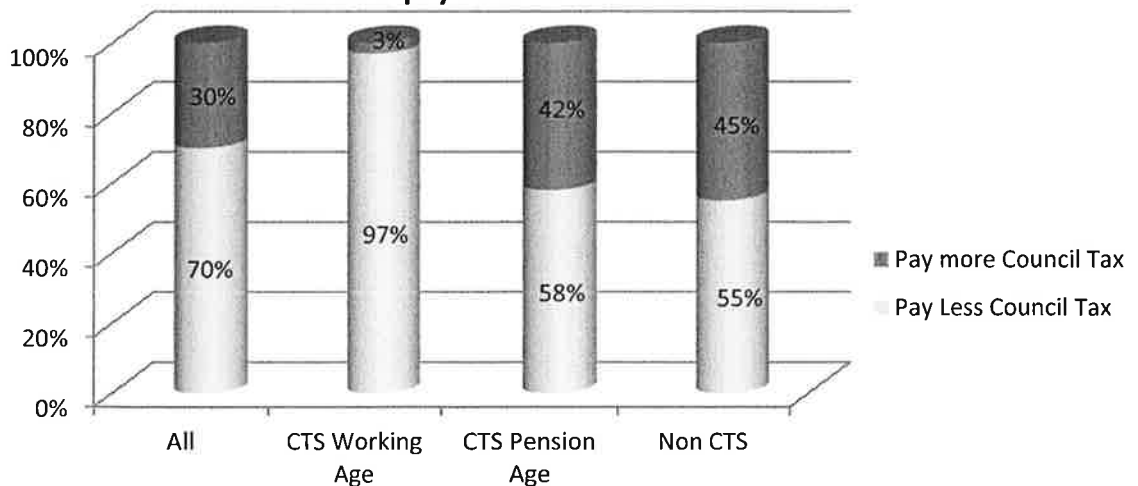


**Question 1b.**

**Overall response.**

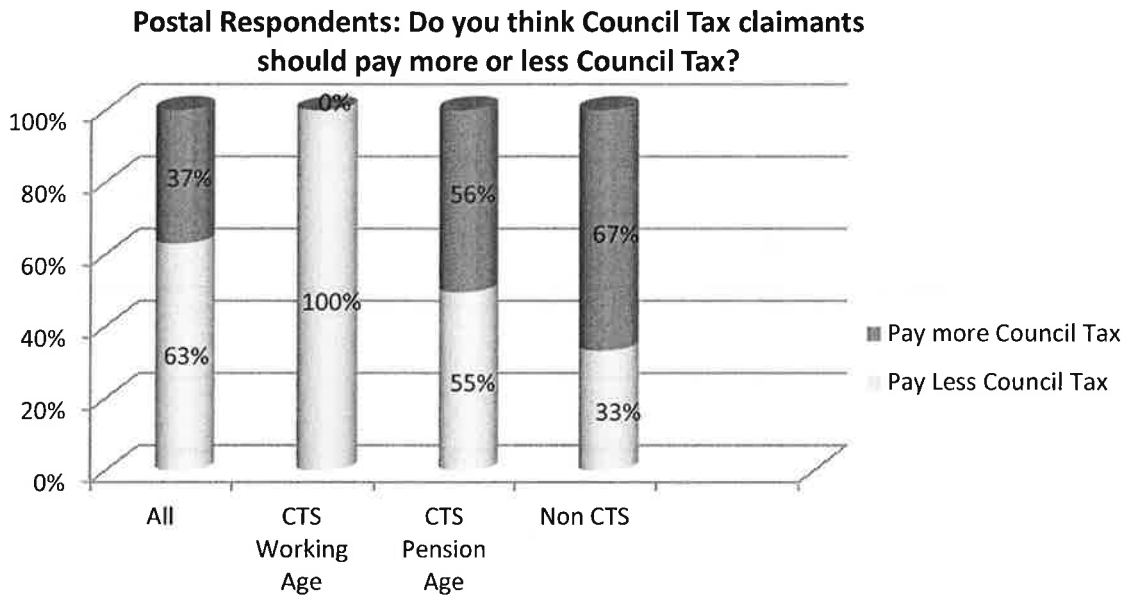
Of those who responded to state that they believe assistance should not be maintained at 75%, the *overall* outcome was that they wished to increase the level of support thereby decreasing the levels of Council Tax which recipients would need to pay.

**Total Respondents: Do you think Council Tax Support claimants should pay more or less Council Tax?**

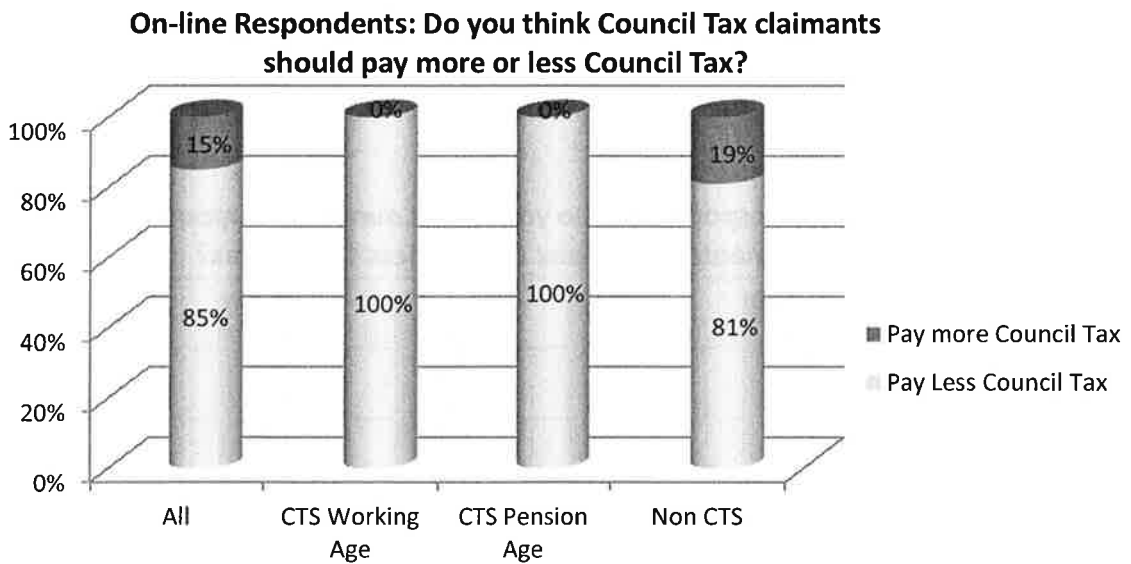


### Analysis of Respondents by Survey Type.

Of the postal responses received, overall 63% were in favour of Council Tax Reduction claimants receiving more support and paying less Council Tax. However, this was not supported by the majority of respondents not currently in receipt of support.



