

London Borough of Bromley  
Council Tax Reduction – Consultation Report

13<sup>th</sup> October 2020

## 1. Details of Recommendations

The Council is asked to agree the

- 1.1 To note the proposed Council Tax Reduction Scheme for Bromley residents is to come into effect from 1st April 2021.
- 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 7<sup>th</sup> December 2020. 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, 2018/19, 2019/20 and 2020/21.

This report is to approve the new scheme, this will be required to be formally approved at full council on 7<sup>th</sup> December 2020 for the next financial year commencing 1<sup>st</sup> April 2021.

The proposal is to retain the scheme rules from 2020/21 for the financial year 2021/22 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 2020/21 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 10<sup>th</sup> August 2020 until 4<sup>th</sup> October 2020.

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 2021/22 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 January 2021 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 2020/21 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 2021/22 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 2021/22;

- New customers will be required to complete an application form for all new claims from 1 April 2021, existing awards under the 2020/21 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 2020/21 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 2021/22 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 2021/22 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 2020/21". 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 20/21 Council Tax Reduction Scheme during a period from 10<sup>th</sup> August 2020 until 4<sup>th</sup> October 2020.

The survey was available through a variety of channels:

- A link was available on the Bromley website
- A paper copy was issued to 1,000 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 246 responses received, 61 being via the website and the majority 185 received by post.

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, 59% 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.**

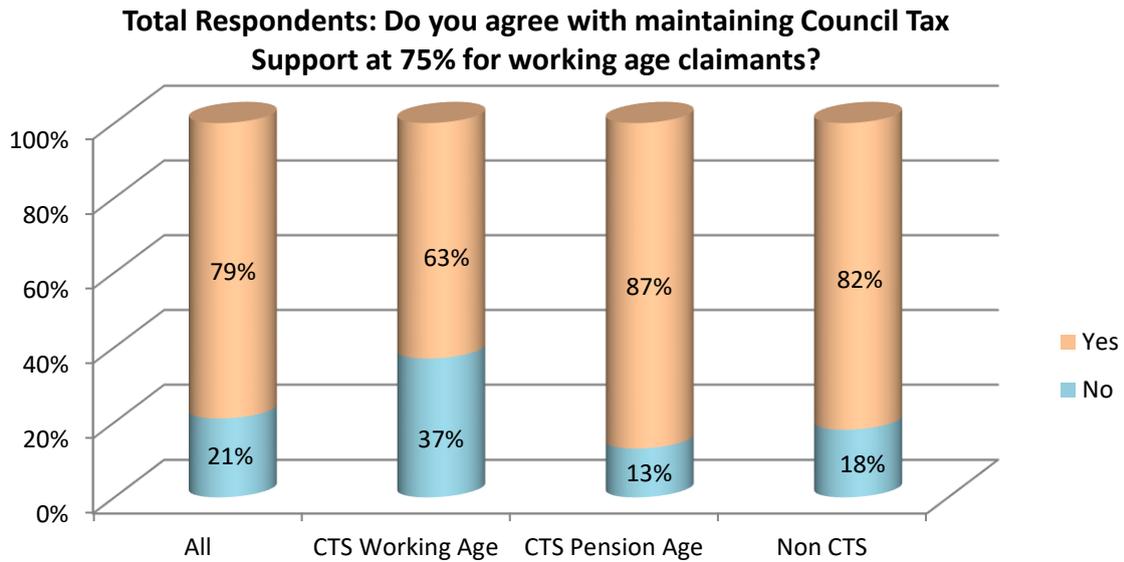
|  | Yes                      | No                       |
|--|--------------------------|--------------------------|
| <b>Please confirm whether you:</b>                                 |                          |                          |
| <b>a. Agree with maintaining the assistance at 75%</b>             | <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:**

.....

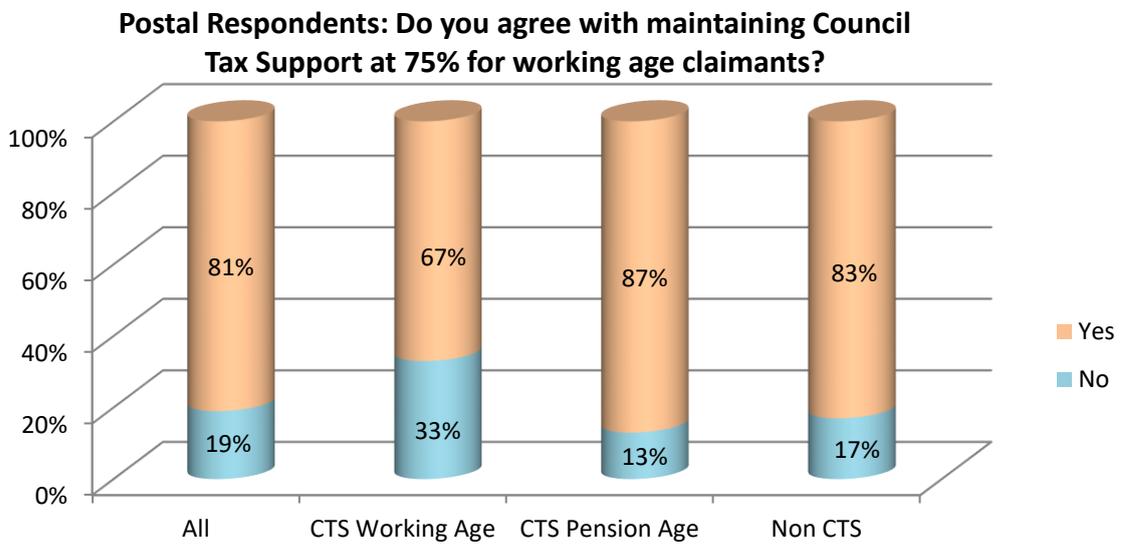
**Overall response.**

Of those who responded the *overall* outcome was that they wished to keep the scheme the same with 79% confirming this to be their preference. This was a higher percentage when this question was asked last year as in 2020/21 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.

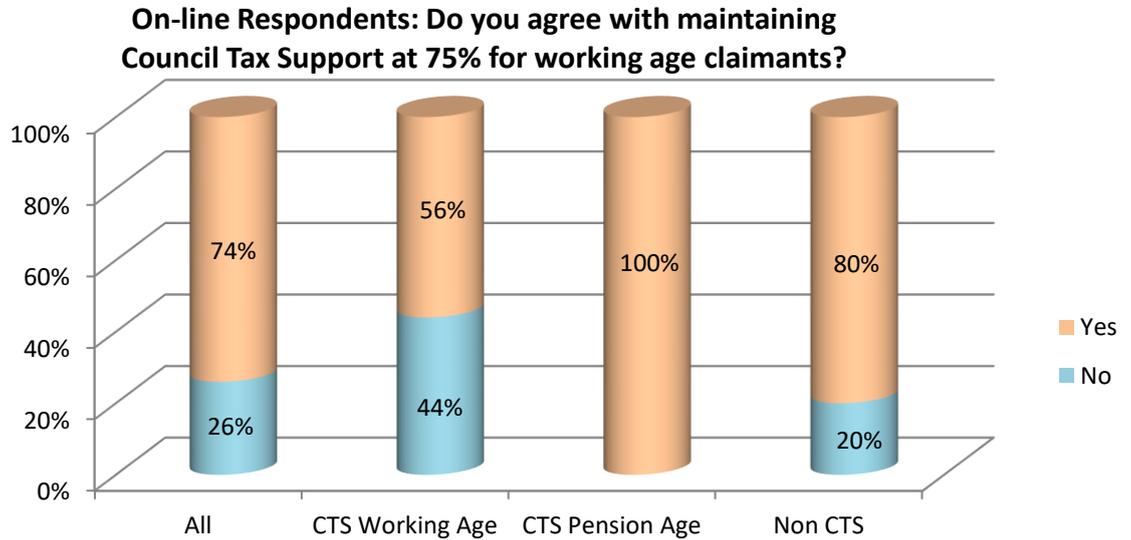


**Analysis of Respondents by Survey Type.**

Of the postal responses received, overall 81% 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.



