

## APPENDIX

**Thursday 16 January 2020**

### CONFIRMATION OF CABINET AND COMMITTEE RECOMMENDATIONS AND RELEVANT ORIGINATING BACKGROUND PAPERS

ITEM ON SUMMONS	CABINET / COMMITTEE RECOMMENDATION	ORIGINATING REPORT
	Recommendation I: Cabinet (9 January 2020)	
12.	CHANGES TO THE COUNCIL TAX SUPPORT SCHEME (CTS) FOR 2020-21	Report of Director of Finance (Pages 3 - 222)
	Recommendation I: Health and Wellbeing Board (14 January 2020)	
14.	HEALTH AND WELLBEING BOARD CHANGES TO TERMS OF REFERENCE	Report of Corporate Director, People (Pages 223 - 234)

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## **REPORT FOR: CABINET**

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<b>Date of Meeting:</b>	9 January 2019
<b>Subject:</b>	Changes to the Council Tax Support Scheme for 2020-21
<b>Key Decision:</b>	Yes
<b>Responsible Officer:</b>	Dawn Calvert, Director of Finance, Resources Directorate
<b>Portfolio Holder:</b>	Adam Swersky Finance & Resources
<b>Exempt:</b>	No
<b>Decision subject to Call-in:</b>	Yes
<b>Wards affected:</b>	All
<b>Enclosures:</b>	Appendix A Consultation booklet Appendix B Consultation questionnaire Appendix C Consultation feedback report Appendix D Equality Impact Assessment Appendix E s13A(1)(c) Policy

### **Section 1 – Summary and Recommendations**

The report provides members with feedback from the consultation carried out with Harrow residents and stakeholders and shows how the feedback has informed the proposal being put to Members for a decision.

Cabinet is requested to make the following decision:

1. Approve and recommend that full council adopts the proposed income banded scheme for Council Tax Support claimants in receipt of

Universal Credit for the financial year 2020/21 and beyond subject to annual review.

2. To recommend to full council that the existing Council Tax Support Scheme be retained for all other claimants not in receipt of UC until the rollout of Universal Credit in Harrow is complete.
3. Recommend to full Council that the proposed income banded scheme should also benefit from £400k of extra investment.
4. That the Council Tax Exceptional Hardship Policy, as set out at appendix E to the report, be approved by cabinet.

**Reason: (For recommendation)**

The Council has carried out a wide consultation to ensure that residents within Harrow were given the opportunity to give their views and help shape a future Council Tax Support Scheme. Feedback from the consultation has informed the recommendation to Cabinet.

## **Section 2 – Report**

### **Background**

- 2.1 Council Tax Benefit (CTB) was previously funded by Central Government via grant, with the Council being responsible for the administration of it alongside Housing Benefit (HB).
- 2.2 From April 2013, this system changed with the introduction of a locally determined system of council tax support (CTS). There is no longer a nationally governed CTB scheme, although certain aspects of the localised scheme are prescribed by regulation.
- 2.3 Pensioners (of state pensionable age) are still protected under these new arrangements. CTS for pensioners is prescribed at a national level. This means CTS must still cover up to 100% of their Council Tax bill if the individual meets certain prescribed criteria.
- 2.4 Full Council determined on the 21 January 2013 to introduce a CTS scheme. The scheme set out the reductions which were to apply in Harrow to specified classes of persons whom the authority considered to be in financial need. The scheme took effect for the financial year commencing 1 April 2013, with some changes phased in from 1 April 2014.
- 2.5 In reviewing the operation of the current scheme, Cabinet agreed in July 2019, that changes to the existing scheme should be considered due to many of our claimants now being moved to Universal Credit (UC) and the need for the scheme to remain fit for purpose as UC rolls out in Harrow in ever larger numbers.



## **The current Council Tax Support scheme**

2.6 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.

2.7 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](http://www.harrow.gov.uk/counciltaxsupport).

In 2019/20 Harrow expects to spend £13.7 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 report.

## **Why Introduce an income banded scheme for UC claimants?**

2.8 Historically Housing Benefit has been administered alongside Council Tax Support so retaining a scheme that was aligned to Housing Benefit made the administration of Council Tax Support simpler and cheaper for the council and residents. As housing costs for most working age residents are now transferring into Universal Credit, there is an opportunity to change the Council Tax Support scheme, for example, to address the impact of multiple changes to Universal Credit entitlement.

Since the UC full service began to rollout in Harrow in July 2018, the council has seen a faster reduction in the Council Tax Support caseload than prior to Universal Credit rollout. This is a trend already seen nationally, and is as a result of residents not submitting a claim to the local authority for Council Tax Support when they claim Universal Credit. Changing the Council Tax Support scheme gives an opportunity

to address this reduction in claims and therefore increase take up for working age households who may be entitled.

Universal Credit recipients also see frequent fluctuations to their entitlement. This in turn results in changes to the level of Council Tax Support awarded under the current scheme, making it difficult for claimants to know how much Council Tax they are required to pay and to manage their finances effectively. Furthermore a high level of change to individual Council Tax Support claims can impact on the Council's ability to collect Council Tax as well as resulting in increased administration costs.

The consultation additionally provided an opportunity for the council to consider other ways of simplifying the scheme, mitigating risk to rising administration costs as it is no longer aligned to Housing Benefit processing, and maximise use of information provided to the council by the Department for Work and Pensions (DWP) in respect to Universal Credit entitlement.

## **Options Considered**

2.9 The drivers for changing the scheme were:

- to be delivered within available funding
- not cost more to administer than the current scheme
- be simpler for claimants to understand and more transparent
- be easier to claim and maximise take up
- not impact on Council Tax collection
- offer a level of protection to the more vulnerable households in the borough
- not act as a disincentive to work
- be legally compliant
- be within the functionality of the software system from the existing supplier
- be fit for purpose for a minimum of four years

The proposed income banded scheme for claimants in receipt of UC was consulted on to see what changes could be made within the framework of these principles. Whilst the changes to the scheme were not intended to make financial savings, consideration was given to implementing an income banded scheme which would keep awards within the existing funding envelope. However, due to the feedback from the consultation and the unintended detrimental consequences for some claimants of adopting an income banded scheme, this was rejected and additional scheme funding of £400k is proposed.

Alternatives to the proposals consulted on were considered including making no changes to the existing scheme; introducing fixed period awards; and not making Universal Credit a qualifying condition, however these were rejected as they do not address the issues raised by the rollout of Universal Credit.

## **Council Tax Support Scheme Consultation**

- 2.10 The Council consulted on an income banded scheme that will only apply to claimants in receipt of UC; all other existing claimants will remain on the current scheme. The Council additionally consulted on moving to a single non-dependent deduction for claims on the income banded scheme, on treating UC notifications from the Department for Works and Pensions (DWP) as a claim for Council Tax Support, and finally, on making UC entitlement a condition for receiving Council Tax Support for working age claimants once UC rollout in Harrow is complete.

The Council has approximately 93,122 domestic households of which 6,700 are working age Council Tax Support claimants. Claimants of pension credit age are protected and the proposed income banded scheme will not apply to them. Additionally the proposed banded scheme will also not apply to existing claimants not yet in receipt of UC, or future claimants who may not qualify for UC, until rollout of UC is completed.

- 2.11 Local authorities have the right and autonomy to develop a scheme that meets the needs of their local area. However councils must follow a statutory framework that includes the following:

- Local authorities must have a revised scheme agreed by 31st January and determined by 11th of March in the preceding year to the year which the changes are to apply.
- Entitlement rules for claimants of state pension credit age are decided by central government;
- Guidance confirms that councils can decide the rules for their working age schemes, but should consider the impact on the most vulnerable when designing or reviewing their scheme
- Guidance also confirms that the scheme should encourage people to work and should not act as a disincentive to working.

## **Consultation Activity**

- 2.12 For any changes to be made to the Council Tax Support scheme, consultation is required. Harrow consulted on the changes to the scheme for UC claimants between the 29th of July to the 22nd of September 2019. In carrying out the consultation, Harrow complied with the following;

- a) Consult any major precepting authority which has power to issue a precept to it;

- b) Publish a draft scheme in such manner as it thinks fit; and
- c) Consult such other persons as it considers are likely to have an interest in the operations of the scheme.

Consultation activity included the following;

- Liaising with the GLA and asking their views both pre consultation and at consultation stage
- 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,
- Raised awareness with Advice agencies in the borough through the Information and Advice forum whose representatives include:
  - Citizens Advice Harrow
  - 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 Council Tax, Adults, Childrens, Housing
- The Council's staff e-newsletter was used as an engagement tool to remind staff of the consultation in progress and invite their feedback, should they wish to participate.
- Publicity via Facebook and Twitter, Council website, e newsletters, and posters distributed throughout the borough
- The Council's online customer account, 'My Harrow', was used as an engagement tool to reach all registered residents with reminders issued during the consultation period
- Harrow Council also 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. A full listing of organisations is set out in the consultation report. This included:
  - Voluntary Agencies
  - Community Groups
  - Libraries
  - Children's Centres
  - Leisure Venues
  - Harrow Arts Centre
  - Harrow Museum
  - Harrow Civic Centre

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

Harrow staff additionally supported workshops at a number of dedicated drop-in events and attended community events and Stakeholder focus groups in order to both widen the consultation awareness and to allow face-to-face discussions and explanations to take place.

In all, consultation on the Council Tax Support scheme took place at 9 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 set out in the consultation report. The total attendance at these events exceeded 500 with 5,970 number of consultation booklets being distributed throughout the course of the consultation.

Supporting material 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.

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.

## 2.13 Summary of consultation activity:

Consultation Activity	Response rate
Liaison with Preceptors (GLA)	1 postal response (100%)
Written survey posted to 5000 Harrow Council's Council Tax Payers and CTS Claimants	46 postal responses received (0.92%)
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 were not recipients of Council Tax	

Consultation Activity	Response rate
Support,	
Dedicated consultation web pages	126 surveys completed on line
Consultation booklet and survey distributed widely with opportunity for comment through freepost/telephone/email and web sent to voluntary sector, Libraries, Children Centres, Leisure venues, Harrow Museum and Art Centre – 600	forms returned unknown as these would have been part of the postal responses received  Nil telephone responses received  1 email contact received
Face to face activity includes Roadshows/'Go to' days/events/community group meetings/workshops and discussion groups  Number of Questionnaires handed out at events - 370  13 different types of face to face activity held – over 500+ people in attendance overall	39 responses

## Consultation Feedback

- 2.14 In addition to a written response received from the GLA (the preceptor authority and the only entity that Harrow was legally obliged to consult with), the authority also received 211 completed questionnaires from the public, of which 85 were paper returns and 126 were submitted online through the Council website.

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](http://www.harrow.gov.uk/ctsconsultation). The website received 126 'hits' during the consultation period.

The outcome of this consultation has fed into the income banded scheme proposed in this report.

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

The process to create an income banded scheme which aligns to Universal Credit was a complex one, involving complex decisions and judgements to ensure any scheme expenditure remained static initially, and so that the change affected as few claimants as possible. The legislation required Harrow to formally consult with the GLA, the publication of a draft scheme, followed by a full consultation with interested parties.

The full Consultation feedback report setting out all of the responses is held at Appendix C. This feedback is summarised below.

211 completed questionnaires were returned from members of the public. A further 8 responses were received from voluntary sector representatives when in attendance at workshops. Comments from these representatives were also captured during these events.

51 of the public 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 included in the feedback set out below. The overall response to most questions was favourable and therefore, while these 51 responses may have distorted the data the outcome of favourable or not remains unchanged. The exception to this is question 1 which received one response more which was not in favour than in favour. If the cohort of 51 are removed from the data in question 1, this response rate moves to 96 in favour and 51 not in favour.