Of the on-line responses received, overall 85% were in favour of Council Tax Reduction claimants receiving more support and paying less Council Tax.



**Question 2.**

**Q2 If you think that Council should increase the level of assistance for working-age people from 75%, how do you think this should be funded? In particular, should the Council increase Council Tax or cut other Council services or use the Council reserves, or all three?**

Please choose any of these that apply:

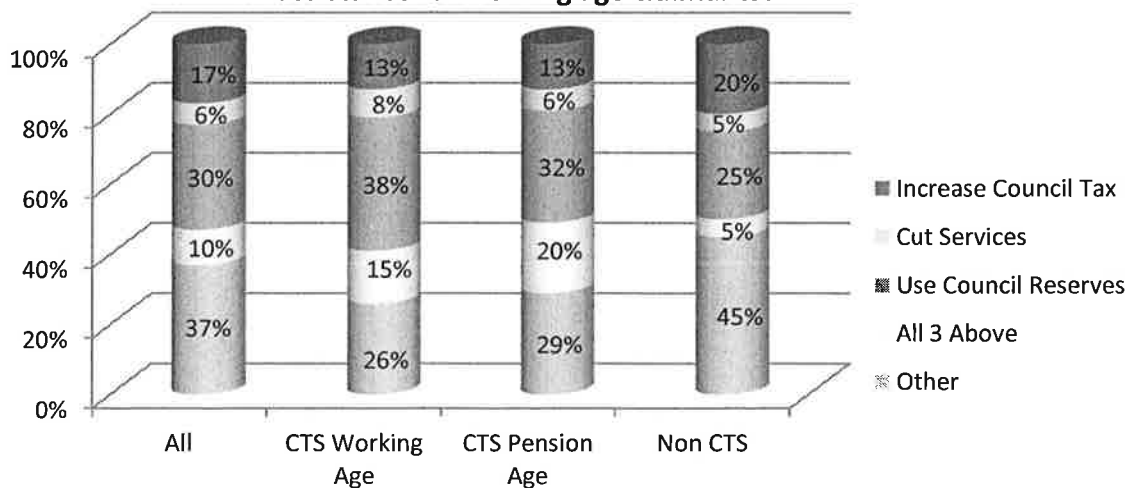
- a. Increase Council Tax
- b. Cut services
- c. Use Council reserves
- d. All three above
- e. Other

If you think services should be cut or have another suggestion, please write your answer here: .....

**Overall response**

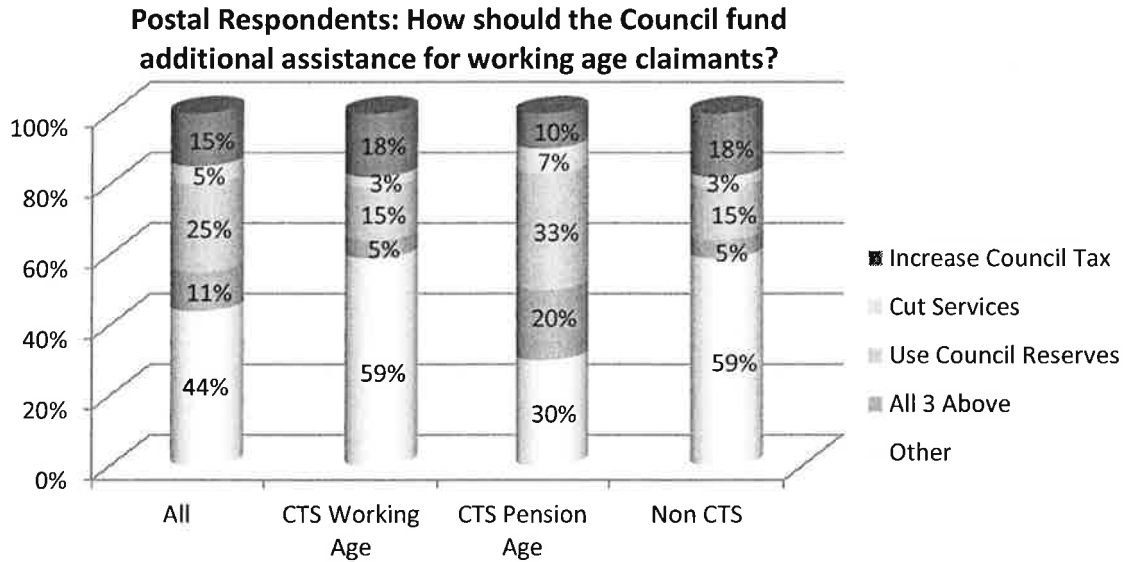
The overall response to this question was that the Council should use other funding to fund any additional contribution to the Council Tax Reduction scheme with 37% stating this to be their preference. The next highest preference at 30% was to use its reserves to fund any additional contribution to the Council Tax Reduction scheme.

