

Report to Overview and Scrutiny Performance and Value for Money Select Committee

Council Tax Reduction Scheme 2019/20

Portfolio Holder:

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Reason for Decision

The purpose of the report is to present the proposed Council Tax Reduction Scheme for 2019/20.

Executive Summary

Members will recall that there is a requirement to have a Council Tax Reduction (CTR) scheme to support residents who qualify for assistance in paying Council Tax. The Local Government Finance Act 2012 places a requirement that each year a billing authority must consider whether to revise its Council Tax Reduction scheme or to replace it with another scheme. Any change to the 2019/20 scheme must be agreed by full Council in line with budget setting and no later than 10 March 2019. For Oldham, this requires the Council to agree a revised 2019/20 scheme at the 27 February 2019 Council meeting.

The Council's CTR scheme has been largely un-amended since April 2015 when the Council introduced a scheme that:

- Limited CTR to a maximum of 85% of Council Tax for a Band A property
- Removed second adult discount for those of working age.

The scheme was initially calculated to generate an amount of funding that, when taken alongside the direct grant received, additional income from the treatment of local discounts and premiums for empty properties, made the scheme viable. The CTR element of this calculation works on the basis of an assumed collection rate.

A full examination of all the changes that might be considered for the 2019/20 scheme was explored by Cabinet in August 2018. This included potential changes to be considered following a wider understanding gained of the impact of Universal Credit (UC) full service on residents since its roll out in April 2017. Members agreed to approve a public consultation focusing on areas of

review that either maintained the status quo or introduced changes that would be beneficial for the claimant. With this in mind, the consultation sought views on the maintenance of the maximum support afforded under the scheme of 85% of a Band A Council Tax property charge, a range of changes to the calculation of CTR for UC claimants and bringing some income disregards, already in place in the national Housing Benefit scheme, into alignment with the local CTR scheme.

A public consultation was carried out over the period 12 September 2018 to 24 October 2018. Overall respondents were in favour of the proposals with an average 77% agreement across the four proposed changes and 71% in favour of maintaining the current 85% scheme.

Recommendations

It is recommended that the Select Committee considers the proposed Council Tax Reduction scheme changes for 2019/20:

- i. To continue to limit support to a maximum of 85% of Council Tax of a Band A property
- ii. Treat information received from the Department for Work and Pensions (DWP) about Universal Credit entitlement as a claim for Council Tax Reduction
- iii. Apply earnings disregards for Universal Credit/Council Tax Reduction (UC/CTR) claims as set out below
 - a. Single claimant £5 per week
 - b. Couple £10 per week
 - c. Disabled/Carer £20 per week
 - d. Lone Parent £25 per week
- iv. Incorporate housing costs into the UC/CTR calculation
- v. Apply disregards for Bereavement Support Allowance and post graduate master's degree loan and special support payments in the assessment of Council Tax Reduction.

Council Tax Reduction Scheme 2019/20

1 Background

- 1.1 Prior to April 2013, Council Tax Payers who qualified for assistance could apply for Council Tax Benefit (CTB) to help pay their Council Tax. The CTB scheme was administered by Local Authorities on behalf of the Department for Work and Pensions (DWP) and was assessed on a means tested basis. Under this national scheme, Council Tax payers could receive benefit of up to 100% of their Council Tax liability. The Council then received full funding from the Government for all correct CTB awards made. Changes introduced by the Government abolished CTB from 1 April 2013 and made Local Authorities responsible for setting up their own local Council Tax Reduction schemes (CTR) for working age people. The Government also reduced the amount of funding given to Councils to pay for the schemes in 2013/14 by 10%. The CTR scheme for pensioners is set by the Government and is not subject to the changes applied to those of working age. In devising new CTR schemes, the majority of Local Authorities have largely adopted schemes that replicate the old CTB schemes and then applied a minimum payment for working age customers to make up the funding difference.
- 1.2 Since 2014/15, the amount of grant received from Government to pay for CTR has been included within the general grant (Revenue Support Grant) that the Council receives and the amount to support CTR schemes is not specifically identified year on year. Revenue Support Grant (RSG) continues to be significantly reduced each year and with the introduction of the pilot of 100% Business Rates Retention and the subsuming of RSG into the Councils Business Rates Top Up Grant, it is fair to say the link between Central Government funding and Central Government support for CTR has been cut.
- 1.3 The legislation confers an obligation on the Council to consider whether to review the CTR scheme on an annual basis. This consideration needs to be given by full Council prior to the deadline for the setting of the Council's budget (which for 2019/20 is no later than 10 March 2019). The last Council meeting before this date is 27 February 2019.

2 Current Position

- 2.1 The Council currently has a CTR scheme that awards a maximum payment of 85% of a Band A rate of Council Tax and has removed the provision to award second adult rebate for claimants of working age.
- 2.2 Current projections for the annual collection rates for CTR cases due in 2018/19 suggest a collection rate between 80% and 85%. This is a similar CTR collection rate to that recovered in 2017/18 (the 2017/18 collection rate was 81.47%). An additional 5% collection of CTR debt could result in an extra £239k in Council Tax receipts for 2018/19.
- 2.3 There have been a number of changes to the Housing Benefit (HB) scheme since April 2016. This means that the CTR scheme does not align with revised Housing Benefit regulations. The main HB changes are:

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- The family premium was removed for all new claimants
 - In households with two or more children, any subsequent children born after April 2017 are no longer be eligible for further support
 - Limiting backdating to one month (previously this was six months)
 - Changes to the temporary absence for a rule (this limits housing benefit payments to 4 weeks from 13 weeks for those travelling abroad)
 - There is an Employment and Support Allowance Work related activity component from 3 April 2017
 - There is a disregard of Post Graduate Master's degree loan and special support loans
 - Disregard of bereavement payments from 3 April 2017

2.4 Prior to Cabinet approval on 20 August 2018 to carry out a public consultation, a number of options for changing the CTR scheme were considered. These options included reducing the maximum level of CTR support to 82.5%, aligning the CTR scheme to reflect some or all of the changes made to HB, introducing a minimum income floor for self-employed claimants and changing the method of assessment for Universal Credit/Council Tax Reduction (UC/ CTR) cases.

2.5 Members agreed to consult on options that would either maintain the current level of CTR offered or would result in increased levels of CTR for working age residents on low incomes. In particular, it was felt that Oldham, as an early adopter of Universal Credit, was well placed to identify areas where the UC/CTR claiming process could be adjusted to better meet the needs of residents.

3 Options/Alternatives

3.1 A public consultation was therefore carried out from 12th September to 24th October 2018, covering 5 key areas:

- Continuing to limit support to a maximum of 85% of Council Tax of a Band A property
- Treating information received from the Department for Work and Pensions (DWP) about Universal Credit entitlement as a claim for Council Tax Reduction
- Incentivising work for those in receipt of UC/CTR by aligning with the treatment of earnings made in Housing Benefit (HB)
- Including housing costs in the way CTR is calculated for UC claimants
- Applying income disregards for bereavement support payments, post graduate degree loans and special support payment.

3.2 A total of 129 residents responded to the consultation, 31.6% of whom receive CTR. The consultation was conducted online on the Council's website. A hard copy version of the survey document was also made available at Access Oldham, where face to face contact with residents with Council Tax and Benefit issues is handled. Access Oldham officers actively encouraged residents to complete the survey when they visited the Council during the consultation period. Partner and stakeholder organisations were directly asked to participate in the consultation and a separate survey link for organisations was set up on the website. A total of 7 responses were received from 5 organisations.

3.3 The consultation was communicated by an extensive media campaign involving Twitter, Facebook, the Council's website and via local media. Overall the campaign achieved a reach of more than 10,000; however the levels of engagement were very low. The low levels of engagement are indicative of the experience of the Council when

conducting a similar CTR consultation for 2015/16 and also reflect the experience of other local authorities when carrying out CTR consultations. Low engagement levels are also expected when the detail of the consultation is particularly technical.

3.4 Overall Response to the Consultation

Overall, respondents were in favour of the proposed changes with an average of 77% agreement across the four proposed changes and 71% in favour of maintaining the current scheme.

Table 1: Summary of Resident's views

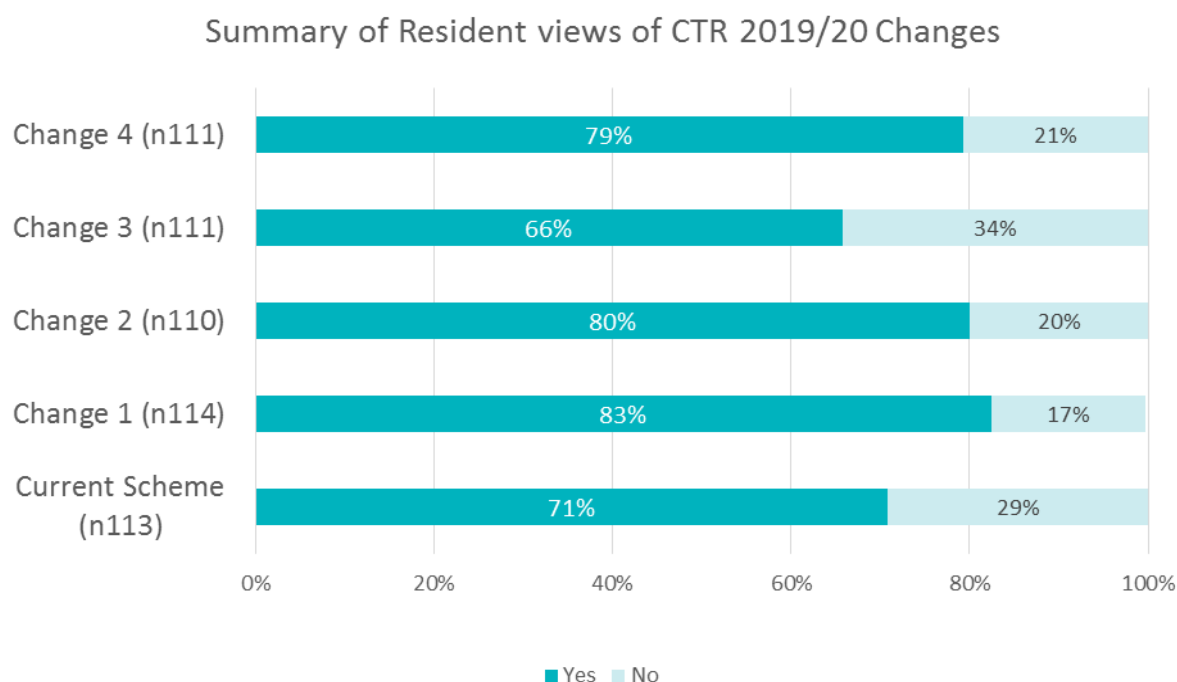


Table 1: Key

| Key | | |
|----------------|-------------------|-----------------------------------|
| Questions | No of respondents | Summary Name |
| Current Scheme | 113 | Maintaining the 85% scheme |
| Change 1 | 114 | Making a CTR claim – UC claimants |
| Change 2 | 110 | Earnings disregards |
| Change 3 | 111 | Housing Costs |
| Change 4 | 111 | Income disregards |

Paragraphs 3.5 to 3.10 set out the background and responses to each of the consultation proposals in more detail.

3.5 Current Scheme: Maintain the current 85% maximum scheme

The current scheme limits the maximum CTR award to 85% of Council Tax for a Band A property. The scheme is understood and established within Oldham and the basis of the calculation is very similar to the Housing Benefit and Pensioner CTR scheme. This scheme requires minimum payments towards Council Tax as set out below (alongside a comparison table of other local CTR schemes). An overall CTR collection rate of 80% rate would support the delivery of the income needed to meet the Council Tax income requirements for 2019/20.