Question	Respondent	Response	Number of responses	% of total
<b>1. An income banded scheme should be introduced into Harrow's Council Tax Support Scheme.</b>	Public out of 211 responses	In favour	96	46%
		Not in favour	97	46%
	Voluntary Sector out of 8 responses	In favour	6	74%
		Not in favour	1	13%
<b>2. The income bands should be set so more help is given to those with lower incomes than those with higher</b>	Public 211 responses	In favour	110	53%
		Not in favour	84	40%

<b>incomes.</b>	Voluntary Sector out of 8 responses	In favour	6	74%
		Not in favour	1	13%
<b>4 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?</b>	Public out of 211 responses	In favour	98	46%
		Not in favour	69	33%
	Voluntary Sector out of 8 responses	In favour	7	87%
		Not in favour	1	13%
<b>5 The number of non dependant deductions should be reduced from 5 different deductions according to income to one single deduction regardless of income.</b>	Public out of 211 responses	In favour	63	30%
		Not in favour	54	26%
	Voluntary Sector out of 8 responses	In favour	0	0%
		Not in favour	6	75%
<b>6 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.</b>	Public out of 211 responses	In favour	121	58%
		Not in favour	26	14%
	Voluntary Sector out of 8 responses	In favour	8	100%
		Not in favour	0	0%
<b>7. For working age people, it is proposed that only those in receipt of Universal Credit should be eligible for Council Tax Support.</b>	Public out of 211 responses	In favour	83	40%
		Not in favour	76	36%
	Voluntary Sector out of 8 responses	In favour	3	50%
		Not in favour	3	50%



<b>8. Transitional protection should be offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31/03/2019 who will see a reduction of 10% or more to their Council Tax support entitlement.</b>	Public out of 211 responses	In favour	109	51%
		Not in favour	36	17%
	Voluntary Sector out of 8 responses	In favour	8	100%
		Not in favour	0	0%
<b>9. The rate of transitional protection offered to those set out in the proposed scheme should be 50% of the reduction in Council Tax Support as at 01/04/2020 for the first year</b>	Public out of 211 responses	In favour	79	37%
		Not in favour	46	22%
	Voluntary Sector out of 8 responses	In favour	4	67%
		Not in favour	1	16%

In addition to the above responses, the consultation asked for comments from respondents who were not in favour of a proposal. The most common theme from these comments across different questions was to retain a means test to make the scheme fairer and to treat people equally. There was concern that those on lowest incomes or with additional outgoings due to their household makeup would be unfairly impacted by the proposed income banded scheme.

Respondents were in favour of using net earned income to calculate entitlement in place of gross as this is their take home pay and therefore easier for them to understand.

The response rate to the proposal regarding non-dependants was relatively low, although most people who gave a preference were in favour of a single non-dependant deduction. Comments made in reference to this question all raised concerns about the ability of low income non-dependants/households being able to afford what for them will be an increased rate of £7.00 a week.

There was a favourable response to the proposal to use the Universal Credit notice as a claim for Council Tax Support. Respondents however showed a level of concern that using Universal Credit as a qualifying criteria for Council Tax Support would prevent some households from being able to access the scheme. While a higher

proportion of people were in favour of the proposal to limit the scheme to Universal Credit claimants only, a number of comments were made around risk to people who experience barriers to claiming Universal Credit, for example people who would be required to demonstrate they are actively seeking work when they may feel unable to do so because of other factors such as caring responsibilities or having taken early retirement. Furthermore some respondents cited concerns about some people's ability to make and maintain a claim for Universal Credit due to issues such as mental health..

The majority of respondents were in favour of the transitional protection at the rates set out in the proposals. Some of those giving further comments felt the transitional protection was too generous while slightly more thought it should be more generous.

2.15 The table below also sets out the specific feedback from our preceptor who was consulted on the proposals pre and during the consultation period.

GLA	Formal Response to Consultation
	<p><b>GLA Response to Proposals</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

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.
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## **Proposed Income Banded Scheme to apply for UC Claimants only post 1/4/2020 and beyond**

- 2.16 The proposed revised Council Tax Support scheme is available for viewing on the internal Council hub:

[https://harrowhub.harrow.gov.uk/downloads/file/9833/draft\\_council\\_tax\\_support\\_scheme\\_202021](https://harrowhub.harrow.gov.uk/downloads/file/9833/draft_council_tax_support_scheme_202021)

This is the final scheme pending receipt of upratings from DWP and MHCLG which are annual applied to the current scheme and prescribed pensioner scheme.

The existing means-tested system will 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 new scheme 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.

The scheme that was consulted upon is set out in the consultation booklet in Appendix A. Following consideration of feedback from the consultation and the potential impacts the scheme could have on recipients, members have proposed to allocate an additional £400,000 to the scheme. The scheme has been adjusted to mitigate some of the impacts and incorporate changes suggested by the consultation. Some of these changes require additional expenditure while others are contained within the existing funding envelope.

Following review of the consultation feedback, the proposed scheme has been amended as set out in the table below to reflect the views of the majority respondents where possible. These changes incorporate the additional £400,000 that has been invested into the scheme. :

<b>Change to proposal</b>	<b>Consultation feedback</b>
Include additional categories for households with 3 or more children	Make scheme fairer Retain means test to take account of different household size and expenditure Treat everybody equally
Make the minimum award 70% across all non-vulnerable groups	Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement
Bands adjusted to reduce detrimental impacts	Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement
Implement two non-dependant deductions in place of the proposed one	One rate of deduction is detrimental to those on low or benefit income Should retain two rates Reducing the current number of deductions will simplify the scheme
Use net earned income instead of gross	In favour of using net Simplify process Help people to understand how CTS is calculated using their take home pay

The above changes have been proposed to ensure the scheme remains within the principles set out in the Options Considered section above. The revised proposals do not accommodate all suggested changes captured in the consultation as this would risk the scheme not delivering on the required outcomes. For example, with the inclusion of the cohort who appear to have misunderstood the proposals, there was one more person not in favour of the introduction of an income banded scheme than in favour. However, as set out earlier in this report, an income banded scheme is deemed to be the most effective solution to the impacts identified as a result of the rollout of Universal Credit which require the scheme to be modernised.

While it isn't possible to completely remove detrimental impacts that result from the introduction of the income banded scheme, the above changes at least in part address the consultation feedback that raised concern over the loss of a means test and requests that the scheme be fairer and more equitable. The consultation also found that many respondents believed there should be two non-dependant deductions: one for those in work and one for people who are out of work.

Following changes resulting from the consultation, the proposed Council Tax Support scheme has four main changes when compared with the existing scheme. From 2020-21 onwards, the following will apply to UC claimants:

- Introducing an income banded scheme
- Introduction of only 2 non dependant deductions for claims
- Treating a Universal Credit notification from the Department for Work and Pensions (DWP) as a claim for council tax support
- Making Universal Credit entitlement a condition for receiving council tax support

Each of the proposed changes is outlined in summary below. All the changes apply to working age claimants only; the scheme will remain unchanged for pensioners.

#### 2.17 Banded Scheme

In common with a growing number of billing authorities, the new scheme will be an income banded scheme and will operate from 2020-21. There are three categories of working age claimants; the proposed level of support each of these groups is entitled to differs:

- Disabled people (those entitled to specific disability benefits) and war pension recipients: 86% discount for those not in work or who earn less than £440 per week. The criteria for being classified as a disabled household under the scheme will not change from the current scheme.
- People in receipt of maximum Universal Credit: 70% discount
- People not classified as disabled and not in receipt of maximum UC: the tables below shows the banded scheme for the six different categories of claimants within this group.

The proposed scheme will use the claimant and partner's net 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.

It is proposed that net earned income will be calculated by totalling the claimant and their partner's earnings from employed and self-employed income after any deductions are taken for tax, national insurance and pension contributions. They will then be placed into one of the income bands set out in the scheme's income table and awarded the rate of Council Tax Support shown. This could be reduced if a non-dependant deduction is applied.

The table below sets out the categories of household and income brackets proposed in the new scheme

	Claimant Category C		Claimant Category D		Claimant Category E1		Claimant Category E2		Claimant Category F1		Claimant Category F2
Percentage award of weekly eligible Council Tax	Single people without children – weekly net income	Percentage award of weekly eligible Council Tax	Childless couples – weekly net income	Percentage award of weekly eligible Council Tax	Lone parents up to 2 children – weekly net income	Percentage award of weekly eligible Council Tax	Lone parents 3 or more children – weekly net income	Percentage award of weekly eligible Council Tax	Couples with up to 2 children – weekly net income	Percentage award of weekly eligible Council Tax	Couples with 3 or more children – weekly net income
70%	£0-£75	70%	£0-£75	70%	£0-£100	70%	£0-£100	70%	£0-£125	70%	£0-£125
60%	£75.01-£125	60%	£75.01-£125	60%	£100.01-£140	60%	£100.01-£150	60%	£125.01-£165	65%	£125.01-£150
40%	£125.01-£175	55%	£125.01-£175	55%	£140.01-£175	55%	£150.01-£200	55%	£165.01-£200	60%	£150.01-£200
0%	>£175	40%	£175.01-£225	40%	£175.01-£225	45%	£200.01-£275	40%	£200.01-£250	50%	£200.01-£275
		0%	>£225	30%	£225.01-£275	30%	£275.01-£325	30%	£250.01-£300	35%	£275.01-£375
				0%	>£275	0%	>£325	20%	£300.01-£375	20%	£375.01-£425
								0%	>£375	0%	>£425

Two additional categories exist:

- Classified as vulnerable awarded 86% less any non-dependant deductions. Vulnerable criteria as in current scheme and set out in The Current Council Tax Support scheme above
- In receipt of maximum Universal Credit awarded 70% less any non-dependant deductions

The scheme has been designed to minimise the level of change for existing claimants.

The scheme will maintain the existing means-tested system for council tax support for all working age claimants who do not receive Universal Credit (UC). Once a claimant begins receiving UC, they will be assessed under the new scheme. When UC is fully rolled-out across the borough, the existing scheme for working age claimants will then cease.

## 2.18 Non-dependant deductions

The consultation proposed to replace the current five deductions with a single rate of £7.00 a week irrespective of the non-dependant's income. After taking into account the consultation feedback and the potential impacts, following modelling on our existing data, the new scheme will now have two non-dependant deductions, one for both non working non-dependants and working non-dependents earning less than £144 gross per week, and one for all other working non-dependants earning £144 or more gross p/w. The levels will be set at £3.30 for those non dependants which do not work or earn less than £144 p/w, and a new amount of £13.10 which will apply for everyone else. As in the current scheme, a deduction will be taken for each non-dependant, so one household could have more than one deduction.

The consultation raised concerns with the original proposal of £7.00 single deduction as it meant an increase of £3.70 for each non-dependant on the lowest incomes. Two deductions are now proposed

to mitigate the impact for this lowest income group, with a rate of the current lowest level of £3.30 for those out of work (same as currently).

The second deduction is proposed at £13.10 for those in work. This allows the benefits from a reduced number of deductions to still be achieved as it simplifies the scheme for customers and the administration. The highest rate will be applied based on information received at the point of receiving the Universal Credit notification, until evidence that the lower rate should be applied is obtained.

To prevent any additional expenditure from the scheme any higher rate deduction would have needed to be set above the £13.10 proposed. However, it was decided that given concerns raised in the consultation about lower income households, any higher rate should not be set too high. It could not be reduced any further than £13.10 without bringing too high a level of risk to the Council Tax Support expenditure by opening up the scheme to households who currently do not qualify but could if the non-dependant deductions were all substantially reduced.

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.

Households with non-dependants who are not in work will either experience no change, or will benefit from this proposal. Non-dependants who are in work but earn less than £144.00 per week (gross) will be beneficially impacted. Non-dependants who are in work but earn more than £144.00 per week but less than £207.70 will be detrimentally impacted while households with non-dependants who earn more than £207.70 per week (gross) will be beneficially impacted.

#### Treating Universal Credit notification from the Department for Work and Pensions (DWP) as a claim for council tax support

The DWP notifies the council if a UC claimant has indicated to the DWP that they wish to claim CTS at the point that they submitted a claim for Universal Credit. If the claimant is liable for Council Tax, the new scheme will treat this DWP notification as an application for CTS. As a result, working age UC claimants will not be required to make a separate claim. Harrow Council expects this to increase the level of take-up for working age people and simplify the claim process.

This proposal was seen to be very favourable by respondents in the consultation as people frequently are not aware that they need to make a separate claim to the Council for Council Tax Support when they claim Universal Credit. It is expected that this proposal will result in an increase in Council Tax Support expenditure as people will automatically be treated as claiming Council Tax Support from the point they claim Universal Credit and, in most circumstances, they do

not need to provide follow-up information in support of their claim. Any of the additional funding not allocated to the post consultation changes will be used to offset additional expenditure resulting from an increase in take-up at an earlier point.

2.19 Making Universal Credit entitlement a condition for receiving council tax support

The new income banded CTS scheme will only be open to low income claimants who are in receipt of UC. Existing claimants will continue to receive support under the current scheme until they are required to claim UC or until they are subject to the rollout of UC for their particular circumstances. At this point, if they receive UC, their CTS entitlement will be assessed under the income banded income scheme or, if they do not qualify for UC, they will no longer qualify for CTS.

The new scheme will provide an exception to this requirement for people who do not receive UC but are in receipt of contribution-based Job Seekers Allowance or Employment Support Allowance, have no other income or their only other income is disability benefits that are disregarded under the current CTS scheme, and have under £16,000 in capital. Claimants meeting all of these criteria will only be transferred to the banded scheme once UC roll-out in Harrow is complete. For the purposes of the proposed new Council Tax Support scheme, if these households are in receipt of a qualifying disability benefit they will be classified as being in the vulnerable group, if no disability benefits are received then they will be treated as if they receive maximum Universal Credit.

