

Appendix A – Council Tax Support Banded Income Scheme Consultation Feedback

1. An open question was raised for general comments on the scheme. A notable response was "I particularly like the change to Non-dependant charges, as my daughter is 18, I need to pay £60 a month Council tax. I feel penalised as full time carer, and money is extremely tight, as I am home with disabled son 6 days a week, I can only work 1 day a week. My daughter helps care for him. I like the April 2020 changes as my family will be better off for it."
2. In responses to the individual questions we only asked for alternative suggestions and comments where the response was 'no' or 'I don't know'
3. The responses to individual amendments to the scheme were as follows
 - a. To use a banded scheme where the percentage of Council Tax that householders are liable to pay is based on the income band each household falls into;

Stakeholders were supportive of this change as they accepted the financial uncertainty that changes to Council Tax Support (CTS) for those in receipt of Universal Credit (UC) needs to be minimised. Citizens Advice West Sussex (CAWS) had concerns over those who would be receiving a reduced amount of support but the Council has reassured them that we will work with these people to minimise financial hardship. The Council will also provide an escalation route to CAWS for independent advice if individuals have any concerns.

Of the consultation questionnaires that were completed by residents one response suggested that we only charge Council Tax to those who own their properties and not those who rent. This would lead to inflated rental prices with no additional assistance and would cause greater hardship. Another voiced concern that we should keep the scheme the same and not make money from the poor and vulnerable people. The scheme is set out to be cost neutral and not to make money.

- b. A flat rate of deduction for all non-dependants of £4 per week (Non-dependants are often people like grown-up sons and daughters or elderly relatives. A non-dependant is a person who lives with you but is not liable for paying rent under a formal arrangement). This excludes:-
 - I. non-dependants in households where the claimant and/or partner are in receipt of the care component of disability living allowance or the daily living component or personal independence payments or attendance allowance, and
 - II. Non-dependents in households where they are on passported benefits (in receipt of Income Support, Job Seekers Allowance (income based), Employment and Support Allowance (income related) or Guaranteed Pension Credit) or they are in receipt of Universal Credit **and** are not working

Stakeholders were generally supportive of this change.

Of the consultation questionnaires that were completed by residents only one negative comment was made; stating that we should keep the deductions as

they are as there is no need to change. Simplifying deductions will reduce administrative costs, align CTS with Universal Credit and reduce the requirement for residents to provide evidence of their non-dependants earnings.

- c. The removal of second adult rebate for people of working age

Stakeholders were overall supportive of this change as it will affect very few people.

3 of the questionnaire responses had negative responses, one said there was no need for change, one was concerned that changes were futile as the next government will change the scheme anyway. The final concern was that many people are carers of SEND children or the elderly. There are other discounts, reliefs and exemptions which are available for carers and disabled residents.

- d. The introduction of a minimum income floor (MIF) for self-employed claimants

CAWS had concerns over this as they have seen the effect that it has on self-employed residents in receipt of UC.

There were also 2 comments from the public. The first was that there was no need for change and the other stating that we could instead make savings by only paying MPs for the time they were doing effective work and it would be unfair due to fluctuating earnings.

Please see Appendix C for how if approved the Council we will apply the MIF sympathetically to minimise hardship.

- e. Increase in backdating to 12 months providing good cause is demonstrated

Stakeholders were supportive of this change as it will assist the most vulnerable people who are unable to make a claim at the appropriate time.

Of the consultation responses from the public, one again said there was no need for change, one said that we should only award CTS from the date they claimed and a third said that is all futile when the Council is taking from the sector of society that cannot feed themselves.

To enable backdating for between 3 and 12 months the Revenues and Benefits Service would have to seek approval on each individual case from the section 151 officer. This is an option that would only be used for the most financially challenged residents and where there is continuous good cause for them not claiming at an earlier date. This change is not to save any money from vulnerable claimants but on the contrary to assist those who are most in need.

- f. Alignment with Housing Benefit regulation changes

Stakeholders were very much supportive of this change to simplify the scheme in line with housing benefit.

Only one comment was received which was that we should not make changes as there was too much paperwork with even small changes in income. We are bound by regulation with the details that are required in notification letters. By

aligning the schemes, however, it would lead to needing less clarification and hopefully reduce the length of the notification letters if the Housing Benefit and Council Tax Support schemes were more similar.

- g. No claim form is required for Council Tax Support where Universal Credit (UC) is claimed.

Stakeholders were supportive of this change as it is less of a burden on Council Tax payers in receipt of UC, some of whom may have chaotic lives so would increase the chances of people being in receipt of the support they are entitled to.

There was only one comment from the public consultation which was that we should scrap UC. This is of course outside the Council's control.

Since the consultation started it has become apparent that the Council will not be able to remove the requirement for a CTS claim form in all cases. If the housing element of UC is not claimed then information is not provided on the number or income of non-dependents. The Benefits Service would therefore remove the need for a CTS claim form where possible but produce a simple 2 sided document for completion where we had no housing costs and therefore no details of non-dependents. This form will be made available in paper form as well as online.