**Total Respondents: How should the Council fund additional assistance for working age claimants?**

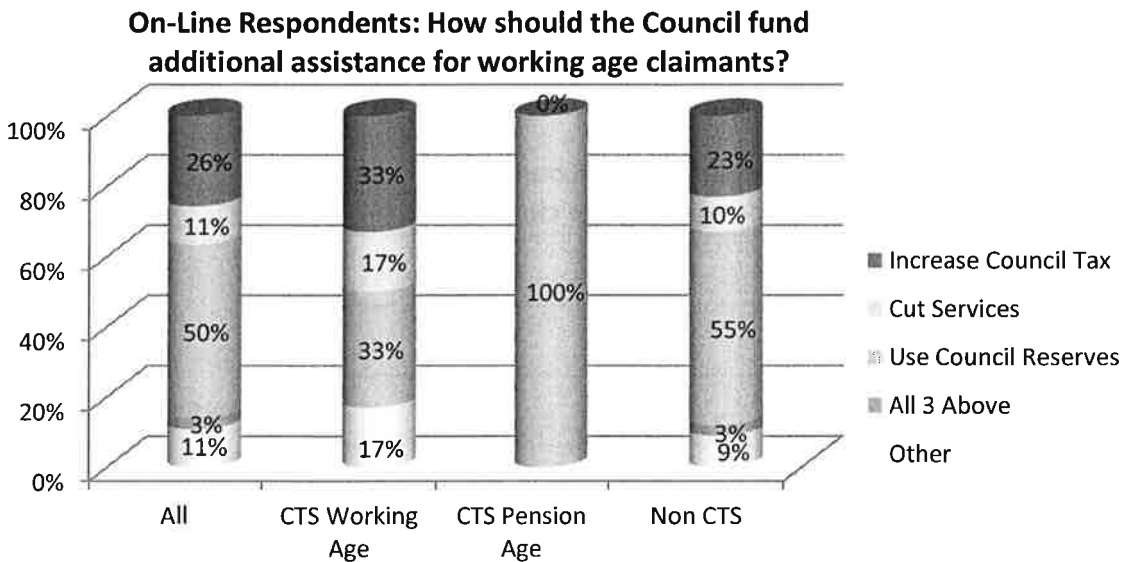


**Analysis of Respondents by Survey Type.**

Of those who completed the postal survey, other funding to fund any additional contribution to the Council Tax Reduction scheme with 44% stating this to be their preference. The next highest preference at 25% was to use its reserves to fund any additional contribution to the Council Tax Reduction scheme.



Of those who completed the on-line survey 50% confirmed to use its reserves to fund any additional contribution to the Council Tax Reduction scheme to be their preferred option with the highest percentage of respondents choosing this option being those of working age who are currently in receipt of Council Tax Reduction.



**Question 3.**

**Q3 The Council has a hardship fund of £100,000 to protect the most vulnerable. This is to provide extra help to residents who are experiencing exceptional financial hardship and are unable to pay their Council Tax.**

	Yes	No
a. Do you agree that there should be a hardship fund?	<input type="checkbox"/>	<input type="checkbox"/>
b. Do you agree the level of funding at £100,000 is correct?	<input type="checkbox"/>	<input type="checkbox"/>

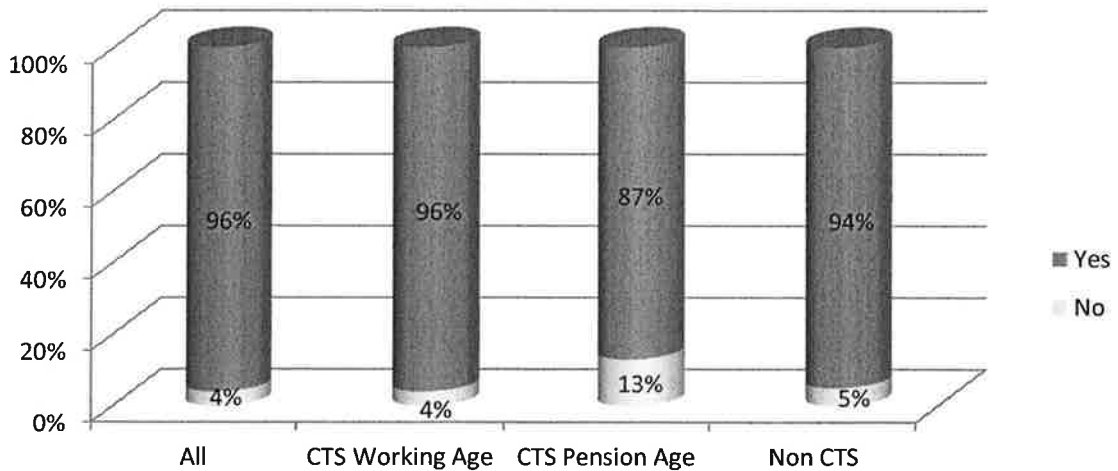
If you disagree please write your answer here:

.....

**Overall response – part a.**

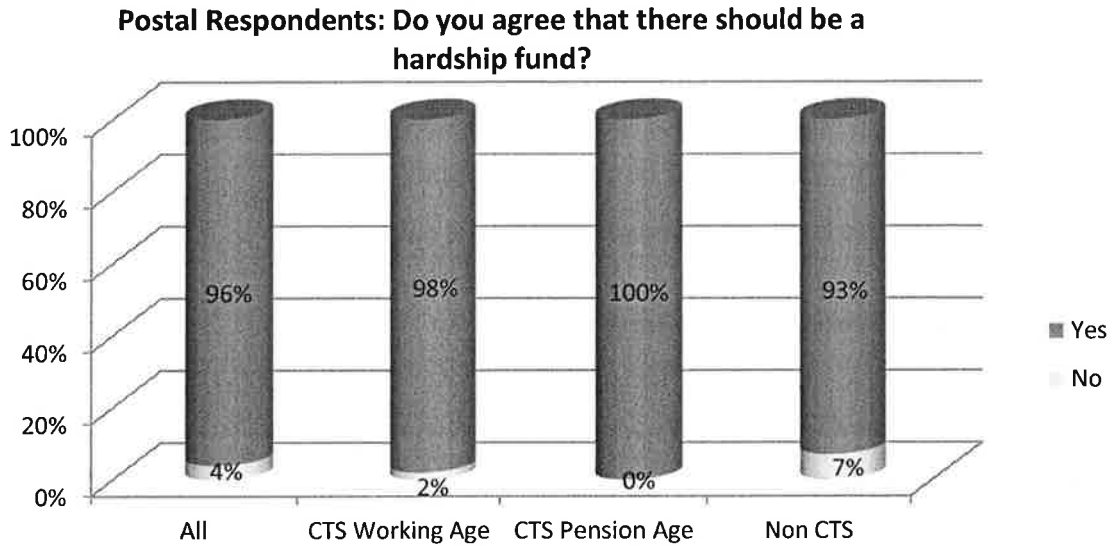
The overall response to part (a) of this question was that, yes, the Council should have a hardship fund with 96% agreeing with this statement.