2.20 Transitional Protection

The new scheme also introduces transitional support for households which are in receipt of both CTS and UC the day before the new scheme begins (i.e. 31 March 2020). Households which lose 10% or more of their CTS award at the point of transferring onto the new scheme will be awarded 50% of the loss for the first year of the scheme.

The consultation found that some respondents thought the transitional protection should be more generous. The number of households that will be entitled to transitional protection has reduced due to the changes proposed to the scheme following consultation. As of 31<sup>st</sup> August 2019 there are 21 households who would qualify for the above rate of transitional protection. This number is expected to increase by 31<sup>st</sup> March 2020 as more households start to receive Universal Credit, but is not expected to be more than 50.

2.20 Council Tax Exceptional Hardship Relief Policy

This report is also introducing a relief policy for Council Tax. Section 13A(1)(c) awards will be used to help mitigate any unforeseen hardship circumstances that threaten taxpayers' ability to pay the council tax. Whilst standing alone and not being part of the CTS income banded scheme, the policy will provide further support to council tax payers suffering exceptional financial hardship.



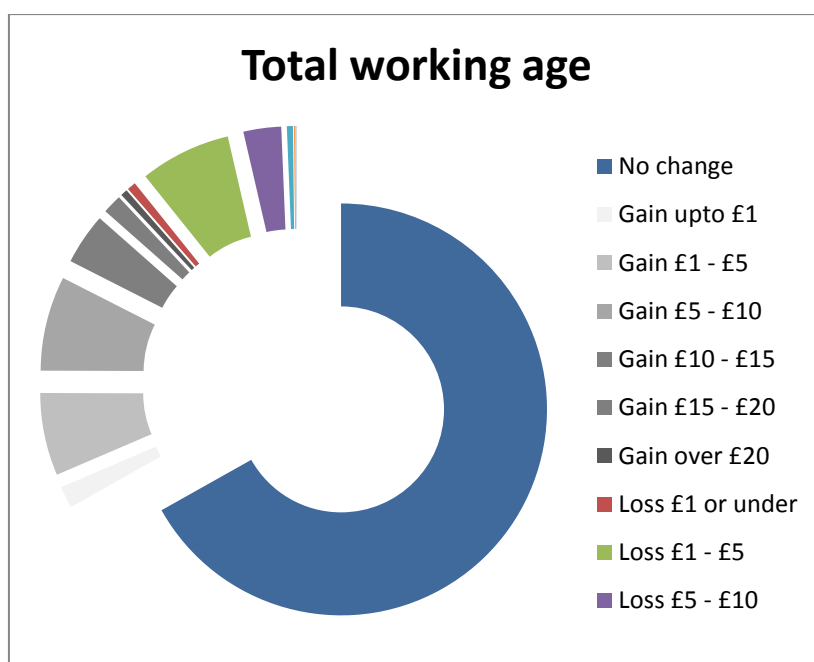
In relation to council tax payers who are in receipt of Housing Benefit and CTS and which migrate to Universal Credit over the next three years, the policy will specifically support them by awarding those households the equivalent of two weeks net council tax.

The policy will also support council tax payers in receipt of CTS further by ensuring that for the financial year 2020/21, those households receive additional relief so that they are not impacted by the 3.99% council tax increase for the coming financial year.

## Impacts of the proposals

### Impacts of the proposed banded income scheme

2.22 The impact of the proposed Council Tax Support scheme following all of the above changes is set out in the chart below



	No change	Gain						Loss					
		Up to £1	£1 - £5	£5 - £10	£10 - £15	£15 - £20	over £20	£1 or under	£1 - £5	£5 - £10	£10 - £15	£15 - £20	Over £20
Number of households (6,686)	4470	114	434	497	269	101	36	46	477	198	32	8	4

The nature of the income banded scheme, along with the changes proposed to non-dependant deductions, means that some households will gain while others will lose entitlement when compared to the current means tested scheme. Consequently, there are 765 households who will lose, 242 of which will lose more than £5 a week, and 44 who are forecast to lose £10 or more. 1,451 households will

gain, 903 of which will gain more than £5 of which 406 are expected to gain more than £10 a week.

The reasons for loss are largely as a result for the need to deliver simplicity and to avoid increases to administration costs. Key reasons for higher levels of loss are:

- The scheme not taking child care costs into consideration as expenditure;
- Households where the number of hours worked is too low to be entitled to Working Tax Credit; and
- Households with higher earnings and lower other income, such as tax credits, compared to other households
- Households not claiming all of the benefits they are entitled to, such as Tax Credits
- Changes to the non-dependant deductions

Adjusting the income bands and introducing additional categories for larger families has softened some of the impacts, but, largely due to the basis of the scheme only using earnings, we expect some households will lose over £5.

This proposed income 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.

## 2.23 Impacts from changing non-dependant deductions

Introducing two non-dependant deductions at £3.30 and £13.10 a week instead of the one originally proposed will negatively impact some households. There are 1,610 working age Council Tax Support claims which have a non-dependant in them. 1,041 have no deduction applied because of exemptions and disregards. Of the remaining 569 where one or more deductions apply, 125 will see no change compared to their current rate of non-dependant deductions. 128 households will lose, 117 lose £5 or more of which 8 are forecast to lose £10 or more. 316 households will gain as a result of the non-dependant deductions, with 90 gaining over £5 and 7 of these gaining more than £10. These impacts are based on the change to the non-dependant change only so the net impact on these households could differ as a result of the other proposals.

## Impacts on non-dependant households where deductions apply

	No change	Gain						Loss					
		Up to £1	£1 - £5	£5 - £10	£10 - £15	£15 - £20	over £20	£1 or under	£1 - £5	£5 - £10	£10 - £15	£15 - £20	Over £20
Number of households with a non-dependant deduction (569)	125	33	193	83	0	7	0	0	11	109	4	2	2

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

This 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.

### 2.25 Impacts of the proposal to make Universal Credit a qualifying benefit

Analysis of the current Council Tax Support caseload indicates that there are a number of households who will not qualify for Council Tax Support under the proposed new scheme as the information held on their claim indicates they would not qualify for Universal Credit. However, 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. 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; &
- 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

We are, however, also aware that there will be some households who cannot qualify for Universal Credit and do not meet the above exception criteria. There are 23 households currently in receipt of Council Tax Support who are not expected to qualify under the new scheme because they cannot claim Universal Credit.

## **Mitigations - Transitional Support**

- 2.26 As stated earlier in this report, to assist the transition process, Harrow is proposing to put in place a transitional support scheme, which will be part of the income banded scheme, to limit the financial impact of any unintended reductions in awards for the claimants that may be affected because of the proposed changes.

The scheme will apply to anyone who may lose more than 10% of their existing award as at 31<sup>st</sup> March 2020, and will provide additional CTS benefit, equivalent to 50% of the yearly loss, in the first year that the income banded scheme is introduced. Following the changes proposed as a result of the feedback from the consultation, the numbers affected have reduced and are forecast to be below 50 households. It is expected this will cost approximately £5k.

In addition to targeted financial support to those who will lose at a higher rate, it is proposed to take the following action to assist residents with the introduction of the new Council Tax Support scheme:

- A publicity campaign will be carried out to inform people how their Council Tax Support entitlement could change in advance of them moving onto the new scheme. The campaign will set out the new scheme in simple terms to ensure residents are able to understand how it works.
- The Council will write to people who are expected to lose out under the new scheme to advise them of the change in advance to help them to start to budget accordingly and to access support if required.
- An online calculator is available for Harrow's bespoke Council Tax Support scheme. This enables residents to see how much Council Tax Support they will be entitled to. A Universal Credit 'better-buy' calculator is also available through the Harrow website which informs residents of whether they will be better off on Universal Credit and what benefits they could be entitled to.
- Anyone identified as not receiving the full benefits they are entitled to will be written to and advised of this. They will either be able to claim additional tax credits to reflect their true circumstances, or, if they don't currently receive any tax credits, then they will be informed that if they claim Universal Credit that their income could increase.
- A review of earned income claims will be carried out to ensure the correct amount of earnings is held on the Council Tax

Support claim. This will reduce the impact of change when the household moves onto Universal Credit. Due to the volume of claims and resources required, it is not possible to review all self-employed claims, but resources will be targeted toward claims that have not been reviewed for the longest to bring the income held up to date, again with the intention of reducing the level of impact when the household moves on to Universal Credit and the new Council Tax Support scheme.

- The Council already has in place a Vulnerability Policy to ensure consideration is given to vulnerable households when collecting monies owed to the Council. This policy will be reviewed to consider what impact the proposed changes to the Council Tax Support scheme may have on recovery and potentially vulnerable households
- In exceptional cases, consideration will be given to exercising the Council's discretion under s13A(1)(c). This hardship policy will be reviewed and funding allocated from the additional £400,000 expenditure. As the new scheme and therefore the associated impacts only start to take effect once the household claims Universal Credit, the level of additional expenditure spent directly on the scheme will be lower initially and will rise as more households transfer across. Funding from the £400,000 not required for scheme expenditure initially, will be allocated to this hardship fund.

In addition to above, it is proposed that the scheme parameters will be reviewed annually with a view to uprate if appropriate. This is intended to ensure the scheme continues to offer a similar level of support to low income residents.

## **2.27 Recommendation**

Officers are recommending that Members agree to the proposed income banded council tax support scheme being implemented for UC claimants from 1/4/2020 as set out in this report. This scheme reflects the outcome of the consultation.

Additionally that Members approve and agree the Council Tax Exceptional Hardship Policy also attached to this report.

Alternatively, Cabinet could not approve this policy and choose to continue with only the current scheme. This is not recommended as it would leave the Council without a CTS that meets the issues caused by the rollout of UC.

## **Procurement Implications**

There are no procurement implications arising from the Recommendations of this report.

## **Legal Implications**

Paragraph 5 of Schedule 1A to the Local Government Finance Act 1992, requires the authority to consider whether, for each financial year, the CTS scheme is to be revised or replaced. Where the scheme is to be

revised or replaced the procedural requirements in paragraph 3 of that schedule apply. Any revision/replacement must be determined by 11<sup>th</sup> of March in the preceding financial year to the financial year which the changes are to apply. If the authority considers the scheme should be revised or replaced, the council must consult with the GLA, publish a draft scheme and then consult with such persons are likely to have an interest in the operation of that scheme prior to determining the scheme before 11th of March. If any proposed revision to the scheme is to reduce or remove a reduction to which a class of person is entitled, the revision must include such transitional provision as the Council sees fit.

At the meeting on 11 July 2019, Cabinet agreed for Officers to consult on a revised scheme which took into account the roll out of UC across the borough. The decision on whether to revise or replace a council tax support scheme is reserved to full council by virtue of s.67 of the 1992 Act. This report now recommends that Cabinet, taking into account the feedback consultation report and the EqIA, endorses the proposed new income banded scheme proposed for UC claimants to Full Council, for adoption for the financial year starting 1/4/2020.

When making policy decisions, the Council must take into account of all relevant material, including financial resources, consultation responses and potential equality impacts in order to reach a decision. This report and attachments highlights the expected impacts, proposes mitigations via a transitional support scheme, highlights additional expenditure, explains that additional funding is being invested in the scheme and makes a recommendation. However, this does not preclude Cabinet from rejecting the proposal and continuing with only the current scheme

There is a statutory duty to consult on the Council Tax support scheme. A summary of the details of the consultation responses are set out in the report and attached as Appendix C. Case law has confirmed that when determining whether to change policy, the Council must be receptive to reasonable arguments against the proposal, however this does not simply involve a head count of those for and against the proposals. The Council must take these views into account and must balance this with other relevant information to decide whether to recommend the proposed option.

Section 13A of the Local Government Finance Act 1992 allows the council to reduce the amount of Council Tax payable where national discounts and exemptions cannot be applied. The council has the right to choose whether to use powers on a case by case basis ie: on the grounds of exceptional financial hardship or to specify certain classes of use where several taxpayers may fall into a group due to similar circumstances.

## **Financial Implications**

As there is a financial implication when awarding discounts under Section 13A because the Council has to fund all awards from its own funds without any Government support, any such awards must meet certain criteria to ensure they offer value for money to the boroughs' taxpayers.

The Council has invested £400k per annum into the new income banded scheme which will result in higher council tax support awards to applicants. However in the early years all of the additional £400k funding will not be taken up as it is anticipated a phased migration of applicants to Universal Credit will occur over the next 3 years. More generous awards will only apply once an applicant qualifies to move into the new income banded scheme because they will also have migrated to UC. As such, in 2020/21, it is anticipated that the unspent amount, approximately £325K, will be used to

- I. Negate the impacts of 3.99% council tax inflation for 6,500 working age applicants in receipt of council tax support
- II. Support approximately 1767 council tax payers moving to UC by awarding them the equivalent of 2 extra weeks worth of council tax support as a run-on.
- III. Provide between £80k - £90k to fund a council tax exceptional hardship support scheme to help council tax payers suffering financial hardship and not able to meet their council tax bills short term.