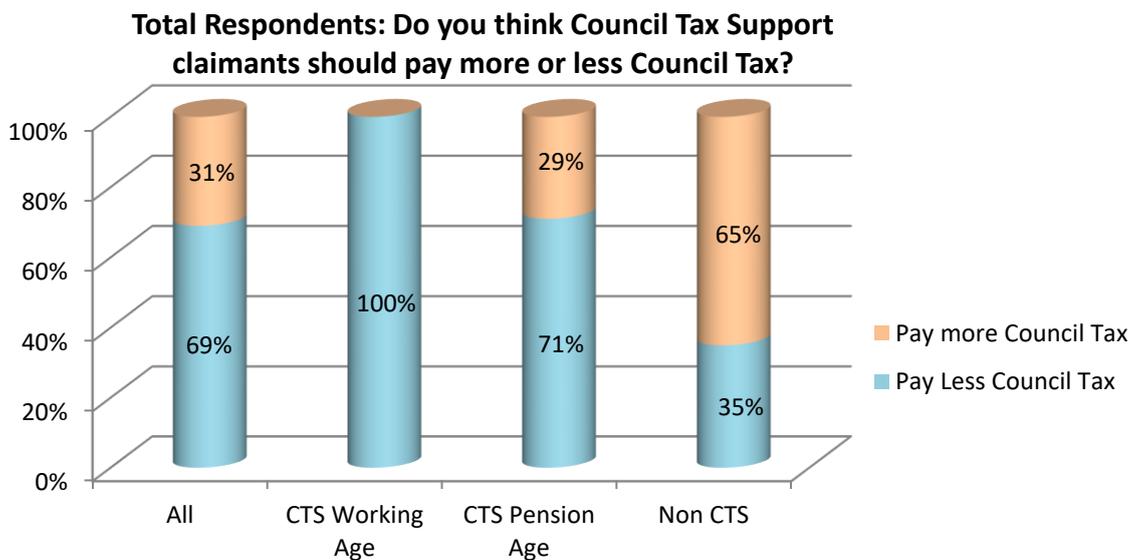
For on-line responses received, overall 74% were in favour of retaining the level of support at a maximum of 75%. However for Council Tax Support working age there were 56% for retaining the level of support however this accounted for only 9 replies. But, 80% for non-Council Tax Support claimants were in favour of retaining the same level of support. Finally, for Council Tax Support pension age there were 100% for retaining the level of support however this accounted for only 1 reply.



**Question 1b.**

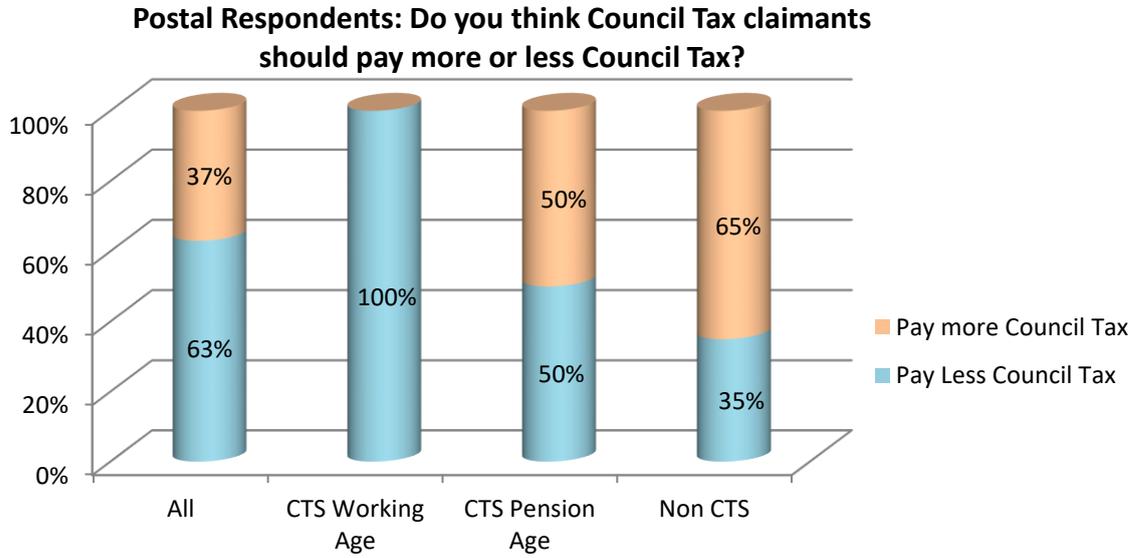
**Overall response.**

Of those who responded to state that they believe assistance should not be maintained at 75%, the *overall* outcome at 69% wished to increase the level of support thereby decreasing the levels of Council Tax which recipients would need to pay.

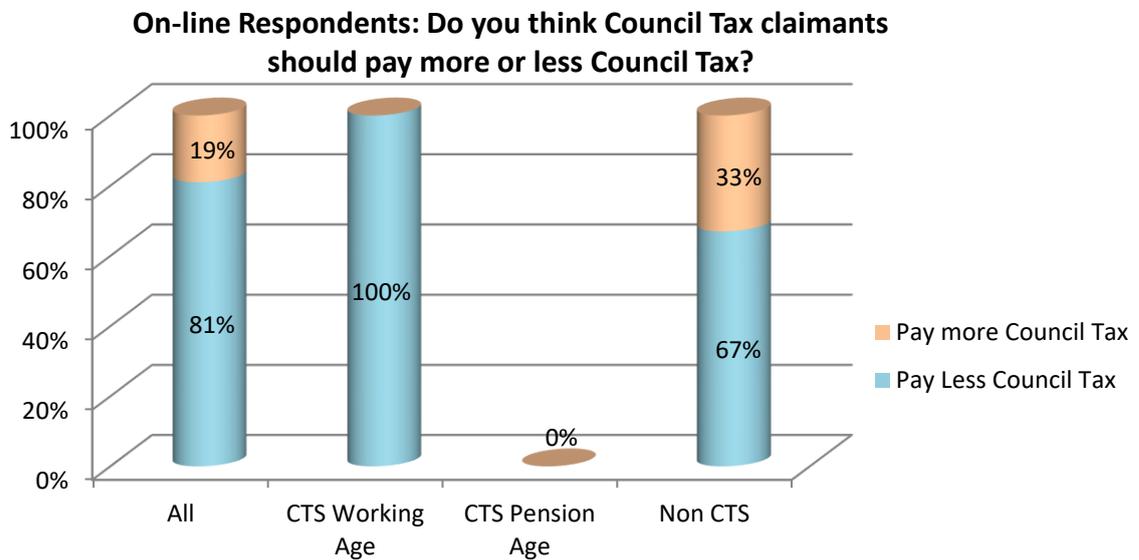


### Analysis of Respondents by Survey Type.

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



Of the on-line responses received, overall 81% were in favour of Council Tax Reduction claimants receiving more support and paying less Council Tax, and this was also supported by the majority of respondents not currently in receipt of support.



**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?**

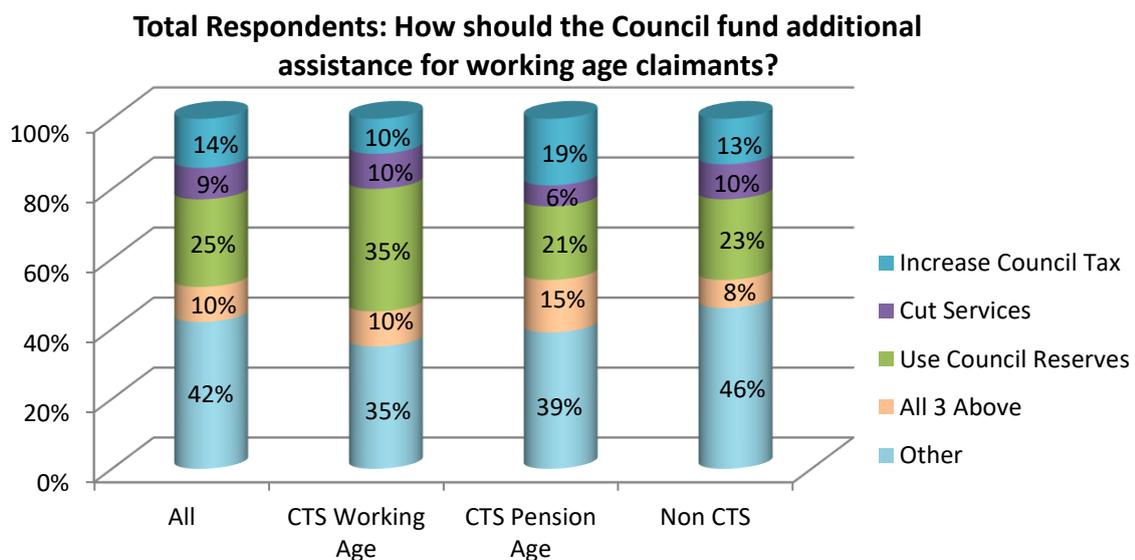
Please choose any of these that apply:

- 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: .....