Table 2a: Council Tax charges: CTR limited to 85% maximum of Council Tax for a Band A property

| Council Tax Charge(Working Age, Maximum LCTR Award, No Single Person Discount Applied) | | | | | | |
|--|-----------|-----------------|-----------|---------------------|---------------------|--------|
| Band | Charge | Maximum Support | Annual | Monthly (12 Months) | Monthly (10 Months) | Weekly |
| A | £1,202.85 | £1,022.42 | £180.43 | £15.04 | £18.04 | £3.46 |
| B | £1,403.33 | £1,022.42 | £380.91 | £31.74 | £38.09 | £7.31 |
| C | £1,603.80 | £1,022.42 | £581.38 | £48.45 | £58.14 | £11.15 |
| D | £1,804.29 | £1,022.42 | £781.87 | £65.16 | £78.19 | £14.99 |
| E | £2,205.24 | £1,022.42 | £1,182.82 | £98.57 | £118.28 | £22.68 |
| F | £2,606.20 | £1,022.42 | £1,583.78 | £131.98 | £158.38 | £30.37 |
| G | £3,007.14 | £1,022.42 | £1,984.72 | £165.39 | £198.47 | £38.06 |
| H | £3,608.58 | £1,022.42 | £2,586.16 | £215.51 | £258.62 | £49.60 |
| Council Tax Charge(Working Age, Maximum LCTR Award, Single Person Discount Applied) | | | | | | |
| Band | Charge | Maximum Support | Annual | Monthly(12 Months) | Monthly(10 Months) | Weekly |
| A | £902.14 | £766.82 | £135.32 | £11.28 | £13.53 | £2.60 |
| B | £1,052.50 | £766.82 | £285.68 | £23.81 | £28.57 | £5.48 |
| C | £1,202.85 | £766.82 | £436.03 | £36.34 | £43.60 | £8.36 |
| D | £1,353.22 | £766.82 | £586.40 | £48.87 | £58.64 | £11.25 |
| E | £1,653.93 | £766.82 | £887.11 | £73.93 | £88.71 | £17.01 |
| F | £1,954.65 | £766.82 | £1,187.83 | £98.99 | £118.78 | £22.78 |
| G | £2,255.36 | £766.82 | £1,488.54 | £124.04 | £148.85 | £28.55 |
| H | £2,706.44 | £766.82 | £1,939.62 | £161.63 | £193.96 | £37.20 |

Table 2b: Neighbouring Local Authority minimum CTR payments for 2018/19 are detailed below

| Council Tax Charge(Working Age, Maximum LCTR Award, No Single Occupier Discount Applied) | | | | |
|--|--------------------------|-------------------|---------------|--|
| LA | Council Tax Band A 18/19 | Maximum Support % | Annual Charge | Minimum Weekly Payment if in receipt of Full CTR |
| Oldham | £1,202.85 | 85% | £180.43 | £3.46 |
| Rochdale | £1,175.78 | 85% | £176.37 | £3.38 |
| Tameside | £1,103.46 | 75% | £275.87 | £5.29 |
| Stockport | £1,226.63 | 100% | £0.00 | £0.00 |
| Manchester | £1,044.52 | 82.50% | £182.79 | £3.51 |
| Trafford | £989.92 | 100% | £0.00 | £0.00 |
| Bury | £1,165.91 | 80% | £233.18 | £4.47 |

Respondents were asked if they agreed that the current level of CTR support should be maintained i.e. keeping the maximum level of CTR support at 85% of Council Tax for a Band A property.

Overall, 71% of respondents agreed that the current level of support should be maintained.

Agreement for this arrangement was lower for Council Tax payers (72%) than those in receipt of CTR (78%) and those in receipt of Universal Credit (78%).

Those in part time employment were least likely to agree with the change (61.5%).

By paying a small charge towards Council tax it encourages responsibility and financial budgeting, female, 45-54 Full time employed.

3.6 **Change 1: Making a CTR claim – Universal Credit claimants**

The roll out of the full service of Universal Credit (UC) commenced in Oldham from April 2017 and the UC/CTR caseload is increasing as a result. The number of UC /CTR cases in December 2018 amounts to 4,337 of an overall CTR caseload of 22,026. The overall CTR caseload has reduced from 23,411 since the introduction of UC.

- 3.7 Universal Credit replaces six working age benefits including Housing Benefit. It is claimed online directly at Gov.uk. CTR must be applied for separately online with the Council. The Council has worked with the DWP closely to ensure that UC customers are signposted directly to the Council to claim CTR and the Council has also undertaken take up activity over recent months to ensure residents are claiming what they are entitled to. To support this activity, it was proposed that information received by the Council from the DWP relating to a claim for Universal Credit could be treated as a claim for CTR. This would help to maximise entitlement to CTR at the earliest opportunity.

This proposal had the highest number of respondents in favour of the change at 82.5%

Agreement for this arrangement was lower for Council Tax payers (81%) than those in receipt of CTR (86%) and those in receipt of Universal Credit.

I think it's an excellent idea as a resident and a front-line worker in the third sector I see the misery and stress it causes due to lack of information and people assuming this has automatically been applied for as it was when making a Housing Benefit claim in the past. Female, 45-54 Full Time employed

3.8 **Change 2: Earnings disregards – Universal Credit claimants**

When UC was originally introduced, the calculation of the UC award included generous work allowances. When UC was introduced, the Government made it clear that work allowances were deliberately higher than earnings disregards in legacy benefits as part of a commitment to 'make work pay'. The work allowance is the amount an individual or family can earn before their maximum UC award starts to be reduced. However, these were cut in 2016. The reductions meant that work allowances for childless claimants reduced to zero i.e. the UC award for childless claimants will begin to reduce as soon as they enter paid work. The work allowances were also cut significantly for lone parents.

Table 3: Universal Credit Work Allowances

Universal Credit work allowances

£ per year

| | Without housing costs | | | With housing costs | | |
|--|-----------------------|---------|---------|--------------------|---------|---------|
| | 2015-16 | 2016-17 | Change | 2015-16 | 2016-17 | Change |
| Single or couple: no children (not disabled) | £1,332 | £0 | -£1,332 | £1,332 | £0 | -£1,332 |
| Lone parent (adults not disabled) | £8,808 | £4,764 | -£4,044 | £3,156 | £2,304 | -£852 |
| Couple with children (adults not disabled) | £6,432 | £4,764 | -£1,668 | £2,664 | £2,304 | -£360 |
| Single or couple: one or both are disabled | £7,764 | £4,764 | -£3,000 | £2,304 | £2,304 | £0 |

Note For purposes of this table "disabled" indicates the presence of an adult with a "limited capability for work". Also note that different work allowances apply according to whether the household is getting help with Housing Costs.]

The Council Tax Reduction Schemes (Default Scheme) (England) Regulations 2013 did not set a specific provision for earnings to be disregarded when determining income for UC claimants (potentially as a result of the work allowances intended for the UC scheme). The earnings disregards used in Housing Benefit and for other earnings in the CTR scheme are set out below.

Table 4: Housing Benefit earnings disregards

| Table 4 : Earnings Disregards | |
|--|-----------------------------|
| A. Only apply one of these | £ (weekly disregard) |
| Single Person | £5 |
| Couple (at least one working) | £10 |
| Disabled/Carer | £20 |
| Lone Parent | £25 |
| B. Plus additional earnings disregard | |
| If working over 16 or 30 hours (qualifying conditions apply) | £17.10 |

For the 2019/20 scheme, the consultation set out these earnings disregards and asked if residents supported their introduction for UC/CTR cases. The introduction of this measure would support work incentives and potentially mitigate the impact of the Government's cut in work allowances in the assessment of UC awards.

The cost of introducing the earnings disregards is estimated at £200k per annum for the standard earnings disregards (Table 4, Section A - £5, £10, £20, £25) rising to an estimated £313k per annum if the additional earnings disregards (Table 4, Section B £17.10) is also included. Estimating the cost of introducing these changes is contingent on the rate of transition to UC for Oldham residents in 2019/20 and making assumptions about the hours that will be worked by qualifying residents over the year. The CTR is a demand led scheme and so financial estimates for the full range of changes could be as high as £426k in 2019/20 (although this higher level is much less likely). While residents were consulted on the full range of earnings disregards and were supportive of their introduction, limiting the earnings disregards in 2019/20 to those set out in Section A of Table 4 may be a prudent option in 2019/20. This will allow for the introduction of disregarded earnings not currently covered in the UC/CTR scheme for residents and would give the Council the advantage of running the scheme for a year (thus providing more certainty around the full financial impact of introducing the complete range of earnings disregards into the scheme before actually doing so).

Overall, 80% of respondents agreed with this proposed change.

Agreement with this proposal was lower with Council Tax payers (80%) than those in receipt of CTR (82%) and those in receipt of Universal Credit (88%).

Those not in employment were least likely to agree to the change (74%).

As UC roll out continues, there will be increasing numbers of CTR claimants in receipt of Universal Credit. The DWP reviews real time earnings information and other changes to the claimant's income for each 5 week assessment period, even for very slight changes in income. In November 2018, the service received a weekly average of 1,560 items of post from the DWP in relation to claimants in receipt of UC. This compares with an average of 500 items a week in June /July 2017 and 400 items per month prior to the roll out of Universal Credit full service. This increases the administrative burden for Local Authorities and impacts on Council Tax collection and recovery, particularly if a new Council Tax bill and payment instalment plan is issued every month. Some Local Authorities have started to automate some of these DWP notifications. The application of earnings disregards does not require a system upgrade but would limit the ability of the Council to automate some of the UC notifications from the DWP in the future.

3.9 **Change 3 Housing Costs - Universal Credit claimants**

The current UC/CTR calculation does not take housing costs into account. Although for the majority of cases, the inclusion of housing costs as income and in the maximum UC award has no effect on entitlement, there are a small number of cases that have been identified where it would be more beneficial to the claimant to include this as part of the calculation. This change would cost the Council £41k p.a. to implement.

Overall, 66% of respondents agreed with this change

Agreement with this proposal was lower for Council Tax payers (65%) than those in receipt of CTR (71%) and those in receipt of Universal Credit (77%).

3.10 **Change 4 Disregarded Income – CTR**

Some income claimants receive is 'disregarded', i.e. not taken into account, when calculating benefit entitlement. Some changes which are beneficial to the residents, have been made to Housing Benefit regulations but have not been incorporated into the CTR scheme. This includes the treatment of Bereavement Support Payments, Post Graduate Degree loans and special support payments. The consultation sought agreement to including these provision within the CTR scheme. This affects a very small number of claimants and the changes are estimated to cost less than £10k p.a. cumulatively.

Overall 80% of respondents agreed with the change.

Agreement for this proposal was lower for Council Tax payers (78%) than those in receipt of CTR (85%) and those in receipt of Universal Credit (82%).

3.11 In addition to any changes to the 2019/20 scheme, the CTR scheme document at Appendix 3 will also be subject to any changes resulting from prescribed requirements issued by the Secretary of State under paragraph 2(8) of Schedule 1A of the Local Government Finance Act 1992 and any changes from time to time to the figures prescribed by the Government for welfare benefit purposes.

4 Preferred Option

- 4.1 The preferred option following the consultation and further financial analysis is to:
- i. Continue to limit support to a maximum of 85% of Council Tax of a Band A property
 - ii. Use information received from the DWP about UC entitlement as a claim for CTR
 - iii. Apply earnings disregards for UC/CTR claims as set out below
 - a. Single claimant £5 per week
 - b. Couple £10 per week
 - c. Disabled / Carer £20 per week
 - d. Lone Parent £25 per week
 - iv. Incorporate housing costs into the UC/CTR calculation
 - v. Apply disregards for Bereavement Support Allowance and post graduate master's degree loan and special support payments in the assessment of CTR.
- 4.2 Following further financial profiling, it is considered prudent not to apply the additional earnings disregard of £17.10 per week for those working additional hours in 2019/20. The impact of this will be monitored in 2019/20 with a view to inclusion in the scheme for 2020/21.
- 4.3 Following member approval of the 2019/20 scheme and the inclusion of prescribed scheme regulations for 2019/20, the Council's revised CTR scheme will be published on the Council's website and included in the Council report for 27 February 2019.

5 Consultation

- 5.1 The Council has consulted with the major preceptor, the Greater Manchester Combined Authority (GMCA) with regard to the provision of Police and Fire Services. A public consultation on the above options took place between 12th September, 2018 and 24th October, 2018. The consultation was conducted online on the Council's website. Two versions of the survey were prepared, one for residents and one for organisations to complete. A number of stakeholder and partner organisations were contacted directly to encourage participation in the survey. A hard copy version of the survey document was also made available at Access Oldham, where face to face contact with residents on Council Tax and Benefit issues is handled. Access Oldham officers actively encouraged residents to complete the survey when they visited Access Oldham during the consultation period.
- 5.2 The consultation was communicated via an extensive media campaign involving Twitter, Facebook, the Council's website and via press releases to local media. The social media campaign achieved a reach of 10,000. Consultation responses are detailed in the body of this report and are also set out in the Consultation feedback summary report at Appendix 1.