	Expected future additional investment into the new Income band scheme	Balance left to be used to support residents as per schemes set out in the S13A(1)(c) Policy and summarised above
2020/21	£75k	£325k
2021/22	£183k	£217k
2022/23	£291k	£109k
2023/24	£400k	£0k

The additional investment in s13A relief applies for a maximum of three years. Additionally some types of relief under the group categories will be year specific.

## Performance Issues

There may be in year council tax collection performance issues as initial resistance to the changes manifests itself. To mitigate this, a transitional support scheme is proposed to be implemented which will reduce financial impacts for those households who may be unintentionally impacted upon due to the cliff edge nature of income banded schemes. The new Council Tax Exceptional Hardship relief policy will additionally be used to mitigate unknown risks that may materialise.

## Environmental Impact

None

## Risk Management Implications

Should Harrow not introduce an income banded scheme for UC claimants, there could be reductions in the number of working age residents accessing assistance from Council Tax Support even if they would be entitled. This is because claimants may not be aware that they need to submit a claim to the council. This affects low income households but also impacts on the ability of the council to collect

Council Tax from households who should be charged a reduced rate but haven't claimed it.

There is a risk of the scheme overspending if working age claimants increase due to the economy worsening due to the potential impacts of Brexit. There is also a risk of the scheme overspending due to claimants of pensionable age increasing as Harrow's population, and specifically, its older population, increases. The council tax support scheme for pensioners is prescribed, and as such awards are fully met from Harrow's Council Tax base.

The nature of the scheme may also result in additional expenditure as a result of increased take-up and due to different treatment of income to the current means tested scheme. The scheme expenditure and caseload will be closely monitored to identify and understand any changes in expenditure.

Collecting monies from households who are in receipt of benefits will always be challenging. There will be a risk of households not being able to afford even the reduced amounts of council tax billed and this may lead to lower collection rates.

There is also a wider corporate risk that robust enforcement of Council Tax may conflict with the wider corporate collection priorities if Departments compete in an uncoordinated way to collect money from residents. Considering the size of Harrow's housing stock, the expected impact on rents due to UC, lack of affordability in general by households not claiming Council Tax Support may additionally have implications for the HRA account.

## **Equalities implications**

A full detailed Equality Impact Assessment (EqIA) has been carried out in relation to the changes to Council Tax Support. The EqIA was opened in July 2019 and has been updated to take into account the feedback from the consultation.

When making this decision, Cabinet should have due regard to the Public Sector Equality Duty. The Council completed an equality impact assessment and a summary of results is shown below.

Section 149 of the Equalities Act 2010 created the Public Sector Equality Duty. Section 149 states:-

- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
  - (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;



- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

When making policy decisions, the Council must take account of the equality duty and in particular any potential impact on protected groups.

Modelling was carried out on claimant data to ascertain any impacts. Where impacts were found, the configuration of the income banded proposed scheme was amended to ensure the number of impacted claimant households was as low as possible. To support this process an additional £400,000 was allocated to the scheme to mitigate the impacts on households with protected characteristics and in response to feedback from the consultation.

If detrimental impacts were not removed by reconfiguring the proposed scheme parameters, then mitigations are proposed to be implemented (taking account of any consultation feedback; e.g. transitional support to support those impacted in the first year). These mitigations are set out in the Mitigations – Transitional Protection section above.

The EqIA is attached at Appendix D and the results of the impacts on the protected characteristics are summarised in table 1 below. Information has only been provided where data is held against the current Council Tax Support caseload. Monitoring data is not available for the following characteristics and only partial information for Race/ethnicity:

- Gender reassignment
- Same sex marriage and civil partnership
- Pregnancy and maternity
- Religion or belief
- Sexual orientation

The impacts have been identified based on the full caseload having transitioned onto Universal Credit and therefore the revised Council Tax Support scheme. Below are the residual impacts against protected characteristics on the assumption that the revised proposals are implemented.

Monitoring data is not available for non-dependants so impacts resulting from this proposal are based largely on the claimant's characteristics.

Age	
Impacted group	Impact
<ul style="list-style-type: none"> <li>▪ Working age only</li> </ul>	<ul style="list-style-type: none"> <li>• These proposals only affect working age claimants, not pensioners <ul style="list-style-type: none"> <li>○</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>▪ Claimants in the age group 35-44</li> </ul>	<ul style="list-style-type: none"> <li>• 35-44 age group are more likely to lose over £10 (22/44 claims losing more than £10 will be in this group)</li> <li>• 35-44 are more likely to lose more than £5 (89 households)</li> </ul>

	<ul style="list-style-type: none"> <li>Households in this age group are also more likely to lose more as a result of the changes to non-dependant deductions with 50% of households who will lose more than £10 being this age, while they account for 29% of the total caseload</li> </ul>
<ul style="list-style-type: none"> <li>Households with children</li> <li>Households with 3 or more children</li> </ul>	<ul style="list-style-type: none"> <li>Households with children more likely to see change: beneficial and detrimental.</li> <li>While 59% of claims have children: <ul style="list-style-type: none"> <li>75% (182) of households which lose more than £5 have children in them</li> <li>89% (39) of households which lose more than £10 have children in them</li> </ul> </li> <li>While 25% of claims have 3+ children: <ul style="list-style-type: none"> <li>35% (85) of households which lose more than £5 have 3+ children in them</li> <li>44% (17) of households which lose more than £10 have children in them</li> </ul> </li> </ul>
<p>Reason for impact:</p> <ul style="list-style-type: none"> <li>Households in age group 35-44 are less likely to be disabled, more likely to be in work and more likely to have children. These factors all result in an increased likelihood that the household will be impacted by the proposals</li> </ul> <p>The reasons households with children are more likely to lose is:</p> <ul style="list-style-type: none"> <li>They are more likely to be in work (56%) than the caseload as a whole. Households in work are more likely to see change, both beneficial and detrimental</li> <li>There are proportionately more households with children in receipt of Council Tax Support than there are in the borough as a whole</li> <li>A number of households with children are not claiming all of the tax credits they are entitled to</li> <li>Larger families will lose out due to the removal of the means test so there is no additional benefit awarded to account for the extra cost of having more children</li> <li>Households paying more child care costs will lose more Council Tax Support under these proposals</li> <li>Proportionately less households with children are disabled than in the caseload as a whole. Disabled groups are less likely to be detrimentally impacted by these proposals</li> <li>There are households in this group with non-dependants who are in</li> </ul>	

work but on a low wage

Disability	
Impacted group	Impact
Households classified as disabled under the Council Tax Support scheme who have a non-dependant deduction applied	<ul style="list-style-type: none"> <li>• The income banded scheme is beneficial to some households with this characteristic as all will be placed in the 86% group. There are 3,020 CTS claims from households classified as disabled</li> <li>• 37 households will lose as a net result of the combined proposals</li> <li>• 36 of these households will lose because of the non-dependant proposals</li> <li>• 30 will lose between £5-£10</li> <li>• 4 will lose over £10</li> <li>• 16 of the 23 households currently in receipt of CTS who are not expected to be entitled to UC are classified as disabled</li> <li>• It should be noted that while there are impacts for this protected characteristic, they are not disproportionate to the number of households claiming (45.2% of caseload experiencing 4.8% of all losses). There are however a disproportionately high number of disabled households claiming CTS compared to the number in the borough</li> </ul>
Households in receipt of a Carers Premium	<ul style="list-style-type: none"> <li>• 923 CTS households are in this group</li> <li>• 45 will lose as a result of the net impact of these proposals</li> <li>• The majority who lose do so because of the changes proposed to the non-dependant deductions</li> <li>• It should be noted that while there are impacts for this protected characteristic, they are not disproportionate to the number of households claiming (13.8% of caseload experiencing 5.9% of all losses). There are however a disproportionately high number of households receiving Carers Premium who claim CTS compared to the number in the borough</li> </ul>
Reason for impact: <ul style="list-style-type: none"> <li>• Higher rate of non-dependant deduction at £12 is detrimental to some households</li> <li>• A high proportion of claims with a Carers Premium have a non-dependant deduction applied.</li> <li>• There are households in this group with non-dependants who are in</li> </ul>	

work but on a low wage

- Many of the 16 who will not be entitled to Universal Credit are in receipt of contribution based Employment Support Allowance and other incomes. If this is work related ESA then they may be able to qualify for Universal Credit after a year.

<p>Race</p> <p>Race monitoring data is held for 32.9% of the working age caseload (2,198). While this is a sufficient number to enable meaningful analysis, if one group is more or less likely to provide monitoring data they could be over or under represented in this analysis. The information should therefore be used with caution.</p>	
Impacted group	Impact
Other Asian or Asian British	<ul style="list-style-type: none"> <li>• This group account for 599 households where monitoring data has been provided, equivalent to 27.25% of the caseload</li> <li>• 16% (98) of households with this characteristic will lose as a result of these proposals</li> <li>• This characteristic does not lose higher amounts compared to the proportion of the caseload it accounts for but 24 of the 81 households where Race data is held who are expected to lose more than £5 are in this group</li> </ul>
White Other	<ul style="list-style-type: none"> <li>• This group account for 90 households where monitoring data has been provided, equivalent to 4.1% of the caseload</li> <li>• 20% (18) of households with this characteristic will lose as a result of these proposals</li> <li>• This characteristic does not lose proportionately higher amounts compared to other households</li> <li>• This characteristic does not lose higher amounts compared to the proportion of the caseload it accounts for but 24 of the 81 households where Race data is held who are expected to lose more than £5 are in this group</li> </ul>
White British/Irish;	<p>44 of the households where Race data is held will lose as a result of proposed changes to the non-dependant deductions. The number of households losing for each of these characteristics are:</p> <p>24</p>

Black or Black British; and Other Asian or Asian British	10 10
<ul style="list-style-type: none"> <li>The two characteristics identified as more likely to lose are more likely to be in work and more likely to have children</li> <li>There are households in this group with non-dependants who are in work but on a low wage</li> </ul>	

<p><b>Sex &amp; sexual orientation</b></p> <p>2,504 claims are from couples – data cannot be extracted to identify whether any of these are same sex couples. They have therefore not been included in the analysis for this protected characteristic</p> <p>4,182 are from single people 210 have not stated their sex. Where data below does not add up, this is due to some claimants not declaring their sex. This data is therefore based on the claims from single people without children and lone parents who have stated their sex: 3,972</p>	
Impacted group	Impact
Female single claimants and lone parents	<ul style="list-style-type: none"> <li>This group are more likely to be impacted as they account for 72.9% of the caseload who do not have a partner (2,896)</li> <li>1,655 are lone parents compared to 99 males</li> <li>They are not however more likely to lose compared to the caseload as a whole</li> </ul>
Lone parents	<ul style="list-style-type: none"> <li>188 lone parents are forecast to lose</li> <li>56 lose more than £5 a week (2 male, 52 female)</li> <li>11 lose more than £10 a week (10 female)</li> </ul>
<ul style="list-style-type: none"> <li>Females are more likely to be impacted because they are more likely than single males to claim Council Tax Support</li> </ul>	

The Equality Impact Assessment sets out impacts identified based on the original proposals and the residual impacts following changes to the proposals based on feedback from the consultation and these impacts. The above are the residual impacts. Not all of the impacts have been removed. Further mitigations are therefore still required and are set out in section Mitigations – Transitional Protection above.

## Corporate Priorities

The report addresses the Council's corporate priorities as the change in policy will ensure we continue to maximise benefits for those who are financially vulnerable. The new income banded scheme for UC recipients will ensure they automatically qualify for council tax support which will lower their council tax bills and ensure they have sufficient monies to spend on other needs.

### Section 3 - Statutory Officer Clearance

Name: Sharon Daniels ☒ on behalf of the \*  
Chief Financial Officer

Date: 25 November 2019

Name: Beljeet Virdee ☒ on behalf of the \*  
Monitoring Officer

Date: 25 November 2019

Name: Nimesh Mehta ☒ on behalf of the \*  
Head of Procurement

Date: 25 November 2019

Name: Charlie Stewart ☒ Corporate Director

Date: 19 December 2019

**Ward Councillors notified:**

NO.