**All respondents: Do you agree there should be a hardship fund?**

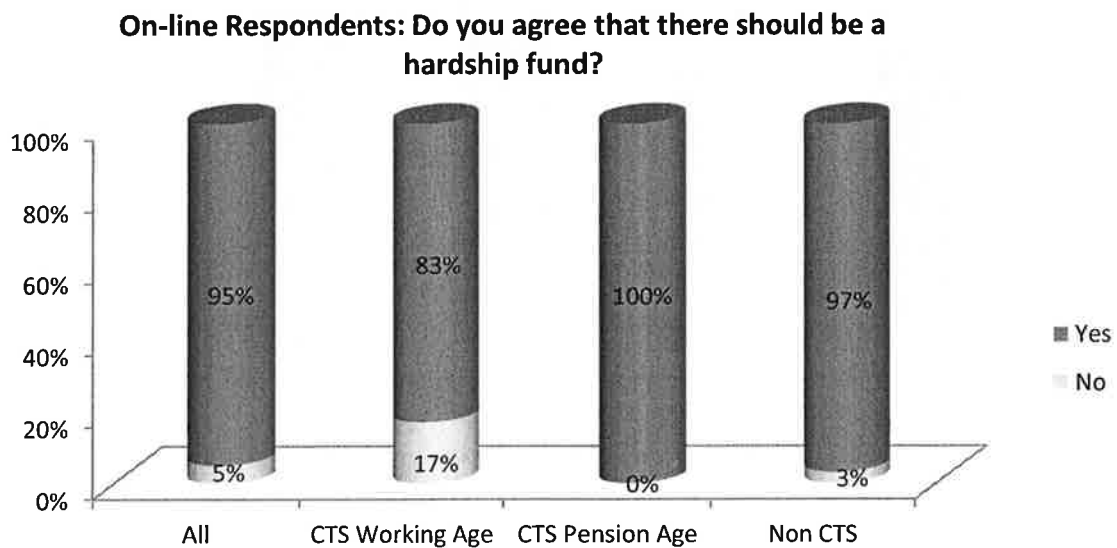


### Analysis of Respondents by Survey Type.

Of those who completed the postal survey 96% confirmed that there should be a hardship fund with a 100% of those in receipt of CTS who were pension age agreeing with this statement.



Of those who completed the on-line survey 95% confirmed that there should be a hardship fund with a continued high support at 100% of those at Pensionable Age in receipt of CTR agreeing with this statement.



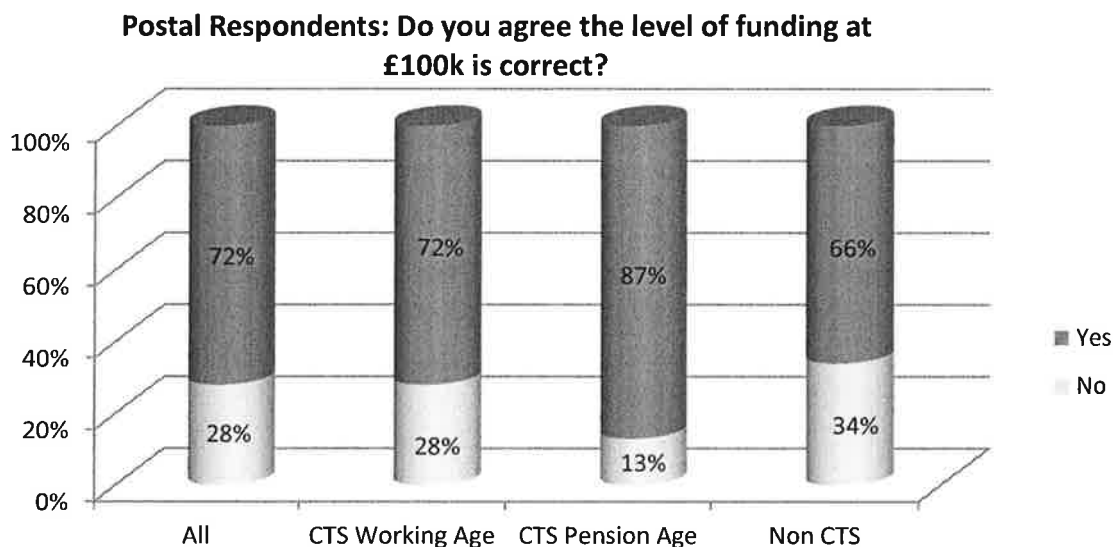
**Overall response – part b.**

The overall response to part (b) of this question was that, yes, the level of £100,000 for a hardship funding was correct with 72% agreeing with this statement.

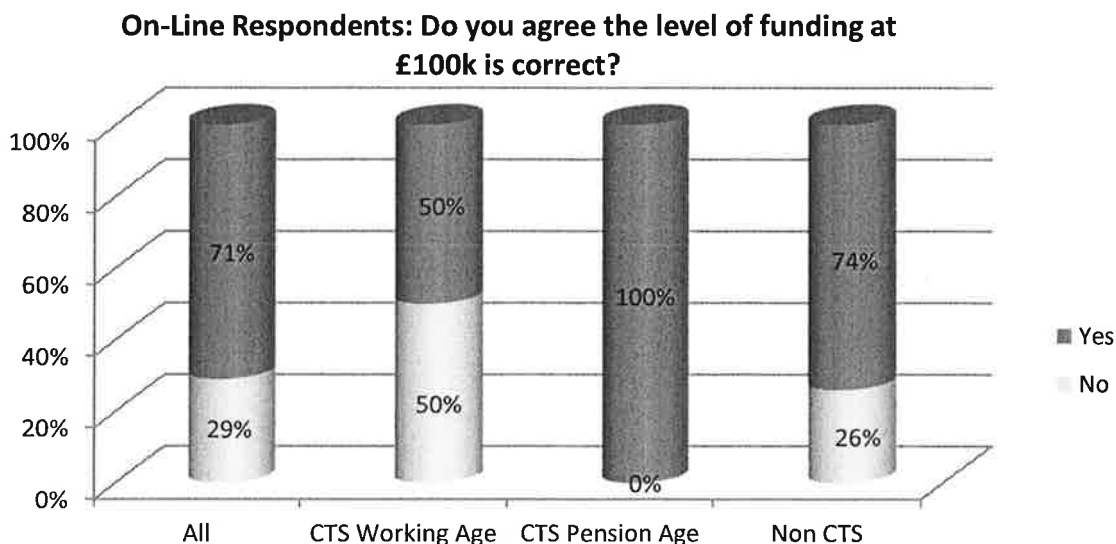
Many of the other respondents felt that they were unable to comment without any further facts and figures being provided regarding the potential spend, numbers affected and the criteria qualifying for this fund.

