Council Tax Support Review - Consultation

Feedback Report

September 2019



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1. EXECUTIVE SUMMARY

1.1 Introduction

Harrow Council currently has a local Council Tax Support scheme as part of the services it delivers. Universal Credit Full Service started to roll out in Harrow in 2018 and the current plan announced by the Government is for everyone who could receive Universal Credit to have transferred onto it by 2023. While the Council is concerned about the impacts Universal Credit will have on its residents, it has no control over the Government's rollout plan and therefore has to consider how it needs to change its services in response to the rollout. Council Tax Support is currently administered jointly with Housing Benefit. If we do nothing as people move onto Universal Credit then the cost of administering Council Tax Support will increase and potentially take money away from other services the Council delivers.

For an 8 week period, from 29 July to 22 September 2019, the Council consulted on proposed methods of modernising the Council Tax Support scheme in response to Universal Credit effective from 1 April 2020. The Council is committed to ensuring residents get the opportunity to give their views and shape services and therefore the Council consulted with existing claimants, residents and Stakeholder organisations including from the voluntary sector within Harrow. To ensure as many residents in Harrow got the opportunity to be involved a number of local organisations were invited to help promote the consultation process.

1.2 The Consultation

The Council is required by legislation to consult with the major preceptor, the Greater London Authority (GLA). To meet this requirement, the Greater London Authority were notified of the Council's decision to consult and invited to feed into the process.

A letter which included the consultation document and survey was sent to 5000 residents across the borough consisting of 2000 Council Tax payers not in receipt of Council Tax Support, 2000 Council Tax payers in receipt of Council Tax Support of working age in the non vulnerable group and 1000 Council Tax payers in receipt of Council Tax Support of working age in the vulnerable group. To ensure that as many people as possible got the opportunity to be involved and to have their say 9 face to face events were held across Harrow, which included roadshows, drop in events and workshops with the voluntary sector. Council officers were also asked to feed into the consultation to identify potential impacts for service users across the borough, for example Adults and Housing.

Within the consultation the Council set out the proposed changes to the Council Tax Support Scheme in order to modernise the scheme in response to Universal Credit. Each proposal was developed with a view to keeping the administration of the scheme cost neutral, simplify the scheme and make the claim process easier. Respondents were asked to identify whether they thought the Council should adopt each proposal, and were asked their views on adopting an income banded scheme, a single non-dependent deduction, treat the Universal Credit notification

from the Department for Work and Pensions as a claim for Council Tax Support and making Universal Credit a condition for receiving Council Tax Support once the roll out in Harrow was complete. They were also asked to identify which groups they thought might be affected by the proposals and why.

The consultation also asked people whether Transitional Relief should be introduced for those households, who as at 31 March 2020, are in receipt of Universal Credit and in receipt of Council Tax Support in Harrow, who would lose 10% or more of their Council Tax Support at the point of transferring onto the new scheme. In order to give those who will lose proportionally more time to adjust, it was proposed that they will be awarded 50% of the loss for the first year.

The feedback received at the face to face meetings helped the Council to understand the impacts of the proposed changes and gave further context to the questionnaire submissions.

Formal feedback to the consultation was received from the preceptor Greater London Authority (GLA).

1.3 Summary of the Consultation Feedback

Respondents were asked to select one of 6 options ranging from whether they strongly agreed, tend to agree, neither agreed nor disagreed, tend to disagree, strongly disagree or didn't know as an option for most questions with a free text box for each for them to tell us why, and what we could do instead if they opted for tend to disagree or strongly disagreed to the proposal. Free text boxes were provided for questions 3, 10 and 11 with a further comments box for any other comments they may have at the end.

211 completed questionnaires were returned from members of the public.

1.31 Public feedback

A number of responses were received on line within a few days of each other which, on analysis, indicated that a cohort of persons had misunderstood the proposals and, from the free text comments recorded, believed that the proposed income banded scheme was to replace the current Council Tax bands.

These responses have been identified through the course of this report to enable an understanding of the feedback to be gained both with and without this information.

The consultation asked people whether an income banded scheme should be introduced into Harrow's Council Tax Support Scheme. The feedback to this question was split evenly between respondents who were in favour and those not in favour (46% each). However, if the responses received from the cohort identified as having apparently misunderstood the principle of an income banded scheme are removed, then more respondents were in favour than not (59% and 31% respectively)

Respondents also expressed strong support for setting the income bands so more assistance was given to those on a lower income than those on a higher income. This remained favourable overall with or without the inclusion of the cohort that misunderstood the proposals, with 53% in favour and 40% not in favour.

However, it should be noted that on analysis of the comments provided by those that were not in favour of the proposal a common theme emerged with responses alluding to the retention of the means test. Concern was expressed that the proposed income banded scheme could detrimentally impact families as it does not capture a persons individual circumstances, household size, and associated outgoings that families face. An additional key theme that emerged was that the proposals should be fair and equal to all. Comments that a banded scheme was not as fair as

a means tested scheme and did not consider all of a household's make-up and expenses were common throughout responses to the various questions in the consultation.

Respondents, 46%, believed that any income banded scheme should be calculated using net income rather than gross as it was recognised that this is what people took home and therefore would be fairer.

The consultation also asked people whether the number of non dependant deductions should be reduced from 5 different deductions according to income to one single deduction regardless of income at the rate of £7 per week. Whilst the majority of respondents, 44%, did not express an opinion either way on this proposal, of those that did, 30% were in favour of a single deduction compared to 26% who were not in favour. Concern emerged that the introduction of one rate, regardless of income would significantly impact those on low incomes or in receipt of benefits, and the introduction of more than one band would be more acceptable.

It was proposed that the Universal Credit notification received by the Council from the Department for Work and Pensions should be treated as a claim for Council Tax Support. The majority of respondents, 58%, agreed that this was favourable and it was seen as a beneficial change as many people were not aware that there was a need to make a separate claim to the Council for Council Tax Support.

It was also proposed that, for working age people, only those in receipt of Universal Credit should be eligible for Council Tax Support. Most respondents, 40%, were in favour of the proposal. Of those not in favour, 36%, there was concern expressed that eligibility to the scheme should be available to all and not just those in receipt of Universal Credit.

The consultation asked respondents for their views on the proposal to introduce transitional protection which would be offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31/03/2020 who will see a reduction of 10% or more to their entitlement. 51% of respondents agreed with this proposal. Furthermore, most respondents, 37%, were in favour of transitional protection being awarded at a rate of 50% for the first year of the scheme, compared to 22% of respondents who disagreed with this part of the proposal. Common themes from those not in favour of transitional protection was that it should not be offered at all or that it should be offered to all, not just those losing 10% or more as at 31/3/20. It was also clear that of those in favour there were 2 themes identified of those that felt that transitional protection should be offered but at a lower percentage and those that felt this should be higher.

Respondents were also asked if there were any groups that they thought would be affected by the proposals. Common groups identified were disabled, those in employment, families and young adults including non-dependents about to turn 18 years old.

1.32 Voluntary sector feedback

Two workshops were held with voluntary sector organisations. While no formal responses were received from the voluntary sector, 8 questionnaires were completed by individuals while in attendance at one of the workshops. Comments made during the workshops was also captured.

6 of the 8 respondents were in favour of the proposal to introduce an income banded scheme and that the bands should be set to provide more support to lower income households. Concerns were however expressed that the bands were set in an unfavourable way for large families. One respondent also stated that there was a risk that providing more assistance to lower income households may result in a disincentive to work.

As in the public feedback, the majority of respondents from the voluntary sector supported the proposal to use net earned income in the assessment of entitlement, rather than gross, with 7 in favour and 1 not in favour.

The proposal to introduce one non-dependant deduction was not supported by any of the voluntary sector respondents, with 75% not in favour and 25% either stating they neither agree nor disagree or don't know. Respondents stated that there should be at least two rates of deduction, taking into account whether the non-dependant was in work or not. A flat rate of £7.00 was believed to be too high.

All respondents from the voluntary sector were in favour of the proposal to use the Universal Credit notification as a claim for Council Tax Support.

In respect to the proposal to make receipt of Universal Credit a condition for receiving Council Tax Support, half of those that responded (6 people responded to this question) were in favour and half were not in favour. Concerns about this proposal were that not everyone who is entitled to Universal Credit will claim it and others may not be entitled.

100% (8) of these respondents were in favour of offering transitional protection to those as at 31/3/20 who will lose more than 10% of their entitlement. 4 people were in favour of the proposal to award 50% of the loss for the first year. One respondent was not in favour of this proposal.

Voluntary sector respondents identified working age people who have taken early retirement will not be able to access the scheme and people with literacy and language barriers may be impacted as they find it difficult to apply for and maintain a claim for Universal Credit.

One respondent stated 'This is a good and well thought out scheme as a way to work within UC'.

Comments captured from the workshops were similar to those stated in the questionnaires returned. In addition attendees noted that families, particularly larger families, were more likely to be disadvantaged by the proposals because they have higher expenses. Concern was also raised in respect to groups who may find it difficult to claim Universal Credit due to issues such as mental health or frequently moving in and out of work, in addition to those who may feel unable to claim due to being unavailable for work, for example carers.

1.33 Greater London Authority feedback

In summary, the Greater London Authority (GLA) supports the proposal to introduce an income banded Council Tax Support scheme. It acknowledges that this approach will reduce the number of changes made to individual Council Tax Support claims and recalculation of the council tax bill, providing greater certainty for households to budget and plan their finances.

The GLA supports the proposal to award transitional protection but ask the Council to consider extending this to all claimants meeting the proposed criteria beyond the start of the new scheme on 1/4/20.

REVIEW OF COUNCIL TAX SUPPORT SCHEME - FULL CONSULTATION REPORT

2 BACKGROUND

In April 2013 Council Tax Support replaced Council Tax Benefit as a local assistance for payment of Council Tax. Council Tax Support is claimed by residents who have a low income and meet certain criteria. Whilst the rules for Council Tax Support are agreed locally there are also some national criteria that Local Authorities must follow. Pensioners have not been affected by the introduction of Council Tax Support and continue to sit under a national scheme.

Every year the Council reviews its Council Tax Support scheme to ensure it remains fit for purpose and continues to effectively provide low income households with assistance in paying their Council Tax. As Universal Credit is rolling out in the borough, it has become necessary to modernise the Council Tax Support scheme to minimise the impact of Universal Credit on recipients and to prevent an increase in administration costs.

Legislation only allows the Council to make changes to the working age Council Tax Support scheme. The pensioner scheme is set by government and is not affected by this consultation.

Council Tax Support is currently administered along with Housing Benefit. Housing Benefit requires a complex means assessment and claimants often need to provide a lot of information and evidence to support their claim. As housing costs transfer into Universal Credit, there is an opportunity to simplify the Council Tax Support scheme. This will make it easier for people to claim and less confusing.

During the first year of Universal Credit starting to rollout in Harrow, the number of working age Council Tax Support claims has reduced. It is believed that this is because claimants are not always aware that Council Tax Support is not included in their Universal Credit and therefore they do not submit a separate claim to the Council, consequently losing out on potential entitlement. A review of the scheme gives an opportunity to address this under claiming.

There is also a concern that because Universal Credit is a monthly benefit which could change on a monthly basis, that Council Tax Support would also fluctuate more frequently. Frequent changes to entitlement make it difficult for claimants to understand what they are entitled to and therefore how much they need to pay. Furthermore this could cost the Council more to administer, drawing limited funds away from other services, and potentially impact on the Council's ability to collect Council Tax. It is important that the Council is able to collect Council Tax as it funds many of the services delivered.

To address these points the following changes were proposed:

- 1. Introduce a banded income scheme for Universal Credit claimants claiming Council Tax Support
- 2. Introduce a single non-dependant deduction for claims on the income banded scheme
- 3. Treat a Universal Credit notification from the Department of Work and Pensions (DWP) as a claim for Council Tax Support
- 4. Make Universal Credit entitlement a condition for receiving Council Tax Support for working age people once Universal Credit rollout in Harrow is complete

The amount of money spent on the working age Council Tax Support scheme was not proposed to change.

Alternatives to these proposals were considered including making no changes to the existing scheme; introducing fixed period awards; and not making Universal Credit a qualifying condition, but determined that the proposals set out in this consultation are the most appropriate to address the issues that Universal Credit is creating for Council Tax Support.

The draft Council Tax Support scheme was published in advance of the consultation

2.1 The current Council Tax Support scheme

The current Council Tax Support scheme, introduced in 2013, was developed by the Council asking residents for their views. The feedback provided was used to shape the scheme that is currently in place in Harrow.

The current Council Tax Support Scheme has three groups of claimants:

- 1. Pensioners who are not affected by the proposed changes under this consultation because the pensioner scheme is set by government.
- 2. Working Age Disabled and War Pension recipients (working age) which consists of households where the customer, a partner or a dependent child is physically or mentally disabled and receives one of the following: Personal Independence Payments, Disability Living Allowance, Employment Support Allowance (Support group), Incapacity Benefit, Mobility Supplement, Severe Disablement Allowance; residents who are registered blind; residents for whom a disabled person's reduction has been awarded; or anyone who is working age and receiving War Disablement Pension or War Widows Pension.
- 3. All other working age this group is for residents who do not fall into either of the above categories.

Claimants will receive different amounts of Council Tax Support depending on a number of factors including which of the above groups they fall into, their income level and their household composition. Harrow's current Council Tax Support scheme is available online at www.harrow.gov.uk/counciltaxsupport

In 2019/20 Harrow expects to spend £13.8 million on Council Tax Support for around 11,800 households. Around 6,700 of these are of working age and could be affected by the proposals set out within this consultation.