**EqIA carried out:**

NO

**EqIA cleared by:**

N/A

### Section 4 - Contact Details and Background Papers

Contact:

Fern Silverio (Head of Service – Collections & Housing Benefits),

Tel: 020-8736-6818 / email: [fern.silverio@harrow.gov.uk](mailto:fern.silverio@harrow.gov.uk)

**Background Papers:**

Local Government Finance Act 2012

<http://www.legislation.gov.uk/ukpga/2012/17/enacted>

Council Tax Reduction Schemes (Prescribed Requirements) Regulations

2012 [http://www.legislation.gov.uk/uksi/2012/2885/pdfs/uksi\\_20122885\\_en.pdf](http://www.legislation.gov.uk/uksi/2012/2885/pdfs/uksi_20122885_en.pdf)

Consultation Documents

The proposed Income Banded Council Tax Support scheme

[https://harrowhub.harrow.gov.uk/downloads/file/9833/draft\\_council\\_tax\\_support\\_scheme\\_202021](https://harrowhub.harrow.gov.uk/downloads/file/9833/draft_council_tax_support_scheme_202021)

**Call-In Waived by the  
Chair of Overview and  
Scrutiny Committee**

**NO**

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# COUNCIL TAX SUPPORT

Consultation information  
29 July - 22 September 2019



**A**s the councillor with responsibility for finance, it is my job to make sure Harrow Council has enough money to carry out its duties – from picking up bins to protecting children and the elderly. Council tax is the main way that we pay for those services.

It's fair to say no one likes paying tax! Unfortunately, I can't make Council services free. But I can try to make sure that those with the broadest shoulders bear the greatest burden.

At a time when our most vulnerable residents are being hit by the effects of central government austerity, we need to do what we can to lighten their load. Council Tax Support, a programme of relief for our worst-off local tax payers, is one way we can do this.

We have run Council Tax Support in Harrow since 2013. Since then, Universal Credit has been introduced, overhauling much of the benefits system and making our local support scheme outdated.

We need to update our scheme. We're not cutting funding – but any changes may make some people better off while others get less than before.

We have come up with what we



think is the best and fairest way to update Council Tax Support in Harrow. Now we need your help to get this right.

You need to tell us if you think our changes are right or wrong. This will allow us to make adjustments before we put the changes into operation next year.

Please take the time to read our ideas and respond. You can get in touch by email or phone, from now until 22 September.

**Cllr Adam Swersky**  
**Cabinet Member for Finance**  
**and Major Contracts**

## Introduction

We are proposing to modernise Harrow's Council Tax Support in response to Universal Credit.

Residents who need help with Housing Benefit and Council Tax Support from the Council, would normally claim both together.

This allows the Council to use the same information to assess entitlement to both. Housing Benefit requires a complex means assessment and claimants often need to provide a lot of information and evidence.

As residents of working age will claim housing costs assistance from Universal Credit in the future, there is an opportunity to simplify the Council Tax Support scheme.

During the first year of Universal Credit being rolled out in Harrow, there has been a drop in the number of claimants receiving Council Tax Support.

This may be because residents previously claimed Council Tax

Support at the same time as Housing Benefit and did not expect to submit a separate application to the Council for help with their Council Tax.

There is also a risk that some claimants could see monthly changes to their Universal Credit entitlement. This could mean a corresponding change to their Council Tax Support entitlement, making it more difficult for claimants to understand and know what Council Tax to pay.

We are proposing the changes opposite to make it easier to claim Council Tax Support. We want to hear your views. Fill in the survey that accompanies this booklet and return it to us at

**Council Tax Support Consultation**  
**PO Box 730**  
**Harrow Civic Centre,**  
**Station Road, HA1 2DU**

You can also respond online or contact us by email or phone using the details at the back of this booklet.

## Summary of changes to Council Tax Support

1. Introduce a banded income scheme for Universal Credit claimants claiming Council Tax Support (see page 8)
2. Introduce a single non-dependant deduction for claims on the income banded scheme (see page 14)
3. Treat a Universal Credit notification from the Department for Work and Pensions (DWP) as a claim for Council Tax Support (see page 16)
4. Make Universal Credit entitlement a condition for receiving Council Tax Support for working age people once Universal Credit rollout in Harrow is complete. (see page 16)

We have also considered alternatives to this proposal 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 that contains these changes can be found online [www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation). A summary of the proposals is set out in this booklet.

## What is Council Tax Support?

Council Tax Support (CTS) is a local discount scheme that provides financial support to Harrow Council Tax payers of working age on low incomes or receiving benefits.

The current scheme was implemented in 2013 and must be reviewed annually by law, but it has remained largely unchanged since its introduction.

However, due to the roll out of Universal Credit, we are now proposing to modernise the Council Tax Support scheme to bring it in line with these changes.

## Why is Harrow proposing changes to the way Council Tax Support is paid?

The “roll out” of Universal Credit in Harrow started in 2018 and current Government plans are that nationally residents entitled to Universal Credit will transfer from their existing welfare benefits by

2023. This will mean that many of our current working age Housing Benefit claimants will claim and receive assistance for their rent via the Department for Work and Pensions (DWP) rather than from the Council. As Council Tax Support is currently administered jointly with Housing Benefit by Harrow Council, we are proposing options for modernising the scheme to provide for this situation.

The introduction of Universal Credit also brings opportunities to make the Council Tax Support scheme less complex and easier for people to claim.

## Why am I being asked for my views?

Apart from pensioners for whom the local Council Tax Support scheme shall remain unchanged, everyone currently entitled to Council Tax Support will ultimately be subject to the new scheme, so it's important to have your say.

As the scheme concerns Harrow's local approach to support for Council Tax and consequently how Council Tax income is spent, we are keen to receive views

from all residents regardless of whether or not they currently are receiving Council Tax Support. The information provided will be treated confidentially.

We are committed to giving you the opportunity to comment on our proposed options for changes to the scheme and are therefore undertaking consultation between Monday 29 July 2019 and Sunday 22 September 2019 inclusive to give you the chance to have your say.

We have selected this timescale in order for responses to the consultation to be considered and the scheme determined within the Council's budget setting timetable for the financial year commencing 1st April 2020.

## How does Council Tax Support work now?

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](http://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.

## 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 whether the claimant was single; had a partner and no children; had a partner with children; or if they were a lone parent. 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:

### 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; people who are registered blind; people who live in a property which has been granted a disabled band reduction; or anyone who is working age and receives War Disablement Pension or War Widows Pension.

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 over the page 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.

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

This consultation also questions the use of gross earned income as opposed to net earnings and ask

for feedback on your views. We have proposed to use gross to keep the scheme simple but want your views on whether net 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 set out in the table on the next page.

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.

For example in our current scheme if one household earned £40 more than another, they would

Disabled and War Pension recipients		Not classified as disabled under the Council Tax Support Scheme									
% Award	In receipt of maximum Universal Credit or in-work	% Award	In receipt of maximum Universal Credit or	% Award	Single people without children	% Award	Couple without children	% Award	Lone parents	% Award	Couples with children
					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 £440	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	40%	£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

**Table 1. The proposed banded scheme, showing the maximum percentage of council tax liability in a household depending on their band**

Includes those who do not work but do not receive maximum Universal Credit

receive less Council Tax Support. It is possible, that under some circumstances in the proposed scheme these claimants may receive the same amount of Council Tax Support: the higher earner may receive more than they do now while the lower earner may receive less.

More examples of how the proposed scheme will work are available on our website [harrow.gov.uk/counciltaxsupport](http://harrow.gov.uk/counciltaxsupport)

To calculate the band levels and the amount of individual awards,

information from the current scheme has been used.

We looked at the average Council Tax Support award, the average gross earnings and the type of household composition. The bands were then set according to these averages 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.

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.

The impact for all other households will depend on their circumstance. We have set out the average impacts in the table below.

Council Tax Support claimant category	Total number of claims in each category	Average weekly Council Tax Support entitlement under Harrow's current scheme	Average weekly Council Tax Support entitlement under the proposed income banded scheme	Average weekly difference in Council Tax Support
<b>All households classified as Disabled under the scheme</b>				
4	2,993	£23.50	£24.13	£0.63
<b>Households not classified as disabled</b>				
3	774	£17.31	£17.31	£0.00
<b>Households not on maximum Universal Credit and not classified as Disabled under the scheme</b>				
Single people with no children	473	£14.30	£14.03	-£0.27
Couples with no children	90	£16.33	£16.47	£0.14
Lone parents	828	£15.78	£15.75	-£0.03
Couples with Children	1,540	£18.78	£18.67	-£0.11

All households must be in receipt of Universal Credit to be eligible for Council Tax Support

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. We are proposing 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	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 of 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

We are proposing 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 it is proposed to take a deduction 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.

Example: a household with two non-dependants would be affected as follows:

	Non-dependant income	Weekly non-dependant deduction under the current scheme	Weekly non-dependant deduction under the proposed scheme
<b>Non-Dependant 1</b>	Job Seekers Allowance (income-based)	£3.30	£7.00
<b>Non-Dependant 2</b>	In work earning £400 a week	£16.50	£7.00
<b>Total weekly non-dependant deduction</b>		£19.80	£14.00

If the claimant in this example was entitled to £24.00 a week Council Tax Support, this would be reduced to £4.20 under the current scheme.

If the proposed change is implemented, their entitlement of £24.00

a week would be reduced to £10.00.

In this example the claimant would be better off. However, if non-dependant 2 was also on Job Seekers Allowance then the total deductions would increase from



£6.60 to £14.00. This would make the claimant £7.30 a week worse off.

Based on the current Council Tax Support caseload we expect 115 households to be better off and 453 to be worse off if this proposed change to non-dependants is implemented.

The overall average impact to entitlement for the 568 affected households is a reduction to entitlement of £0.19. For those that will receive less, the average reduction is £2.27 and for those that will receive more, the average increase is £8.01.

This proposal will mean that households with non-dependants who work are most likely to receive more Council Tax Support than they do now, 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 Department for Work and Pensions that they would like to claim Council Tax Support. We are proposing to use these notices as a claim for Council Tax Support.

This 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.

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 on to 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. Through the consultation we also intend to understand in greater detail who will be impacted and what the impact will mean to people.

This will 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.

We are also proposing to introduce 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, 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.



## How you can give your views?

We will be listening to your comments from Monday, 29 July 2019 to Friday, 22 September 2019




There are lots of ways you can give us your views:-

- **Questionnaires:** You can fill in the questionnaire that accompanies this booklet and return it to us at:  
  
**Council Tax Support Consultation  
PO Box 730  
Harrow Civic Centre  
Station Road  
Harrow  
HA1 2DU**
- **Event Days:** You can also come and see us in person at one of our events/workshops. Please come along and talk to us when we are out. Details of where we will be in the borough are online: [www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation)
- **Workshops/Meetings:** We will be working with Voluntary Groups in the area to ensure that the organisation and its customers are given the opportunity to have their say.
- **Online:** Visit [www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation) where you'll find all the information about the consultation. You can complete the questionnaire online as well.
- **Postal Survey:** We will be carrying out a postal survey with some of our residents including Council Tax Support recipients and Council Tax payers.

**For a glossary of terms used in this booklet, visit [www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation)**

## Contact Details

You can contact us with your views on the options for the new Council Tax Support scheme in the following way:

-  [www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation)
-  020 8416 8037 (24hour answerphone)
-  [CTS.Consultation@harrow.gov.uk](mailto:CTS.Consultation@harrow.gov.uk)

Council Tax Support Consultation  
PO Box 730  
Harrow Civic Centre  
Station Road  
Harrow  
HA1 2DU

## How the decisions will be made

Once the consultation is complete the feedback will be collated and anonymised to ensure the consultation is transparent and inclusive. This will then ensure your feedback shapes the recommendations for any changes to the Council Tax Support Scheme.

A report will then be developed which will be presented to the Council's Cabinet meeting in January 2020, and then to Full Council in February 2020 where the final decision on the Council's Council Tax Support Scheme for 2020 will be determined. This will be available for access on the Harrow Council website. We will also write to you if the scheme agreed by Full Council is going to have an impact on you.

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# HAVE YOUR SAY ON CHANGES TO COUNCIL TAX SUPPORT

Harrow Council is proposing to make changes to its Council Tax Support scheme.

After reading the consultation booklet, please answer the questions in this leaflet so you can help shape the new scheme.

Return to us at:

Harrow Council, PO Box 730, Civic Centre,  
Harrow, HA1 2DU or complete online at  
[www.harrow.gov.uk/ctsconsultation](http://www.harrow.gov.uk/ctsconsultation)

**29 July-22 September 2019**



To what extent do you agree or disagree with the following statements?

1. An income banded scheme should be introduced into Harrow’s Council Tax Support scheme

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don’t know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

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

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don’t know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why

3. 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?

4. While we have proposed to use gross earned income to calculate entitlement, we could use net earned income instead. This would allow us to take into account deductions for tax, national insurance and some pension contributions. Do you agree that we should use net earned income instead of gross?