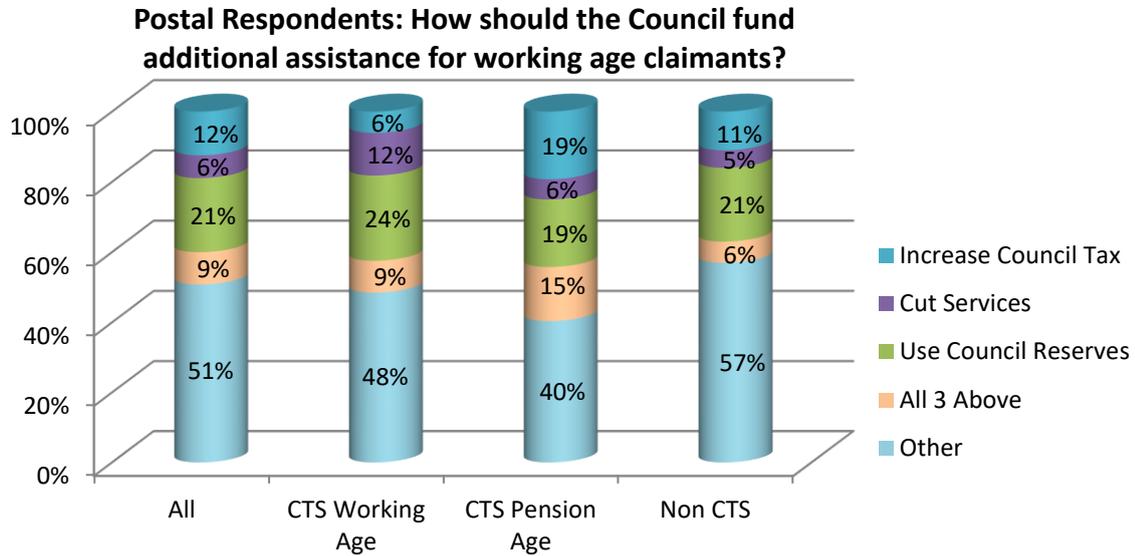
**Overall response**

The overall response to this question was that the Council should use other funds to fund any additional contribution to the Council Tax Reduction scheme with 42% stating this to be their preference. The next highest preference at 25% was to use Council Reserves to fund any additional contribution to the Council Tax Reduction scheme.

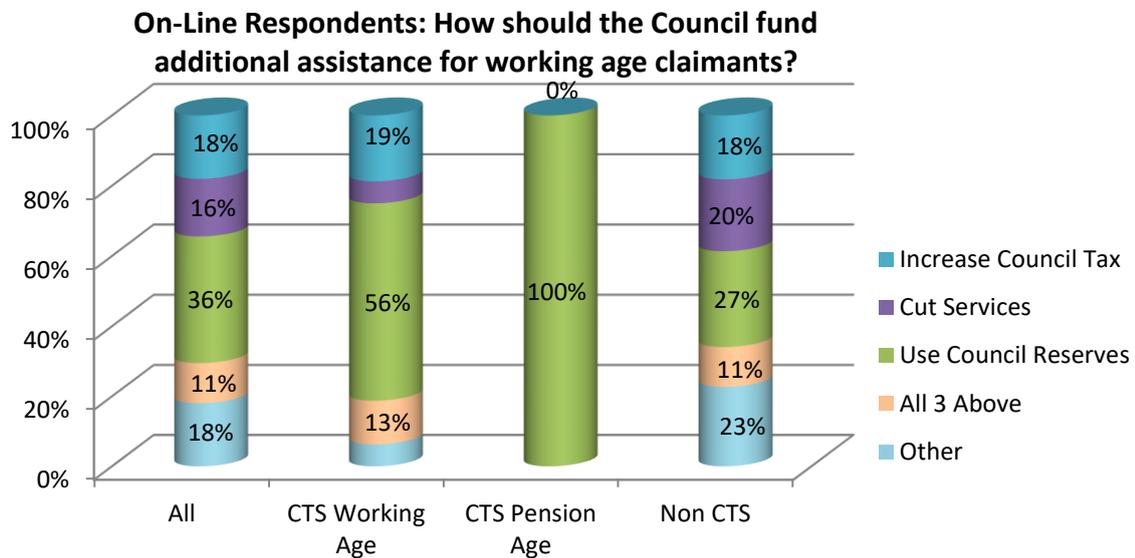


### Analysis of Respondents by Survey Type.

Of those who completed the postal survey, using other funds to fund any additional contribution to the Council Tax Reduction scheme with 51% stating this to be their preference. The next highest preference at 21% was to use Council Reserves to fund any additional contribution to the Council Tax Reduction scheme.



Of those who completed the on-line survey 36% confirmed to use its reserves as well as other options to fund any additional contribution to the Council Tax Reduction scheme to be their preferred option with the highest percentage of respondents choosing Council reserves being those of pension age who are currently in receipt of Council Tax Reduction.



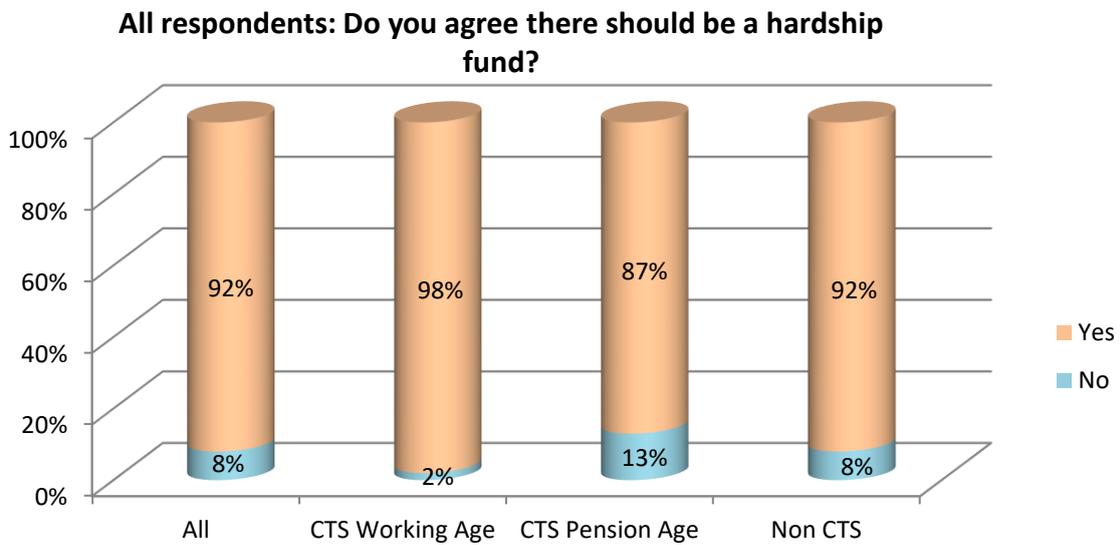
**Question 3.**

**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:<br>.....      |                          |                          |

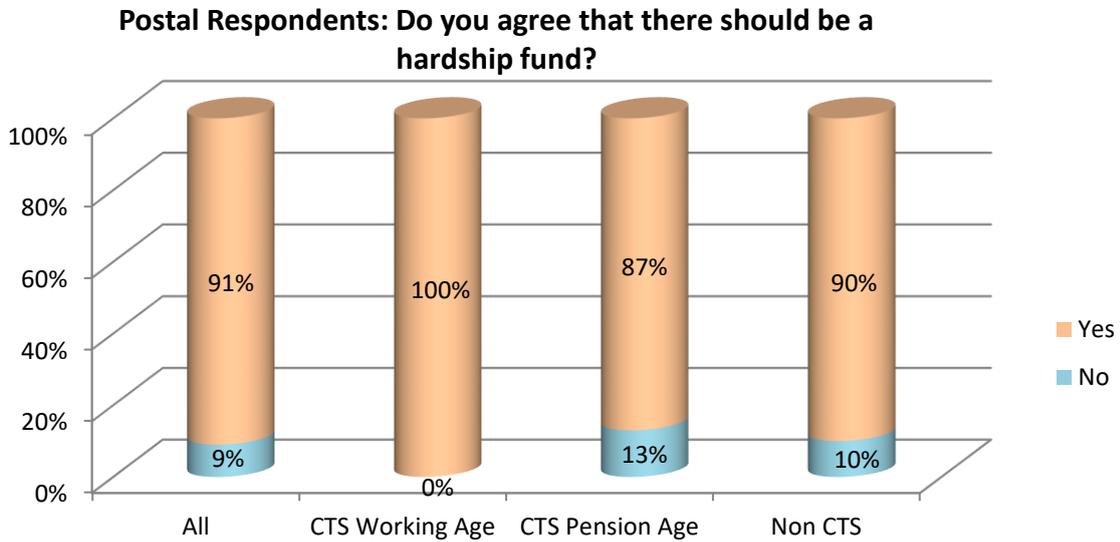
**Overall response – part a.**

The overall response to part (a) of this question was that, yes, the Council should have a hardship fund with 92% agreeing with this statement.