2.2 The proposals

Introduce a banded income scheme

The existing means-tested system would remain until the rollout of Universal Credit in Harrow is complete. This means that existing Council Tax Support claimants of working age that do not receive Universal Credit will continue to have their Council Tax Support entitlement determined under the Council's existing scheme arrangements until either they start to receive Universal Credit, or Universal Credit rollout is complete in Harrow, whichever is earlier.

This proposal will make the process of applying for Council Tax Support simpler as less information is required to assess entitlement. It will be easier for claimants to understand how much they are entitled to and they will have fewer changes to entitlement as their Universal Credit fluctuates. It is also expected to prevent an increase in administration costs for the Council in response to Universal Credit.

Our proposed scheme will use the claimant and partner's gross earned income to work out how much Council Tax Support the household is entitled to. The amount awarded would also depend on the households make-up. A different rate of Council Tax Support would also be awarded if the household is classified as disabled. We are not proposing to change the criteria for classifying a household as disabled but will keep it as in the current scheme (see section The Current Council Tax Support scheme above)

It was proposed that gross earned income will be calculated by totalling the claimant and their partner's earnings from employed and self-employed income before any deductions are taken for

tax, national insurance etc. They will then be placed into one of the income bands set out in the table below and awarded the rate of Council Tax Support shown. This could be reduced if a non-dependant deduction is applied: more information about non-dependant deductions is given later in this document.

Proposed Banded Income Scheme

Disabled and War Pension recipients Not classified as disabled under the Council Tax Support scheme		Not classified as disabled under the Council Tax Support scheme and in work									
% Award	In receipt of maximum Universal	% Award	In receipt of maximum Universal	% Award	Single people without children	% Award	Couple without children	% Award	Lone parents	% Award	Couples with children
	Credit or in-work		Credit		Weekly gross earned income*		Weekly gross earned income*		Weekly gross earned income*		Weekly gross earned income*
86%	No earned income or gross earned income up to the £440.00	70%	Maximum Universal Credit	65%	£0-£75	65%	£0-£75	65%	£0-£75	70%	£0-£100
				50%	£75.01-£125	60%	£75.01-£125	60%	£75.01-£125	60%	£100.01-£150
				40%	£125.01- £175	50%	£125.01-£175	50%	£125.01-£175	50%	£150.01-£200
				0%	>£175	40%	£175.01-£225		£175.01-£225	40%	£200.01-£250
						0%	>£225	30%	£225.01-£275	30%	£250.01-£300
								0%	>£275	20%	£300.01-£375
										0%	>£375

^{*}Includes those who do not work but do not receive maximum Universal Credit

If entitlement is below £2, an award will not be made which is consistent with the current scheme.

The consultation asked whether the proposal to use gross earned income was correct or whether net earned income should be used instead. Net earnings would be calculated by deducting tax, national insurance and all or part of any pension contributions. If net earnings were used the income bands used in the scheme would be altered accordingly.

Under the current scheme a Council Tax Support recipient could see a gradual change to the amount of assistance they receive as their circumstances change. Under the proposed banded scheme the amount of assistance received will only alter if the recipient's circumstances change to such an extent that they would move between income bands or move between the households groups.

As a result, the change to entitlement, when it occurs, will be greater either awarding the claimant more or less depending on the nature of their change.

To calculate the band levels and the amount of individual awards, information from the current scheme has been used.

The proposed income bands were set by looking at the current average Council Tax Support award, the average gross earnings and the type of household composition. This approach was intended to minimise the level of change for existing claimants. However, the nature of a banded scheme means that some people will get more and some will get less.

Furthermore, because we are proposing to only use gross earnings to assess a household's income, some claimants will see larger increases and others larger decreases to their entitlement. However, we have tried to create a scheme that minimises disruption to claimants and keeps the scheme total expenditure the same.

Impacts of the proposed banded income scheme

This proposed banded scheme does not affect people who currently receive a passported benefit and who would receive maximum Universal Credit. The term passported benefit applies to people on Income Support, Job Seekers Allowance Income Based and Income Related Employment Support Allowance.

Many people classified as disabled under the Council Tax Support scheme who are in work will receive more Council Tax Support under this proposal.

While some households won't see a change in their entitlement, others could be affected either positively or negatively. Our modelling forecasts that 3,802 households will see no change under the proposal to introduce a banded income scheme.

- 1,152 will receive more Council Tax Support as a result of this proposal, of which 57% will see an increase of more than £5 a week compared to their current entitlement.
- 1,744 will see a reduction in their entitlement. 23% of these households will lose more than £5 a week compared to their current entitlement.

Examples of reasons people might get more than they do under the current scheme are:

- They are in-work and at the top of one of the income bands
- They are classified as disabled under the proposed scheme and do not receive maximum Universal Credit
- Claimant qualifies for Universal Credit but also receives an income other than earnings e.g. maternity allowance, maintenance allowance or income from a boarder
- In receipt of a higher rate of tax credits and lower earnings

Examples of why people might get less are:

- They are in-work and are at the bottom of one of the income bands
- Claimant pays a relatively higher rate of child care proportionate to their earnings
- Claimant has not claimed tax credits that they may be entitled to
- Claimant receives a lower level of tax credits due to a higher level of earnings
- The higher the number of children in a household where the parent(s) have relatively higher earnings compared to some other claimants, the more likely it is that the Council Tax Support will reduce under the proposed income banded scheme
- No entitlement to Universal Credit (mostly owner occupiers who don't qualify for Universal Credit because their income is too high).

Changing non-dependant deductions

Harrow's Council Tax Support scheme currently has five rates of non-dependant deductions. The consultation proposed to reduce this to one.

Non-dependants are adults that live in a household who are not the claimant or their partner. An amount is deducted from the Council Tax Support award depending on the non-dependant's income.

This change is being proposed to help simplify the scheme and make it easier for claimants to understand how much Council Tax Support they will receive.

The deductions in the current scheme are set out in the table below.

Non Dependant Income	Rate of weekly deduction
Aged under 25 and on Income Support, Job Seekers Allowance (Income Based) or Employment Support Allowance (Income Related) assessment phase	£3.30
Aged 25 or over and on Income Support or Job Seekers Allowance (Income Based)	£3.30
Aged 18 or over and not in remunerative work	£6.60
In receipt of main phase Employment Support Allowance (Income Related)	£3.30
In receipt or Employment Support Allowance contribution based	£3.30
In receipt of Job Seekers Allowance contribution based	£6.60
In receipt of Pension Credit	£3.30
Gross income less than £202.85	£6.60
Gross income not less than £202.85 but less than £351.65	£13.10
Gross income not less than £351.65 but less than £436.90	£16.50
Gross income not less than £436.90	£19.80

It was proposed to replace the above deductions with a single rate of £7.00 a week irrespective of the non-dependant's income. As in the current scheme a deduction would be taken for each non-dependant so one household could have more than one deduction.

If the claimant or their partner receive Disability Living Allowance Care Component or the Daily Living element of Personal Independence Payment then a non-dependant deduction will not be applied. This is the same as the current scheme.

Students will also continue to be disregarded for the purpose of non-dependant deductions, as in the current scheme.

Impacts of the proposed change to non-dependant deductions

At the point of consulting 115 households were forecast to be better off and 453 worse off as a result of the proposed changes to non-dependant deductions. Households with non-dependants who work would be more likely to receive more Council Tax Support than under the current scheme, while households with non-dependants who are not in work are most likely to receive less.

Using a Universal Credit notice as a claim for Council Tax Support

When people claim Universal Credit they must submit a separate claim to the Council if they also want to claim Council Tax Support. People do not always do this and can miss out on Council Tax Support that they would have been entitled to.

When someone claims Universal Credit the Department for Work and Pensions (DWP) send the Council a notification if the claimant has told DWP that they would like to claim Council Tax Support. We are proposing to use these notices as a claim for Council Tax Support.

Impact of the proposal to use the Universal Credit notice as a claim for Council Tax Support

 $\underline{\mathbf{T}}$ his is a beneficial change for all working age Council Tax Support claimants as it will increase the level of take up for working age people in receipt of Universal Credit and simplify the claim process.

Making Universal Credit a qualifying benefit for working age people Under this proposal, from 1st April 2020 the income banded Council Tax Support scheme will only be available to new claimants who have a low income and are in

receipt of Universal Credit.

This proposal would mean that the council can get most of the information needed to work out Council Tax Support from the Department for Work and Pensions. This is quicker and simpler for Council Tax Support claimants and keeps administration costs to a minimum. People who currently receive Council Tax Support and are not in receipt of Universal Credit will continue on the current scheme until they are required

to claim Universal Credit or until they are subject to the rollout of Universal Credit for their particular circumstances. At that time, they will either transfer onto the Harrow Council Tax Support scheme in place at that time or, if they do not qualify for Universal Credit, they will no longer qualify for Council Tax Support.

Impacts of the proposal to make Universal Credit a qualifying benefit

We are aware that there are a number of households who are not claiming all of the benefits they are entitled to, for example, child tax credit and working tax credit and these could not migrate onto Universal Credit. We propose to advise these households, where they can be identified, that they may be entitled to Universal Credit. This will increase their income and potentially enable them to continue to receive Council Tax Support.

We realise that some people are not able to claim Universal Credit and will be detrimentally impacted by this proposal once the current scheme has ended following the completion of the rollout of Universal Credit. We are therefore proposing an exception to the requirement for claimants to be in receipt of Universal Credit for people who receive contribution based Job Seekers Allowance or Employment Support Allowance.

We are proposing to treat people who meet the following criteria the same as people who receive maximum Universal Credit:

- Not in receipt of Universal Credit; and
- Receive JSA(C) or ESA(C); and
- Have no other income or their only other income is disability benefits that are disregarded under the current Council Tax Support scheme; and
- Have under £16,000 in capital

The above will apply once Universal Credit rollout in Harrow is complete. Households who do not receive Universal Credit will continue to claim Council Tax Support from the current scheme until that scheme no longer exists. At this point they will transfer onto the banded scheme if the above criteria are met

Transitional Protection

While the proposed changes to Harrow's Council Tax Support scheme will benefit many households, we recognise that some will receive less Council Tax Support.

To ensure people are able to manage this change we will publicise changes so people are aware of how their Council Tax Support could change when they move onto Universal Credit. The consultation also intended to understand in greater detail who will be impacted and what the impact will mean to people. This was to not only help to inform the decision of whether or not to implement these proposals, but will also enable us to assist those most affected.

The proposals also included an element of transitional relief for those households who as at 31 March 2020 are in receipt of Universal Credit and in receipt of Council Tax Support in Harrow. Households who would lose 10% or more of their Council Tax Support at the point of transferring onto the new scheme will be awarded 50% of the loss for the first year of the scheme. This is intended to give people who will lose proportionately more time to adjust to the change in entitlement.

As Council Tax is an annual charge, it was proposed that the award will be a one off payment based on 50% of their overall reduction in entitlement for 2020/21 only.

We don't know how many households will be entitled to transitional protection because we don't know how many will be in receipt of Universal Credit as at 31 March 2020, but we estimate it will be around 300.

3. **CONSULTATION PROCESS**

3.1 Consultation Methodology

Legislation states that the local authority must consult with major preceptors when reviewing the Council Tax Support scheme. Harrow Council therefore notified the Greater London Authority (GLA) of the review and gave an opportunity to feed into the consultation. The Greater London Authority (GLA) submitted a formal response which is in Appendix H

The Communication and Consultation Strategy ensured the consultation would create the opportunity for a broad representation of residents, including Council Tax Support recipients and key Stakeholders to give their views. To meet this outcome the consultation included the following:

- a mailshot of the consultation booklet and questionnaire was sent to 2000 Council Tax Support recipients in the working age non vulnerable group, 1000 Council Tax Support recipients in the working age, vulnerable group and a random sample of 2000 other council tax payers who are not recipients of Council Tax Support,
- online consultation,
- 9 drop in events, discussion groups and workshops
- Email & telephone
- Raised awareness with Advice agencies in the borough through the Information and Advice forum whose representatives include:
 - Citizens Advice Harrow
 - o Harrow Law Centre
 - HASVO

- Harrow Mencap
- Harrow Association for the Disabled
- Mind in Harrow
- Harrow Carers
- Age UK
- Raised awareness with Council officers from different services whose service users could be impacted, for example Adults, Children's, Housing
- Publicity via Facebook and Twitter, Council website, e newsletters, and posters distributed throughout the borough

Supporting material has included a consultation booklet, consultation questionnaire and a consultation presentation.

Responses to the questionnaire were either submitted by hand at face to face events, posted back or completed online at http://www.harrow.gov.uk/ctsconsultation

The booklet and questionnaire were enclosed in the mailshot to assist residents in submitting a response. The information also signposted to the online form and additional information, and advised of events that were taking place across the borough. Some people stated at the events that they had attended because of the information in the mailshot, demonstrating that it had been received and opened these channels to respond for many residents.

Feedback was captured at face to face events either on a one-to-one basis or in focus groups. In these forums residents and organisations were given an overview of the proposals and had the opportunity to ask questions to inform their response. Holding face to face discussions gave the Council the opportunity to discuss this complex subject in depth and gave opportunity for detailed feedback to be provided. All feedback from these face to face events/discussions was captured and has fed into this report.

Residents and organisations were also able to submit comments and questions through both email and telephone to Harrow Council.

Further information was also available on the Harrow Council website at www.harrow.gov.uk/ctsconsultation. The website received 126 'hits' during the consultation period.

The consultation ran for a period of 8 weeks, from 29 July to 22 September 2019. The outcome of this consultation is to be reported to Harrow Council Cabinet in December 2019 and Full Council in February 2020 when a final decision is to be made on the Council Tax Support scheme that is to be taken forward for 2020/21.