**Analysis of Respondents by Survey Type.**

Of those who completed the postal survey 72% confirmed that the sum of £100,000 was correct.



Of those who completed the on line survey only 71% confirmed that the sum of £100,000 in respect of a hardship fund was correct.



Question 4 provided the respondents with the opportunity to raise anything else which they believed should alter in respect of the CTR scheme.

**Q4 Are there any other changes you would like to see to the Council Tax Support scheme 2019/20 or any further comments you would like to make regarding the scheme?**

Please write your answer here: .....

Where respondents did suggest changes, responses here fell into a number of broad categories with many suggesting the following:

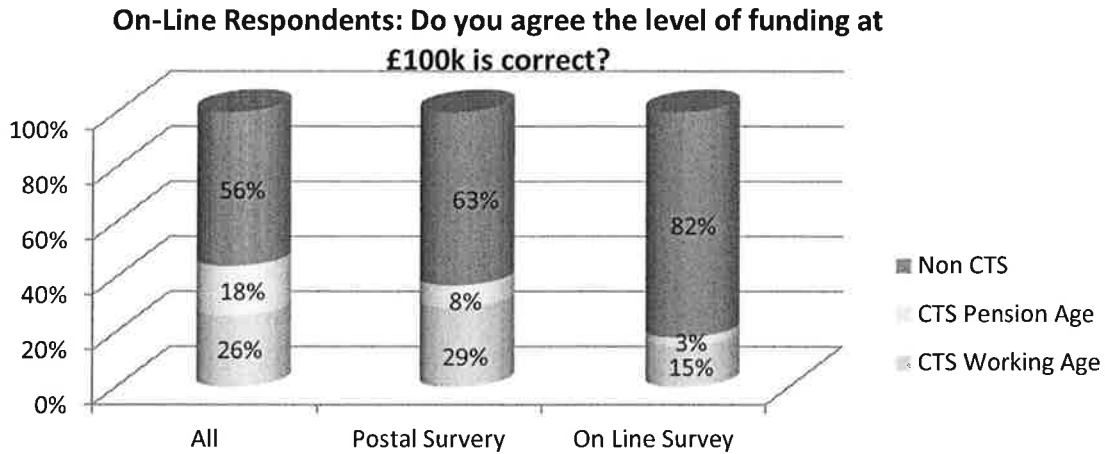
- Undertaking better checks into those receiving CTS
- Increased protection for certain categories of people such as the disabled or single parents
- Employing a sliding scale of assistance
- Limiting the support further e.g. to those living in the lowest CTAX band
- Helping citizens to help themselves through employment opportunities

Q5	Please choose any of these that apply:	Yes	No
a.	Are you currently in receipt of Council Tax Support?	<input type="checkbox"/>	<input type="checkbox"/>
	If you answered yes to (5a) please tick one of the following:		
bi.	Are you a pensioner?	<input type="checkbox"/>	<input type="checkbox"/>
bii.	Are you of working age?	<input type="checkbox"/>	<input type="checkbox"/>



## Overall response

Of those who completed the survey, overall 56% were from respondents not in receipt of Council Tax assistance, and 44% confirmed they were either pension age or working age currently receiving Council Tax Support.



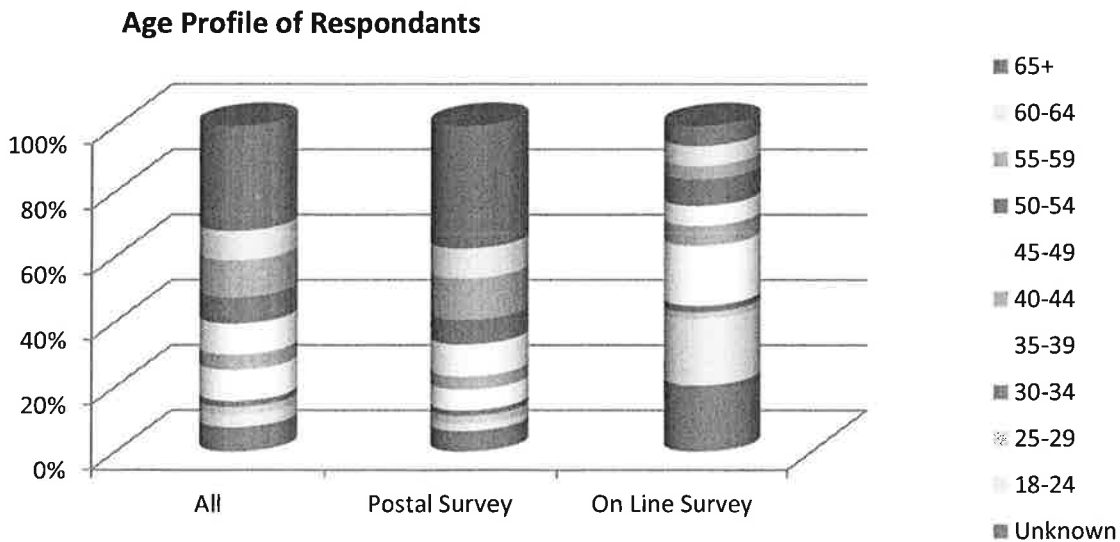
Details of all the narrative responses, to this question and others, have been included at Appendix 1.

## Equality and Diversity.

Standard questions relating to Equality and Diversity were included on the survey but it was made clear that answering these was not compulsory.