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don’t know	<input type="checkbox"/>

If you have said you tend to disagree, or strongly disagree, please tell us why and what you think we could do instead



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

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

516. *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*

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

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

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

8. *Transitional protection should be 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 entitlement.*

Strongly Agree	<input type="checkbox"/>
Tend to agree	<input type="checkbox"/>
Neither agree nor disagree	<input type="checkbox"/>
Tend to disagree	<input type="checkbox"/>
Strongly disagree	<input type="checkbox"/>
Don't know	<input type="checkbox"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

9. 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 1st April 2020 for the first year

Strongly Agree	<input type="radio"/>
Tend to agree	<input type="radio"/>
Neither agree nor disagree	<input type="radio"/>
Tend to disagree	<input type="radio"/>
Strongly disagree	<input type="radio"/>
Don't know	<input type="radio"/>

If you have said you tend to disagree or strongly disagree, please tell us why and what you think we could do instead

5210. Is there anything else you would like to tell us about these proposals or any alternative options you would like us to consider?

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

Other comments

Do you have any other comments about the proposals or information in the consultation document?

About you

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

Yes	<input type="radio"/>
No	<input type="radio"/>
Don't know	<input type="radio"/>

Does your household receive Council Tax Benefit?

Yes	<input type="radio"/>
No	<input type="radio"/>
Don't know	<input type="radio"/>



# EQUALITIES MONITORING

Please help us know more about who is responding by filling in the questions below.

## *Please indicate your age group*

Under 25	<input type="checkbox"/>
25-34	<input type="checkbox"/>
35-44	<input type="checkbox"/>
45-54	<input type="checkbox"/>
55-64	<input type="checkbox"/>
Over 65	<input type="checkbox"/>

## *How would you describe your ethnic origin?*

White British/Irish	<input type="checkbox"/>
White other	<input type="checkbox"/>
Black or Black British	<input type="checkbox"/>
South Asian or South Asian British	<input type="checkbox"/>
Other Asian or Asian British	<input type="checkbox"/>
Mixed race	<input type="checkbox"/>
Other ethnic group	<input type="checkbox"/>

## *What is your religion or belief?*

No religion	<input type="checkbox"/>
Hindu	<input type="checkbox"/>
Muslim	<input type="checkbox"/>
Agnostic	<input type="checkbox"/>
Buddhist	<input type="checkbox"/>
Jain	<input type="checkbox"/>

## *What gender are you?*

Female	<input type="checkbox"/>
Male	<input type="checkbox"/>
Other	<input type="checkbox"/>

## *Do you identify as the gender you were assigned at birth?*

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

## *Which of the following best describes your sexual orientation?*

Heterosexual/Straight	<input type="checkbox"/>
Bisexual	<input type="checkbox"/>
Lesbian/Gay woman	<input type="checkbox"/>
Gay man	<input type="checkbox"/>
Other	<input type="checkbox"/>

Pagan	<input type="checkbox"/>
Atheist	<input type="checkbox"/>
Christian	<input type="checkbox"/>
Jewish	<input type="checkbox"/>
Sikh	<input type="checkbox"/>
Other religion or belief	<input type="checkbox"/>

## *Are your day-to-day activities significantly limited because of a health problem or disability?*

Yes	<input type="checkbox"/>	No	<input type="checkbox"/>
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Thank you 53 taking part

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# **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-dependants 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](http://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 Credit or in-work	% Award	In receipt of maximum Universal Credit	% Award	Single people without children	% Award	Couple without children	% Award	Lone parents	% Award	Couples with children
					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	40%	£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.

<b>Non Dependant Income</b>	<b>Rate of weekly deduction</b>
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 of 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

This 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
  - 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](http://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.

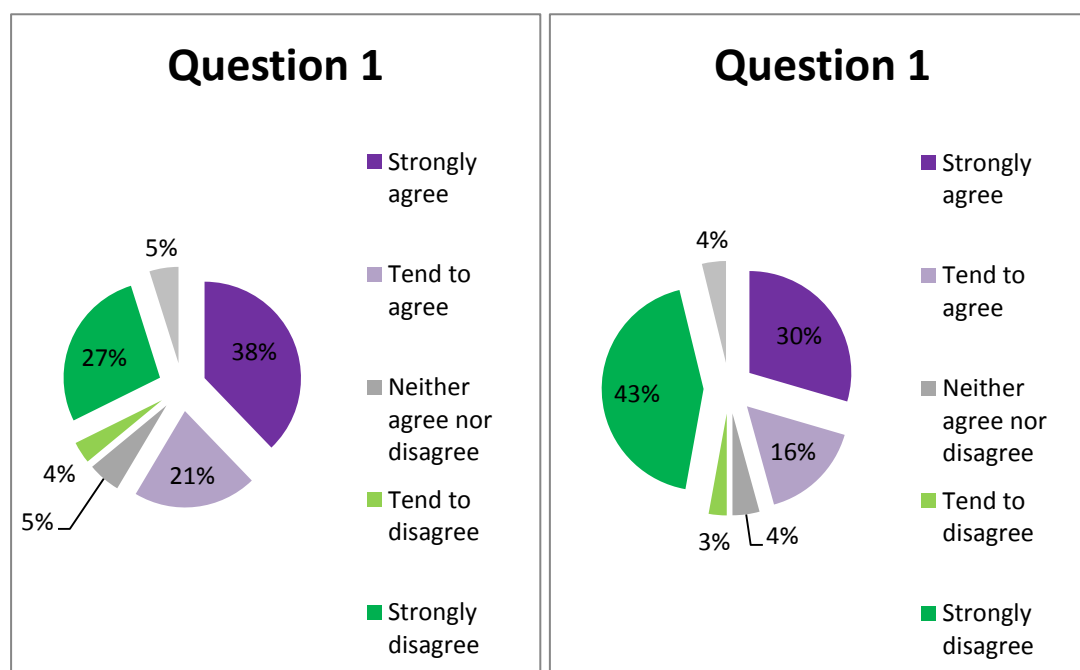
## Q1. An income banded scheme should be introduced into Harrow's Council Tax Support Scheme.

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).

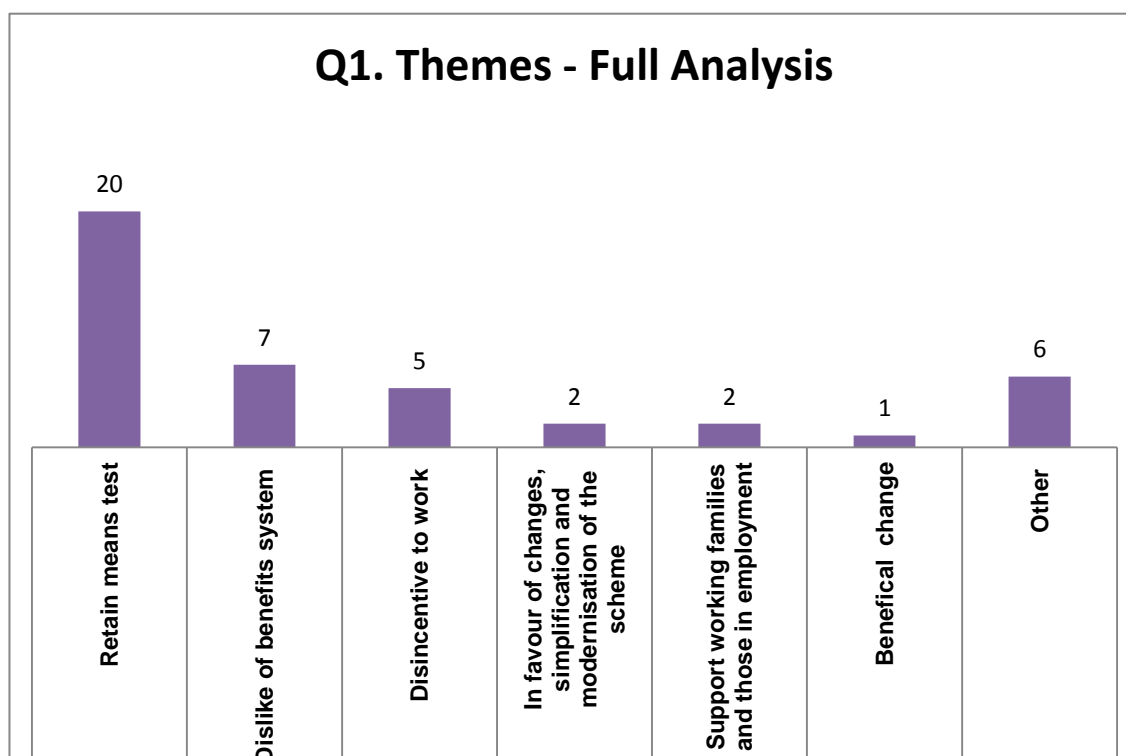
**Partial Responses (total number of responses received 164)**      **Full Responses (total number of responses received 210)**



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.

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 simplify 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
1. Retain the means test /treat people fairly/equally	<p>‘Everyone should be treated equally’</p> <p>‘It needs to be fair on everyone’</p> <p>‘Everyone should be treated equally irrespective of finances.’</p> <p>‘1. It should be based on family size.</p> <p>2. It's not fair system. As real income of many households not known</p> <p>3. Income keep changing. How are you sure it will work’</p>
2. Dislike of the benefits system	<p>‘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.’</p> <p>‘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’</p>



<p>3 Disincentive to work</p>	<p>'...What we don't need for sure is further disincentive for people who work hard.'</p> <p>'...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.'</p> <p>'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.'</p>
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### **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.

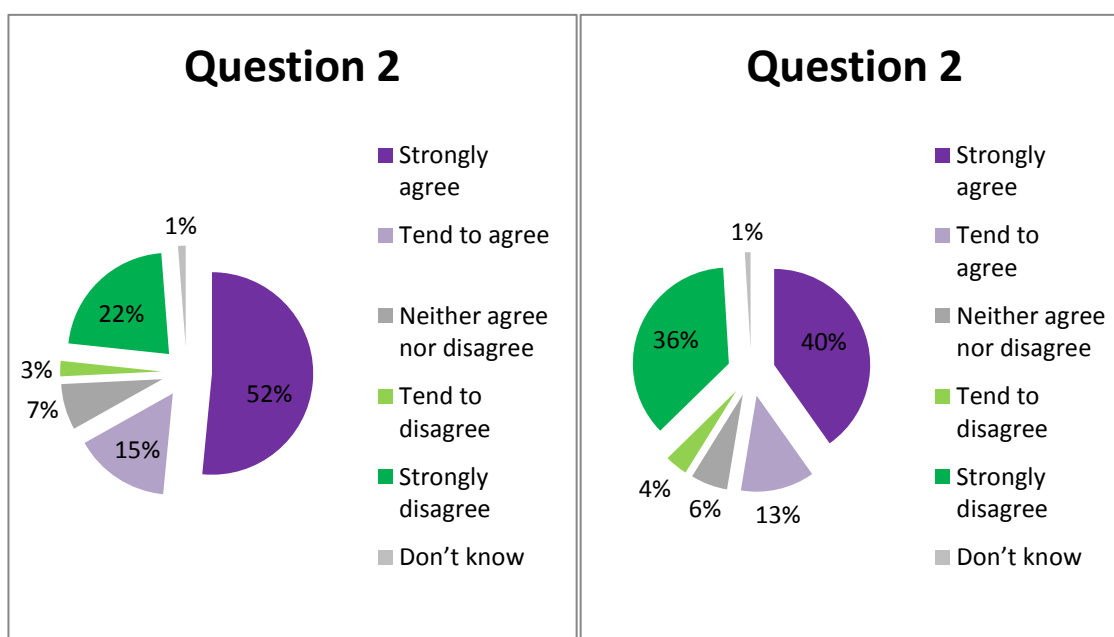
## Q2. The income bands should be set so more help is given to those with lower incomes than those with higher incomes.