6 Financial Implications

- 6.1 The direct grant previously paid by the Department for Communities and Local Government (now the Ministry for Housing, Communities and Local Government) for Council Tax Reduction Support has now been subsumed within the Council's Settlement Funding Assessment and Revenue Support Grant (RSG) figure which has itself been incorporated within Business Rate Top Up grant under the piloting of 100% Business Rate Retention. The link between CTR arrangements and grant compensation is no longer evident, given the level of grant funding that has been reduced under the Government's austerity agenda.

6.2 As at the time of preparing this report, 85% of claimants have made some payment towards their 2018/19 Council Tax bills, suggesting a collection rate of approximately 80%. As outlined above, data is not available to assess how many of these claimants making payments will fall into arrears during the rest of the year, however it is envisaged that proactive collection methods implemented by the Unity Partnership Ltd will enable the Council to collect an amount between 80% and 85% of the amount due in 2018/19. Weekly monitoring of the collection rate is being maintained to manage the risk of non-collection. One perceived risk at this stage is that the present collection rate will reduce throughout the remainder of the financial year and beyond as the Government's welfare change programme progresses. The amount of disposable income many of the scheme's claimants will have available to meet Council Tax and other financial commitments is likely to reduce. This will have the impact of increasing the risk of arrears from those who are currently paying their Council Tax.

6.3 The table below summarises the current scheme and potential options for consideration. Each option assumes collection rate of 80% (deemed feasible given current projected collection levels).

| Scheme Options | % Band A Property | CTR Billed | Collection Rate | CTR Income |
|----------------|-------------------|------------|-----------------|------------|
| | % | £m | % | £m |
| | 87.5 | 4.475 | 80 | 3.580 |
| | 85 | 4.772 | 80 | 3.818 |
| | 82.5 | 5.069 | 80 | 4.055 |
| | 80 | 5.366 | 80 | 4.293 |

6.4 For each 2.5% movement of CTR benefit, Council Tax income shifts by approximately £297k. However, this is the Council Tax income figure prior to apportionment over the appropriate precepting percentages. In 2018/19, the present allocation percentages are Oldham Council 86.61%, GMCA for Police Services 9.63% and finally GMCA for Fire Services at 3.76%. Therefore a £297k movement would benefit Oldham Council's available funding by approximately £257k.

6.5 The average impact to claimants assuming December caseload numbers of 14,144 claimants remain constant is that for each 2.5% CTR move, a claimant is likely to see a +/-£21.00 adjustment to their CTR benefit depending on whether the CTR scheme is made more or less beneficial.

6.6 As a consequence of not including all the Housing Benefit changes within the Council Tax Reduction Scheme, this scheme is effectively more generous to its recipients than the Housing Benefit regime.

6.7 The introduction of earnings disregards for UC cases is estimated to cost £200k p.a. for the standard earnings disregards rising to a possible £313k if the additional earnings disregards are also introduced. CTR is a demand led scheme and so financial estimates for the full range of changes could be as high as £426k p.a. in 2019/20 (although this higher level is much less likely). Estimates are contingent on the rate of transition to UC for these claimants in 2019/20.

6.8 Incorporating Housing Costs into the assessment of UC/CTR awards is likely to cost £41k in 2019/20.

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- 6.9 Further decisions regarding disregarded bereavement support and postgraduate loan claimants are deemed immaterial from a financial perspective given the very limited numbers of cases within these fields estimated to amount for less than £10k cumulatively.
- 6.10 The Council currently applies a Council Tax Empty Property Premium of 50% for properties empty and unfurnished for over two years, This was introduced from 1st April 2013 to encourage owners of empty properties to bring properties back into use and to help mitigate the impact of reduced central government funding. From 1st April 2019, the Government has given discretion to local authorities to increase the Council Tax Empty Property premium to a maximum of 100% and the Council intends to apply this new premium. It is anticipated that any adverse implications from the introduction of CTR changes in 2019/20 could be mitigated by income from additional empty premium charges. These changes have also been accommodated within Council Tax base calculations.
- 6.11 The Council has an exceptional hardship fund for those residents who are struggling to pay their Council Tax. This fund is a discretionary fund and will continue to be utilised in 2019/20 to support those residents experiencing severe financial difficulty.
- 6.12 However, as set out in paragraph 2.2 of this report, the collection rate is on an upward trajectory and expected to achieve somewhere between 80% and 85%. This level of collection in addition to the growing Council Tax tax base is deemed sufficient to meet the 2019/20 budgeted Council Tax Income requirements as included in the current Medium Term Financial Strategy (John Hoskins).

7 **Legal Services Comments**

- 7.1 The legislation states that each year an authority must give consideration to whether to revise its Council Tax Reduction scheme.
- 7.2 The revision of a scheme is a decision that the legislation reserves to full Council. Any revision to apply to the scheme for the following year must be made no later than 10 March of the preceding financial year.
- 7.3 No revision of a scheme can occur unless the authority has, in the following order:
1. Consulted with the major precepting authority – The Greater Manchester Combined Authority for Police and Fire services
 2. Published a draft proposed scheme
 3. Consulted with others likely to have an interest in the scheme
- 7.4 The authority has undertaken consultation as above and is therefore able to revise its scheme should it wish to do. If so, the matter goes to full Council.
- 7.5 If following consultation it is proposed that no revision is made, it is still recommended that the matter goes to full Council. The legislation does not expressly state that the consideration of whether to revise a scheme, as opposed to actual revision, is reserved for full Council. Given the lack of clarity in the legislation, authorities would be wise to approach the matter with caution even if no revision is proposed.
- 7.6 In order to discharge its duties under the Equality Act 2010, the authority will need to consider the effects of proposals on people with a protected characteristic as defined by the Act, which can be done by way of an equality impact assessment as happened before the present scheme was made. This is set out at Appendix 2.

7.7 Any scheme to be implemented by the Council shall apply from April 2019 and shall be in terms of the Oldham Council Tax Reduction Scheme at Appendix 3 of the report subject to:

- Any changes resulting from prescribed requirements from time to time issued by the Secretary of State under paragraph 2(8) of Schedule 1A of the Local Government Finance Act 1992
- Any changes from time to time to the various figures in Appendix 3 that are figures prescribed by central government for welfare benefits purposes (Alex Bougatef)

8. **Co-operative Agenda**

8.1 The approval of support for residents who are of working age and on low incomes is consistent with and embraces the principles of the co-operative agenda.

9 **Human Resources Comments**

9.1 None

10 **Risk Assessments**

10.1 There are a number of risks to be managed in this process:

- Ensuring the revised scheme is not subject to a legal challenge on the basis of equality legislation
- Developing a scheme which is both fair and affordable to the Council in 2019/20 particularly as it will only be based on limited collection rates information early in the financial year and assumptions on grant funding previously made
- Linking in Council Tax Collection Processes to the Council's Council Tax Collection Strategy (Mark Stenson)

11 **IT Implications**

11.1 None

12 **Property Implications**

12.1 None

13 **Procurement Implications**

13.1 None

14 **Environmental and Health & Safety Implications**

14.1 None

15 **Equality, community cohesion and crime implications**

15.1 In taking financial decisions, the Council must demonstrate that it has given 'due regard' to the need to eliminate discrimination, promote equality of opportunity and promote good relations between different groups.

15.2 Demonstrating that 'due regard' has been given involves:

- Assessing the potential equality impacts of proposed decisions at an appropriate stage in the decision making process so that it informs the development of policy and is considered before a decision is taken

-
- Ensuring that decision makers are aware of equality duties and any potential equality issues when making decisions.

N.B. Having due regard does not mean the Council cannot make decisions which have the potential to impact disproportionately. It means that we must be clear where this is the case and must be able to demonstrate that we have consulted, understood and mitigated the impact.

- 15.3 To ensure that the process of impact assessment is robust, it needs to:
- Be specific to each individual proposal
 - Be clear about the purpose of the proposal
 - Consider available evidence
 - Include consultation and involvement with those affected by the decision, where appropriate
 - Consider proposals for mitigating any negative impact on particular groups
 - Set out arrangements for monitoring the actual impact of the proposal

- 15.4 As with previous Council Tax Reduction Schemes from 2013, an Equality Impact Assessment is being undertaken to try to identify any potential disproportionate adverse Impacts arising from the proposed scheme and also identify any actions which might mitigate these impacts (Dominic Coleman)

16 **Equality Impact Assessment Completed?**

- 16.1 An Equality Impact Assessment has been completed and is set out at Appendix 2

17 **Key Decision**

- 17.1 Yes

18 **Key Decision Reference**

- 18.1 FCR - 22- 18

19 **Background Papers**

- 19.1 The following is a list of background papers on which this report is based in accordance with the requirements of Section 100(1) of the Local Government Act 1972. It does not include documents which would disclose exempt or confidential information as defined by the Act:

20 **Appendices**

- 20.1 Appendix 1: Consultation Feedback Summary Report
Appendix 2: Equality Impact Assessment
Appendix 3: Council Tax Reduction Scheme 2019/20 (this will be available following inclusion of prescribed requirement amendments on www.oldham.gov.uk by 27 February 2019)

Consultation on Council Tax Reduction Scheme options in Oldham for 2019/20

December 2018

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Maps

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Executive Summary

1.1 Overall Summary

Overall, respondents were in favour of the proposed changes to the Council Tax Reduction (CTR) scheme in 2019/20 with an average 77% agreement across the four proposed changes and 71% in favour of maintaining the current scheme.

Table 1: Summary of Resident views

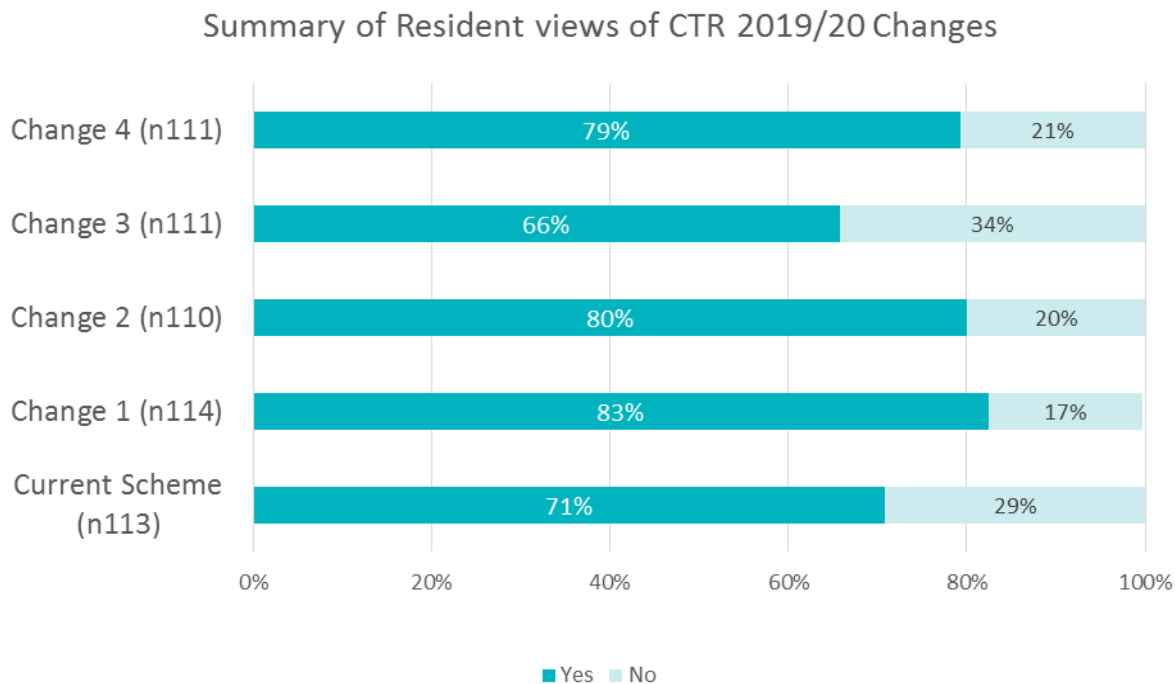


Table 1: Key

| Key | | |
|----------------|-------------------|-----------------------------------|
| Questions | No of respondents | Summary Name |
| Current Scheme | 113 | Maintaining the 85% scheme |
| Change 1 | 114 | Making a CTR claim – UC claimants |
| Change 2 | 110 | Earnings disregards |
| Change 3 | 111 | Housing Costs |
| Change 4 | 111 | Income disregards |

- In total, 129 responses were received. As such, any findings reported in this document must be indicative of the view of the 14,144 potentially affected by any proposed changes to Council Tax Reduction.