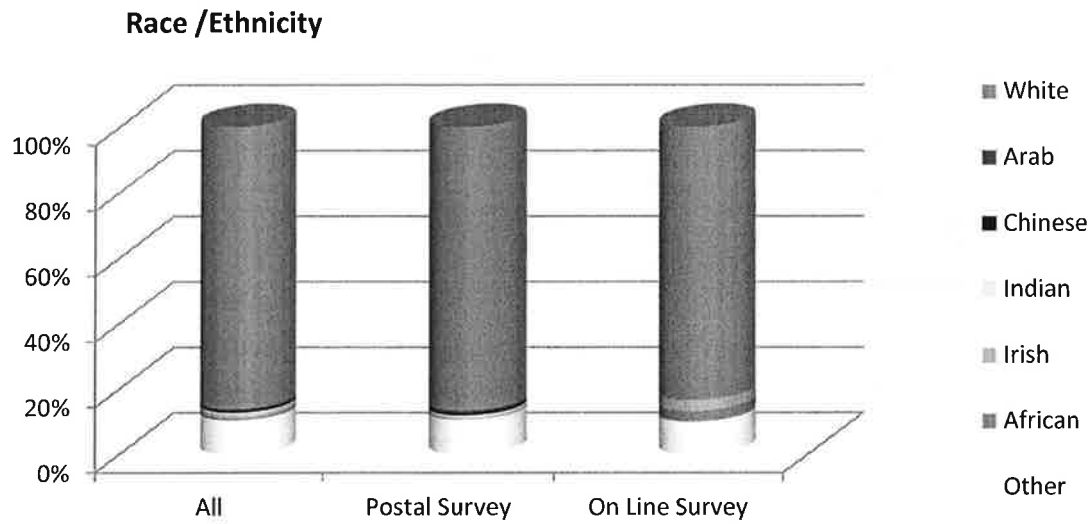
While 249 responses were received, not all respondents chose to complete the questions regarding their circumstances or ethnic background.

Overall, 211 people confirmed their age with the highest volumes of respondents being from those aged over 65 years of age.



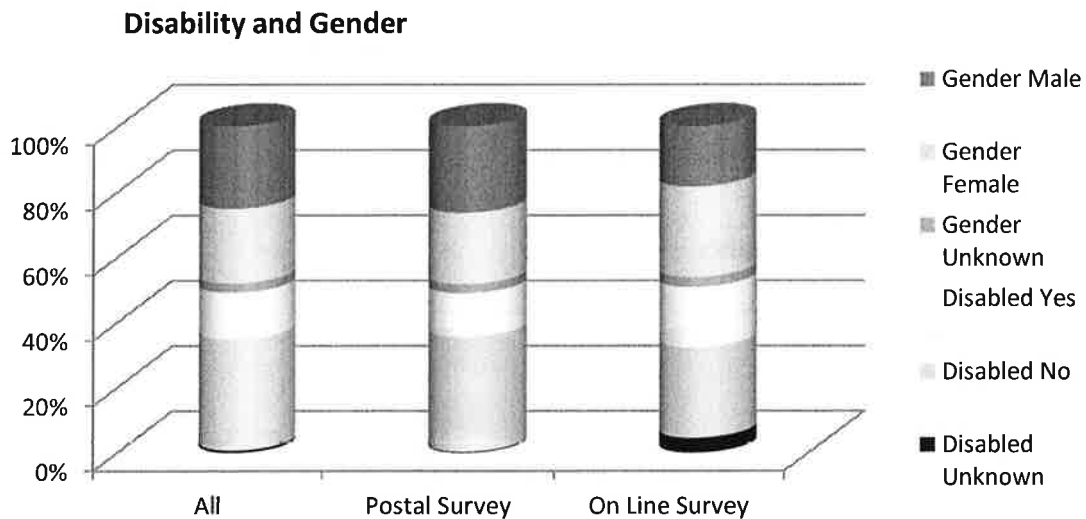
### Ethnic Background.

175 respondents confirmed their ethnic background with the majority of respondents, 85%, stating that they were from a white background.



### Disability and Gender.

211 respondents were happy to confirm whether they were disabled or not. 196 confirmed their gender of which 48% were female and 52% were male respondents. The analysis is shown below.



## 8. Timetable for Implementation

The new scheme will commence on 1<sup>st</sup> April 2019 for one year.

## 9. Appendix 1 – Narrative responses.

While narrative responses have been reproduced here for completeness, those respondents who simply stated “yes”, “no” or “don’t know” have been removed as these have been included in the analysis undertaken of the results above.

### Q1 If you disagree with maintaining assistance for working-age claimants at 75%, please state why:

- How can people who receive benefits able to afford to pay the ridiculous council tax!
- I think the amount paid by working-age claimants should be capped, perhaps to £5.00 a month for adults, so if you have four adults in a property the bill would be £20.00 a month, six adults would be £30.00 a month for a property, reflecting the service each individual receives, such as household bin services, street sweeping etc.
- I earn £8000 a year yet I pay full tax of £1775. I am hanging by a thin thread trying to reach the next day as my life feels too expensive and at times it is too much to bare. How can you charge so much to me when my salary is low? People who earn less should not have to pay council tax. Yet not everyone who earns less claims benefits etc. I don't want to claim benefits as the whole system makes you feel degraded. You should set your council tax according to people's salaries.
- Austerity continues to bite. Bromley going Full Service for Universal Credit in July has meant more and more sick, out-of-work and low paid, unsecure employed people are having to wait longer for their entitlement, facing more sanctions etc...
- It's already too expensive and I don't get the service/assistance I expect for that price
- We are talking here about the poorest and most disadvantaged in our community, on whom austerity has had the greatest effect. This is a small way to improve their situation.
- the level of young homeless people living and begging on the streets has increased and will increase every time the council withdraw or reduce support and people having to turn to food banks to feed themselves and their families.
- Working age claimants should pay toward council services especially if they are living in a property on their own. I would expect them to pay 35-50% towards council tax
- As benefits (ESA / JSA) having gone up by less than rise in CTAX we are being penalised
- Benefits have been cut, difficult to live on what already receiving. Also have to top up rent due to capping. I have to find £400 extra rent to be able to live and go without basics to keep a roof over my head. Even when you apply for hardship it just gets rejected. So need more support. the Hardship fund didn't help me when I applied so its useless, stop wasting money on top heavy management
- It would be better to pay £85% so we only pay 15%. So we can afford other household bills
- Not enough support given to those not working.
- If you have to live on disability benefits finding extra money is hard. If you are house bound it cost extra as have to order everything online.