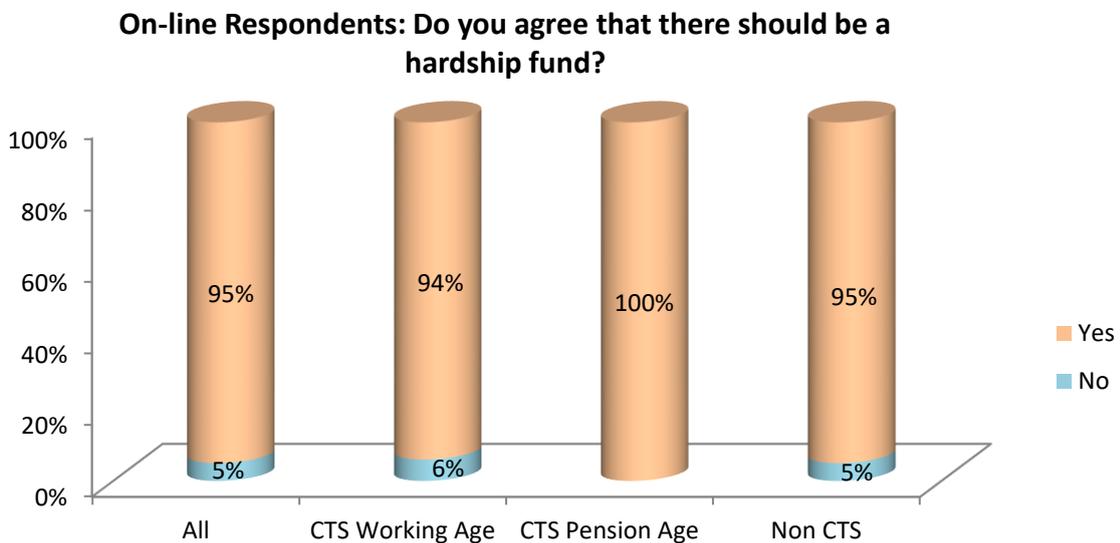


### Analysis of Respondents by Survey Type.

Of those who completed the postal survey 91% confirmed that there should be a hardship fund with a 100% of those in receipt of CTS who were working 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 pension age in receipt of CTR agreeing with this statement.



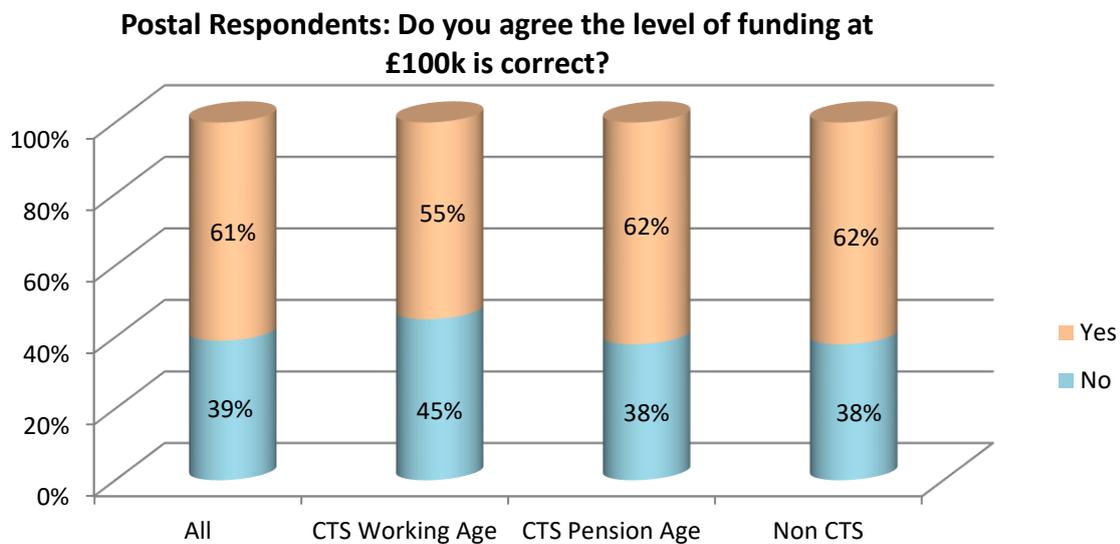
## Overall response – part b.

The overall response to part (b) of this question was that, yes, the level of £100,000 for a hardship funding was correct with 60% agreeing with this statement.

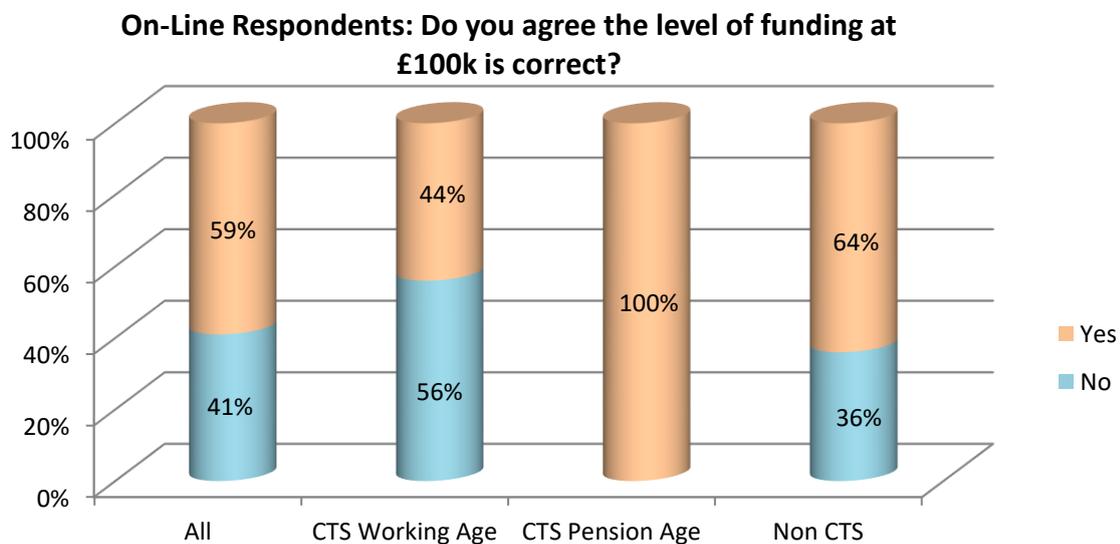
Many of the other respondents felt that they were unable to comment without any further facts and figures being provided regarding the potential spend, numbers affected and the criteria qualifying for this fund.

### Analysis of Respondents by Survey Type.

Of those who completed the postal survey 61% confirmed that the sum of £100,000 was correct.



Of those who completed the on line survey only 59% confirmed that the sum of £100,000 in respect of a hardship fund was correct, however for working age they did not agree that the level of funding is 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: .....