A copy of the Consultation Booklet is included in Appendix A

3.2 Consultation Questionnaire

A total of 5000 questionnaires were posted to a number of existing Council Tax Support claimants and to randomly selected Council Tax payers who are non-Council Tax Support claimants in Harrow. The Council's online customer account, 'My Harrow', was used as an engagement tool to reach all registered residents. An article in the e newsletter, sent weekly to all registered account holders, was included at the start of the consultation period to remind them of the consultation in progress and invite their feedback, should they wish to participate. The Council's staff e newsletter was also used as an engagement tool to remind staff of the consultation in progress and invite their feedback, should they wish to participate.

A copy of the Consultation Questionnaire is included in Appendix B.

A copy of the Staff e newsletters and "My Harrow" e newsletter are included in Appendix C, D and E.

3.3 Events

Harrow Council set up a number of dedicated drop-in events and attended community events and Stakeholder focus groups in order to both widen the consultation process and to allow face-to-face discussions and explanations to take place.

In all, consultation on the Council Tax Support scheme took place at 13 events/roadshows/focus groups, including:

- Chando's Children's Centre
- Town Centre stall
- Access Harrow stand
- Xcite Job Fair
- Voluntary Sector Workshops
- Workshops with relevant internal departments

A full list of events is in Appendix F. The attendance at each of these events is included in the Appendix F and varied from 0 to over 150, dependent upon the type of event, the nature of the audience and the weather. The total attendance at these events exceeded 500..

3.4 Organisational Promotion

Harrow Council invited a wide range of organisations to help promote the consultation through the use of posters and through making booklets and questionnaires available to their users. There is a full listing of organisations in Appendix G. This included:

- Voluntary Agencies
- Community Groups
- Libraries
- Children's Centres
- Leisure Venues
- Harrow Arts Centre
- Harrow Museum
- Harrow Civic Centre

In total 600 booklets and surveys and 76 posters were sent to voluntary agencies, Libraries, Children's Centres, Leisure Venues and The harrow museum and arts Centre.

A further 370 booklets and surveys were handed out at events held across the borough

Further meetings or email communication took place with MPs and Councillors.

The consultation was also publicised via Council website, My Harrow Account, Social media (Facebook & Twitter) and Access Harrow.

Meetings were also held with staff in a number of Service Departments within the Council, including Council Tax Support/Housing Benefits.

3.5 Formal Stakeholder Feedback

A formal response was received from the major preceptor, the Greater London Authority (GLA).

4. CONSULTATION FEEDBACK

4.1 Consultation Questionnaire

In total there were 211 responses to the questionnaire, of which 85 were paper returns (46 returned via post and 39 completed surveys handed back at the events held across the borough) and 126 were submitted online through the Council website.

The volume of questionnaire responses is relatively low, 1.42 % of the questionnaires distributed out and This may in part be due to the fact that technical changes only were proposed and the difficulty from a lay perspective of making an informed decision on the

proposals put forward. This was balanced with the number of events attended together with meetings held with stakeholder organisations, where face to face discussion and explanation took place with a number of people.

The questionnaire responses were recorded anonymously as to ensure confidentiality

Respondents were asked to select one of 6 options ranging from whether they strongly agreed, tend to agree, neither agreed nor disagreed, tend to disagree, strongly disagree or don't know. There was also a free text box for respondents to tell us why they disagreed, and what we could do instead.

The analysis in this section of the report is of the combined paper and online responses. It should be noted that respondents were able to provide comments by way of free text on all questions, and in doing so, could provide further information for consideration.

As a consequence of this it was noted that between 23 August 2019 and 28 August 2019 a number of responses (51) were received on line which, on analysis, indicated that a cohort of persons who had misunderstood the proposals and, from the free text comments

recorded, believed that the proposed income banded scheme was to replace the current Council Tax bands.

Focusing purely on the comments made it became evident that these persons believed that they were being asked to consider that higher earners will have to pay more Council Tax as a result of the proposal and be penalised in some way.

These responses have been identified through the course of this report to enable an understanding of the feedback to be gained both with and without this information.

It should be noted that a % of the responses that selected the option to 'tend to disagree' or 'strongly disagreed' could be attributed to the results received by the unknown cohort on 24/08/2019 to 28/08/2019 and this could have influenced the proportion of 'disagree's'

However although the principles of the consultation and the proposals appear to have been misunderstood, some of the responses were relevant to a number of common themes.

In order to maintain the integrity of the data, all responses have been included in the analysis and in doing so it is recognised that the inclusion of these responses distorts the outcomes further.

We have therefore provided a table showing the overall responses to the questions with additional graphs showing any distortion to the overall outcomes between the partial analysis and the full analysis.

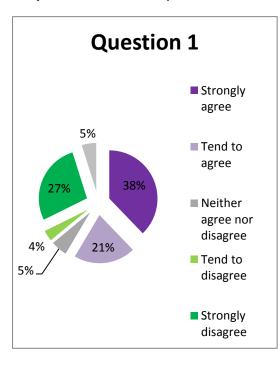
Q1. An income banded scheme should be introduced into Harrow's Council Tax Support Scheme.

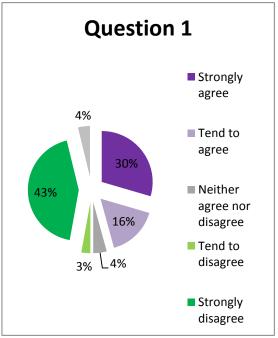
Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 211)
In favour	96	46%
Not in favour	97	46%
Neither agree nor disagree/Don't know	17	8%

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

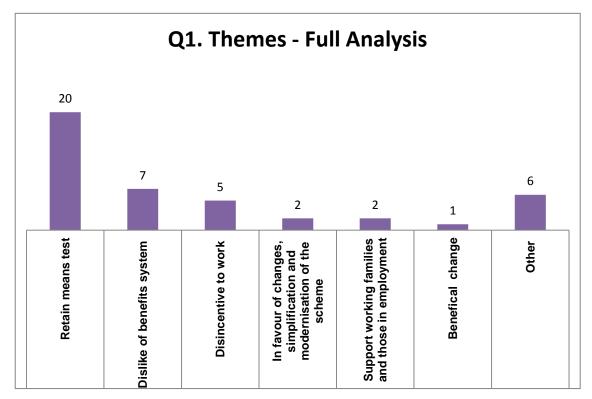
Partial Responses (total number of Full Responses (total number of responses received 164) received 210)





There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

An equal number of respondents were in/not in favour of a banded scheme, however it is worth noting the free text comments and understanding the public's views regarding a banded scheme being introduced. The issues most commonly raised were:



The following graph shows the number of comments made in the free text boxes which provide more context.

- * Some respondents made multiple comments under each theme so totals don't tally with total number of comments'
 - 1. It was expressed in the free text comments received that income bands would be unfair to those on low incomes, those with other means of income or benefit income. A number of comments were made that everyone should be treated equally, fairly and to look at all circumstances individually as every case is different. Comments were also made to family size needing to be considered. The current means test takes into consideration the above. Respondents feeding into this theme thought that these changes, that could have sufficient impact on a claimant, would not be captured if income bands were introduced
 - 2. There were a number of references made with regards to a dislike of the benefit system. A strong feeling was expressed that this could lead to fraudulent claims as income is not always declared, to live within your means and to better yourselves and not be reliant on the benefit system. Additional comments also raised concerns that Harrow gives too much to applicants and that Harrow should start looking after its own residents rather than the "poor migrants".
 - 3. The proposal of introducing an income banded scheme was see as a disincentive to work as this could be 'manipulated' and was seen as a discouragement to work

harder.

While we asked for people to give comments if they were not in favour of the proposal, some people added comments in support of it e.g.

'Please simply the system'

'Positive changes needed to improve Council Tax Support system'

The top three most common reasons given as to why an income banded scheme should not be introduced are listed below:	What people said
Retain the means test /treat people fairly/equally	'Everyone should be treated equally'
	'It needs to be fair on everyone'
	'Everyone should be treated equally irrespective of finances.'
	'1. It should be based on family size.
	It's not fair system. As real income of many households not known
	3. Income keep changing. How are you sure it will work'
2. Dislike of the benefits system	'As we have a labour council, what they want to do is tax those with money even more and offer everyone else a free ride. Harrow is full of poor migrants from the around the world. About time they started looking after the people that pays their wages.'
	'I don't believe in benefits as so fraud claims. I'm sorry but I don't see why people who work hard and earn should be penalised'

3 Disincentive to work '...What we don't need for sure is further disincentive for people who work hard.' '...There doesn't seem to be any valid reason to have another channel to subsidize select households. This only discourages people to take on work and be ambitious.' 'This will encourage people to manipulate tax system to be in lower band. It discourages hard working people and encourages people not progress with career and business initiatives which will move them higher band which will be long term loss to council.'

In Summary

The responses were split quite evenly between in favour and not in favour of the proposals, although if the 51 respondents who appear to have misunderstood the consultation are excluded from the results, the majority of respondents (59%) were in favour of introducing a banded income Council Tax Support scheme. Other comments and references made alluded to the fact that the scheme needs to be fair for everyone and that all applicants need to be treated the same.

There was also support for simplification, and acknowledgment that changes were positive with concerns about how it would be administered; eg frequency of peoples changes in income

What is apparent is that, notwithstanding the responses received that distort the data, there is strong argument to adopt a banded scheme. Once we factor in the responses which, from the comments provided appear to have misunderstood the question then this shows that there is equal preference for adopting the proposed scheme as there is against adopting the proposed scheme.

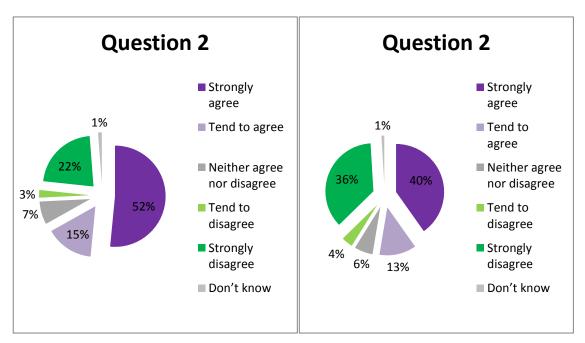
Q2. The income bands should be set so more help is given to those with lower incomes than those with higher incomes.

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 211)
In favour	110	53%
Not in favour	84	40%
Neither agree nor disagree/Don't	15	7%
know		

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

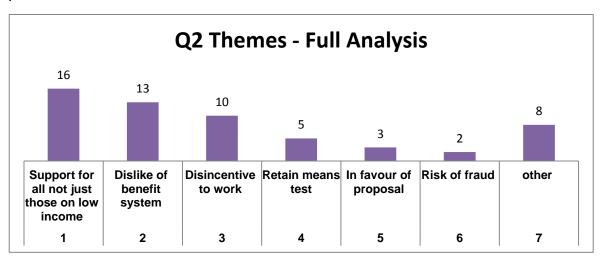
Partial responses (total number of	Full responses (total number of
responses received 163)	responses received 209)



There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

While a greater number of respondents were in favour of more help being given to those on a lower income than those with higher incomes, it is worth noting the free text comments and understanding the public's views as to why some considered this to be unfavourable. The points most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- It was expressed in the free text comments that respondents believed that equal consideration should be given to all regardless of whether of a low income or not as those in the higher earning brackets also need assistance too. Respondents feeding into this theme felt that this should be equal to all in order to be 'fair to everyone'
- 2. There were a number of references made with regards to a dislike of the benefit system. Once again a strong feeling was expressed that to offer more assistance to those with lower incomes promoted fraud as it would encourage people not to declare their true income. Respondents felt that people should live within their means and that those that earn more are supporting those that don't.
- 3. Many felt that helping those on lower incomes rather than those on higher incomes was a disincentive to work. This was evident from the feedback as views were expressed that the more assistance offered to those on a low income the less incentive there was to work at all or to work harder to improve their situation. The comments expressed also feed into a dislike of the benefit system as again the view that those that are working are supporting those that don't or wont.

Some people also still expressed the need for the retention of a means test as:

'Higher income does not equate to higher savings. A higher income person can have larger outgoings e.g. higher mortgage, medical care for elders, childcare, larger family

etc.....'

Support of the proposal was also expressed as respondents told us:

'If people are working and on lower incomes then yes at least they are working and yes they deserve the help'

'Lowest income should get help'

The top three most common reasons given as to why income bands should be set so more help is given to those with lower incomes than those with higher incomes are listed below:	What people said
Support for all not just those on low income	'Everyone needing and requiring CTS should be treated equally.'
	'Because universal credit, supplements the lower income families. So the higher income borne all the costs'
	'Harrow is not a borough where there is a huge divide in incomes. People earning more than 375 per week with a child are not exactly rolling in money asking them to pay more given their circumstances is outrageous.'
	'Everyone should be treated equally irrespective of finances.'
	'Fair to everyone'
Dislike of the benefits system	'Why penalise the one earning more for someone earning less'
	'I don't believe this is fair. If you are unable to support yourself then downgrade your property or move to another location. People who earn more should not be subsidising people who earn less. People who earn less income may in fact be richer than higher income earners based on money sitting in banks accounts or investments.'
	'Efforts should be made for lower earners to work even hard and educate to earn more rather than giving things for free on cost of those who have spent money and

	efforts to earn more and already paying much more in terms of taxes. This sort of scheme will encourage people to hide income and earn in cash. If someone can afford a certain size house (own or rent) that itself is justfication to pay equivalent tax as others pay for similar property'
3. Disincentive to work	'You are saying that those who work hard for so many years have to pay for those not working hardor not interested to work.' 'The hard working have to keep paying more and more which will incentivise people not to work.'
	'Lower income people should be provided support so that they can earn enough to support themselves. Providing discounts, subsidies and bursaries does not help in the long run. These will encourage more and more people to not work at all as everything is given "free" to them.'