- It would be better to pay 85% so we only pay 15% so that we can afford other household bills
- Why should any working person get reduction if paying council tax. I am retired and I still have to pay a full amount which I've had to pay all my life.
- We should do more to support the more vulnerable in society
- We are trying to make ends meet which is hard enough without paying more council tax. Personally I have not claimed anything from the council.
- Council tax has risen & risen whilst wages have not. This is unfair to those on in work and already contributing (via council tax & national taxes). To those who do not work. There has to be more fairness.
- There are many residents of Bromley struggling with severe financial problems, as revealed at the local food bank. they need and deserve more help to survive.
- Working age claimants should contribute more towards council tax as they are likely to be using numerous local services. Why should those already contributing 100% pay more or lose services -they have been reduced enough already.
- A claimants savings should be taken into account when deciding the subsidy they receive.
- Why should any working person get reduction if paying council tax? I am retired and I still have to pay the full amount which I have paid all my life
- I think it should be a means tested support that has no cap.
- Everyone has to pay more at this present time in spite of any discounts they may be entitled to. This is a countrywide problem that has implications for us all. The max support should be 65%.
- Several reasons, there are other benefits these claimants may be entitled to e:g lower taxation.
- It is difficult enough in current times to support your own family, let alone having to support other families.
- Reduce the cap to a lower level of support i.e.: 60/40
- The poor & vulnerable need more support in this era of government cuts & austerity. Public services are in crisis and its terrible what this government are doing to our services.
- If working age then should pay more
- Council tax is expensive but so is electric and gas that has just gone up again. Plus we will be getting millions back from our brexit fee so this can be used for ctax support too and shared among councils
- There are many jobs that these people could do so should make an effort and not have to rely on people who pay full ctax
- Im a single parent being evicted as my ctax and rent is Â£1450 per month without my council debts, I struggle everyday with bills and I cannot work anymore hours due to ill health

- Not enough support given to people not working
- If you have to live on disability benefits finding extra money is hard. If you are housebound it costs you extra as have to order everything online
- The council up for 2016/17 was 25% in view of the current time of austerity and possible cuts across the board - I feel it should now be 30%
- Every household faces tough challenges in their day due to high inflation and low increase in their wages so its only fair that the benefits are reduced so the system is fair.
- You haven't given enough info i.e. who gets this? Yet another badly thought out 'consultation' and why 7 pages long? With 7th page practically blank..Given to an intern to do?
- I believe 66% assistance is the right balance. 1/3 paid & 2/3 assisted. Everyone of working age should make reasonable contribution to our society.
- I think people in hardship should receive more support
- Are all claimants genuine?
- As a young single mother of two who only works once a week the amount of council tax I am expected to pay is far too high
- Tax those with money who can afford it. This will significantly increase the Councils revenue and subsequently increase the quality and quantity of the services that can be provided to the Bromley Borough residents
- Because you are hitting the poorest sector of society if you reduce assistance the current government already penalise the working class and those on benefits too heavily
- As a young single mother of two who only works once a week the amount of Council Tax I am expected to pay is far too high
- Claimants should pay 75% of their liability and receive 25% support
- Continue at 25% provided the majority of claimants are able to afford 25%. If not the percentage should reduce and the extra costs paid by those not receiving benefit
- Support % must be adjusted ( reduced ) by inflation levels ( ie at least that much) to make up for the increased cost of the council services
- They should move to a property they can afford. Reduce their spending to sort out their income ( less fags & booze) why should people working hard to earn a living have their income cut so others can leech in theirs
- I am a single parent being evicted as my council tax and rent is Â£1,450 per month without my council tax debts. I struggle every day with bills and I cannot work any more hours due to ill health.
- Not enough support given to those not working
- If you have to live on disability benefits finding extra money is hard. If you are housebound it costs you extra as have to order everything online

- It would be better to pay 85% so we only pay 15% so we can afford other household bills.

**Q2 If you think that Council should increase the level of assistance for working-age people from 75%, how do you think this should be funded? In particular, should the Council increase Council Tax or cut other Council services or use the Council reserves, or all three?**

**If you think services should be cut or have another suggestion, please write your answer here.**

- Better management of the contracted-out services from which we benefit.
- Charge council tax according to salary. I earn £8000 a year and pay full council tax. Someone who earns £100,000 pays the same rate as me. This isn't fair.
- Increase Council Tax for bigger properties.
- Cut inefficiency in the Council. Reduce red tape and back end functions increase parking fees
- If you need to cut services then do so to protect the people struggling in Bromley. Not all if us use your services ie social services, housing
- Increase council tax to those more financially secure - the middle class, those earning £50,000+ per year
- No service should be cut. There are too many 'layabouts' getting money from council. Everybody should work, pay their taxes and council rates fully.
- Apart from my bus pass I don't know what other help the council gives.
- cutting existing services will be in nobody's interest, least of all those who need it most.
- No further cuts to services, investments in some arrears would help fund the service itself. Making better use of libraries rather than close them. Making use of empty premises in the main street. Utilising local under developed parks, Norman park in particular, no events.
- Get an improved allocation of funds from the GLA. Bromley receive a disappointedly low funding. Bromley receives less per head of funding compared with almost all other boroughs. This should be rectified to allow improved funding and a fairer system.
- No service should be cut. There are too many 'layabouts' getting money from council. Everybody should work pay their tax's and rates fully.
- If the result of change there is an increase in total subsidy (unlikely) then that would be my choice.
- Why can't this council use all the reserves it makes from parking permits to aid this situation?
- No services should be cut. Public services are in crisis. The government should stop austerity and increase tax. Bromley is a wealthy borough and should help the poor & vulnerable.
- Looking after children by the Council should be stopped parents that have children

should make their own arrangement and not rely on the council only disabled etc should be fully helped

- I struggle every month to pay my council tax and have outstanding debts of ctax amounting to over 6000 due to illness I currently have and being unable to work more than 15 hours per week to which I struggle with and having bailiffs threaten me all the time is awful
- Increase ctax to those more financially secure - the middle class earning 50k + per year
- Whatever the outcome I believe the Council should raise council tax in order for it to be in a better position to meet its commitments
- I know some of the local business's enjoy the benefit of reduced or even no rate at present, you will have to review such arrangements.
- I don't. No more cuts
- 1, Efficiency measures. 2, Invest more in your fraud teams for benefit, housing and support. Incentive these people with commission and I believe you will earn millions.
- More council tax bands required for most expensive properties.
- I struggle every month to pay my council tax and have outstanding debts of council tax amounting to over £6,0000 due to an illness I currently have and being unable to work more than 15 hours per week to which I struggle with and having bailiffs threatening all the time its so awful.
- Increase council tax to those more financially secure, the middle class, those earning £50,000+ per annum.