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 know	15	7%

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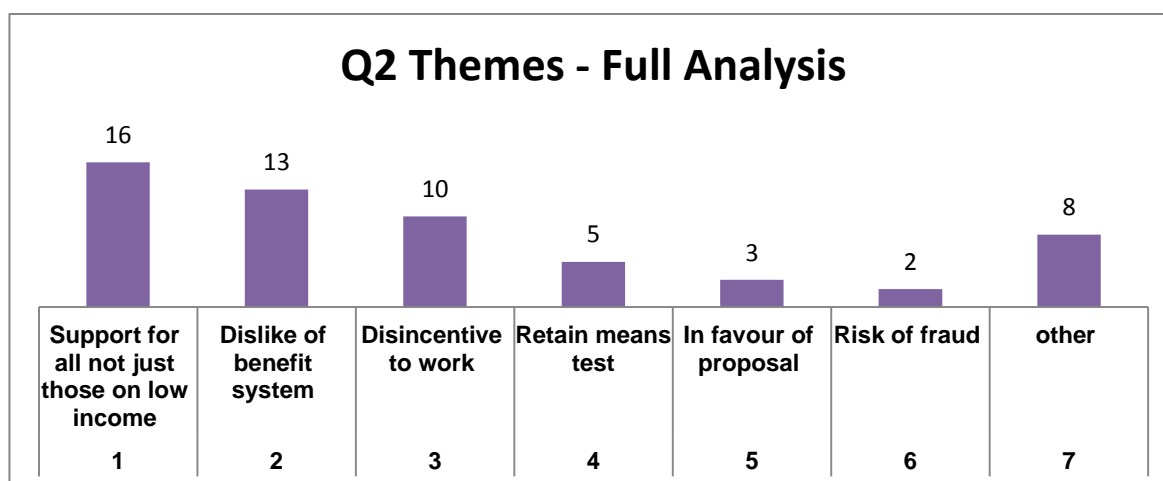


There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

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'*

1. 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
1. Support for all not just those on low income	<p>'Everyone needing and requiring CTS should be treated equally.'</p> <p>'Because universal credit, supplements the lower income families. So the higher income borne all the costs'</p> <p>'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.'</p> <p>'Everyone should be treated equally irrespective of finances.'</p> <p>'Fair to everyone'</p>
2. Dislike of the benefits system	<p>'Why penalise the one earning more for someone earning less'</p> <p>'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.'</p> <p>'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</p>

	<p>efforts to earn more and already paying much more in terms of taxes.</p> <p>This sort of scheme will encourage people to hide income and earn in cash.</p> <p>If someone can afford a certain size house (own or rent) that itself is justification to pay equivalent tax as others pay for similar property'</p>
3. Disincentive to work	<p>'.....You are saying that those who work hard for so many years have to pay for those not working hard...or not interested to work.'</p> <p>'The hard working have to keep paying more and more which will incentivise people not to work.'</p> <p>'Lower income people should be provided support so that they can earn enough to support themselves.</p> <p>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.'</p>

### **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.

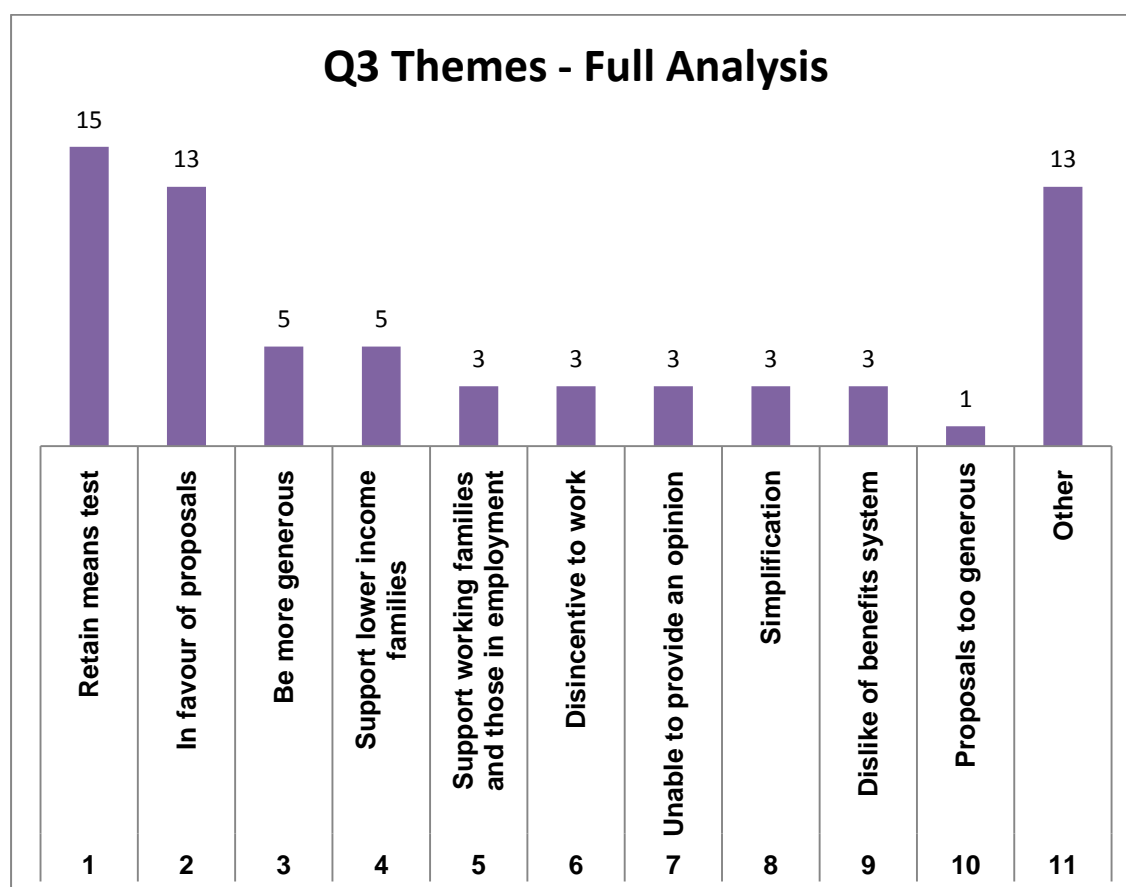
**Q3. In the box below please give any other comments you have about the level you think the bands should be set at and comments about the household groups that are included in the proposed banded scheme.**

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.

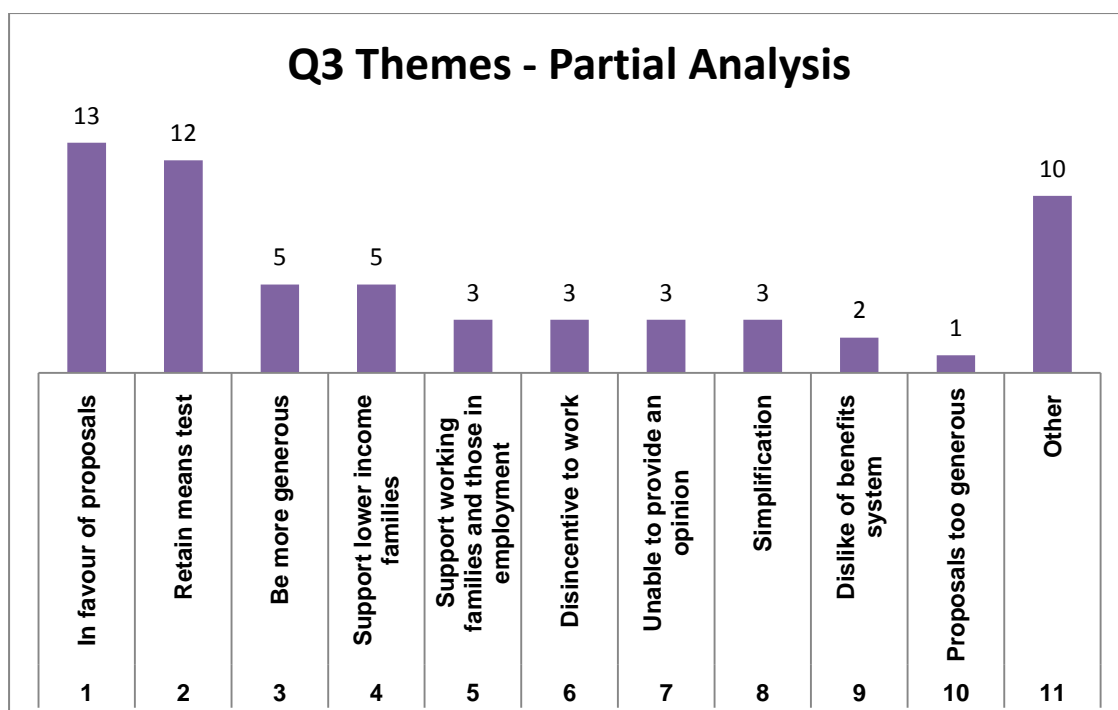
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. However analysis has identified that this does not appear to be the case and there was little change in the themes identified

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.
2. 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 equivalent 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
1. Retain means test/consider household size	<p>'Council must consider not to discriminate household with less than 3 children'</p> <p>'Multiple children, single parent household'</p> <p>'Penalising familiea, great message to send to people living in the borough.'</p> <p>'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.'</p> <p>'There should be something more done for single parents with limited income...for 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 account..so please take this into account.'</p>
2. In favour of proposals	<p>'Seems fair as no money out of the scheme'</p> <p>'Agree with Council Tax Support 29 July-September information booklet.'</p> <p>'Agree that disabled people should get the most help'</p> <p>'Appear set in a fair way'</p> <p>'Levels about correct within limits that council has'</p>
3. Be more generous	<p>'Upto 90% award where nil income '</p>



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

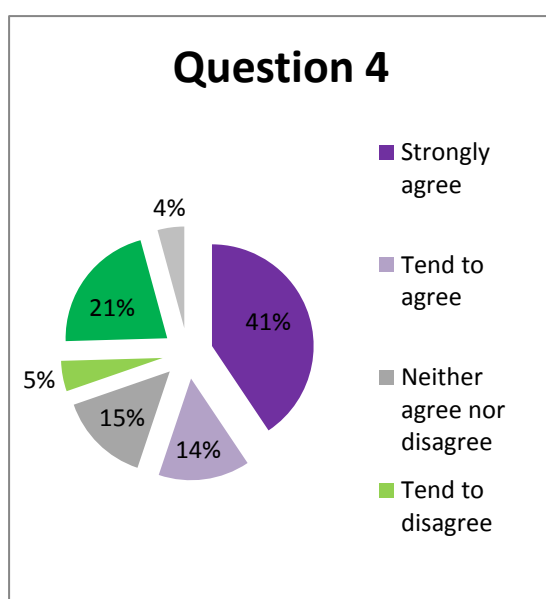
**Q4. While we have proposed to use gross earned income to calculate entitlement, we could use net earned income instead. Do you agree that we should use net earned income instead of gross?**

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.

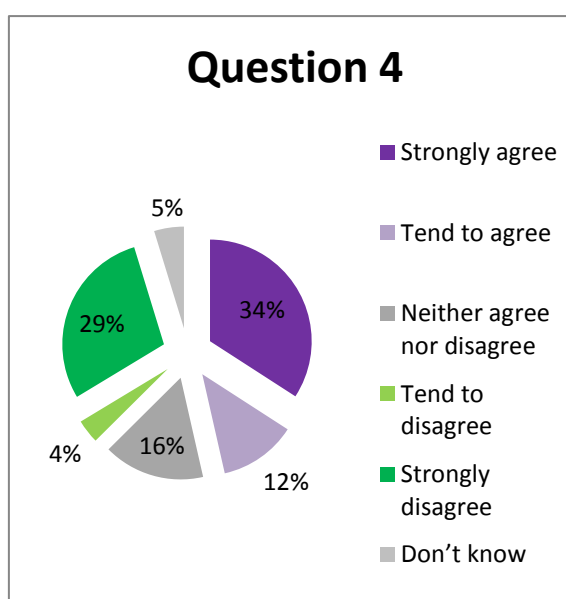
Responses Received	Number	% (out of 211)
In favour	98	46%
Not in favour	69	33%
Neither agree nor disagree/Don't know	44	21%

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)**



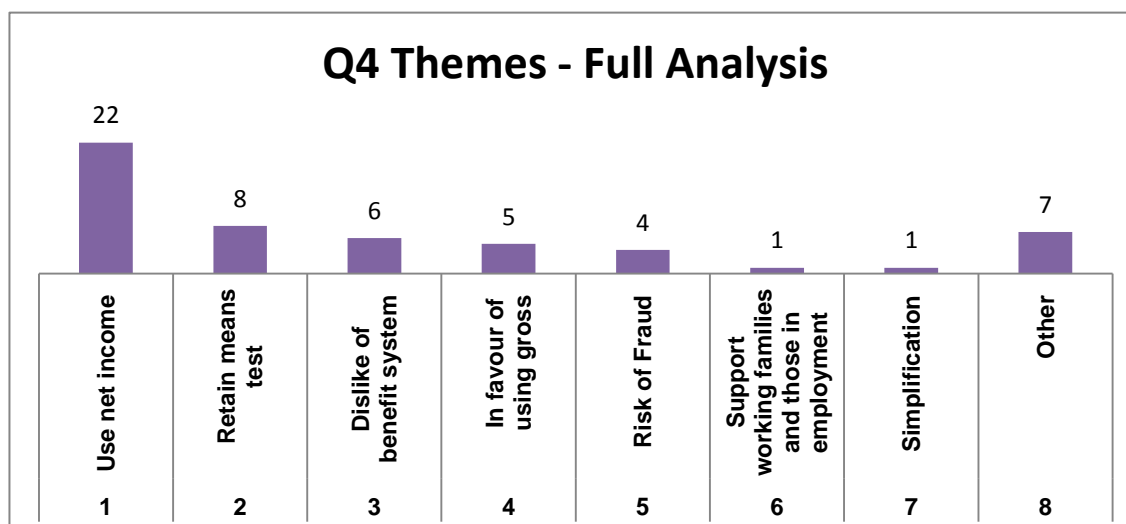
**Full Responses (total number of responses received 210)**



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.