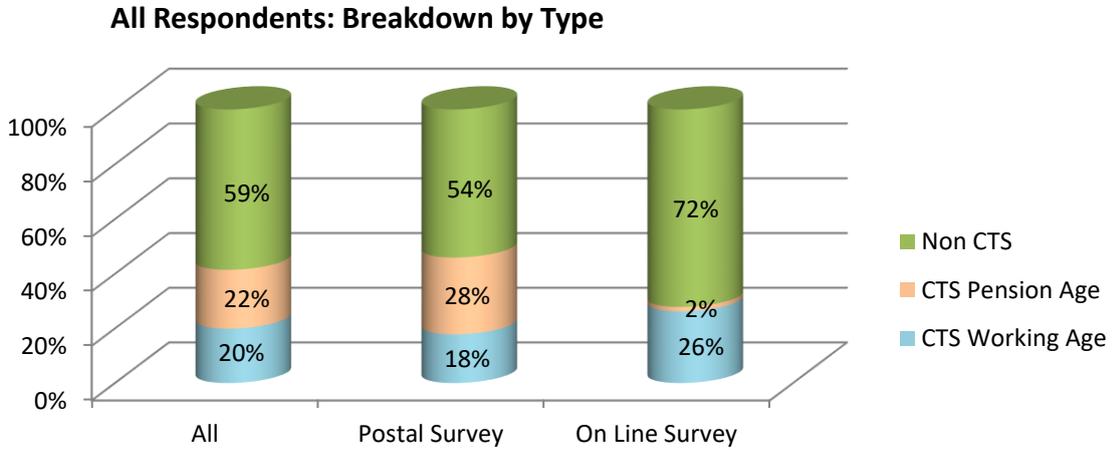
Where respondents did suggest changes, responses here fell into a number of broad categories with many suggesting the following:

- There should be increased by government funding
- Increased protection for certain categories of people such as the disabled
- Difficult to agree or not as no basis for comparison
- 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 59% were from respondents not in receipt of Council Tax assistance, and 22% confirmed they were pension age receiving Council Tax Support.



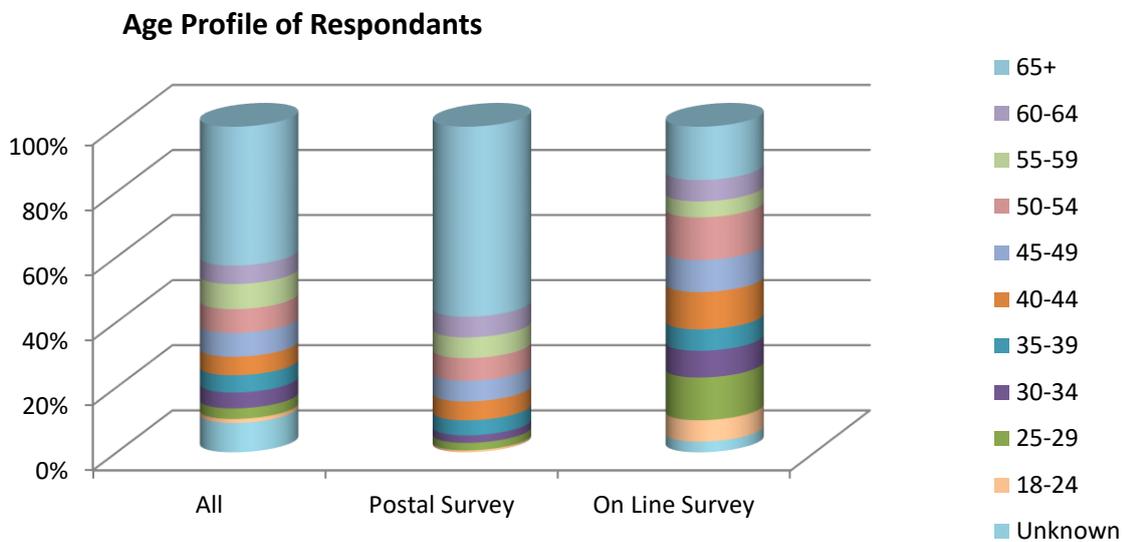
Details of all the narrative responses, to this question and others, have been included at Appendix 1.

## 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.

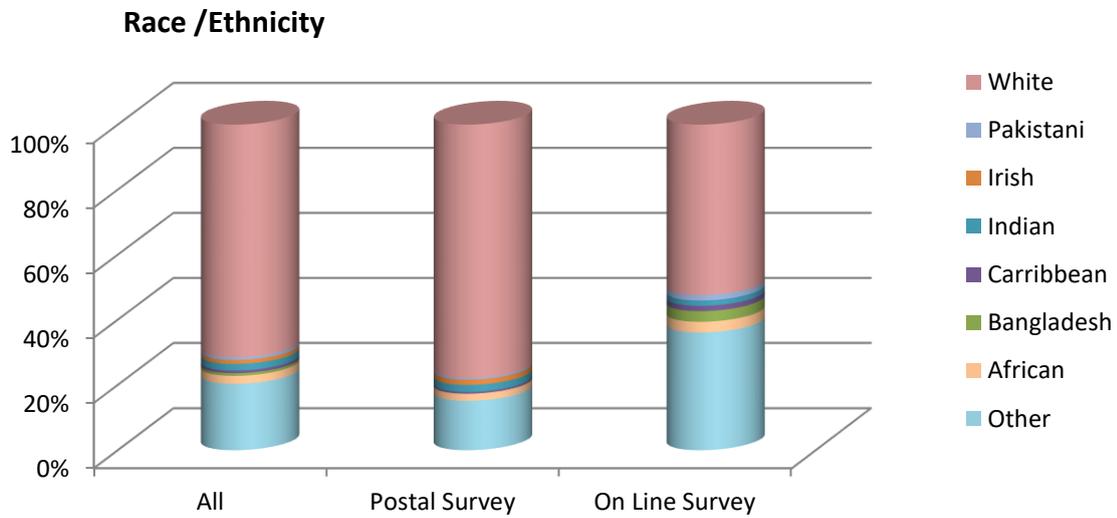
While 246 responses were received, not all respondents chose to complete the questions regarding their circumstances or ethnic background.

Overall, 224 people confirmed their age with the highest volumes of respondents being from those aged over 65 years of age.



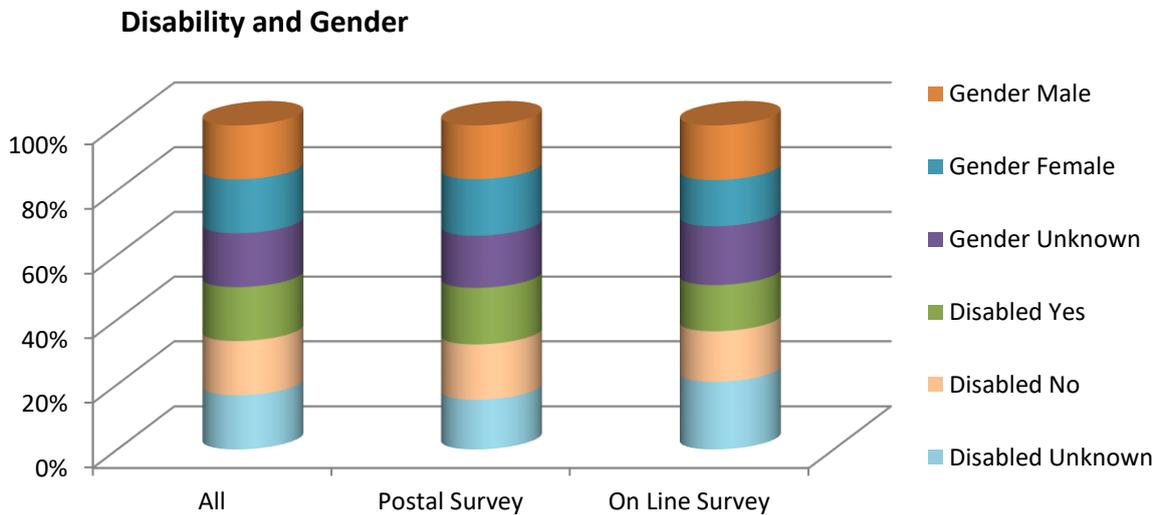
### Ethnic Background.

210 respondents confirmed their ethnic background with the majority of respondents, 72%, stating that they were from a white background.



### Disability and Gender.

215 respondents were happy to confirm whether they were disabled or not. 221 confirmed their gender of which 53% were female and 47% were male respondents. The analysis is shown below.



## **8. Responses from the Greater London Authority**

### **LONDON BOROUGH OF BROMLEY: COUNCIL TAX SUPPORT SCHEME 2021-22**

Thank you for your email of 2 October informing the GLA about the Council's formal consultation on proposals for the draft council tax support (CTS) scheme for 2021-22. This letter sets out the GLA's formal response to the consultation.

#### **Introduction**

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 Options for 2021-22 Scheme**

Under Bromley's existing scheme, the maximum level of council tax support available to working age claimants is 75 per cent 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.

#### *Minimum Contribution*

The council's consultation seeks views on whether the minimum working-age contribution for 2021-22 should remain at 25 per cent of claimants' council tax liability. We note the council's preference to maintain the current minimum contribution level and the consultation does not propose an alternative.