-
- Less than one third (31.6%) respondents indicated that they receive Council Tax Reduction.
 - Due to the low number of responses received from organisations, it was deemed inappropriate to conduct quantitative analysis of responses for this data. Instead qualitative feedback has been shared with those responsible for developing the changes.
 - Several comments received alluded to the changes being difficult to understand, this was particularly relevant to change three.

1.2 Current Scheme

This question covered maintaining the present level of support i.e. limiting the level of CTR support at 85% of Council Tax for a Band A property.

- Overall **71%** of respondents agreed that the current levels of discount should be maintained.
- Those aged 35-44 were least likely to agree the change (61%) whilst those aged 45-54 were the most likely.
- Agreement for this arrangement were lower with Council Tax payers (72%) than those in receipt of CTR (78%) and those in receipt of Universal Credit (UC) (78%).
- Those in part time employment were least likely to agree with the change to maintain the current scheme (61.5%).
- Only one in five of those with a disability agreed with the change.
- Comments received indicated that some felt that the scheme was unfair on low income households, whilst six respondents were either unsupportive of local government support or disparaging of those in receipt of support.
- There was a mixture of respondents reporting that they felt the discount too high or in contrast did not go far enough.

1.3 Change One: Making a CTR claim - Universal Credit claimants

This proposal covered whether the Council should treat the information that the Council receives from the Department for Work and Pensions (DWP) telling us about a UC claim as a claim for CTR

- Overall **82.5%** respondents agreed that the information received from the DWP for UC claimants should be used in the CTR application process.
- Those aged 35-44 were least likely to agree the change (75%) whilst those aged 45-54 (92%) were the most likely.
- Agreement for this arrangement was lower with Council Tax payers (81%) than those in receipt of CTR (86%) and those in receipt of Universal Credit (94%).
- Those in full time employment were least likely to agree with the change (77%).
- Only one in five of those with a disability agreed the change.
- Overall comments received were positive around the change with agreement about the proposed process in particular how it was felt it would speed up the process.

1.4 Change Two: Disregards

Incentivising work for UC claimants by aligning with some or all of the treatment of earnings made in Housing Benefit (HB).

- Overall **80%** respondents agreed with the change.

-
- Those aged 35-44 were least likely to agree the change (71%) whilst those aged 45-54 (96%) were the most likely.
 - Agreement for this arrangement was lower with Council Tax payers (80%) than those in receipt of CTR (82%) and those in receipt of Universal Credit (88%).
 - Those not in employment were least likely to agree with the change (74%).
 - Only 18% of those with a disability agreed with the change.
 - Seven respondents were unclear about the change.

1.5 Change Three: Housing costs

Including housing costs in the way CTR is calculated for UC claimants

- Overall two thirds (**66%**) of respondents agreed with the Change.
- Those aged 35-44 were least likely to agree the change (57%) whilst those aged 55-64 (72%) were the most likely.
- Agreement for this proposal was lower with Council Tax payers (65%) than those in receipt of CTR (71%) and those in receipt of Universal Credit (UC) (77%).
- Those in part time employment were least likely to agree with the change (56%).
- Only 18% of those with a disability agreed with the change.

1.6 Change Four: Disregarded Income

Application of income disregards for Bereavement Support Payments, Post Graduate Degree Loans and Special Support payments to align with the treatment of this income in HB

- Overall **80%** respondents agreed with the Change.
- Those aged 35-44 were least likely to agree the Change (70%) whilst those aged 45-54 (72%) were the most likely.
- Agreement for this proposal was lower with Council Tax payers (78%) than those in receipt of CTR (85%) and those in receipt of UC (82%).
- Those in part time employment were least likely to agree with the Change (75%).
- Only 18% of those with a disability agreed with the Change.

Section One: Background

The Council's CTR scheme has been largely un-amended since April 2015 when the Council introduced a scheme that:

- Limited CTR to a maximum of 85% of Council Tax a Band A property
- Removed second adult rebate for those of working age

Between 12 September and 24 October 2018, Oldham Council conducted a consultation around proposed changes to Council Tax Reduction for 2019/20. This consultation follows Cabinet approval of this consultation on 20 August 2018. The consultation sought the views of residents and stakeholders around 5 areas. The changes set out for consideration were:

| <i>Change</i> | <i>Text Summary</i> | <i>Summary name</i> |
|-----------------------|---|---|
| Current Scheme | Maintaining the present level of support i.e. limiting the level of support at 85% of Council Tax for a Band A property as the maximum amount available. | The Current Scheme |
| Change 1 | Proposal to treat the information that the Council receives from the DWP telling us about a UC claim as a claim for CTR | Making a CTR claim - Universal Credit claimants |
| Change 2 | Incentivising work for UC claimants by aligning with some or all of the treatment of earnings in Housing Benefit (HB) | Earnings disregards |
| Change 3 | Including housing costs in the way CTR is calculated for UC claimants | Housing costs |
| Change 4 | Application of income disregards for Bereavement Support Payments, Post Graduate Degree Loans and Special Support payments to align with the treatment of this income in HB | Income disregards |

Methodology

Eligible Population

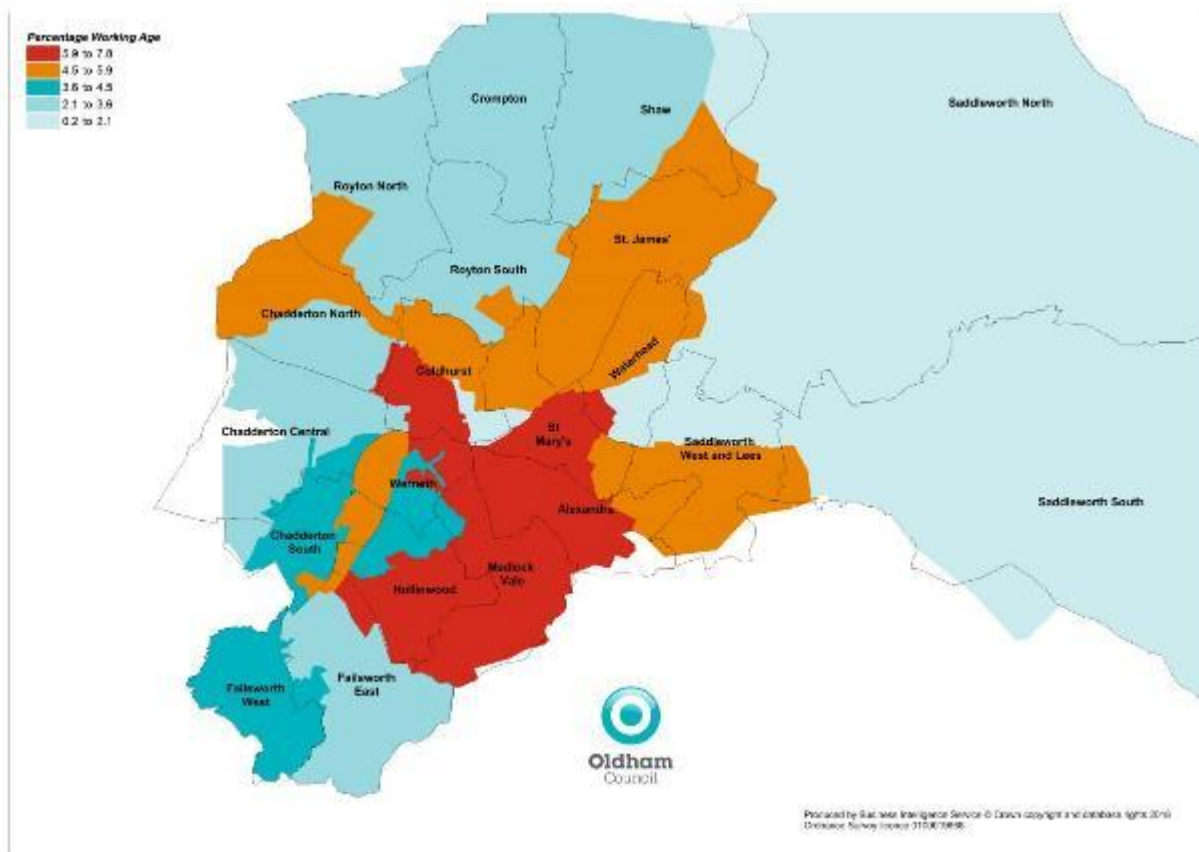
Figures provided by the Oldham Council Revenues and Benefits client team indicate an eligible population of 14,144 claimants of working age. Table one provides a breakdown of claims by claimant type. It shows that those people of working age (64% of the entire claimant group) are affected by the changes (there is a mandatory requirement to protect those of pension age.)

| Type of Recipient | Number | % |
|-----------------------------------|--------|--------|
| Pension Age | 7,809 | 35.57% |
| Working age - passported benefits | 6,118 | 27.87% |
| Working age – UC | 4,452 | 20.28% |
| Working age – other | 3,574 | 16.28% |
| Eligible population | 14,144 | |
| Overall Total | 21,953 | 100% |

Table 1: Working Age Claimants Oldham Jan 2019

Working Age Claimant Distribution

Map 1 illustrates the distribution of working age claimants in Oldham.

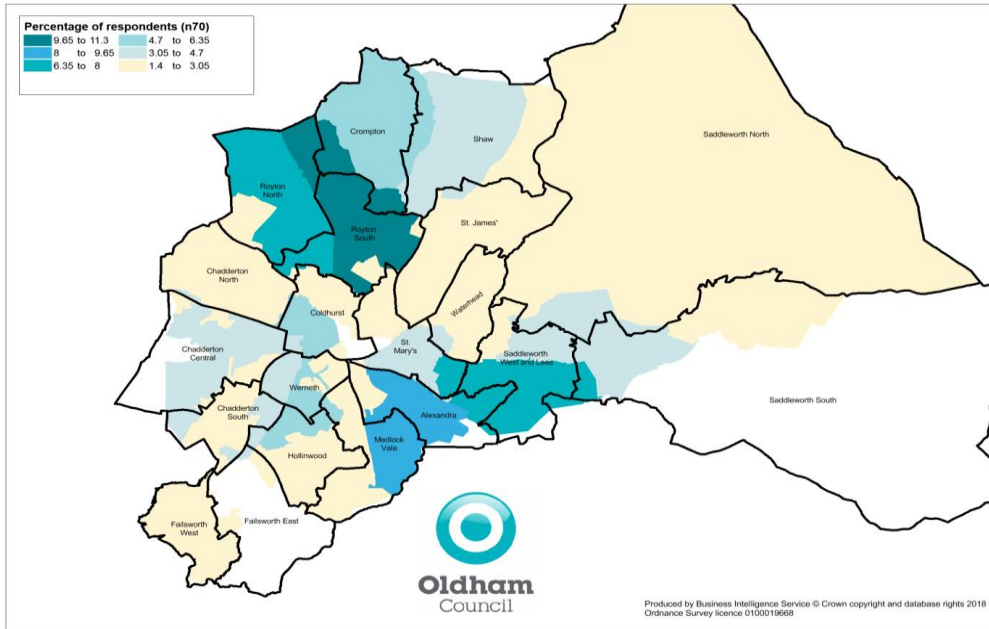


Map 1: Map to show distribution of claimants October 2019

Respondent location

Overall, 97% respondents indicated that they live in the town of Oldham. When asked to state the first four digits of their postcode, 98 provided details of their location. The analysis below is based upon the 71 respondents who provided their information in the requested format (i.e. OL1 1)

Map 2 below illustrates the approximate location of respondents. Overall this reflects the distribution of working age claimants shown in Map 1.



Map 2: Distribution of respondents

Resident Consultation

The public consultation took place between 12 September 2018 and 24 October 2018. The consultation was conducted online on the Council's website. A hard copy version of the survey document was also made available at Access Oldham, where face to face contact with residents on Council Tax and Benefit issues are handled. Access Oldham officers actively encouraged residents to complete the survey when they visited Access Oldham during the consultation period.