In Summary

The responses show that the majority were in favour of the proposals. The majority of respondents (53%) were in favour of the income bands being set so more help is given to those with lower income than those with higher incomes.

However it is also evident from the comments received, many of which were expressed by those that appeared to have misunderstood the consultation, that there is a strong view that offering more help to those with lower incomes than those with higher incomes is a disincentive to work and there was a dislike of this and the benefit system as whole.

It is apparent that, notwithstanding the comments received that showed a strong dislike of this proposal, or from those that appear to have misunderstood the question, there remains a preference for the income bands being set so more help is given to those with lower income than those with higher incomes.

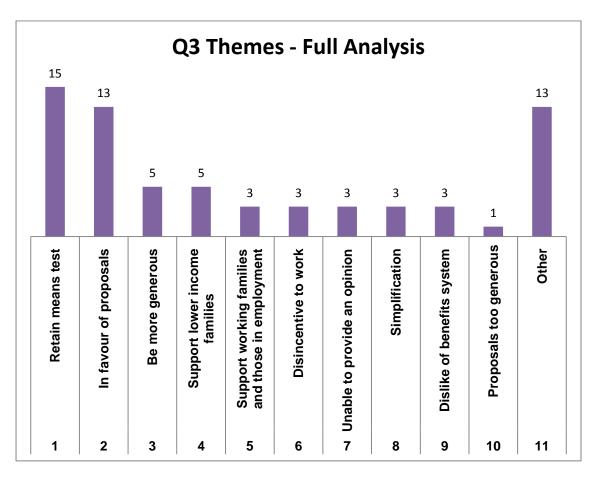
Q3. In the box below please give any other comments you have about the level you think the bands should be set at and comments about the household groups that are included in the proposed banded scheme.

This question invited free format comments for respondents to tell us their opinions about the levels the bands had been set at and the household groups included. The option to select a response ranging from whether they strongly agreed, to don't know was not offered.

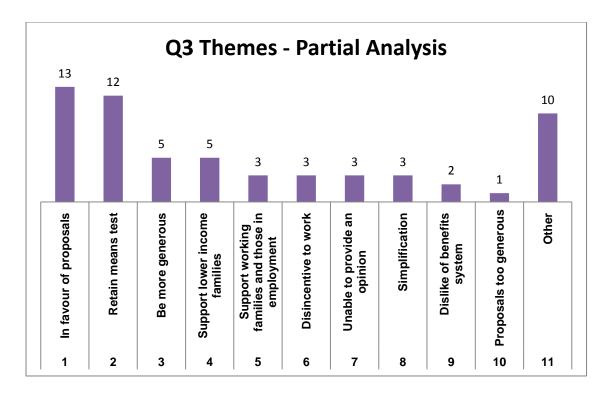
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. However analysis has identified that this does not appear to be the case and there was little change in the themes identified

It is worth noting the free text comments and understanding the public's views on the levels the bands have been set at and the household groups included. The issues most commonly raised were:

The following graphs show the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'



* Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- 1. It is indicative of the responses that it is believed that the proposed income banded scheme does not capture or consider the circumstances of the groups identified and that income bands would be unfair to those on low incomes, lone parents and working families including those with multiple children.
- Those Respondents that were in favour stated why they believed the proposals to be fair bearing in mind the current climate and within the limits that the Council has.
- 3. A number of Respondents felt that the income banded scheme should be more generous and that the percentages of awards or the width of the bands should be reconsidered so that more help is available.

While we asked for people to give comments on the levels the bands had been set at and the household groups affected, the majority of the responses alluded to retaining a means test as well as the groups that would be affected by the introduction of an income banded scheme. However comments made under the themes 'be more generous', 'support lower income families' and 'support working families and those in employment' did not state that they disagreed with the concept of a banded scheme but gave opinions on how the bands should be set. These respondents also largely commented on potential detrimental impacts for families.

This was reflected in the comments of 2 people who suggested:

'The proposed banding do not make sense as they are detrimental towards lone parents, against couples, who may have one or two incomes. The bandings should if anything be made more beneficial to lone parents, and certainly should not drop to zero at less than the couples equivalant of £375 per week. Proposals in this respect poorly thought through'

'Have more band at lower end'

The top three most common reasons given about the levels the bands should be set at and comments about the household groups included are listed below:	What people said
Retain means test/consider household size	'Council must consider not to discriminate household with less than 3 children'
	'Multiple children, single parent household'
	'Penalising familiea, great message to send to people living in the borough.'
	'I do think that more help should be given to single parents(mothers) with more than 2 or 3 children but on a declining scale.'
	'There should be something more done for single parents with limited incomefor ex: I work with agency and at school and i dont have any work in august n last 8 days of july but council tax i have to pay for full even for the August. clever councilors dont take this into accountso please take this into account.'
2. In favour of proposals	'Seems fair as no money out of the scheme'
	'Agree with Council Tax Support 29 July- September information booklet.'
	'Agree that disabled people should get the most help'
	'Appear set in a fair way'
	'Levels about correct within limits that council has'
3. Be more generous	'Upto 90% award where nil income '

'It should be slightly higher for people how to work more. Perhaps 10% higher for couples with children in all the bands.'
'Be more generous with the percentage of CTS awarded'
'Think the bands should be increased - there should be more help available'

In Summary

Of those who made a comment in response to question 3, the key themes related to ensuring families were not detrimentally impacted, believing the proposals to be fair or that the bands should be adjusted to make the scheme more generous.

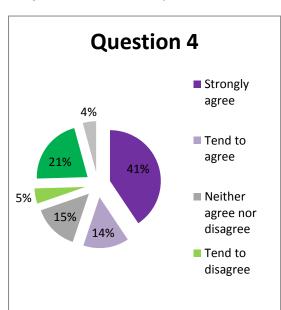
Q4. While we have proposed to use gross earned income to calculate entitlement, we could use net earned income instead. Do you agree that we should use net earned income instead of gross?

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

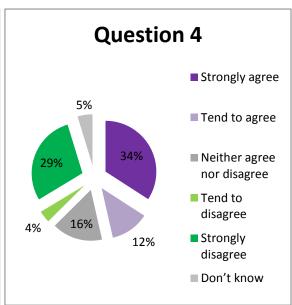
Responses Received	Number	% (out of 211)
In favour	98	46%
Not in favour	69	33%
Neither agree nor disagree/Don't	44	21%
know		

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

Partial Responses (total number of responses received 164)

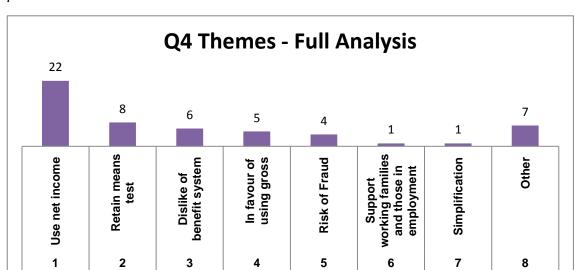


Full Responses (total number of responses received 210)



There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

Although a greater number of respondents were in favour of using net, It is worth noting the free text comments and understanding the public's views regarding whether we should use net income as opposed to gross income. The comments most commonly stated were:



The following graph shows the number of comments made in the free text boxes which provide more context.

- 1. It was clear that most respondents were predominantly in favour of using net income as this is something that most people understand as this is the pay that they would take home.
- 2. The majority of comments made by respondents that fed into this were in respect of capturing all changes in income and that family size was not being considered to the extent it would be in a means test. These comments did not address the question of using net or gross but it is evident that they are requesting a fair assessment.
- 3. Once again a number of respondents made clear their dislike of the benefit system, including factors that affect hardworking people which is deemed to be unfair, the risk of fraud within the system due to undeclared income and the unfairness perceived of the benefits system that it does not support those that attempt to better themselves in comparison to those that do not.

The top three most common reasons given as to whether we should consider using net income instead of gross income are listed below:	What people said
9	

^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

1. Use net income	'People will have other deductions and it is the amount after these that they will have to live on.' 'It would be unfair to base on gross income as this gives a false view of a persons take home income espicailly if they pay pension etc.' 'That's what is actually being taken home'
2. Retain means test	'Keep uniform system. People with more income does not mean they have more money to spare.' 'Higher income families have dependents and overheads which sometimes income does not cover the overheads and now we have to pay more council tax' 'Everyone eligible for CTS should be treated equally rather than on income banding. Their should rather be treated based on their circumstances e.g. couples with children, single mothers, elderly etc.'
3. Dislike of benefit system	'So you use net income when it suits you. But for people with property income for example they are not allowed to claim any expenses. It's counted as income when assessing benefits but it's not counted as income for example taking out a mortgage. Benefit system sucks for hardworking people. Whilst others sit around claiming everything' 'Those in organised employment will only fit a given %. Those in unorganised employment (cash economy) will
	underplay their Gross/Net income. It will only increase the complexity and labyrinthine rules, clauses, sub-clauses and become an admin nightmare for council as well as the council tax payers.' 'This is penalising those who are working hard and appeasing those who don't.'

In Summary

The responses indicate a clear preference for using net income rather than gross income and, if the 51 respondents who appear to have misunderstood the consultation were to be excluded from the results, the majority of respondents (46%) remain in favour of using net income instead of gross income. It should be noted that the percentage of those that selected 'tend to disagree' or 'strongly disagree' rose in the full analysis as the respondents that misunderstood the consultation commented that the banded scheme should not be based on income at all.

It is apparent that, notwithstanding the responses received that distort the data, that there is a strong preference to using net income as opposed to using gross income.

Q5. The number of non dependant deductions should be reduced from 5 different deductions according to income, to one single deduction regardless of income at the rate of £7.00 a week

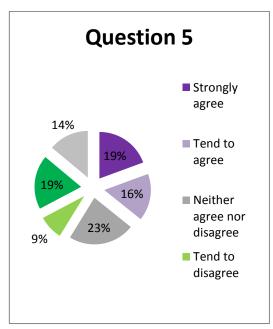
Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 211)
In favour	63	30%
Not in favour	54	26%
Neither agree nor disagree/Don't	94	44%
know		

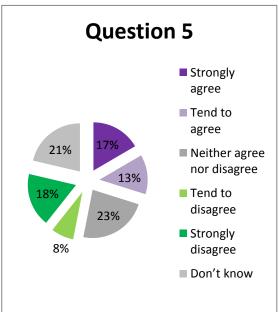
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation, much of the data was distorted. However, analysis of responses to question 5 was less distorted.

The majority of respondents did not indicate whether they were in favour of the proposal to introduce a single non-dependant deduction at a rate of £7 a week or not. Of those that did indicate a preference, slightly more were in favour than not in favour, 30% and 26% respectively.

Partial Responses (total number of responses received 164)



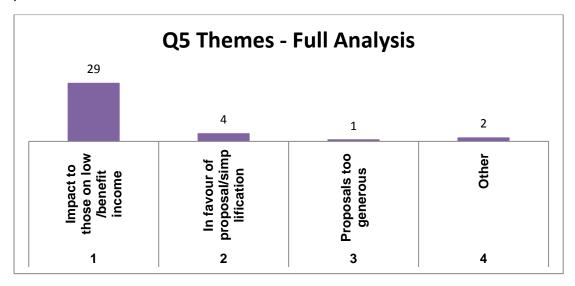
Full Responses (total number of responses received 210)



There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A slightly greater number of respondents were in favour of a single non-dependant deduction, however it is worth noting the free text comments and understanding the public's views regarding the introduction of one non dependant deduction. The points most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



- * Some respondents made multiple comments under each theme so totals don't tally with total number of comments'
- 1. The majority of comments received indicate that most respondents clearly saw this as unfair to those on the lowest incomes or on benefit incomes with at least 12 people suggesting that there should be at least 2 levels of Non dependant deduction if not more. Most responses were in agreement that the introduction of one non dependant deduction at the rate of £7 was seen as having a significant impact for those that may be on the lower non dependant deductions under the current scheme and unfair that they should be responsible for the same amount as a person with a higher income.
- 2. The respondents that were in favour of the proposal felt that this was welcomed as it simplified the scheme and as fair.
- 3. One person believed the proposal was too generous and the rate should be higher

The top three most common reasons given as to why the number of non dependant deductions should/should	What people said
not be reduced from 5 non dependant	

deductions to one regardless of income are listed below:	
Impact to those on low /benefit income	'One deduction rate for those out of work, another for non dependant in work'
	'It's now fair that an unemployed person and a someone earning for example 100k a year pay the same, it should be divided into not working, working but low income and working high income'
	'For some people the £7 flat rate will be a significant drop in income'
	'£7 is too high'
2. In favour of proposal/simplification	'The less factors that need to be taken into account the better, more efficient and less prone to mistakes or misunderstanding '
	'The simpler this calculation the better for all, council and payee's.'
	'This is fair for all households'
3. Proposals too generous	'But the amount should be set higher, say £10.'

While the number of respondents giving a view on whether or not they were in favour of this proposal was relatively low, there were slightly more in favour of a single non-dependant deduction at a rate of £7.00 a week than not. However, the majority of comments made raised concern about the impact of a relatively higher rate deduction for low income non-dependants, with some suggesting that two rates of deduction would be more favourable.

There was however, some support for simplification of the scheme through a single rate of deduction.

Q6. The Universal Credit notification issued to the Council by the Department for Work and Pensions should be treated as a claim for Council Tax Support.