The diversity of council tax support schemes developed in London since 2013-14 means there is now a wide range of minimum contribution rates, varying from no minimum contribution to 30 per cent. In

addition to Bromley, six other London boroughs have contribution rates of 25 per cent and a further four London boroughs currently require a minimum contribution level of over 25 per cent. The GLA notes therefore that Bromley is within the third of boroughs that require a minimum contribution of at least 25 per cent.

The GLA recognises that local authorities have faced difficult choices on CTS schemes, as overall funding from central government has reduced and funding for CTS is no longer identifiable within the settlement. The consultation states that if the minimum contribution rate was reduced, this would have to be funded by either one or a combination of the following options: a council tax increase, use of reserves, reducing council services. Therefore, notwithstanding the comments elsewhere in this response, the GLA is content for the council to maintain its minimum contribution rate at the current level.

#### *Hardship Fund*

The consultation also seeks views on the council's hardship fund, which provides assistance to residents who are experiencing exceptional financial hardship and are unable to pay their council tax. The GLA welcomes the assurance that the Council will continue to make a discretionary hardship fund available and notes its level appears appropriate. We would encourage the Council to take a proactive approach to informing those council tax support claimants facing difficulties paying council tax bills about the help available.

#### **Financial Implications of the Proposed 2021-22 Scheme**

It would be helpful for the GLA's planning purposes if the Council could provide the GLA with a forecast total cost for the proposed scheme in 2021-22, based on the forecast 2020-21 caseload— ideally apportioning all elements between the GLA and the council having regard to 2020-21 council tax shares. This would also allow the GLA to calculate its share of the cost of the scheme proposed by the Council.

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

The GLA considers that in formulating its council tax support scheme each billing authority should consider the impact of the additional revenue it may be possible to raise through powers introduced in the Local Government Finance Act 2012 and the Rating (Property in Common Occupation) and Council Tax (Empty Dwellings) Act 2018.

The GLA understands that Bromley no longer provides any discounts for properties undergoing major repairs (former class A), unoccupied and substantially unfurnished (former class C) or second homes. The Council also decided last year to increase the empty homes premium up to the maximum thresholds currently allowed by the 2018 Act.

However, it is not clear from the Council's website whether the Council plans to increase the empty homes premium further, by implementing a 300% premium for homes empty for over 10 years from April 2021. Any additional revenues from maximising this flexibility could be used to support the council tax reduction scheme.

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 2021-22 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 2021-22 and Assumptions in Relation to Collection Rates**

The council will be required to set a council tax base for 2021-22 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 over the last eight 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 2021-22. 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 2021 the council is required to notify the GLA of its forecast collection fund surplus or deficit for 2020-21, which will reflect the cumulative impact of the localisation of council tax support since it was introduced in 2013-14. The GLA would encourage the council to provide it with this information as soon as it is available.

I would like to thank you again for consulting the GLA on your proposed council tax support options for 2021-22.

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

## **9. Timetable for Implementation**

The new scheme will commence on 1<sup>st</sup> April 2021 for one year.

## **10. 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:**

PAY LESS

I think council tax should be abolished. I am unemployed and can't afford to pay council tax when people are on benefits there should be totally exempt from all council tax and extra bedroom tax

Because we are pensioners and have to pay full council tax

Levels of support are too high presently in many cases. Assistance at 50% would be adequate and need for full paying residents to pay more

NOT SURE

I believe till normality returns full help and support should be provided

Because of the cost of living up Any money people have pays for this. The cost of living is not taken into account when people are on benefits hence the need for food banks which has only come about by a Tory government

The council tax is already HIGH. I am 71 years old and retired.

This increase has not change since 2016/2017 and as inflation an annual increases apply it seems a small increase should apply 4 years on. Support still available but lower than 75%

As a full time carer to my daughter I struggle with the money I do get from benefits by the time I pay bills food etc I,m not left with much

Would like to see more help.

means test all those claiming to ensure there is no fraud in people claiming

I am at a pensionable age and currently if I needed care assistant help I would have to pay the full amount due to not receiving benefit and being a owner of a house. Giving working age claimants a discount is not right as some how work is available if you look hard enough

75% support is too generous taking into account other benefits people receive. it is not fair on people paying their full ctax. After all council tax is a fee for services

There are plenty of households with two working parents in that struggle to pay their bills but still have to pay 100% council tax. Why should others get a large reduction.

I started working at age 14 during the war and worked for 48 years paying all the necessary dues. I never claimed any benefits and managed my life accordingly to my modest means and did not go on foreign holidays or spend hours in the pub

If you are working age and working you should pay your full council tax I think that also if you are working age but do not have a job then a discount of maybe just 50% should be ok - I am a pensioner I don't think that I get 75% so why should they

Those that are vulnerable eg have a disability and not able to work should get 100% assistance those that are working but struggling to pay rent should be assisted, those that can work but chose not too should get less support

There is no reason for someone to have 75% discount. Everyone uses the system they claim other benefits those that pay in full are over charged and need relief or the whole system will collapse

The number of claimants is set to rise dramatically for the next few years due to current Covid conditions so the level of assistance should be set to maintain the same cost to the council eg 70% support and 30% paid by working age claimants who receive services from the Council

Council tax should be fair and tiered everyone should pay the same

Bromley is one of the richest London boroughs but has one of the highest minimum liabilities

because it should be the Landlords responsibility to pay the Council Tax as they get paid full rent for the property whether the claimant works or on benefit

Far too many people who do not pay in makes more expensive for the rest of us to support the bloated and inefficient services that Bromley allegedly provide.

This discriminates on the basis of age. The same support should be received regardless of age, which is a protected characteristic under the equalities act.

Personally I have very low income on monthly basis so would need a higher percentage of support otherwise i would still be in financial difficulty.

Due to Covid pandemic a rise in unemployment in the area has left financial strain on many residents. Along with high rents people in Bromley need more assistance from local council rather than less

It should be more support. When it came in it went from a 100% paid via benefit to now 75% with the first year and all announced as don't worry the contribution will be less than 10% payable. You're now well Over triple the original amount asked to pay. It's disgusting. Manage your money better. You aren't even offering most services fairly and asking people to pay for services they should have paid for under council tax. You're mishandling your finances and outsource everything and whining all the time about having no money.

"I don't think it's one size fits all.

I am a 44 year old stage 4 cancer patient; unable to work. My 30 year old brother whom I live with and am 24/7 carer for, has physical disabilities and learning difficulties. We are not

able to work."

I used to be exempt from council tax as a disabled full time wheelchair user in receipt of high rate DLA. I am also in receipt of ESA and my wife receives carers allowance. The contribution currently asked for constitutes a cut in our benefit which does not increase to offset the council tax we are now asked to pay. I do not consider this fair. I am unable to work due to my disability and my wife provides full time care and so is also unable to work.

I feel that 75% support is too low. If a person is on Universal Credit their income is already incredible low without council tax taking more of it.

75% support is not enough

Mismanagement by Conservative government is not an acceptable reason for people to be starved to death.

The council should be looking to raise as much funds as possible, as well as spend its limited resources in the most effective way to the benefit of all residents. Its is unfair to be asking some taxpayers to be pay the tax liability of others, while we are all getting less spending per head as cuts and rationining continues unabated.

Both myself and my wife have recently lost our jobs and are now reliant on benefits. Having 3 children it is extremely difficult to make ends meet, whilst pensioners will have a limited expenditure and therefore more disposable income, adults with children know how difficult this can be and when forced into paying council tax it if the children who are made to suffer, we recently had to put off buying our child new shoes for school as we didn't have enough money to buy new ones, this meant for a couple of weeks he had to go to school in shoes that were hurting him. You have also removed the school uniform benefit so families with growing children are made to suffer even more. This support should be better and means tested

"With the current Covid-19 pandemic, Bromley Council must be supporting those families who have been hit hard by losing their job and income, been on the Universal Credit and have no means of paying for things other than their food. These people are very 'vulnerable' and it would not be justice to charge them 25% of the bill. This would mean they have to cut from their food adversely affecting their health and that of their children, etc..

The Council should be helping these people and certainly not milking them!"

Council shoud help more to low income people .

The disadvantaged/ poor and disabled people should get 100% support, this is what a caring society, Government and Council would do. The people and companies with the broadest shoulders should be the one whom should be paying the most.

As a disabled individual who can not work and has to rely on benefits. I find it hard some months to afford the extra 25%. I wish I could work and pay my taxes, However, this is not possible.