Consultation communications¹

The consultation was communicated by an extensive media campaign involving Twitter, Facebook, Oldham Council website and local media. Further analysis found that the campaign achieved a reach of more than 10,000; however, the levels of engagement were extremely low. ⁱ Figure 1 shows that respondents were most likely to respond via their smartphone (57%)

¹ Communications Business Partner (Corporate and Commercial Services and Unity Partnership)
Oldham Council Communications team

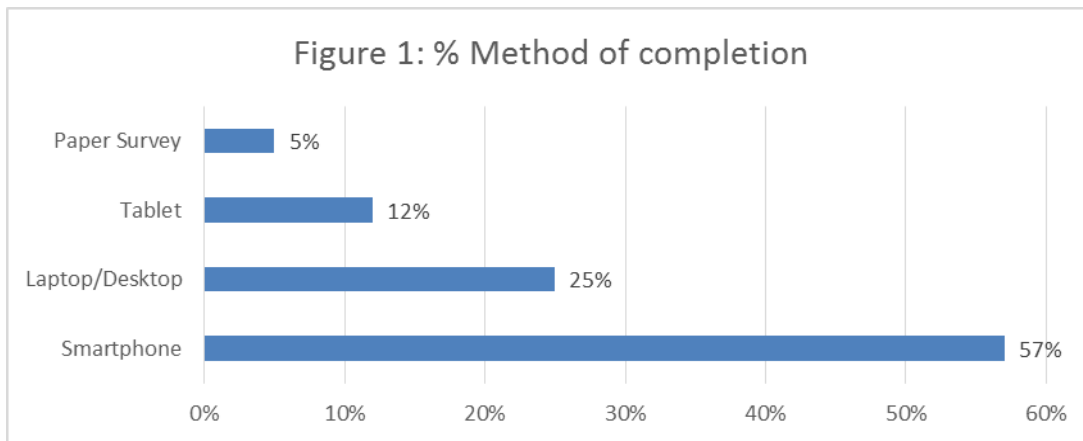


Table 2: Method of completion

Stakeholder Consultation

Oldham Council was keen to engage with organisations both local and national to gather views on Changes for Council Tax Reduction in Oldham. As such fifteen organisations were invited to contribute via an online survey. A separate online link was also provided for other organisations to contribute to the survey on the website. Further details of the responses received can be found in Section 4 of this report.

Analysis and reporting

Overall, 129 responses from residents were received. As such any findings reported in this document must be indicative of the view of the 14,144 potentially affected by any proposed changes to Council Tax Reduction.

Due to the low number of responses received from organisations (7 responses from 5 organisations), it was deemed inappropriate to conduct quantitative analysis of responses this data. Instead qualitative feedback has been shared with those responsible for developing the changes and is set out in section 4

- Analysis was conducted using a combination of the SNAP survey tool and Microsoft excel. All figures quoted within this report are based upon known data. Figures have been rounded to the nearest whole number.
- A thematic analysis of comments received from residents and professionals was conducted using NVIVO and MS Excel.
- The number of respondents for each question and where appropriate subgroup can be found in appendix one.
- Any concerns addressed by both respondent cohorts will be recorded in Section 5 Mitigation.

Section Two: Oldham Residents

Overall views

Figure 2 provides an overall summary of resident's views to the changes consulted on for the Council Tax Reduction Scheme in Oldham in 2019/20.

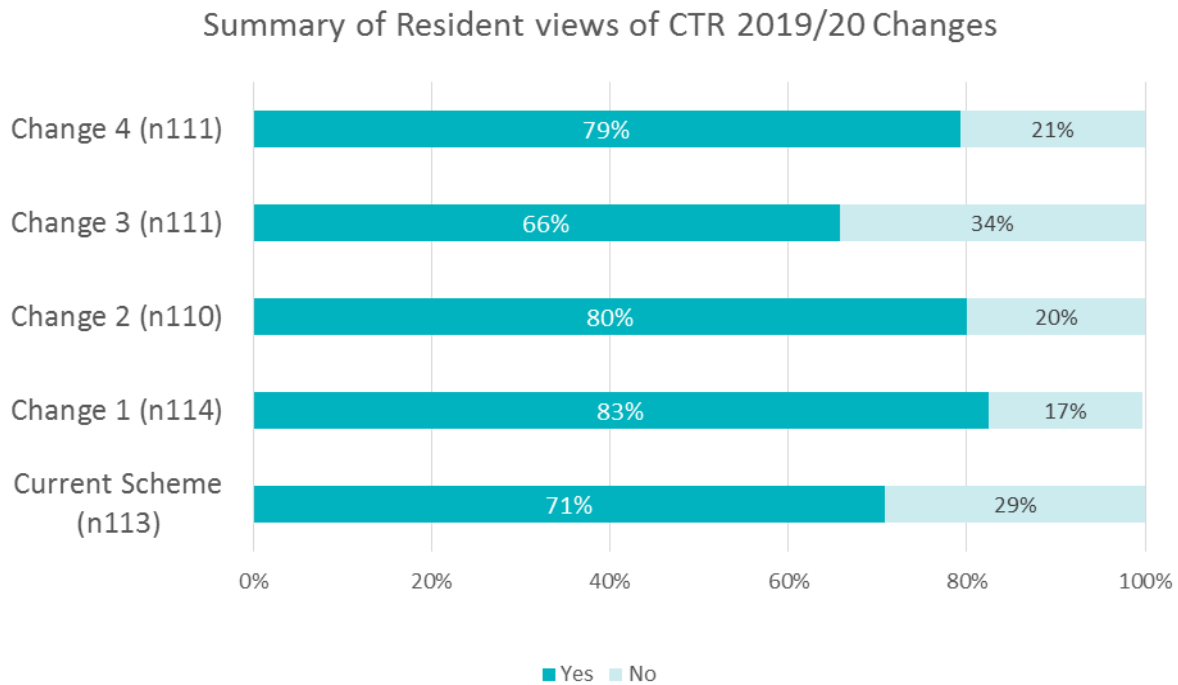


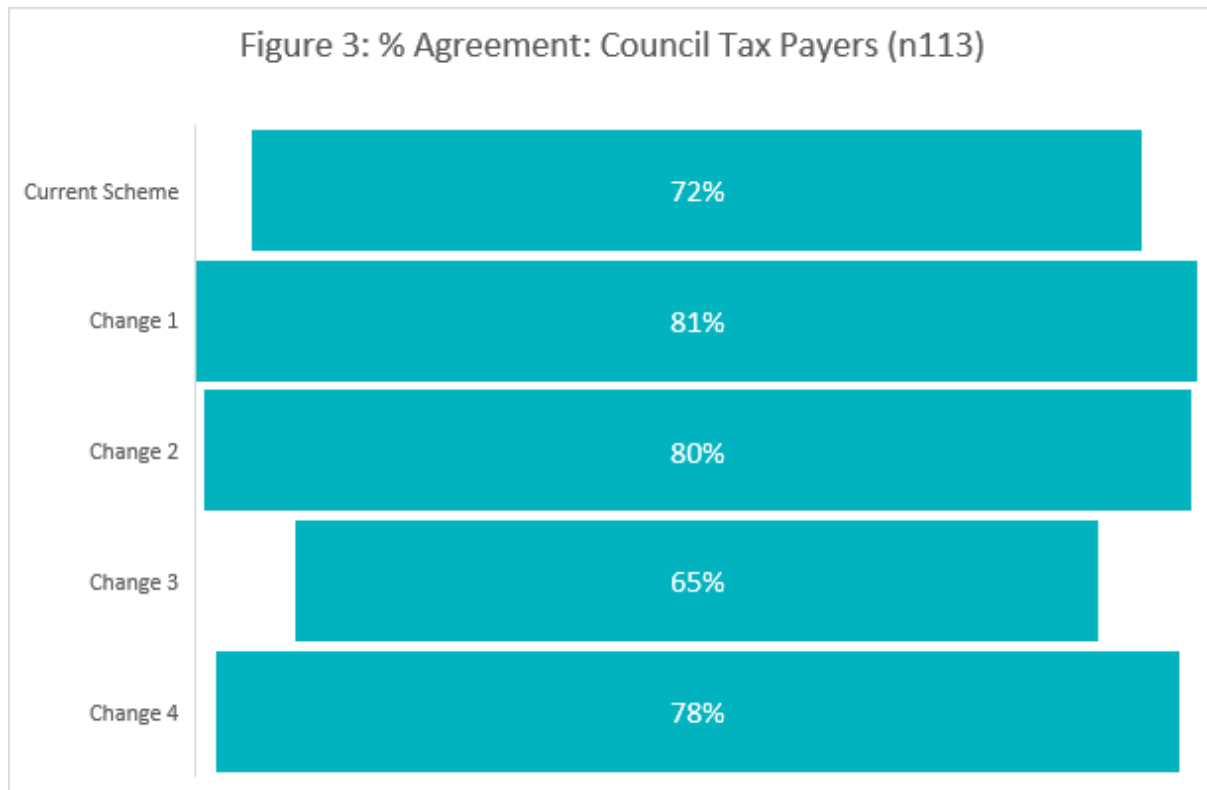
Figure 2: Key

| Key | | |
|----------------|-------------------|-----------------------------------|
| Questions | No of respondents | Summary Name |
| Current Scheme | 113 | Maintaining the 85% scheme |
| Change 1 | 114 | Making a CTR claim – UC claimants |
| Change 2 | 110 | Earnings disregards |
| Change 3 | 111 | Housing Costs |
| Change 4 | 111 | Income disregards |

- Overall there are high levels of agreement to the changes proposed. The most favoured being Changes 1, 2 and 4.
- Respondents were least likely to support Change 3 with around two thirds declaring their agreement with the proposed change.

Council Tax payers

Figure 3 considers the agreement, or not with these respondents with the various changes. There are considerable levels of support across three of the four proposed changes and in the maintenance of the current scheme.

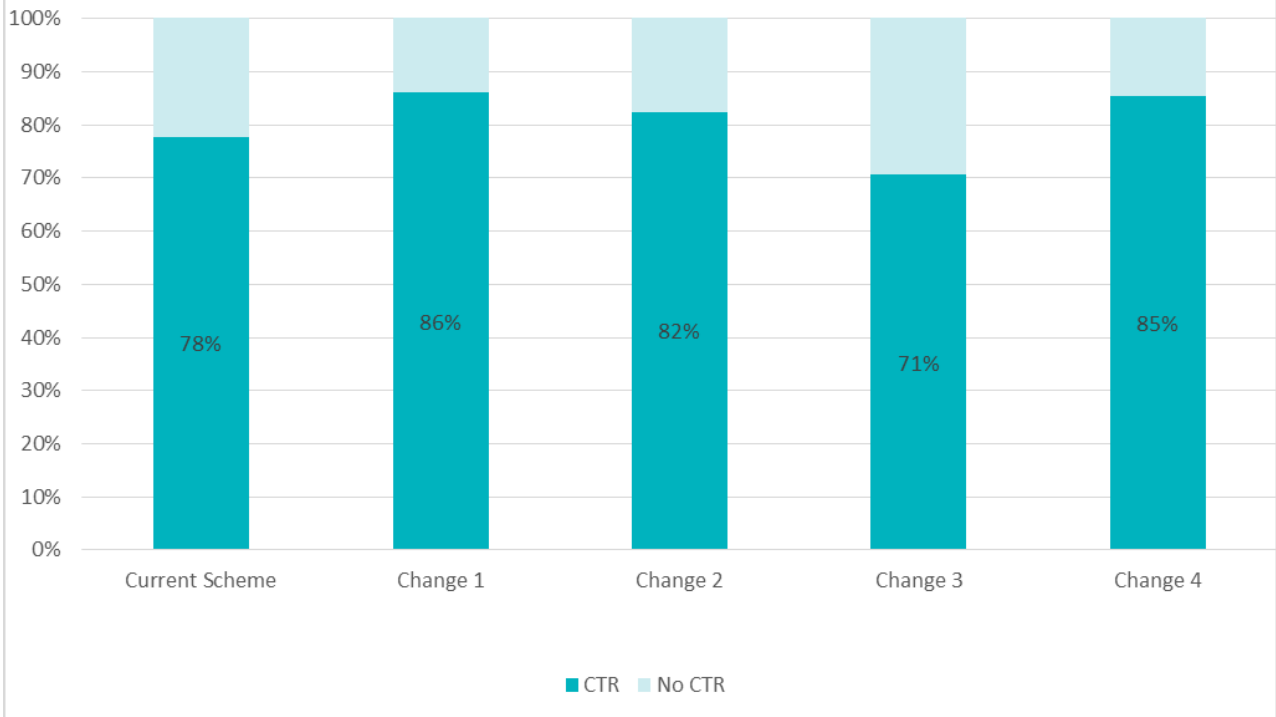


Council Tax Reduction

Less than one third (31.6%) respondents indicated that they receive CTR. Figure 4 shows the differences in agreement of the changes between those in receipt of CTR and those not.