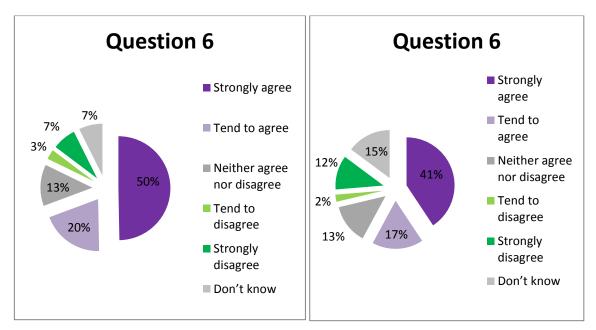
Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 211)
In favour	121	58%
Not in favour	29	14%
Neither agree nor disagree/Don't	59	28%
know		

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

Partial Responses (total number of responses received 164)

Full Responses (total number of responses received 210)

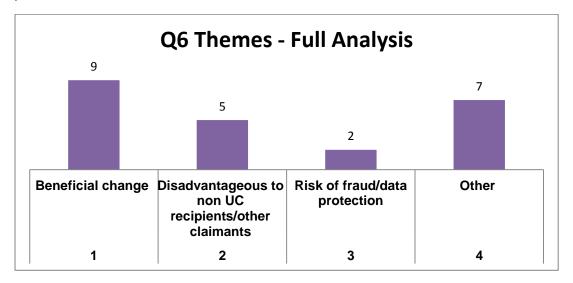


There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A large number of respondents were in favour of treating the Universal Credit notification issued to the Council by the Department for Work and Pensions as a claim for Council Tax Support, however it is worth noting the free text comments and understanding the public's

views in using this as a method of claiming Council Tax Support. The points most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- The majority of those that responded saw this as a beneficial change for those that are unaware of the need to make a separate claim for Council Tax Support or those that are unaware of the support they could be entitled to and for the simplification of the claim process.
- 2. Although the majority of those that made a comment saw this as a beneficial change some felt that this was not equal to all and did not account for those that may not claim Universal Credit but that were on low incomes. Therefore this would impact those that were not in receipt of Universal Credit but who may require assistance.
- 3. Comments were received from 2 respondents alluding to this being open to risk of fraud and another commented that this would be a data breach as the Council should not be holding this information.

The top three most common reasons given as to why an income banded scheme should not be introduced are listed below:	What people said
Beneficial change	'This would cut out unnecessaary paperwork and speed things up. People claiming UC often think thi

	covers CTR.'
	'It saves people having to remember to apply separately.'
	'Always. People may not be aware of this benefit'
	'If this is not the case, people get confused. They say one claim and then expect to make another claim for council tax doesn't make sense'
Concern for non UC recipients/other claimants	'Yes, Universal Credit claimants should qualify for Council Tax Support automatically but a route should remain for people who will fall through the cracks of the current rigid benefits system as they are and will be. For example, I am currently unemployed but do not qualify for either JSA or UC.'
	Agree but trying to find work without going to the job centre should give more or the same regards to universal credit. As I am also working part time without getting JSA (should give preference too)
	'It needs to be fair on everyone.'
3. Risk of fraud/data protection	'A separate claim should be made as there can be multiple residents in the property some who are not entitled'
	'None of council business to have such data'

The majority of respondents were in favour of treating the Universal Credit notification issued to the Council by the Department for Work and Pensions as a claim for Council Tax Support.

If the 51 respondents who appear to have misunderstood the consultation are excluded from the results, the majority of respondents (70%) were in favour of the proposal.

Once we factor in the responses which appear, from the comments provided, to have misunderstood the question then this shows that there is a larger preference for adopting the proposal than there is against adopting the proposal. It is therefore apparent, notwithstanding the responses received that distort the data, that there is strong preference to adopt the proposal.

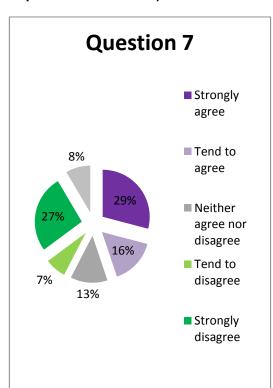
Q7. For working age people, it is proposed that only those in receipt of Universal Credit should be eligible for Council Tax Support

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

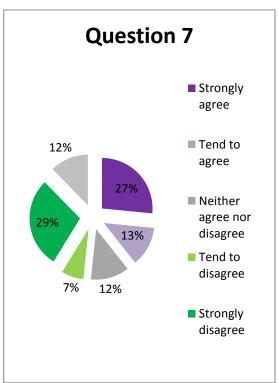
Responses Received	Number	% (out of 211)
In favour	83	40%
Not in favour	76	36%
Neither agree nor disagree/Don't	52	24%
know		

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a slightly larger percentage of those in favour of the proposal (set out in table Partial Responses below).

Partial Responses (total number of responses received 164)

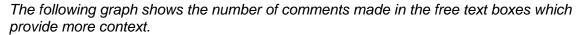


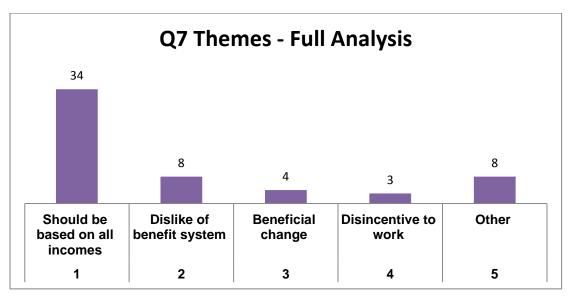
Full Responses (total number of responses received 210)



There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A slightly larger number of respondents were in favour of the proposal that only those in receipt of Universal Credit should be eligible for Council Tax Support, however it is worth noting the free text comments and understanding the public's views regarding Universal Credit being a qualifying criteria for Council Tax Support. The points most commonly raised were:





- * Some respondents made multiple comments under each theme so totals don't tally with total number of comments'
- 1. A number of Respondents felt that it would be unfair for the Council Tax Support Scheme to only be made available to those in receipt of UC and a large number of comments were received in respect of this. Many commented that this would be unfair as you may be not have any entitlement to Universal Credit but still be on a low income and others simply expressed the opinion that it should be open to all. Some commented that this would be unfair as some people did not wish to claim Universal Credit for various reasons and therefore would not be entitled to claim Council Tax Support.
- 2. Once again a number of respondents made clear their dislike of the benefit system. Comments were made of the unfairness perceived that the benefits system does not support those that attempt to better themselves in comparison to those that do not. Additional comments also raised concerns that Harrow needs to attract residents rather than 'poor people from around the world'.
- Respondents that commented in favour of the proposal saw this as beneficial change as, those that were eligible for Universal Credit were on a low income, and therefore Council Tax Support would be needed taking into consideration the level of Council Tax and possible increases

The top three most common reasons given as to why Universal Credit should not be a qualifying criteria for Council Tax Support are listed below:	What people said
Should be based on all incomes	'Look at each applicants indvdual circumstances as not everybody is entitled to universal credit but they could still need support due to low income'
	'It means people who have the old Benefits would loose out and not be able to use the Council Tax Support scheme'
	'Some people do not want to go down the universal credit route and manage on the income they have with help to reduce Council Tax bill'
	'It should be for all why is it only if you are in receipt of benefits?'
	'It needs to be fair on everyone.'
	'Look at everyone's circumstances '
Dislike of the benefits system	'Without staying at home doing nothing but getting JSA, the government should give more consideration to people who is actually trying to work like me. I am working 16 hours and I should get the council tax reduction too. (I am not jobless like them) looking for handouts.'
	'It is unfair on working class people to pay for those not in work.'
	'Harrow needs to start attracting well-off people back into the area, rather than poor people from around the world

	dependent on my Council tax.
3. Beneficial change	'Universal Credit is a low weekly sum paid therefore council tax support will definitely be needed.'
	'Universal credit should be eligible for council tax support. Council tax in Harrow is very high and it is increasing every year. This is becoming impossible to pay and I think it should be considered. Please who don't claim are paying for this using their food money ' 'Removes duplicate assessments'

The responses showed that, despite the many concerns expressed, slightly more people were in favour of the proposals than not. If the 51 respondents who appear to have misunderstood the consultation are excluded from the results, there is little change and the majority of respondents (40%) remain in favour of Universal Credit being a qualifying criteria for Council Tax Support.

What is apparent is that, notwithstanding the responses received that expressed concern, there is still a preference to adopt the proposal that only those in receipt of Universal Credit should be eligible for Council Tax Support.

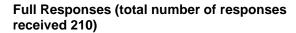
Q8. Transitional protection should be offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31/03/2020 who will see a reduction of 10% or more to their Council Tax Support entitlement

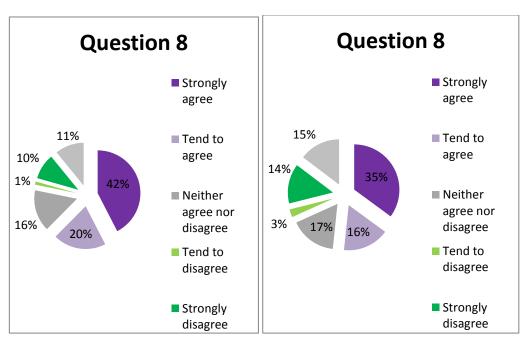
Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 211)
In favour	109	51%
Not in favour	36	17%
Neither agree nor disagree/Don't	66	32%
know		

As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

Partial Responses (total number of responses received 164)



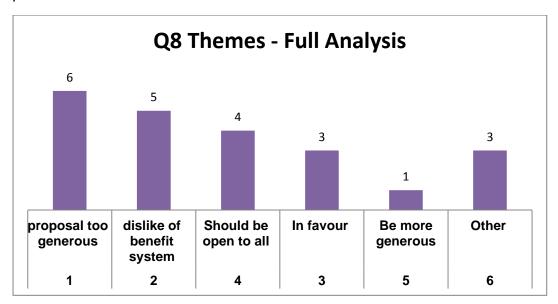


There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A greater number of respondents were in favour of transitional protections being offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31 March 2020

who will see a reduction of 10% or more to their Council Tax Support, however it is worth noting the free text comments and understanding the public's views regarding this proposal being introduced. The points most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- Respondents that thought the proposal too generous did so as they believed the
 more assistance you give the less likely people will attempt to improve their
 circumstances and that there is sufficient time before the proposal could be
 introduced to allow time to adjust and make provision for any change.
- 2. Again there were a number of references made with regards to a dislike of the benefit system. A strong feeling was expressed that those on benefits receive sufficient assistance, should live within their means and with regards to the unfairness of the benefits system that it does not support those that attempt to better themselves in comparison to those that do not. A number of these comments also indicated that the respondent believed the transitional protection proposed was too generous
- 3. A number of Respondents felt that transitional protection should be offered to all those that may be effected by the proposal.

While we asked for people to give comments if they were not in favour of the proposal, some people added comments in support of it e.g.

'It allows people to budget for the changes rather than taking them by surprise with an large increase in council tax.'

The top three most common reasons	What people said
given as to why transitional protection	
should not be offered to those that will	

see a reduction of 10% or more as 31 March 2020 who are in receipt of Universal Credit and Council Tax Support are listed below:	
Proposal too generous	'If you change the rules people should accept it, some people purposely don't want to work more hours even if they are capable so not doing this may encourage people to work more and come off benefit'
	'It is in year 2020 in March 6 months from now, if you inform claimant now they can start making provision'
	'People need to live within their means and learn how to budget. If I lost my job tomorrow, I wouldn't be offered 'transitional protection' to pay my bills.'
2. Dislike of the benefits system	'Most people should work and not expect benefits'
	'They can move property and have been given enough notice'
	'They should offer the same support for people who is willing to work and working but in low income category like me. I am not waiting for nest free handouts but trying to work and provide for my kids as possible. I should get more support not like people who live on benefits.'
Proposals should be more generous/ fair to all	'Nobody should lose '
	'It needs to be fair on everyone.'
	'Although I agree with in principle with transitional protection, I don't understand the need to penalise people in

	hardship. '

The responses indicate that more were in favour of the proposal. If the 51 respondents who appear to have misunderstood the consultation are excluded from the results, the majority of respondents (62%) who were in favour of introducing transitional protection increases.

What is apparent is that, notwithstanding the responses received that distort the data, there is strong preference to offer transitional protection. Once we factor in the responses which appear, from the comments provided, to have misunderstood the question then this shows that there is a greater preference for adopting the proposal than there is against adopting the proposal.

Q9. The rate of transitional protection offered to those set out in the proposed scheme should be at 50% of the reduction in Council Tax Support as at 01/04/2020 for the first year.

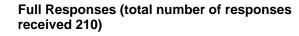
Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

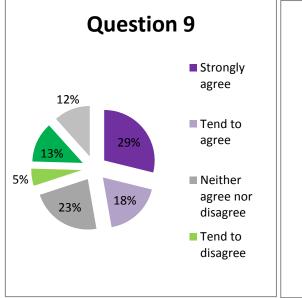
Responses Received	Number	% (out of 211)
In favour	79	37%
Not in favour	46	22%
Neither agree nor disagree/Don't	84	41%
know		

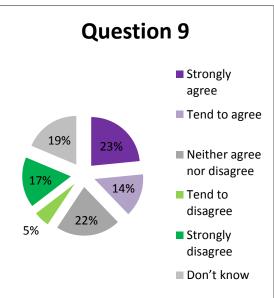
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

The majority of respondents did not indicate whether they were in favour of the proposal to offer transitional protection at a rate of 50% of the reduction or not. Of those that did indicate a preference, more were in favour than not in favour, 37% and 22% respectively.