**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.**

Perhaps parking charges increase and make people pay for the parking where is now free street parking.

Council tax should be abolished for working age people

council waste money

"Ask for volunteers +streamline services +work experience in this climate its obvious that not many people will be able to

pay more money out! we would struggle with this"

Don't agree everyone should pay full council tax

Increase council tax for those in band H review bands as very out of date  
Government taxes

TV "BBC" LICENCES TOO MANY TO LIST.

Set it for the likes of wealthy people

"Cut down on works in Bromley town centre.

I.E changing names like the glades to into then back again and all the new paving in the town centre waste of money"

Given the year with coronarvirus some services would have made savings when not operational council reserves to support in this extraordinary time given the raising unemployment and recession

And stop awarding according to general perception valuable contracts to cronies

some people don't choose to be on benefits we struggle as it is.

I DONT WANT TO TICK INCREASE BUT YOU NEED TO FIND THE MONEY FROM SOMEWHERE CENTRAL GOVERNMENT MAYBE

I know the decisions are painful but you do try to be as fair as possible and it is appreciated by me no one knows where all the revenue for parking fines is used so this revenue should be used in road repairs and pavements and the revenue given to councils by the government could be used to help other services the council provide

There is a lot of money being wasted by not only Bromley council but also by all councils see above - money should be used in some way to lower rents so people think its worth it to work

Re-evaluate residential properties

Stop paying for useless projects that not all can use

I think if you work should pay a small contribution not full Council Tax

"Reduce bloated pension schemes and remove levels of private companies that are all taking their cut at every stage.

If local authority staff were not so greedy and self serving in years previous perhaps the private sharks would not have looked so appealing - obviously lots of corruption and back room deals!"

Services have already been cut to the bare minimum and Bromley is rapidly becoming a second class borough in London. Council tax needs to go up and everyone (regardless of age) needs to contribute to provide the resources to restore the borough.

non essential services such as town centre improvements and cosmetic services that are non essential to residents should be mothballed. Prioritise social case and Housing

Manage your damn money properly. Charge less and actually provide services.

"reduce collection for rubbish

cut libraries

cut police support"

"Parking attendants.

Get rid of at least 90% the parking attendants"

I think that money could be saved by the LA by stopping the practice of using outside agencies to conduct borough work. This would also have the benefit of giving jobs to local people rather than those miles away.

This is a Conservative Council. If you don't think you have enough money to fulfill your obligations to the people that live within the Bromley area, go get some from the Conservative Government. If there's enough to give away to friends and associates of government for contracts which are never fulfilled, there's enough to fund councils properly & not be trying to starve people to death.

This is a leading question. Support should be cut to protected these services.

"I am a resident in the Orpington area.

I see many residents driving around in huge expensive vehicles, Range Rovers, Audi, Mercedes, Lexus etc.

I feel these residents should be made to pay higher rates to the lower middle class like myself.

These residents think nothing of spending hundreds of pounds on their children's extravagant birthday parties and yet still pay the same amount of council tax as the less fortunate lower end middle class residents.

Stop paying council workers bonuses and other additional payments above their salaries  
The amount of council tax I pay is leaving me in debt, I think £27 a month from low income households is too much, I can't even save any money's for a pair of trainers or new clothes when I'm paying so much council tax. shut some parks or recks around Bromley, the ones with high crime rates, sell the land to developers and use that moneys to help reduce costs also of maintenance on said park or reck, charge more for parking or something and make pensioners pay council tax they have worked all their life have pensions and do alright, well the ones around here are anyways and they are well off compared to me.

The Council should be charging those people on higher income or with the buy-to-let property portfolios more tax to support the low income and decent / honest people who are suffering. It is so unfair ..... It would not be difficult for the Council to identify landlords with multiple properties. I am

not suggesting that the Council should be acting as Robin Hood but merely that it should strive to ensure a just mechanism so that vulnerable low income families and their children do not suffer more than what they are currently going through with the uncertainty and unemployment resulting from the Covid-19 pandemic.

I don't think that the level of assistance should increase for working age people. It should increase for pensioners.

Central government

I think the Council should dip in to its reserves, cut the number of Councillors and sell off or rent the Civic Centre. I represent no-one but myself.

**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:**

AS per normal people very few people like me never knew it existed

"The council should be reducing the council tax fee. so that everyone can afford to maintain payments.

I work full time I have requested for support from the council but all I got were penalty and court fees"

Stupid question how do we know how the fund is used annually and if its the correct amount

If that's what the council can afford then yes

not sure

The council should have more than that amount and be able to help

I am struggling with debts & bills and cannot afford school shoes or food yet so I need to apply for this & will probably be rejected

For those who really need the fund and with prove of need

SORRY I DONT KNOW WHAT CAN I SAY

To many people getting help when they have sons and daughters living with them.

Elderly people and ex army need help & the hardship fund should not be abused by NON UK/ BRITISH CITIZENS.

Didn't know there was a hardship fund I 've been in serve hardship and never received help

I appreciate the financial changes faced by all across the country but a fund of £100,000 seems inadequate for o la size of Bromley suggest a increase of 20%

Every few people know about the hardship fund

Should be enough to help all who need help/support

NOT SURE

Individuals ought to be able to live with in their means

Not sure so couldn't answer  
No should be more

THERE SHOULD BE MORE MONEY TO SHARE FOR ALL

I would think that £100,000 in the large area of Bromley would be difficult to disperse  
not able to make my mind up so couldn't answer

Needs more

Amount seems low given the number of residents in the Borough particularly in the current climate  
where there are job cuts caused by COVID-19

Given the number of people who have been adversely affected by COVID-19 and who will be  
struggling I think the council should raise the level of funding above £100,000

Not sure

not sure

It seems rather low having in mind the population of Bromley

its impossible to answer without knowing number of vulnerable applicants and level of hardship

Cant answer above

NOT SURE

Need history data to respond meaning fully

could not answer this question

not sure

Particularly in view of increased levels of financial difficulty due to COVID-19 the council should  
consider increasing the amount and possibly scope of the fund

NOT SURE

The amount of people out there that need help the funding should be increased so those who need  
it get it.

HAD TO PUT SOME THINK ABOVE BUT DONT WANT TO MARK YES OR NO. The reason why  
I didn't answer question B is that I don't have statistical data to check how many people apply on  
average for this type of help

With the prospect of increased redundancies there could be more calls on a hardship fund -support  
should be short term but the fund should be flexible enough to deal with unforeseen demands  
Is the £100,000 for individual or in total if in total I think its needs to be increased in the  
unpresidented times Â£500,000

Is £100,000 enough to help those in financial hardship or vulnerable people

Didn't answer either question but couldn't move on unless ticked boxes  
It should be more and should be used

Slightly more. ben is vulnerable, we live in care home no PPE been given  
It seems a little on the low side. However it is good to know that there is indeed such a fund. I was born into extreme poverty ( no bed linen only rags and old coats) and the changes I have seen are very encouraging

Unable to comment as I never knew about it or has it been made public regarding the hardship fund amount ?

I think a Bromley resident who is not familiar with council funding and the needs of people who might have to claim on a hardship fund cannot give a sensible answer to the question . A sum of £200,000 would allow the council to help more people

see my previous comments

The amount should increase in line with the percentage rise of the Council Tax whenever an increase is applied to residents

definition of hardship is unclear - income support should be income - council should provide services not define hardship and compensate for it

The sentiments are well meant and in theory I agree with them but in practice too many people know how to abuse such policies

Difficult to comment without an understanding of the typical draw/need ( and whether the fund is usually sufficient or not )

I think those who are vulnerable and cant work should volunteer should be fully supported. those that don't contribute to society and are not vulnerable should have less access to funds

YOu are encouraging people not to push to look after themselves There is too much burden on those not claiming

Should be able to flex up or down according to demand / circumstances

Level of funding should relate to the need and by council priorities for supporting vulnerable people eg having to access food banks council run service provision etc

Low paid pension causes hardship and cannot feed and support themselves

Always helping doesn't help people get on their feet they always expect a hand out !

I don't have enough information to know whether the level is correct but it seems low, what is more important is whether you are spending it its pointless if you don't use it or promote it

Insufficient info to comment whether the 100k is correct

I was affected several times by hardship and never got any support  
Fund should be greatly increased during the pandemic

How on earth could I provide a meaningful answer without any background information? You may as well be asking how many sweets do I think are in the jar!

Higher amount

We should provide for our most vulnerable. We can and should do more.