- Respondents from both cohorts were shown to be least likely to agree with Change 3
- The greatest discrepancy in views between the two cohorts was around Change 4 with a gap of ten percentage points

Figure 4: % agreement ctr/non-ctr respondents

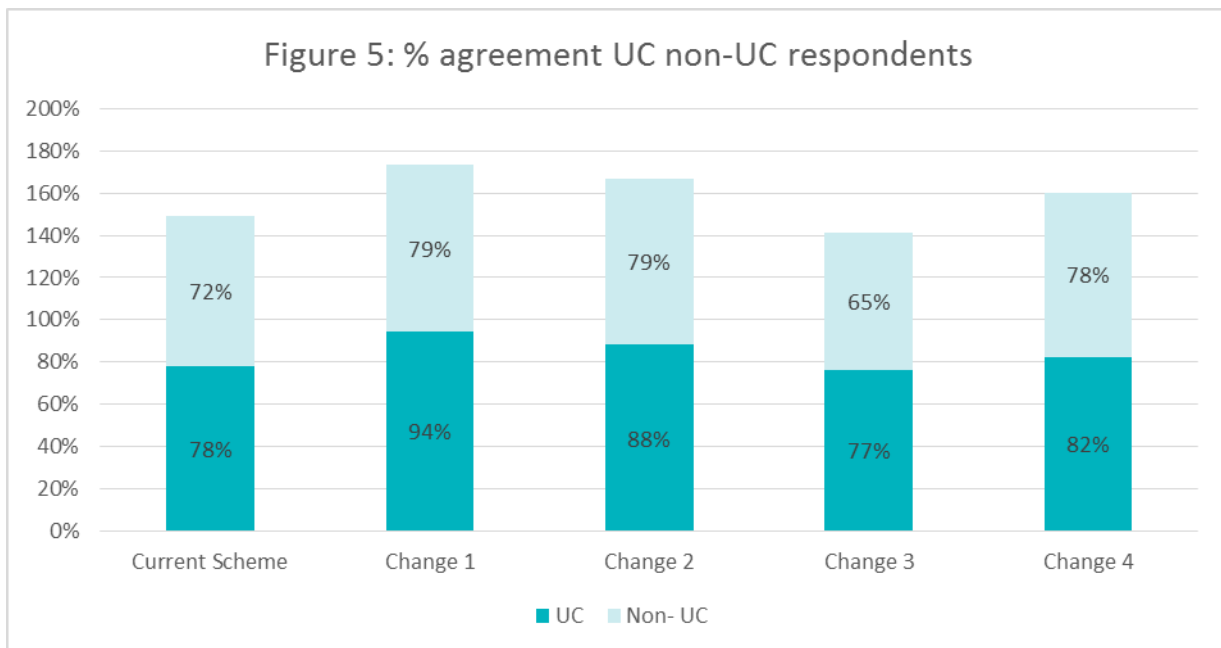


| | CTR Respondent (no) | Non- CTR Respondent (no) |
|-----------------------|---------------------|--------------------------|
| Current Scheme | 36 | 77 |
| Change 1 | 36 | 78 |
| Change 2 | 34 | 76 |
| Change 3 | 34 | 77 |
| Change 4 | 34 | 77 |

Universal Credit

Overall, only 18 (15.8%) of respondents stated that they are in receipt of Universal Credit (UC) Figure 5 shows the differences in agreement of the changes between those in receipt of CTR and those not.

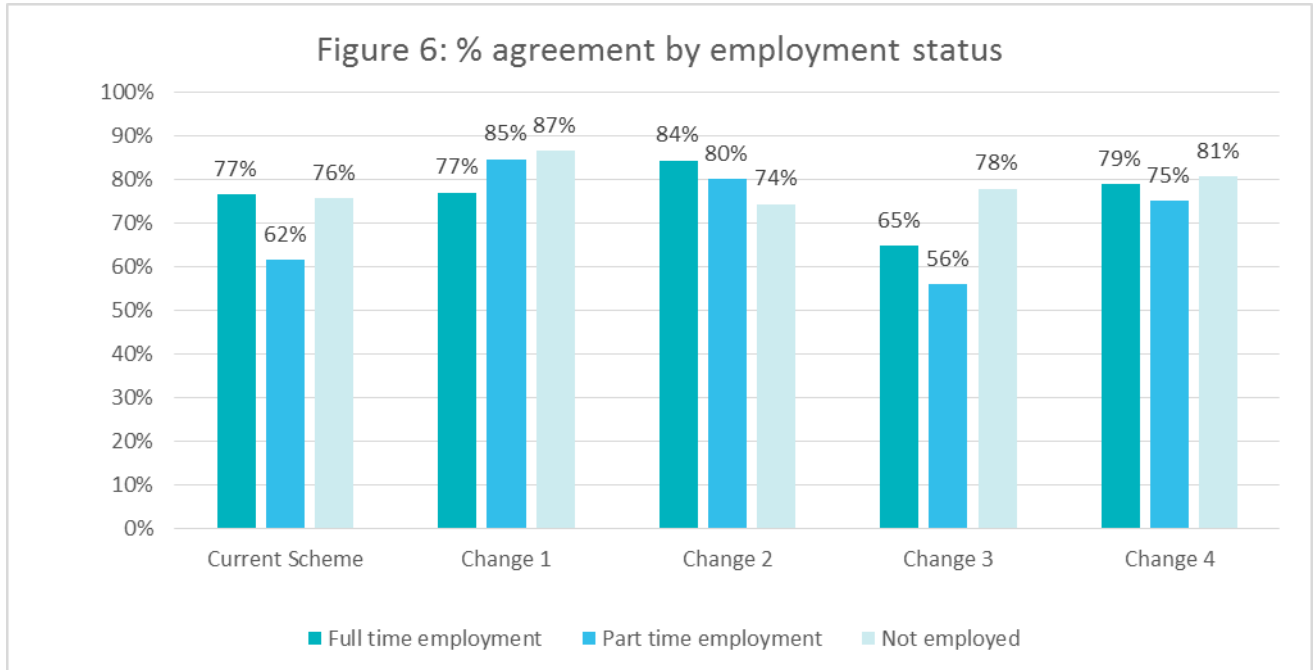
- For those in receipt of UC, respondents were most likely to agree with change 1 and least likely to agree with change 3.
- For those not in receipt of UC, again the highest levels of agreement came for change 1 (Q2) whilst agreement was lowest with change 3.
- The greatest discrepancy in levels of agreement between the two cohorts came with change 1.



| | UC Respondent (no) | Non- UC Respondent (no) |
|----------------|--------------------|-------------------------|
| Current Scheme | 18 | 95 |
| Change 1 | 18 | 96 |
| Change 2 | 17 | 93 |
| Change 3 | 17 | 94 |
| Change 4 | 17 | 94 |

Employment

When asked if they work, (Figure 6) most commonly respondents indicated that they were in either full time (45%) or part time employment (23%) and almost a third indicated that they do not work. Figure 6 provides a comparison of the views of these different cohorts across the Changes laid out.



Respondents in part time employment were least likely to agree with plans to maintain the current scheme as well as changes 3 and 4

Only two thirds of full-time workers agreed with change 3. This contrasted with approaching 80% of those not in employment

Equalities

Ethnic Group

Over 80% respondents are White British; numbers for other ethnic groups are too low to provide meaningful analysis.

Age

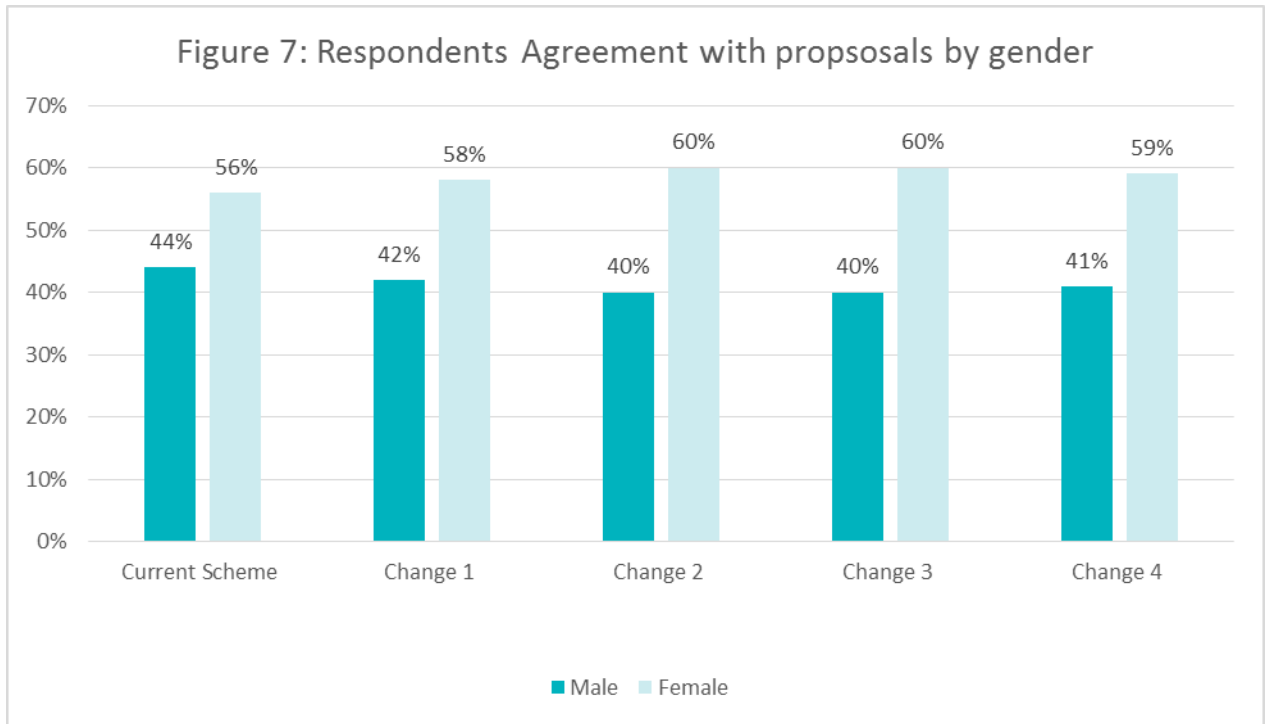
Table 1 provides a summary of agree with Changes by age group. Due to the low number of responses by those aged 16 to 24, figures have been redacted.

| Table 1: Agreement with Changes by broad age group | Current Scheme | Change 1 | Change 2 | Change 3 | Change 4 |
|--|--------------------------|----------|----------|----------|----------|
| Age range (number of respondents) | | | | | |
| | % Agreement with Changes | | | | |
| 16 to 24 (n3) | | | | | |
| 25 to 34 (n23) | 61% | 78% | 82% | 65% | 82% |
| 35 to 44 (n24) | 67% | 75% | 71% | 57% | 70% |
| 45 to 54 (n25) | 92% | 92% | 96% | 65% | 89% |
| 55 to 64 (n26) | 77% | 89% | 77% | 72% | 69% |
| 65 + (n14) | 57% | 71% | 67% | 69% | 85% |

Gender

53% respondents are female and 41% male. 6% preferred not to state their gender. The findings indicated here are based where the respondent gender is known. Figure 7 considers how, if at all, the views of male and female respondent differed.