Partial Responses (total number of responses received 164)



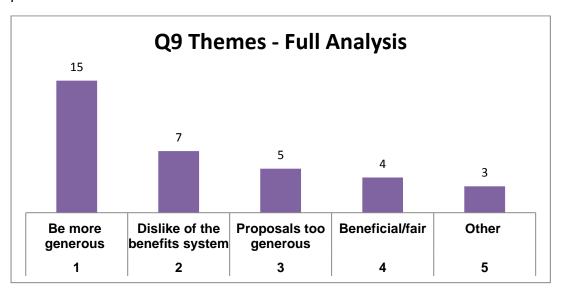




There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A larger number of respondents were in favour of transitional protection offered to those set out in the proposed scheme being at 50% of the reduction of Council Tax Support as at 1 April 2020 for the first year, however it is worth noting the free text comments and understanding the public's views regarding the percentage being considered in the proposal. The points most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



- * Some respondents made multiple comments under each theme so totals don't tally with total number of comments'
- Some respondents felt that the percentage of transitional protection offered should be more generous and offered suggestions of what should be considered as an alternative, or commented that the percentage proposed was acceptable but that this should be for all and not just those that may be affected as set out in the proposed scheme.
- 2. Once again there were a number of references made with regards to a dislike of the benefit system. A strong feeling was again expressed that the system is already generous to those on benefits, or those that rely on benefits and do not try to better themselves as opposed to those that are working and trying to better themselves. It was also felt that people should live within their means and where they can afford.
- 3. Some respondents felt that the percentage proposed was too high and offered suggestions of what should be considered as an alternative.

The top three most common reasons given as to why transitional protection offered to those set out in the proposed	What people said
scheme should be at lower or greater	

than 50% are listed below:	
Be more generous	'My belief is that the maximum should at max 80%'
	'Should be 75% year one 50% year two and 25% year three ie more tapered'
	'Should be higher than 50% - 65% to 70% is better'
	'I agree with 50% for everyone. Not just those on benefits.'
2. Dislike of the benefits system	'Encourage people to earn more rather than giving things on discount or free'
	'These are adults and need to learn how to manage their finances.'
	'I am saying the low income earners should get the same benefits as we try to work and provide for our family and seperated. '
	'They can move property and have been given enough notice'
3. Proposals too generous	'Should be less '
	'Should pay 25%'
	'50 percent is too much, make it less'

The majority of respondents did not give a preference of either in favour or not in favour to this proposal. Of those that indicated a preference, a higher proportion (37%) were in favour of offering transitional protection at a rate of 50%. If the 51 respondents who appear to have misunderstood the consultation are excluded from the results, a larger number of respondents (47%) are shown to be in favour of the proposal.

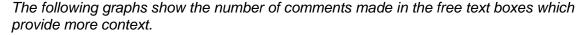
What is apparent is that, notwithstanding the responses received that distort the data, there is strong preference to offer transitional protection at a rate of 50% of the reduction to Council Tax Support.

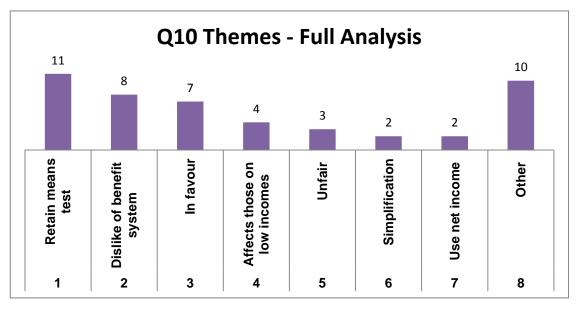
Q10. Is there anything else you would like to tell us about these proposals or any alternative options you would like us to consider?

This question invited free format comments for respondents to tell us their opinions about the proposals and any alternative options they would like us to consider. The option to select a response ranging from whether they strongly agreed, to don't know was not offered.

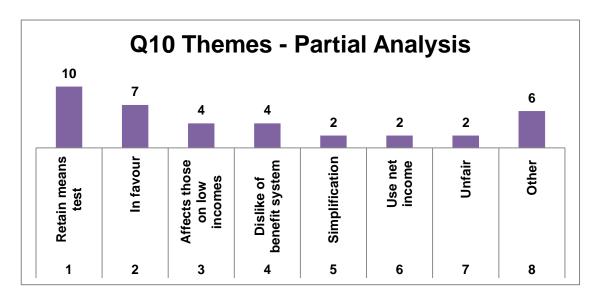
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. Analysis has identified that the themes differed depending on whether this cohort were included in the data or not, in particular in respect to the theme 'Dislike of the benefit system'. The two sets of analysis are set out below.

It is worth noting the free text comments and understanding the public's views on the proposals and any alternatives they may have asked us to consider. The issues most commonly raised were:





^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'



* Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- It is indicative of the responses that it is believed that the proposed income banded scheme does not capture or consider an individual's circumstances and therefore this would be unfair to some and that each case should be considered on its individual circumstances.
- 2. There was the common thread that existed throughout the consultation from some respondents that made reference to a dislike of the benefit system. In particular the perceived notion that this is seen as a disincentive to work and with regards to those that rely on benefits and do not try to better themselves. It was also captured that people should live where they can afford to.
- 3. Some respondents who commented were in favour of the proposals and saw them as acceptable and fair.

A number of comments were also received that indicated that the principals of the scheme were acceptable but further thought was required as to how the income band should be set and concerns over the proposals in respect of the non dependant deductions:

'Lone parents need more support. Single people to encourage them to a better way of living'

'As a claimant of single person without children support I would struggle to pay more council tax than I do as cost of living continues to increase'

'Council needs to support people on lower earnings.......'

'Ultimately my most important priority is to make sure the sick and disabled are not made worse off but I also feel people should not be markedly worse off for being in low income and I feel the proposed non dependent deductions are especially harsh

in that regard and should be rethought'

1.	The top three most common reasons given about the proposals and any alternatives that should be considered are listed below:	What people said
1.	Retain the means test /treat people fairly/equally	'Listen. Case by case. Everyone is individual'
		'It needs to be fair on everyone.'
		'Earners and non-earners should be treated equally.'
		'Keep the current scheme'
		'All benefits need to be counted. Figures need to be properly analysed and no extra cost to council and net income taken into account.'
		'Yes council tax should be taken into account in terms of persons net income and council should support people when they are out of work temporarily'
2.	Dislike of benefit system	'While there could be many reasons why people get UC - why are not so many in jobs? It is too easy for workshy people to sponge on the state.'
		'Stop targeting people who work hard to survive and give more and more benefits to people who are on low income as such people never want to or never will work 12 to 14 hours to earn more money and come out of council benefits.'
		'A fair scheme where everyone pays council tax based on their choices or where they live and whether they wish to work rather than encouraging people to do as little as possible '
		'For people claiming for housing benefits, specially rent, as everyone are aware rent is higher in our borough, so families should be asked to move elsewhere where rent is low and council should pay. Council will

	save money and can reduce council tax who work hard to make ends meet.'
3. In favour/fair	'I think the banding is a good idea as it makes it easier to understand how much reduction you would get rather than trying to work out 30%. It would also mean for those who's income changes by a small amount every month does not keep getting new bills every month.'
	'Seems Fair'
	'Its palatable for todays market '
	'Well on the surface of these proposals they read pretty good so far'
	'Seems Ok as a whole'
	'Just do it. The proposal is the best for those who need more support financial. Good luck!'

The general comments made in response to question 10 did not on the whole give any new views than those already expressed in response to earlier questions. The general themes around treating people fairly, retaining a means test to capture family sizes and all changes to income and people stating they were in favour of the proposals were reiterated in this question.

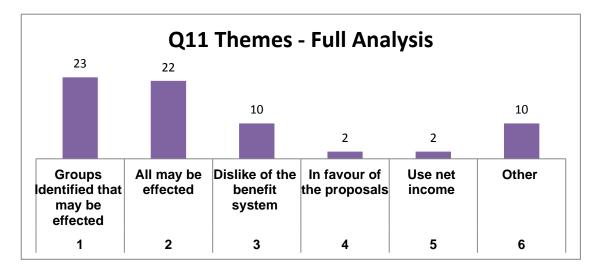
Q 11. If you think the proposals will affect particular groups or individuals more than others, please give your view on this below stating what the impacts will be and how you think we may address this

This question invited free format comments for respondents to tell us their views about particular groups or individuals that may be affected, stating what the impacts may be and how these could be addressed. The option to select a response ranging from whether they strongly agreed, to don't know was not offered.

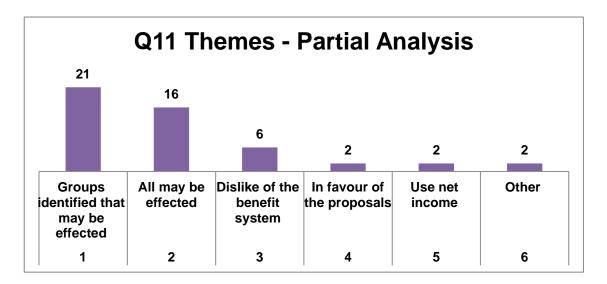
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. However analysis has identified that this does not appear to be the case and there was little change in the themes identified

It is worth noting the free text comments and understanding the public's views about particular groups or individuals that may be effected, any impacts and how these could be addressed. The points most commonly raised were:

The following graphs show the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- 1. Respondents identified a number of groups that they believed would be effected such as the disabled, those in employment, families, and young adults including non-dependants about to turn 18. Most comments showed concern that these groups would not be sufficiently supported by the proposals. Other groups identified were those already on benefits, single persons, those with poor English and particular communities that already have high unemployment and the working class
- 2. A number of respondents acknowledge that there would be groups impacted but were not able to identify who these might be and therefore all circumstances for an individual or household should be considered
- 3. There was the common thread of those that made reference to a dislike of the benefit system and in particular the perceived notion that this is seen as a disincentive to work and that the Councils resources are impacted as 'made to easy for not british resident to claim'.

	The top three most common reasons given about groups that may be effected, any impacts and how these could be addressed are listed below:	What people said
1.	Groups Identified that may be effected	'Clearly it will effect people like me with children approaching 18, despite, if a high income is earned or not. I am very worried about this. Does it meant that we will have to starve to pay this bill?'
		'The proposal affects couples with children

	who earn more.'
	'Yes will effect those who earn more '
	'Young people might be effected'
	'More should be given to help single people. Multiple incomes in a house can not be compared to one household income.'
	'People with poor English'
	'This will definitely affect working class people when they would be able to survive during no income periods or low income periods.'
2. All may be effected	'Yes but don't know how '
	'Yes but don't know which groups will effect more '
	'Depends on their circumstances. Each case if different '
	'Groups and individual needs varies. Need to be considered'
	'Need to look at claimants individual circumstances not everyone is entitled to universal credit because they earn just over the threshold. Also universal credit can stop then restart dependant on earnings so this will effect a lot of people on zero hour contracts as thier income and entitlement to universal credit will vary month to month.'
Dislike of the benefit system	'Yes. Made too easy for not british resident to claim draining Council of resources'
	'Anyone who has no reason not to work, should not receive any benefits at all. For far to long people do not intedn to work and just live off the state. It is a disgrace.' 'People will be more willing to stay at home
	and be unemployed as there's more and more benefits for lazy bums in this country. Why don't you help and support the actual people without encouraging to be jbless

and waiting for benefits '
'I would say the poorest but the reality in people can afford the latest iphones and gadgets yet claim to not be able to afford council tax which I don't understand as you are encouraging this behaviour with the current system'

The responses to question 11 identified the following groups as being potentially impacted by the proposals:

- Disabled
- Those in employment
- Families
- Young adults including non-dependants about to turn 18.
- Those already on benefits
- Single persons
- Those with poor English
- Particular communities that already have high unemployment
- The working class

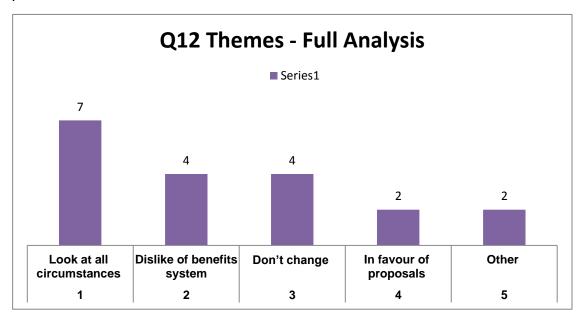
Q12. Other Comments.

This question invited free format comments for respondents to tell us anything else they thought was relevant to the proposed changes to Harrows Council Tax Support scheme and was open for any other comments they wished to make. The option to select a response ranging from whether they strongly agreed, to don't know was not offered and therefore it was not possible to quantify the level of responses.

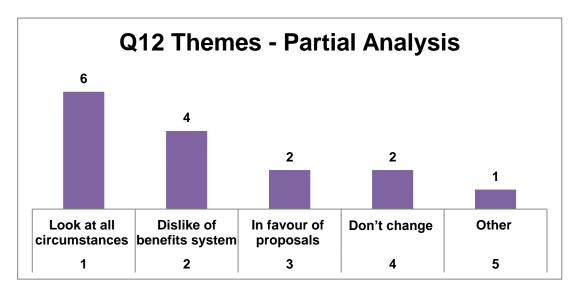
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. However analysis has identified that this does not appear to be the case and there was little change in the themes identified

It is worth noting the free text comments and understanding the public's views on the proposals and in general. The issues most commonly raised were:

The following graph shows the number of comments made in the free text boxes which provide more context.



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'



^{*} Some respondents made multiple comments under each theme so totals don't tally with total number of comments'

- Respondents again expressed concerns over the impacts that the proposed changes would have on the groups already identified and those not in receipt of UC. The opinion that everyone is treated equally and fairly was also reiterated.
- 2. The common thread of those that made reference to a dislike of the benefit system was again highlighted, in particular the perceived notion that this is seen as a disincentive to work and with regards to those that rely on benefits and do not try to better themselves. It was again captured that people should live where they can afford to.
- 3. A number of respondents commented that no changes should be made and disagreed with the proposals.