**Q3 The Council has a hardship fund of £100,000 to protect the most vulnerable. This is to provide extra help to residents who are experiencing exceptional financial hardship and are unable to pay their Council Tax. Do you agree that there should be a hardship fund? Do you agree the level of funding at £100,000 is correct? If you disagree please write your answer here:**

- £100,000 is a lot of money! Anyone who earns that much does not need help or funding.
- I don't know if the amount is correct or incorrect as I don't know how it is currently spent / under/overspent? And what criteria are used to assess, so it is impossible to say.
- This is an impossible question to answer without knowing how many claims are made on the fund. £100,000 does sound a very small amount for a whole borough.
- It should be increased to help more people stay in the homes they already have
- Unable to answer as I don't know how you use this fund and if it is fully utilised or not
- It should be more
- I tried to get hardship fund but did not get it even though I couldn't pay my rent - waste of time

- The Hardship fund should be increased to at least £200.000.
- It is not a lot of money as such to help the people with. Only a few will benefit and it will be for a short time.what happens next year or the year after?
- it does not sound adequate for those in serious need in a wealthy borough like Bromley.
- Unsure what the criteria is for receiving this but would hope it is there for families and individuals in exceptional one off circumstances-regularly receiving this would suggest mis-use/inappropriate claim. Unsure if current fu7nding is correct. Once this is used up are claimants refused fund despite their circumstances?
- Insufficient information is given to know whether it is : a: spent wisely/effectively and b: whether the amount is sufficient for its purpose.
- The means test and no cap should mean the hardship fund would be superfluous. If necessary, however, then the £100,000 seems suitable
- This level is too low. Bromley is a rich borough and should support the poor. We need a Labour council, they support the poor and would not let this happen to the vulnerable. it is shameful to think of increasing charges on the poor.
- Hardship fund should be more as it should have enough to cope with hardship demand. Otherwise sending people to Court or jail wont ease their hardship, this will only make their situation worse
- I think the Council needs first to make sure they are truly vulnerable as many are not
- The hardship fund should be increased to at least 200k
- You should get a discount for physical disability
- The level of funding should be more.
- The cost is of getting 25% where I expect a lot of people will be in arrears outweighs any saving. Councils should raise a lot of the fund they need not have this ridiculous collection process.
- Doesn't seem to be much of a budget, £250.000
- Unknown whether £100K is sufficient, what cases are currently unable to be funded?
- B, qualified to judge.
- I have not been provided with enough information to know whether this is a sufficient amount for residents who are experiencing exceptional financial hardship. So I cannot say whether the level of funding is correct
- seems exceptionally low considering the huge number of people that live in the Borough and that is the largest borough in London
- Cancel CTS
- The level of funding should be determined by the cost of justable hardship claims. If 100k is sufficient the amount should be increased by increasing the amount of ctax paid by those not receiving benefit



- Don't live beyond your means
- The hardship fund should increase to at least £200,000

**Q4 Are there any other changes you would like to see to the Council Tax Support scheme 2019/20 or any further comments you would like to make regarding the scheme?**

- Residents should be able to feed themselves and their families adequately, be safely housed, be able to afford to keep themselves clean, and enjoy a 21st century quality of life. If residents qualify for help in paying council tax there should be practical help offered on how to manage better on the pittance we expect them to survive on.
- Please do not charge Council Tax to those on low incomes.
- How can you justify charging me £1775 Council Tax when I earn £8000 a year? This is unfair.
- We need a standalone form for Council Tax Support for people on Universal Credit and those that already receive HB, but their eligibility for CTS moves (such as a reduction in income). Having to fill out a HBCTS1 just to claim CTS is confusing for the claimant (and their advisors/helpers/advocates) and must also confuse the assessors too.
- It would be great if the recycling system improved. So far, it has not excelled since I moved in (3 years ago) and the situation is getting worse. I have asked for recycling bins twice with no response, there are not enough recycling stations and it's hard to find all kinds of bin bags
- Reduce the salaries at the very top
- Contribute less as already struggling and the hardship scheme is not working as it should, never heard back and had to borrow money to pay rent
- Payment cards to pay Council Tax would be easier
- As above, its unfair to the unemployed.
- You should get a discount for physical disability not just mental disability
- Payment cards to pay council tax would be much easier.
- There are programmes on TV about council's not checking who's in their flats and subletting, lying about disabilities and claiming benefits. If there were better checking council's would have enough money for everything. I am 82 and I hate that I have to support working age people because that just want easy money.
- I would hope that family concerns, number of children and dependents with special needs all would be taken into consideration in a compassionate manner.
- Think individuals should have to contribute more than max 25%. Raising annually so that each year their contributes and the amount of council tax decrease to discourage benefit, possibly contribute to local services if necessary.
- The single persons discount should be reduced by 5%

- I would like to see those failing to contribute but still receive the same levels of service pursued for back payment etc.
- Increase the support to the poor. Reverse austerity!! Hopefully we will have a government that cares soon and will reverse all these cuts and put public services first!! Bromley should reverse the cuts it is shameful to hurt the poor. Increase support to the poor, they deserve our help.
- yes use funds from brexit
- Many of these scheme are not paid by parents the Council need to check these people carefully many parents are able to pay for their children and should do so
- its unfair to the unemployed
- If you told me who this applied to I might be able to comment more than just make comments about the need for wholesale reform Also could someone have made sure this didn't run for 7 pages making the last page one line?
- No, believe it should remain as in for our pensioners. They have already made their contributions
- More council tax should be raised on more expensive properties. Council should be able to purchase land at pre planning permission prices for more council housing.
- The true measure of any society can be found in how it treats its most vulnerable members - quote by M Gandhi
- Cancel CTS
- Scrapped
- As above, its unfair to the unemployed
- You should get a discount for physical disability not just mental disability
- Payment cards to pay council tax would be so much easier