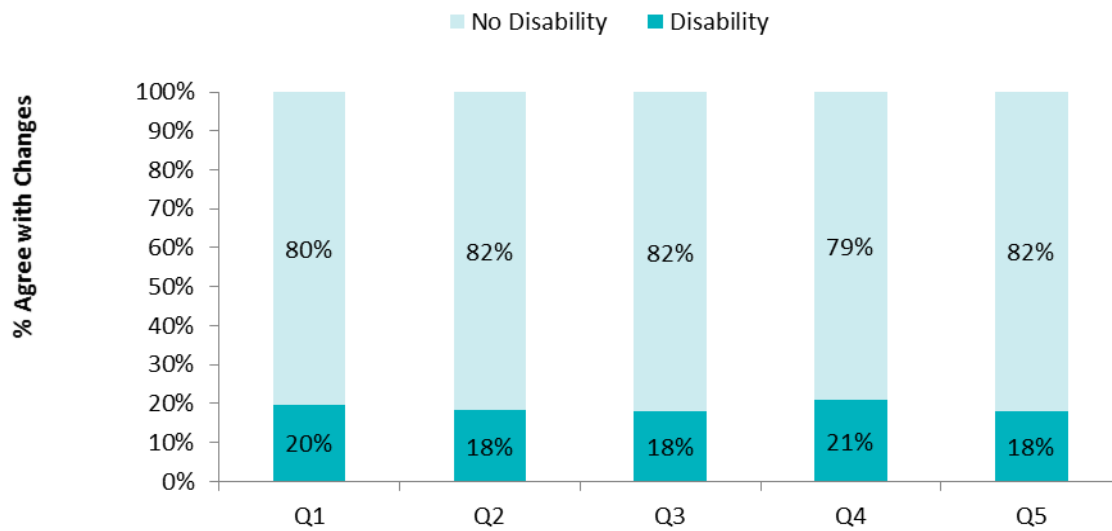
- Female respondents were considerably more likely to agree with the Changes laid out for CTR in 2019/20 than male respondents.
- The greatest discrepancy in views came in change 3(Q4) where a gap of 20.6 percentage points existed.



Disability

Only 18 respondents indicated the presence of a disability (15%). The findings indicated here are based where the respondent’s disability status is known. Figure 8 shows a distinction in levels of agreement with changes between those stating a disability and those not.

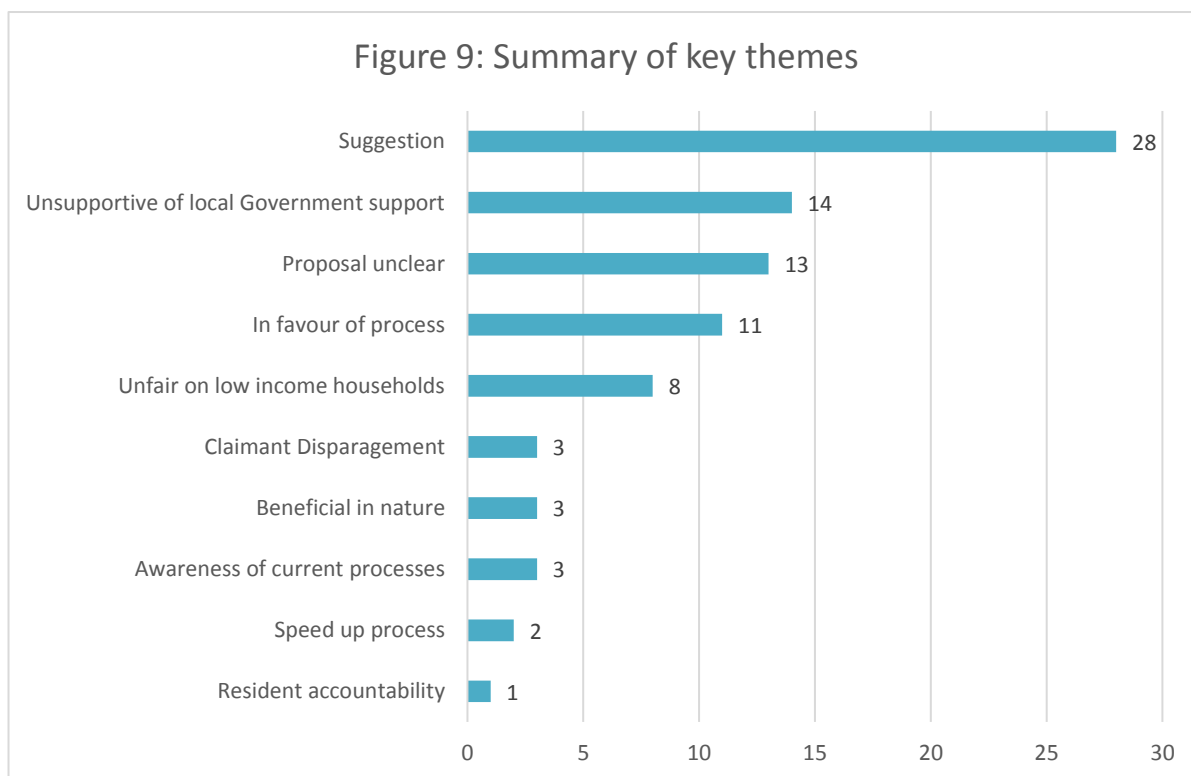
Figure 8: Respondents Agreement with proposals by disability



| | Disability (no) | No Disability (no) |
|-----------------------|-----------------|--------------------|
| Current Scheme | 18 | 95 |
| Change 1 | 18 | 96 |
| Change 2 | 17 | 93 |
| Change 3 | 17 | 94 |
| Change 4 | 17 | 94 |

Section Three: Residents views

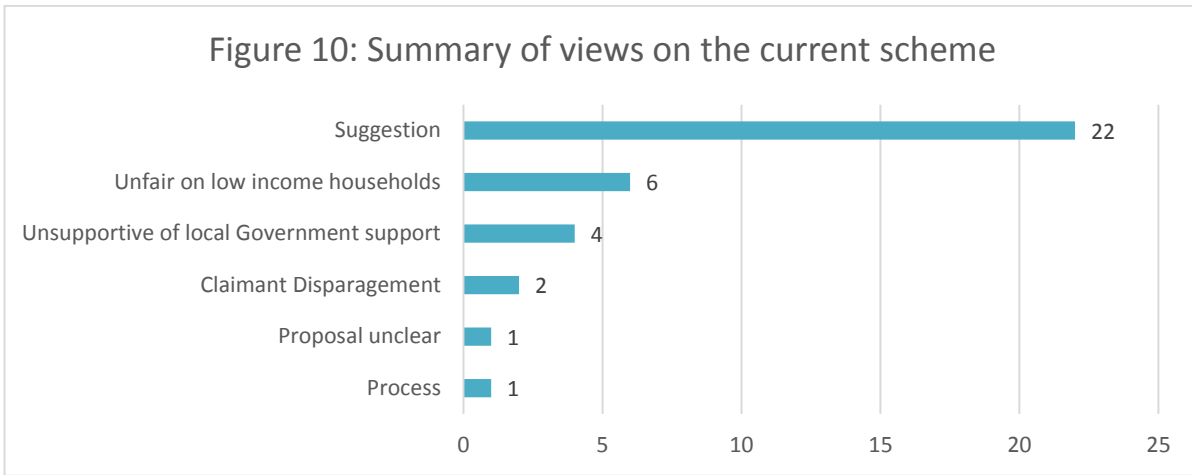
Section three focuses on the comments received from Oldham residents on the proposed changes to CTR in 2019/20. A total of 86 comments emerged from residents. Over 45 (50%) were in support of one or more changes. Figure 9 shows the key themes that emerged across the five changes



The Current Scheme

36 residents provided extra narrative to their response to this question. Of these 10 were in favour of the Change and 24 were not. Figure 10 shows the key issues emerging from respondents. It shows that most respondents were keen to share their ideas around the scheme, most commonly the level of discount being too high (n9) or too low (n3).

Figure 10: Summary of views on the current scheme



By paying a small charge towards Council tax it encourages responsibility and financial budgeting, female, 45-54 Full time employed

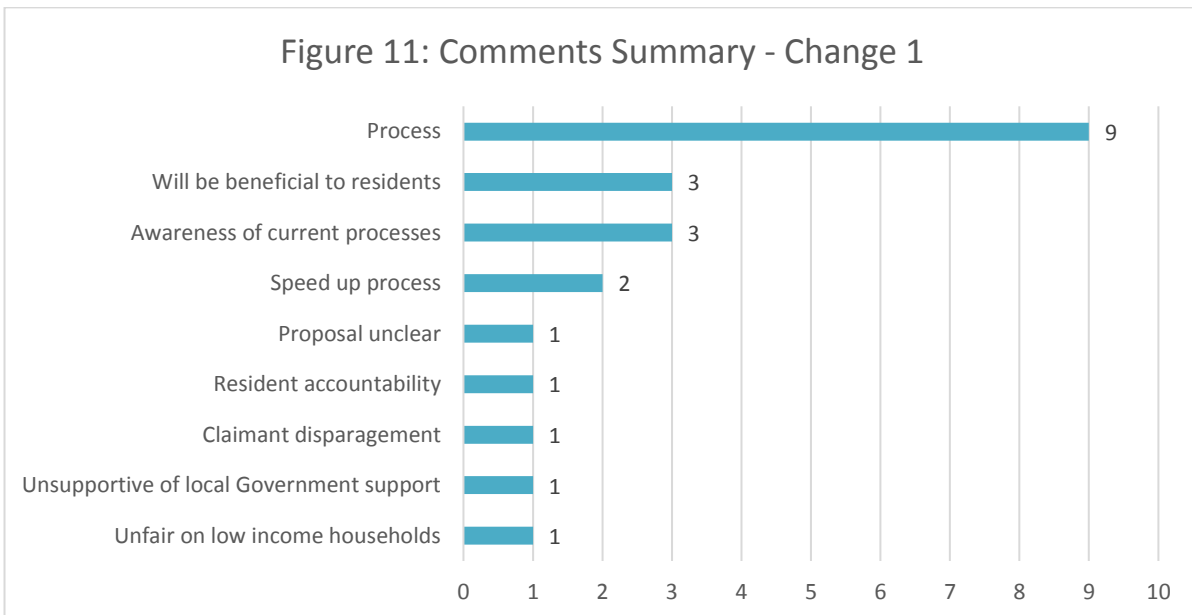
Far too cheap, unfair on full time working families! Why should we pay more and have use of the same services? Male, 25-34 Full time employed

I feel that people that don't get benefits that struggle on low incomes should be the area that is supported more and helped rather than the long term unemployed. Female 35-44, Full Time employed, Chadderton

Change 1 – Making a CTR claim (UC claimants)

22 residents provided extra narrative to their response to this question. Of these 10 were in favour of the change and 6 were not. Figure 11 provides a summary of these comments

Figure 11: Comments Summary - Change 1

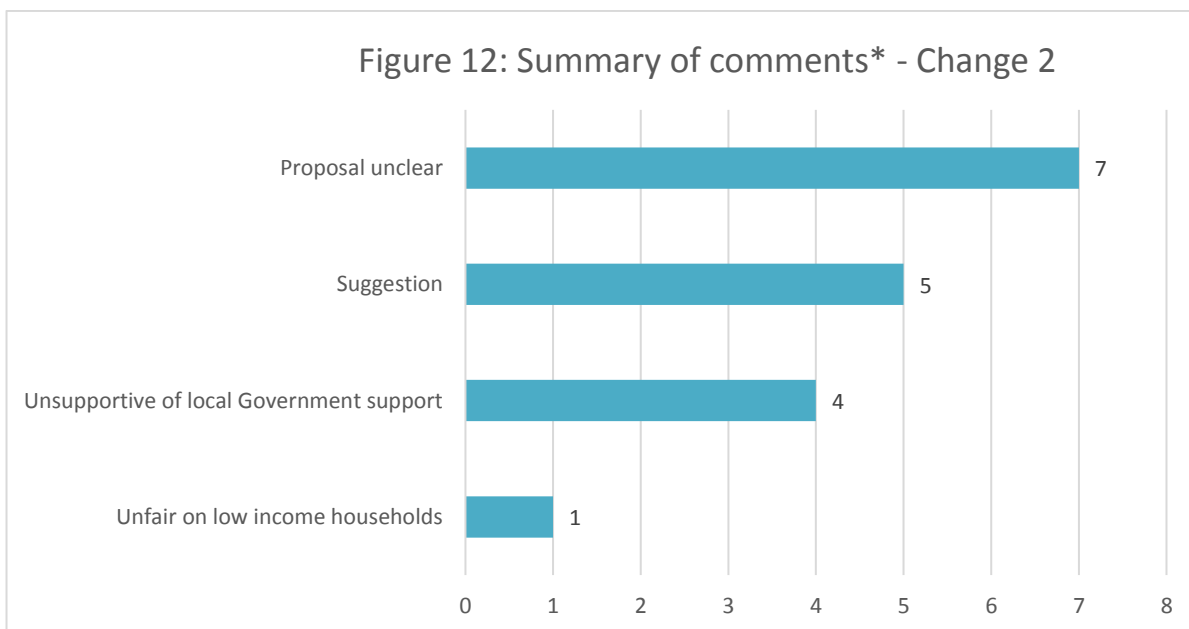


I think it's an excellent idea as a resident and a front-line worker in the Third sector I see the misery and stress it causes due to lack of information and people assuming this has automatically been applied for as it was when making a Housing Benefit claim in the past. Female, 45-54 Full Time employed