	The top three most common issues to be considered are listed below:	What People told us
1.	Look at all circumstances	'It needs to be fair on everyone.' 'Earners and non-earners should be treated equally.'
2.	Dislike of benefit system	'Claimant asking for bigger accommodation, and council pays rent should be asked to move out and council pays the rent. Give you an example, Gosport where 3 bed roomed housed can be rented out at £950 per month,

	here in Harrow one has to pay £1350. If
	claimant wants to stay on benefits should be asked to move or cut the benefits.'
	'Please help and give support and benefits for people who are working and in a low income due to many reasons.
	DO NOT SUPPORT benefit scroungers who can work but made up their minds not to as its much easier for them because of the welfare benefits they receive. Please support us working - seperated - children and still willing to work and at the moment working to provide for the family. Thank you'
3. Don't change	'As I said keep the current scheme in place and forget about the Universal Credit roll out in Harrow and elsewhere'
	'So far, things were running smoothly, this new proposed schemes is creating complications as theres no clear undesranding of the schemes purpose.'
	'Disagree with this approach'
	'Bad proposal'

The general comments made in response to question 12 did not on the whole give any new views than those already expressed in response to earlier questions. The general themes around taking all of a household's circumstances into consideration and disliking elements of the benefit system were repeated here. There were also some comments that the scheme should not be changed.

A number of general comments were also captured from the public responses received that covered a wide range of topics. The table below shows a summary of the common themes identified and the nature of the comments received.

General themes arising from all consultation activity	
Council Tax	☐ Comments made that Council Tax is too high already and the annual increase in Council Tax.
	☐ Suggestions for exemptions for particular groups such as Foster Carers and Shared Lives Carers being 100% exempt from CT. That further bands should be included for over 70's or that pensioner's, low income earners and unemployed should be charged less.
	☐ Reductions should be considered for single parents and young adults and for the terminally ill to be considered.
	☐ Suggestions that Council shouldn't be targeting the working age and the burden should be shared.
	☐ Suggestions were made in respect of the Council Tax Bandings and that these should be reconsidered and re-banded.
	Questions raised on how Council Tax is spent.
Council/Government spending	☐ Suggestions that Council Spending is better used for improved facilities and services including better customer services, waste collections and highways maintenance

	Many people raised concerns with Universal Credit as a benefit, the claiming process and the effect that this has on many claimants.
	☐ Comments made that cuts in services are detrimental to all residents of the borough and more needs to be done to attract residents to Harrow and in turn attract more commercial establishments to better the economy of the borough
	□ Communication between Council and other agencies, for example the Department for Works and Pensions, should be improved.
Employment	 More Government schemes should be available such as apprenticeships schemes
	 Increase employment avenues for the low skilled/semi skilled workforce
	More need to be done to promote services to those that wish to enter the workforce through training and other methods
Operational	 Can't get information about the help that is available in Harrow
	☐ Find it difficult to contact the Council and access Council services i.e. Access Harrow
	Need a different collection policy for those who cannot pay.

Consultation	 Suggestions put forward to ensure consultation inclusive
	 Comments regarding the consultation and the consultation process.

4.2. Stakeholder Feedback

A formal response was not forthcoming from any Stakeholder organisations. General feedback was captured at the Voluntary Sector workshop and a further workshop conducted with Citizens Advice Harrow. This feedback is not a formal response from any organisation but rather the opinion of each individual representative, if they chose to complete a questionnaire. This section of the report contains the key issues raised. In total there were 8 questionnaires completed.

The questionnaire responses were recorded anonymously as to ensure confidentiality

Once again respondents were asked to select one of 6 options ranging from whether they strongly agreed, tend to agree, neither agreed nor disagreed, tend to disagree, strongly disagree or don't know. There was also a free text box for respondents to tell us why they disagreed, and what we could do instead.

Due to the low volume of questionnaires completed and comments provided it was not possible to determine whether any trends became evident. Therefore the information provided has been analysed and fed into the themes already identified above.

Q1. An income banded scheme should be introduced into Harrow's Council Tax Support Scheme.

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	6	74%
Not in favour	1	13%
Neither agree nor disagree/Don't	1	13%
know		

The introduction of an income banded scheme was seen as favourable but concern was expressed that the bands were seen as unfair to large families as captured in the following comment:

'Helps the general public to understand how much CTS they could get but bands are not completely fair - discriminates people with large figures struggling to cover all household expenses by working more.'

One respondent disagreed with the proposal but their comments indicate that they were in disagreement with the proposal relating to the non dependant deduction and not the proposed income bands. They said:

'Every household circumstances are different, need to take into account if they are claiming benefits such as IS, ESA, JSA. I think the banding should be split into at least 2 groups making deductions of less than £7 weekly to those on IS, JSA, ESA.'

Q2. The income bands should be set so more help is given to those with lower incomes than those with higher incomes.

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	6	74%
Not in favour	1	13%
Neither agree nor disagree/Don't	1	13%
know		

It was seen as favourable that the income bands should be set so more help is given to those on a lower income than those with higher incomes. However there was a concern raised that people work less hours as to work more effects their entitlement. The proposal was seen as a disincentive to work if those on lower incomes are given more assistance as:

'People are aware that working, increasing their income will have an affect on their benefits, so they deliberately do not try to improve their circumstances '

An additional concern was also raised that the proposed income banded scheme does not capture or consider the circumstances in respect of families. Concern was expressed over the outgoings that families have as these are generally higher. The means test (applicable amount) allows an element of this to be considered and therefore the comments allude to retaining a from of means test:

'Bit concerned about impact on couples with children - their outgoings will be high'

Q3. In the box below please give any other comments you have about the level you think the bands should be set at and comments about the household groups that are included in the proposed banded scheme.

This question invited free format comments for respondents to tell us their opinions about the levels the bands had been set at and the household groups included. The option to select a response ranging from whether they strongly agreed, to don't know was not offered and therefore it was not possible to quantify the level of responses.

It was expressed that the proposal to introduce an income banded scheme was reasonable and 'well thought out' as captured by the following:

'Seems fine and sensible. Well thought out based on solid research and data'

'Appear to be okay'

'Percentages seem to be similar to current levels so OK'

However concern as also raised that the income banded scheme would not benefit those on zero hour contracts due to the many fluctuations of income they experience as:

'People on zero hour contract will always struggle under the scheme due to fluctuations in income'

Q4. While we have proposed to use gross earned income to calculate entitlement, we could use net earned income instead. Do you agree that we should use net earned income instead of gross?

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	7	87%
Not in favour	1	13%
Neither agree nor disagree/Don't	0	0%
know		

It was evident that all respondents supported the use of net income as this is reflective of what people take home. It should be noted that one although one respondent selected 'tend to disagree' the comments they made were in support of using net income so it is possible that this was an error as they told us:

'Net is easier for people to understand'

Others also told us:

'Net income must be looked at'

'Because, as mentioned. People have deductions such as pensions, student loans and deductions for Tax, NI are different. Thus NET should be taken into consideration as this reflects what someone is actually getting.'

Further comment received was with regards to the fact that consideration needs to be given to any deductions being taken from benefit income. However they have selected strongly agree to the proposal to use net income instead of gross income. They said:

'Need to take account of deductions in income due to recovery of advance payments in UC, benefit overpayments and payments back to social find, debts etc.'

Q5. The number of non dependant deductions should be reduced from 5 different deductions according to income, to one single deduction regardless of income at the rate of £7.00 a week

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	0	0%
Not in favour	6	75%
Neither agree nor disagree/Don't	2	25%
know		

All responses indicated that this was not a favourable proposal and that for those on a low income a flat rate would be unfair and with two respondents suggesting more than one rate of deduction should be considered and another who recognised that this is a cost often borne by the claimants and not necessarily the non dependant and therefore this would impact the claimant further. One respondent recognised the simplification of one non dependant deduction but felt that it was unfair. Comments received were:

'Should be reduced but to two payments - non working and working deductions - flat rate is unfair'

'Should work out differently for students/jobseekers/people earning sufficient salaries'

'Far too much money - parents will really struggle to pay this'

'Easier to understand but not fair to high income NDD'

One respondent queried how the rate of £7.00 had been determined:

'How did you come to the rate of £7.00?...'

Q6. The Universal Credit notification issued to the Council by the Department for Work and Pensions should be treated as a claim for Council Tax.

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	8	100%
Not in favour	0	0%
Neither agree nor disagree/Don't	0	0%
know		

This proposal was favoured by all but reservation was expressed as it was felt that there needs to be other channels available to make a claim for Council Tax Support other than the Universal Credit notification.

They told us:

'As long as those still on legacy benefits can continue to apply for CTS under the old scheme. Have an existing or alternative application'

'This would be easier a lot of people do not know about CTS and do not know they have to claim as UC submission'

'But it should be possible to claim CTS as same with no claim for UC or only on contribution based benefits could lose out.'

What is unclear is whether these concerns raised are with regard to access to the current scheme till full roll out of Universal Credit or whether this was with reference to having the scheme available once full roll out takes place.

Q7. For working age people, it is proposed that only those in receipt of Universal Credit should be eligible for Council Tax Support

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	3	50%
Not in favour	3	50%
Neither agree nor disagree/Don't	0	0%
know		

An equal number of respondents were/were not in favour of this proposal. Those not in favour felt that UC being a qualifying criteria was unfair as not everyone chose to claim UC due to various reasons or were not in receipt of UC

They told us:

'Not everyone claims UC even if they are eligible due to several issues such as, not knowing they are eligible, stigma, shame etc.'

'Not everyone claims UC - difficulty using claiming system, delays in claim being processed.'

Another said:

'Tend to agree but there may be household adults not in receipt of UC. How that will effect the overall support? Especially for school age - under 21 and students '

Q8. Transitional protection should be offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31/03/2020 who will see a reduction of 10% or more to their Council Tax Support entitlement

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	8	100%
Not in favour	0	0%
Neither agree nor disagree/Don't	0	0%
know		

There were no comments made but all were in favour of the proposal

Q9. The rate of transitional protection offered to those set out in the proposed scheme should be at 50% of the reduction in Council Tax Support as at 01/04/2020 for the first year

Respondents were asked to select one of 6 options ranging from whether they 'strongly agreed' to 'don't know'. The table below shows the number of responses received.

Responses Received	Number	% (out of 8)
In favour	4	67%
Not in favour	1	16%
Neither agree nor disagree/Don't	1	17%
know		!

The majority of respondents were in favour of the proposal. One respondent selected 'tend to disagree' and their comments reflect that they appear in favour of the proposal but that consideration should be given to a larger percentage of transitional protection:

'Maybe it should be set as 65% in first year and then 35% next year to give people time to get used to living with changes.'

Q10. Is there anything else you would like to tell us about these proposals or any alternative options you would like us to consider

This question invited free format comments for respondents to tell us their opinions about the proposals and any alternative options they would like us to consider. The option to select a response ranging from whether they strongly agreed, to don't know was not offered and therefore it was not possible to quantify the level of responses.

Those that commented referenced the roll out of Universal Credit and the change from one scheme to another. Concern was expressed that people would not get any transitional protection if transitioning before 2023 and the end of the current scheme as this is phased out. Comments made were:

'I am concerned about the group of vulnerable client who are transitioning to UC until 2023 and wont be given transitional protection and will have to pay slightly more in Council Tax'

'I do not think it is a good idea to completely abandon the CTS scheme after the complete roll out of UC, due to people who cannot claim UC/been sanctioned, inability to claim, people with severe mental health (not claiming disability benefits).'

One respondent felt that more legal information should have been made available during the consultation and stated:

'Consultation scheme needs to give more information on Law scheme will effect everyone including pensioners'

Another expressed concern over the single non dependant deduction proposed and said:

'Main concern is the single rate of NDD'

Q 11. If you think the proposals will affect particular groups or individuals more than others, please give your view on this below stating what the impacts will be and how you think we may address this

This question invited free format comments for respondents to tell us their views about particular groups or individuals that may be affected, stating what the impacts may be and how these could be addressed. The option to select a response ranging from whether they strongly agreed, to don't know was not offered and therefore it was not possible to quantify the level of responses.

The same concerns were expressed that those not yet of pension age that take early retirement through choice or ill health would not have access to claim Council Tax Support under the proposed scheme. Another respondent raised concerns that those that struggle with literacy and language would also be at a disadvantage:

They told us:

'Clients who are not pension age yet but who have retired on ill heath or have just taken their pensions will need a scheme to apply for'

'People struggling with literacy and language problems as these people have most difficulty applying for and remaining on UC in order to be eligible for CTS'

One respondent commented on the consultation and the proposed changes in a positive way and said:

'This is a good and well thought out scheme as a way to work within UC'

Q12 Other Comments

This question invited free format comments for respondents to tell us anything else they thought was relevant to the proposed changes to Harrows Council Tax Support scheme and was open for any other comments they wished to make. The option to select a response ranging from whether they strongly agreed, to don't know was not offered and therefore it was not possible to quantify the level of responses.

Only one respondent chose to leave a comment and told us:

'There will be some individual cases - vulnerable clients that may lose out and fall between the gaps. I ask that Harrow Council act reasonably on a case by case basis to offer the full CTS to those that may be extremely impacted by the change over.'