Should be more. And actually paid to people. I don't know a single vulnerable person who has

been helped with this fund

should be 0

I agree with it as long as it is going to the right people.

This is not a question we can answer as we do not have access to the numbers of people requesting help. If the applications for help exceed £100,000 then it's clearly not enough but if there is money left over then perhaps it is!

This is a Conservative Council. If you don't think you have enough money to fulfill your obligations to the people that live within the Bromley area, go get some from the Conservative Government. If there's enough to give away to friends and associates of government for contracts which are never fulfilled, there's enough to fund councils properly & not be trying to starve people to death.

Or more

I think the value of the hardship fund should be higher, for example £250,000, as I find it hard to believe that £100,000 is sufficient extra help for those residents experiencing exceptional financial hardship.

Should be more

It should be more

I think the hardship fund should be determined on individual household circumstances. Impossible to say as I don't know the figures involved and I wouldn't like to make an unfair judgement .

The fund should be what ever is needed, when you are talking about real hardship people are suffering and that includes children going hungry, in the UK in 2020 this should not be happening. This borough has some very high earners and some very valuable housing. Some of these people would not even notice an increase in their council tax, where at the other end of the scale people are genuinely suffering

I believe in these unprecedented times there will be need for a higher level of funding possibly £200,000.

£100,000 would not be enough.

The fund should be bigger as the number of vulnerable people is increasing at this time £100,000 is a very marginal amount for this .

More.

That would depend on how many people in the borough need help. Would that cover all.

**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?**

Thank you very much for all the support I've received from the council, is much appreciated and our family could not do without it :

I would like to see council tax abolished for unemployed people and working age people

Help people and support people who are struggling with life and the suicide rate will continue to increase

Funds to be put into the council tax bill every resident

Do the sums and make it work ! Extra expenses like this survey are not helpful

Too many pensioners cannot claim support as they are pennies over the threshold so unable to claim any other support or benefits either so why should working age people get support pensioners have in all their life for there pension and some still struggle

Stop bedroom tax

no comment

A revised property band at over £320.000 would give the option if a higher rate of council tax for very high value properties in Bromley

Council is try there best and I want them to keep it up as usual

No changes

Stop harassing people

Disabled people with extra rooms shouldn't have to pay extra H/B & C.TAX

people over 80 shouldn't have to pay anything

Increase council services such as bin collections on a weekly basis and not fortnightly

Sorry I don't say how much can I explains or what ..?

People over the age of 75 should not have to pay council tax.

Write off unpaid tax why in lock down

Increase in funding 2021/2022 for registered long term disabled unable to work

With covid I feel there will be a great demand for help and I think you need to look at how you will respond to this new demand

Everyone MUST pay something towards council tax, even if its a minimal amount, whilst appreciating cases of hardship the principle of paying must be encouraged otherwise people become over dependant on the state /local authority

No it is really good as it is and I'm very grateful for all the councils help due to a low income due till illness

Yes you should see how much benefit is left after the benefit cap not just calculating the income

Not at the moment

Yes more help for O.A.PS

Nothing to add to the above

No other comments

Less money spent on silly projects -like graffiti removal at skateboarding parks in Crystal palace park more money allocated to projects to alleviate climate change. Plant wild flowers verges in the borough maintenance of exciting trees in the borough ECT

NO CHANGE

If recession/unemployment following 2020 increase significantly a call to review the CTS threshold and hardship to maintain support for those most vulnerable

More housing (council housing)

Nothing sensible

People need all the help they can get as times are hard as they are.

Although I don't mind paying a small amount to CT but to pay a big chunk out if my benefit money has a big impact to whether I eat that week for myself and my kids (1 of whom is disabled and vulnerable)

Make it easier to understand.

Persons who are disabled should not have to pay any council tax as it is the decent thing that they should not have to pay

Bromley is a rich borough, care in the community is the thing of the future and ben relies on family. Too many rely on family, more support network ie night of for my brother who cares, free meal out for that matter, free TV licence. Anything to create a better atmosphere day trips movie tickets

Maybe you already have them but if not courses on good parenting

I would like the Council to protect younger people ( perhaps aged 24 or under ) is the same way older people are quite rightly protected. The young may come from difficult family situations be gaining qualifications in education or just at the start of their careers and in uncertain employment. It takes time to get your life started and I would like to support to be given to the group. I would pay for this through Council Tax.

If not part of the scheme requirements households where there is more than one working age person in the household to support should be reduced with earning or earning potential

You should use any money saved to introduce paper recycling for businesses it is terrible that businesses are forced to throw their used paper in the normal bin

I would respectfully suggest if you expect me/us to provide an informed opinion you need to inform us of all relevant information. Issues like this demand serious mature discussion and proper consideration of all relevant data

I don't know enough about the scheme but just dishing out money to support people pay largely private landlords is not sustainable for the greater good. We have to work on getting people out of poverty and create opportunities to level the playing field

Re-evaluate residential properties eg re-band / align properties to correct banding according to number of bedrooms / square footage. Landlords profiting by increasing rental bedrooms. Enforce fines on abusive and fraudulent landlords - invest in enforcement office and apply new KPIs to achieve goals

We are all members of the community and we should all contribute to pay for all services provided by the council - even if we don't use them personally eg schools / education. Of course we must look after the less fortunate in society but the needs of the minority should never exceed the needs of the majority. With unemployment likely to become increasingly

relevant we should avoid the danger of benefits becoming a reason to remain unemployed

support the scheme in particular in context of current pandemic as indicated above  
reducing support in this area likely to have a knock on effect and costs to other council  
support services eg social care

I am disabled on benefits with my electrical bill and other bills and I am struggling

Why are you asking for feedback and comments when you have as a council already  
made up your minds what you are going to do ! Council tax should go on the services that  
as a council tax payer I do not see

Stop using bailiffs to pursue people in real hardship and poverty, stop adding bailiffs  
charges to peoples debts. Other councils don't use bailiffs and exemptions to the minimum  
charge of people on disability benefits or income support

Abolish it altogether as it is not fair on tenants or workers as you get full rent

"Rather than give money away how about saving some on useless individuals who  
fabricate nonsense and clearly do not understand the systems that they are supposed to  
administer.

While we are at it how much did you really need to spend on putting in new paving, moving  
market stalls, and ridiculously expensive street furniture? All utterly pointless but I'm sure  
someone did well out of the contract."

Low wages and children on benefit should get help

I would like there to be a faster response and stronger communication. I have already filled  
out all the forms for council tax support and have been asked to fill it out again.

Yes. See previous comments. Including making social housing council owned. Making  
more social housing. Paying for social care instead of charging people. Shame on you.

yes cut all support schemes there will always be needy people

Penalising for extra bedrooms when trying to downsize should stop.

A reduction in council tax

More funding available to those who need it

More discounts

Support should be gradually reduced to zero, council tax should be increased across the  
borough.

Helping people pay their top up rent to maintain being able to continue to live in rented  
accommodation as there is not council housing available and landlords do not want  
housing benefit claimants. We do not want to be told to look for cheaper as there is  
nothing cheap in Bromley and landlords do not want to take housing benefit so it becomes  
very difficult to find somewhere to live.

My household income is Â£21000 and I am an immigrant cannot access any public fund.  
What council is doing for us? Paying council tax is an extra burden for us. I have a wife  
and a child and private tenants how can I survive?

"I have noticed a huge increase in migration of foreigners in the borough in the last few

years.

I have heard that many foreign residents claim benefits then send the money back to their native country for their families.

This is wrong as it penalizes the rest of us in many ways and has to stop.

I think there should be stricter rules for identification authenticity made for migrants when applying for benefits."

More support is needed at the bottom end of the scale, maybe a food voucher scheme could be setup with the help of supermarkets and big businesses to off set the council tax burden.

Pensioner should pay council tax like everyone else is

Publication been sent out to residents on support which is out there to help people in need of financial assistance with council tax and Rent.

It is highly commendable

CTS must get back to the original level of 100% for the unemployed families on full Universal Credit who also have children.

Give same support or more from previous year .

Support the vulnerable, disadvantaged, poor and disabled and not penalise them for being in the situation through no fault of their. Only a cold hearted, uncaring society, Government or Council will penalise them, Give them a 100% support like they deserve.

Every household is not the same. the majority of people living together are not related and just sharing the rent, council tax and other taxes. current situation puts vulnerable people in a situation where they are excluded from Council tax support, because other people living in the same house (not related to them) has higher than average income.

I think you have already decided what you are going to do and this consultation is merely a smoke screen.