This would make more sense for all parties if they are still given this amount of benefit for council tax and I am sure more cost effective when dealing with applications Female, 35-44
Full time employed, Chadderton

Change 2 – Earnings Disregards

21 residents provided extra narrative to their response to this question. Of these 10 were in favour of the Change and 10 were not. Key themes are extracted in Figure 12



*not all 21 comments are included in the themes in Figure 12

Figure 12 shows that most commonly respondents were unclear about the change, with respondents raising questions the impact on those who are disabled, families without children and the favourable impact on lone parents. One respondent also noted that it was unclear if the level of disregard offered mirrored those stated by the national Government

Should be the same for everyone. Again! Kids get more but childless adults are discriminated against. If you can't make it fair? Then don't bother. Male, 25-34, Full Time employed, Royton

I don't know if the disregard mirrors the Government's, but it would be easier all round if it did. Female 65+ Saddleworth and Lees

I would have supported this Change except for one thing - I don't see why a Lone Parent should get £25 disregard.... This should be £5 the same as a single person. Lone parents already get the relevant 'benefits' for themselves and their child(ren) as per their personal situation. Female 65+ Royton

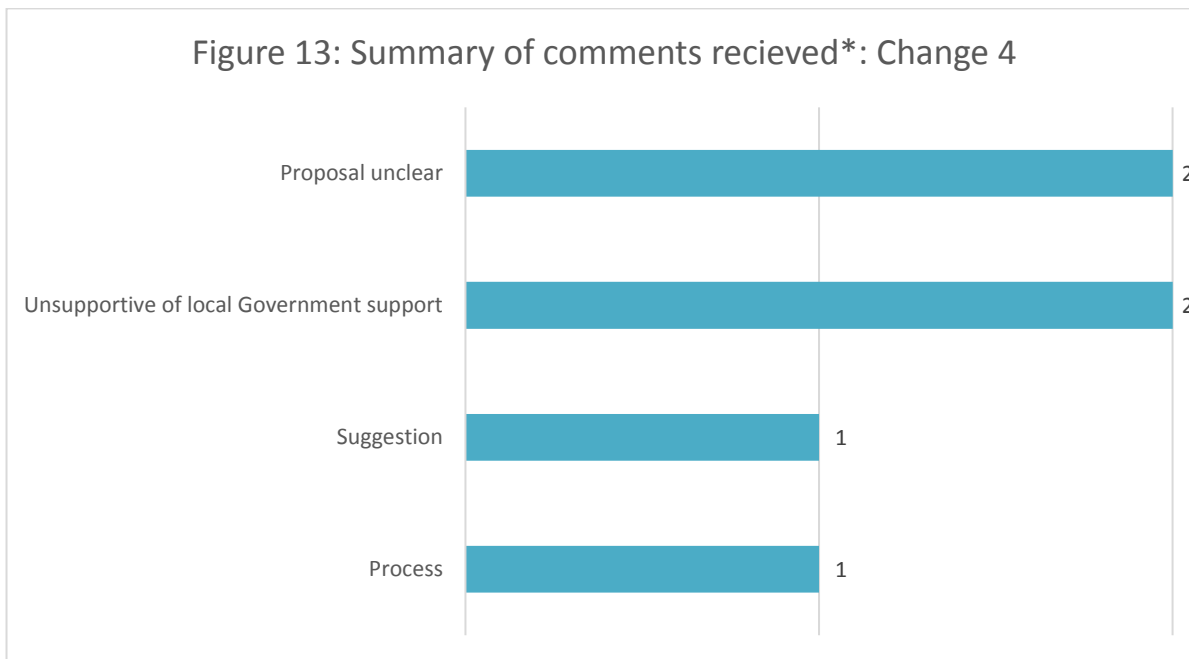
Change 3 – Housing Costs

8 residents provided extra narrative to their response to this question. All but one comment received was from respondents in favour of the Change. Of these, three were unsupportive of local government assisting with Council Tax payment and two felt the Change was not clear.

The change isn't clearly defined here, but if the change is what you currently do, then I agree with the change. I don't see why you should increase the amount of CTR some claimants are entitled to (Oldham needs every penny of Council Tax it can get!!) Female 65+ Royton

Change 4 – Income disregards

7 residents provided extra narrative to their response to this question. Of these, 4 were in favour of the Change and 3 were not. Figure 13 provides a summary of the key themes emerging.



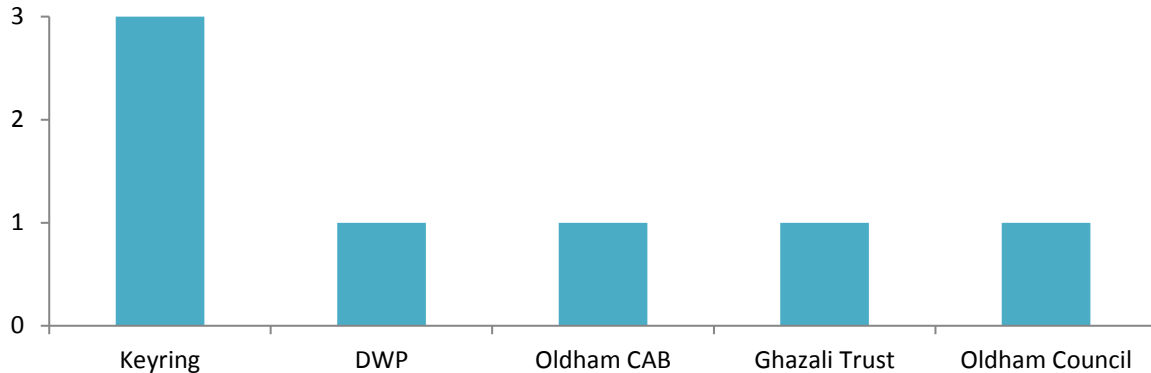
*not all 7 comments are included in the themes in Figure 13

¹ This is likely due to the technical nature of the content. Because of the complex nature of the way Council Tax Reduction is setup, it is extremely difficult for non-Council Tax experts and professionals to understand and engage with the content.

Section Four: Organisations

A total of 7 representations were received from 5 organisations. (Figure 14) Given the low number of responses, section 4 of this report will focus on the qualitative feedback received.

Figure 14: Responses received



The Current Scheme

All but two organisations responding agreed that Oldham Council should maintain the current scheme. The following comments were received

- ***I support this proposal as we support a lot of vulnerable adults to live independently. The majority of adults we support would not be able to pay their full Council Tax and would end up with debt and court cost***
- ***The people I support rely on this deduction to make ends meet. Paying Council Tax is difficult enough for some people on benefits, some people are taken to court for non-payment adding additional costs.***
- ***Band A should have more relief as they are often earning a lot less and struggling to meet basic needs to run their households.***
- ***Agree maximum award 85% (If no scope to increase), but do not agree restricting to a Band A charge, should be 85% of that person's banding. It does not make sense that they would have to pay £215pm for living in a Band H property which is 67% of their UC standard allowance.***

Change 1

All responding organisations agreed with this change. The following comments in support were received:

- ***This will protect the vulnerable who are most likely not to claim their entitlement.***
- ***The separation of UC and CTCS now does not work and leaves people confused and in debt with their council tax as they automatically presume that the CT runs alongside UC***

-
- ***This would greatly assist claimants as not all are aware that there needs to be a separate claim for CTR resulting in loss of benefits and a debt.***
 - ***Particularly useful for vulnerable claimants who would find it difficult to make the claim.***

Change 2

All responding organisations agreed with this change. The following comments in support were received:

- ***This incentive will help people earning the minimum wage. We will be encouraging in-work progression the disregard will help people transition as they increase their pay. I assume when they earn above the threshold taking them off Universal Credit there will be a process to remove the disregard.***
- ***I do agree with this proposal but could be too complicated***
- ***This will support people in work on low incomes***

Change 3

All but one respondent agreed with change 3. The one respondent in disagreement indicating that the change may be difficult to understand.

Change 4

All responding organisations agreed with this change.

Section Five: Summary

Following other similar exercises and the experience of other Local Authorities conducting consultation on CTR schemes, it was anticipated that the consultation would not receive a high number of responses due its technical nature. This proved to be true with only 129 responses received; a third of whom were in receipt of Council Tax Reduction. The overall response to all changes, including the maintaining of the current scheme has been positive, particularly with those who currently pay Council Tax. The lower number of responses and comments received indicated that participants were less clear around changes 2 and 3.

Section Six: Mitigation

Based on the feedback received from this consultation exercise, a list of issues and questions has been included for response in the mitigation log below

| Who You are asking - Stakeholder Group e.g. Residents, businesses, service users etc. | How information is received e.g. via questionnaire, focus groups, letter, phone call, email etc. | Feedback (if possible specific details, including any concerns about the Changes) | Further explanation |
|--|---|--|--|
| Residents | Questionnaire | Low levels of response | Extensive levels of media coverage reaching c.10, 000 residents. |
| Residents | Questionnaire | Inaccessible to those without internet | Residents able to take part using hard copy questionnaire at Access Oldham |
| Residents | Questionnaire | Changes unclear | All changes went through several revisions before publication. The technical nature is unavoidable |
| Residents | Questionnaire | Changes are unfair on low income working families "Why should we pay more for the same services?" | The proposed changes are all aimed at increasing CTR entitlement. In particular, the earnings disregards proposal is designed to support those who are working and on a low income |
| Residents | Questionnaire | Council Tax in Oldham is too high | Maintaining the 85% scheme aims to ensure that the maximum |

| | | | |
|-----------|---------------|---|--|
| | | | award of CTR remains comparatively high (in comparison with other local authorities CTR schemes) |
| Residents | Questionnaire | Change one: Include others who are excluded due to being on the bottom of threshold for no universal credit. Make it individualised. | CTR is calculated on a means tested basis so those with lower levels of income are taken into account when assessing benefit |
| Residents | Questionnaire | Change one: Are checks in place to ensure only the right people are getting CTR. | All claim go through an assessment and checking process to ensure the correct CTR is awarded |
| Residents | Questionnaire | Change Two: it is unclear whether people would be better or worse off than at present. Illustrative examples would have been helpful. | Examples are included in the Equalities Impact Assessment (EIA) Those in work will be better off if the changes are adopted. |
| Residents | Questionnaire | Change Two: Only helps those who qualify for tax credits and reductions | The proposal supports those who are in work as some of their earnings are disregarded (i.e. not taken into account) when assessing entitlement |
| Residents | Questionnaire | Change Two: How does this impact on disabled residents who cannot work | This proposal is specifically aimed at supporting those in work. There are other adjustments to UC in place as a result of a claimant's limited capability for work. |
| Residents | Questionnaire | Change Two: Does the change reflect disregard outlined by the Government | The change reflects the earnings disregards in place for HB and other non UC CTR claims |
| Residents | Questionnaire | Change Two: Why do lone parents receive higher levels of disregard than single person | This replicates the earnings disregards in Housing Benefit and supports those in work looking after children in lone parent households |

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|-----------|---------------|--|--|
| Residents | Questionnaire | Change Three: Unfair on UC claimants who already have limited finances | This change increases entitlement and only affects a limited number of people |
| Residents | Questionnaire | Change Four: All calculations should be shown | Due to its technical nature, it was difficult to express this simply in a sample calculation |
| Residents | Questionnaire | Change Four: Streamline guidelines to mirror the Governments | The proposal suggests doing just this. |
| Residents | Questionnaire | Change Four: What changes are proposed for those who are exempt due to SMI | A council tax exemption applies if you are severely mentally impaired. |
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