However it is unclear if this refers to the change over to the new scheme or the change over to Universal Credit and the waiting time applicants are subject to when they make a claim for Universal Credit

Many of the comments captured were reflective of the comments that were also captured at the workshops held with the Voluntary Sector and the Citizens Advice Bureaux

Workshop	What they said
Voluntary Sector Workshop	 Most were agreeable that the proposals of using an income banded scheme and use of the Universal Credit notification as a claim were favourable. Dissent was voiced by all that the one rate of non dependant deduction was not favourable as this was disadvantageous to those on a low income or in receipt of a benefit income. It was queried how the bands had been determined. It was noted that the tables in the booklet do not reflect the impacts that will be felt by those on the lower income levels, families and non working Non dependants. The impacts for large families mean they would be disadvantaged under the new scheme as not considering the applicable amount. Their incomes may be higher but then so are their responsibilities, expenses etc. Surprise was expressed at the lack of attendance at the workshop. Queries were raised about how we had contacted the V and who had we sent mailshots to etc. Queries made as to why we chose to consult now One attendee suggested that we (Harrow) provide resources to the VS advisors to support them in advising their users on individual impacts as these appear to have a greater effect overall.
Citizens Advice Workshop	 Would the proposal mean that people who have a change of circumstances e.g

- lose their job will still be eligible for CTS?
- Non dependant deduction 1 rate of Non dependant deduction does not align with Harrow Councils values to protect those with low income.
- Same with families with children who lose out more - again does not align with Harrow Council's values to protect children.
- Non dependant deduction does not take into account families with more than 3 children – Universal Credit only counts 3 children in the household
- People from abroad if people are in the process of being considered for a Universal Credit claim can they be covered under this scheme. They have no income till Universal Credit awarded. Are they eligible based on nil income or underlying entitlement to Universal Credit?
- Will impact those that go in and out of employment due to temporary contracts.
 They don't always claim in between jobs because the process is so stressful. This will also apply to mental health suffers and others that fall through the cracks or fall of the grid for numerous reasons.
- The more children you have, the more Council Tax Support you should get – disadvantages larger families.
- Some misunderstanding of the 'banded' scheme - confusing income band scheme for Council Tax Support with Council Tax bands. One attendee required clarification of this as had misunderstood
- General consensus was net income preferable as people understand this as it is what is in their hand.
- Universal Credit claim notification. It was expressed that this was favourable and many fail to claim as they are not aware that a separate claim is required to the

Council.

- Non dependant deduction should not be £7 for all as this would be unfair to those on low or benefit income and the increase from the current lowest rat e of £3.30 would be significant.
- What about those that have take early retirement due to ill heath or caring responsibilities and who are not pensioners so do not have a state pension. There is a heavy onus on the claimant, when making a claim for Universal Credit, to demonstrate that they are seeking employment. People in this category are not seeking employment either because of being so close to pension age, unable to seek employment as have caring responsibilities or having lost employment for whatever reason. This would also affect mixed age couples. Under the new proposals they would not be eligible for Council Tax Support.
- The above also affects carers who have full time responsibilities for another and can not claim UC as they are not in a position to seek employment.
- One attendee stated that the information in the booklet was complex and it should have been simplified and the booklet should have been shorter!
- One attendee could not understand why families with children were disadvantaged more.

It should be noted that the Cabinet Voluntary Sector representative commented that the team had done a good job with the consultation and that the literature was relatively clear and understandable.

4.3 Formal Feedback from Greater London Authority

4.3.12 Formal response was received from the Greater London Authority and are indexed in full in Appendix H

4.3.23. Given the detailed nature of the formal response from the Greater London Authority, this section of the report summarises the Greater London Authorities response.

The GLA notes that the Council will operate two parallel schemes whilst implementation of UC is ongoing. In principle, the GLA believes that CTS claimants with similar circumstances should not receive different levels of support, depending on whether or not they are part of the Universal Credit cohort. In practice, however, we recognise it is not always feasible to align entitlements exactly, but differences should be minimised as far as possible.

The GLA supports the council's proposal to move to a banded scheme; it is important that schemes take account of the roll-out of UC. The proposed change should help to reduce the burden on the council to recalculate entitlements multiple times a year, thus ensuring administrative costs do not escalate. It should also improve clarity over the council tax bill for claimants, providing greater certainty for households to budget and plan their finances.

The GLA recognises that local authorities face 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 Council anticipates that the overall amount spent on CTS will not change. The GLA welcomes the proposal that spending will not reduce, despite uncertainty over future funding levels.

As outlined above, the council anticipates the majority of claimants will receive the same or a greater level of support than under the current scheme. However, the GLA notes that around 400 households are expected to be worse off by more than £5 per week as a result of the changes. It is therefore welcome that the council intends to publicise changes, so people are aware of how their CTS entitlement could change when they move onto UC. Similarly, the council also plans to write to households eligible for benefits for which they are not claiming, where they can be identified, to encourage take-up. However, the GLA urges the council to consider communicating, in advance of the changes, directly with those claimants who will receive less support in the future than under the current system, to enable them to budget for these additional costs.

The GLA also welcomes the assurance that the council will provide transitional support to those most adversely affected by the changes in 2020-21. The council should consider replicating similar arrangements for those who will lose 10 per cent or more of their CTS entitlement when transferred from the existing scheme after 1 April 2020. This would enable those in similar circumstances who are transferred onto UC at a later date to be treated in the same way as those in receipt of UC at the date of the new scheme's implementation.

The GLA notes that the consultation seeks feedback on the proposal to use gross income, rather than net earnings. Using net earnings may make it easier for claimants to understand their entitlements, but the council should be guided by feedback from others on this issue.

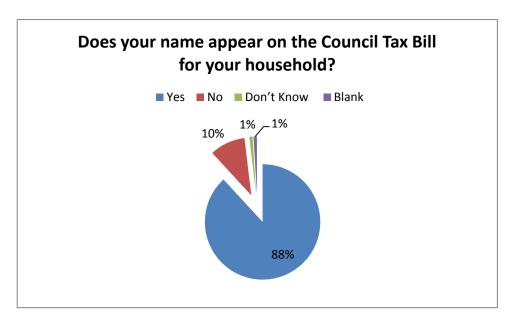
Notwithstanding the above comments, the GLA is content to endorse the broad approach proposed by Harrow for the scheme from 2020-21 onwards, recognising that the proposed scheme is in accordance with the general principles set out by Government, as set out above.

5. MONITORING INFORMATION

5.1 About You

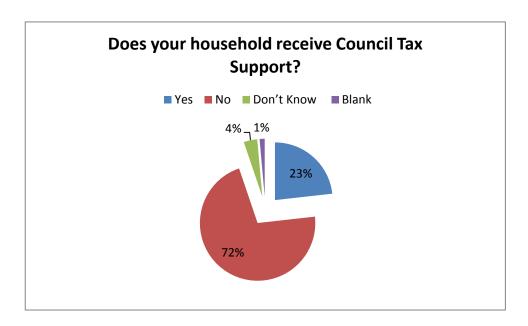
5.1.1 The Questionnaire asked respondents to confirm whether they appeared on the council Tax Bill and/or were in receipt of Council Tax Support. The table below are inclusive of the papers and online responses.

Q: Does your name appear on the Council Tax Bill for your household?



Is your name on the Council Tax Bill for your household	Number	Percentage
Yes	186	88%
No	21	10%
Don't Know	2	1%
Blank	2	1%

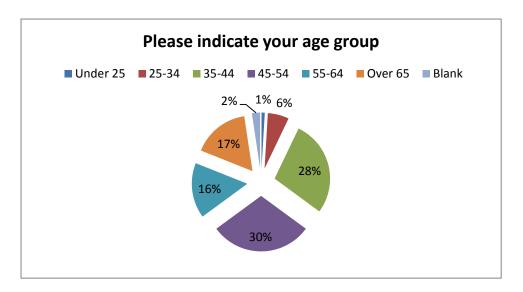
Q: Does your household receive Council Tax Support?



Does your household receive Council Tax Support	Number	Percentage
Yes	49	23%
No	151	72%
Don't Know	8	4%
Blank	3	1%

The Consultation Questionnaire invited respondents to provide a range of monitoring information, as detailed below. The statistics here are combination of the 211 paper and online responses.

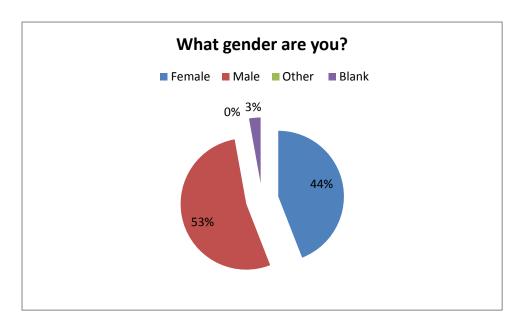
5.2 Age



Q: Please indicate your age group

Please indicate your age group	Number	Percentage
Under 25	2	1%
25-34	13	6%
35-44	59	28%
45-54	63	30%
55-64	34	16%
Over 65	35	17%
Blank	5	2%

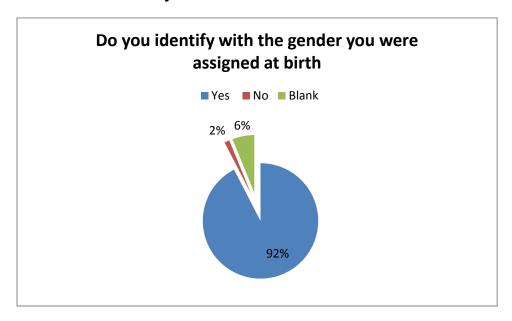
5.3 Sex



Q: What gender are you?

What gender are you?	Number	Percentage
Female	93	44%
Male	112	53%
Other	6	3%

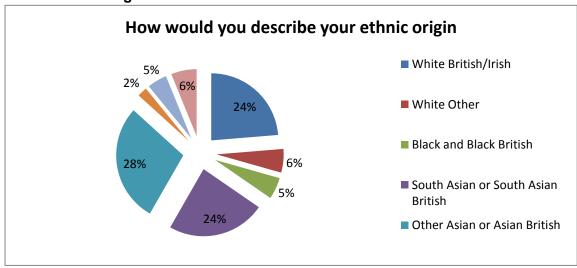
5.4 Gender Identity



Q: Do you identify as the gender you were assigned at birth

Do you identify as the gender you were assigned at birth	Number	Percentage
Yes	195	92%
No	3	2%
Blank	13	6%

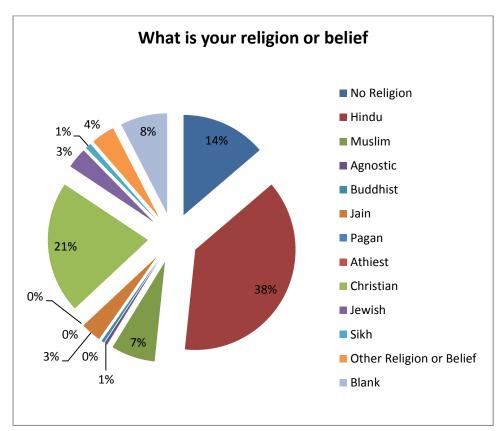
5.5 Ethnic Origin



Q: How would you describe your ethnic origin

How would you describe your ethnic origin	Number	Percentage
White British/Irish	50	25%
White Other	12	6%
Black and Black British	11	6%
South Asian or South Asian British	50	25%
Other Asian or Asian British	60	30%
Mixed Race	5	3%
Other Ethnic Group	10	5%
Blank	13	6%

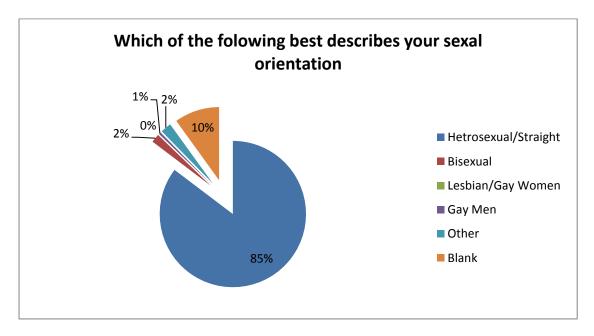
5.6 Religion or Belief



Q:What is your religion or belief

What is your religion or belief	Number	Percentage
No Religion	29	15%
Hindu	80	41%
Muslim	15	8%
Agnostic	1	0%
Buddhist	1	0%
Jain	7	4%
Pagan	0	0%
Athiest	0	0%
Christian	45	23%
Jewish	7	4%
Sikh	2	1%
Other Religion or Belief	8	4%
Blank	16	8%

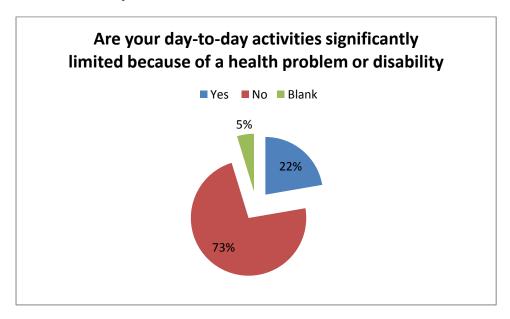
5.7 Sexual Orientation



Q: Which of the following best desrcibes your sexual orientation

Q: Which of the following best describes your sexual orientation	Number	Percentage
Hetrosexual/Straight	180	85%
Bisexual	4	2%
Lesbian/Gay Women	0	0%
Gay Men	1	1%
Other	5	2%
Blank	21	10%

5.8 Disability



Q: Are your day-to-day activities significantly limited because of a health problem or disability

Are your day-to-day activities significantly limited because of a health problem or disability	Number	Percentage
Yes	47	22%
No	154	73%
Blank	10	5%

6. NEXT STEPS

The feedback from the consultation and the Equality Impact Assessment will be presented to Councillors at the Council's Cabinet meeting in December 2019. Councillors will make their decision based on the feedback in a full Council meeting in February 2020.

Once a decision on whether the proposed changes are to be made to the Council Tax Support scheme we will ensure that feedback is provided to Council Tax Support recipients, residents and stakeholders.