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

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.

<b>The top three most common reasons given as to whether we should consider using net income instead of gross income are listed below:</b>	<b>What people said</b>
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<p>1. Use net income</p>	<p>'People will have other deductions and it is the amount after these that they will have to live on.'</p> <p>'It would be unfair to base on gross income as this gives a false view of a persons take home income espically if they pay pension etc.'</p> <p>'That's what is actually being taken home'</p>
<p>2. Retain means test</p>	<p>'Keep uniform system. People with more income does not mean they have more money to spare.'</p> <p>'Higher income families have dependents and overheads which sometimes income does not cover the overheads and now we have to pay more council tax'</p> <p>'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.'</p>
<p>3. Dislike of benefit system</p>	<p>'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.'</p> <p>Benefit system sucks for hardworking people. Whilst others sit around claiming everything'</p> <p>'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.'</p> <p>'This is penalising those who are working hard and appeasing those who don't.'</p>

### **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**

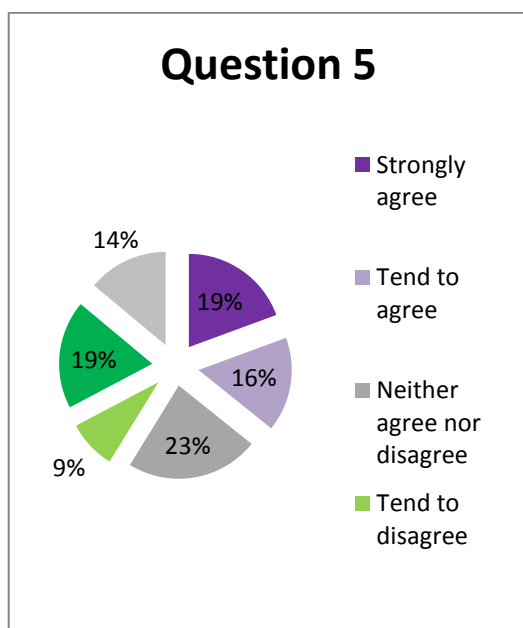
Respondents were asked to select one of 6 options ranging from whether they ‘strongly agreed’ to ‘don’t know’. The table below shows the number of responses received.

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

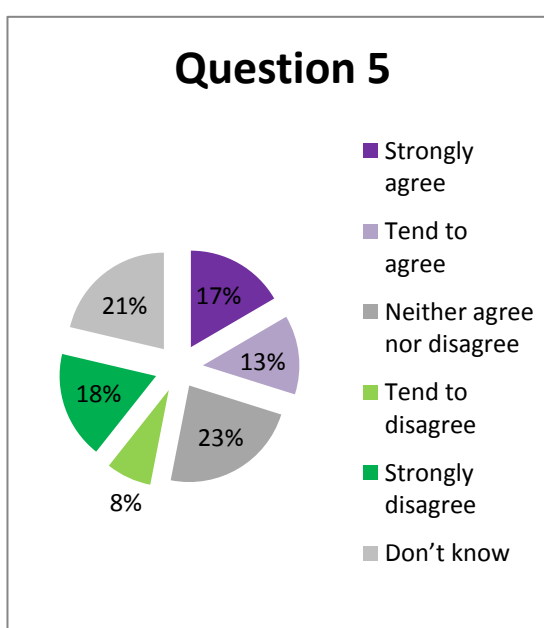
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation, much of the data was distorted. However, analysis of responses to question 5 was less distorted.

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)**



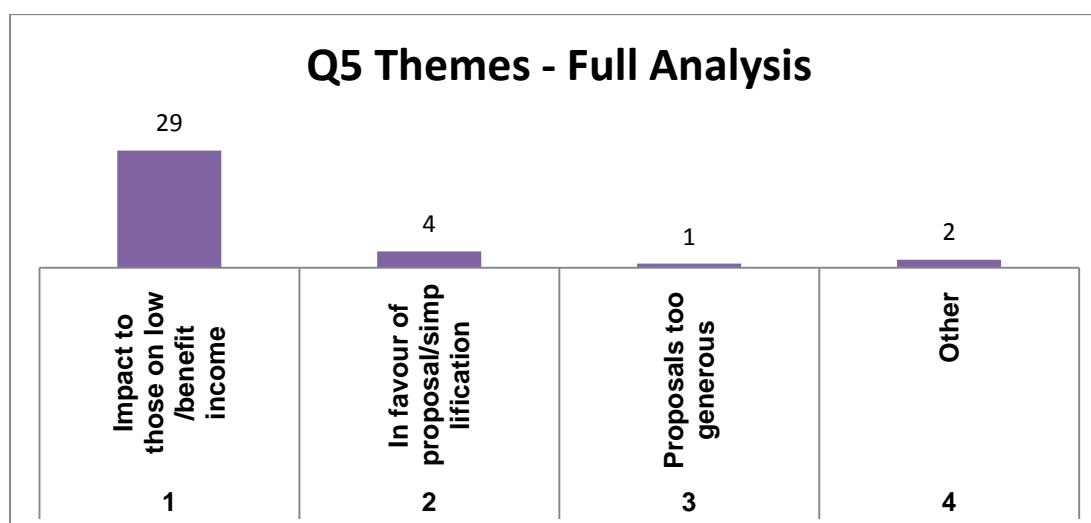
**Full Responses (total number of responses received 210)**



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 not be reduced from 5 non dependant	What people said
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deductions to one regardless of income are listed below:	
1. Impact to those on low /benefit income	<p>'One deduction rate for those out of work, another for non dependant in work'</p> <p>'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'</p> <p>'For some people the £7 flat rate will be a significant drop in income'</p> <p>'£7 is too high'</p>
2. In favour of proposal/simplification	<p>'The less factors that need to be taken into account the better, more efficient and less prone to mistakes or misunderstanding '</p> <p>'The simpler this calculation the better for all, council and payee's.'</p> <p>'This is fair for all households'</p>
3. Proposals too generous	<p>'But the amount should be set higher, say £10.'</p>

### **In Summary**

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.



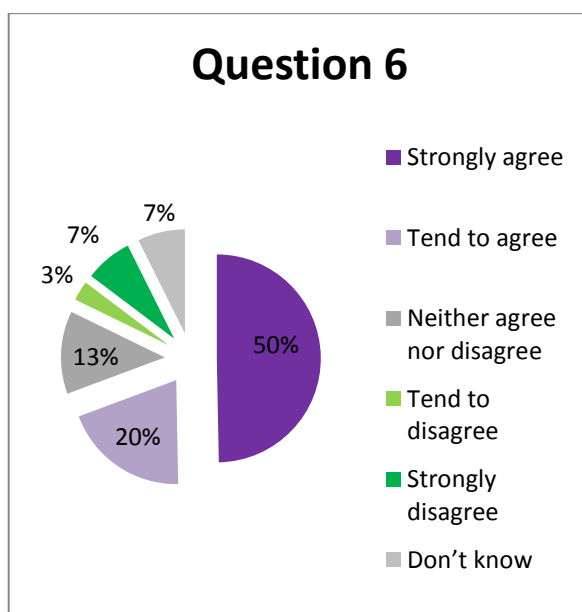
# **Q6. The Universal Credit notification issued to the Council by the Department for Work and Pensions should be treated as a claim for Council Tax Support.**

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.

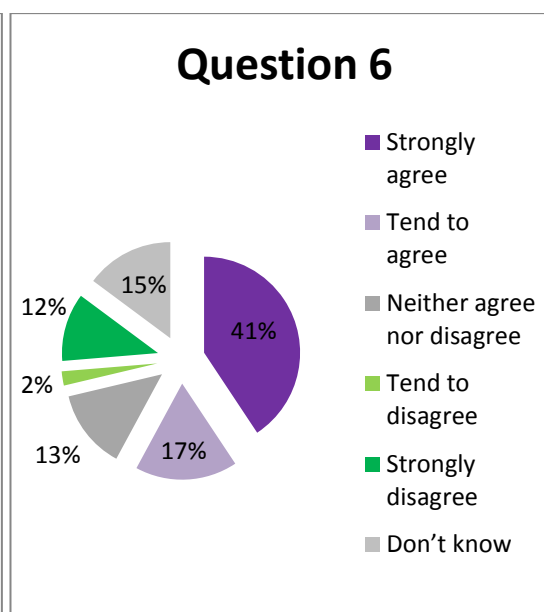
Responses Received	Number	% (out of 211)
In favour	121	58%
Not in favour	29	14%
Neither agree nor disagree/Don't know	59	28%

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)**

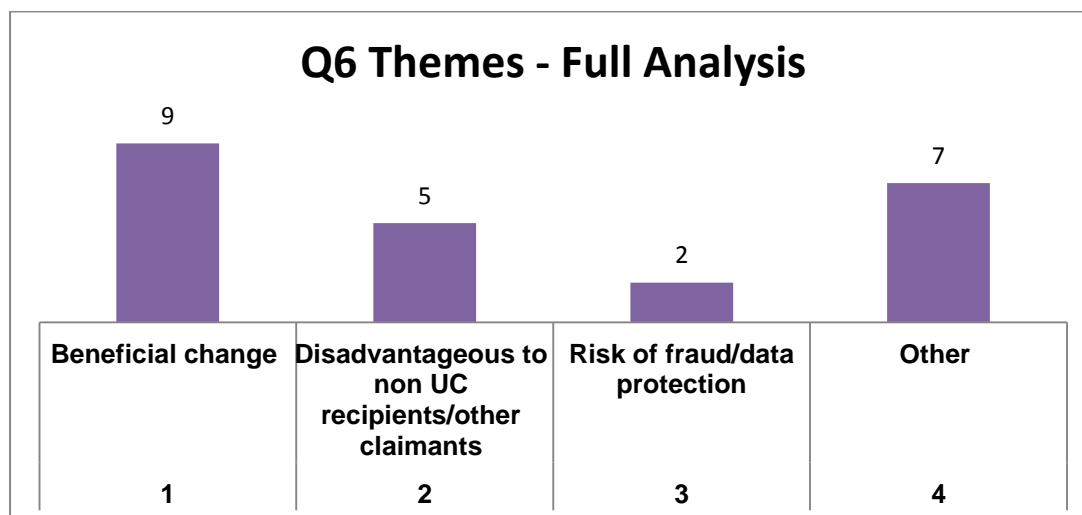


There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

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'*

1. 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
1. Beneficial change	'This would cut out unneccssaary paperwork and speed things up. People claiming UC often think thi

	<p>covers CTR.'</p> <p>'It saves people having to remember to apply separately.'</p> <p>'Always. People may not be aware of this benefit'</p> <p>'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'</p>
2. Concern for non UC recipients/other claimants	<p>'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.'</p> <p>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)</p> <p>'It needs to be fair on everyone.'</p>
3. Risk of fraud/data protection	<p>'A separate claim should be made as there can be multiple residents in the property some who are not entitled'</p> <p>'None of council business to have such data'</p>

### **In Summary**

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.

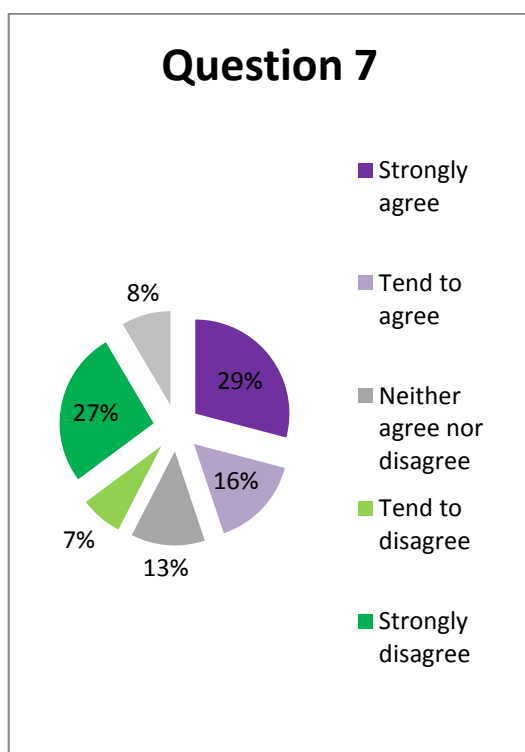
## Q7. For working age people, it is proposed that only those in receipt of Universal Credit should be eligible for Council Tax Support

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.

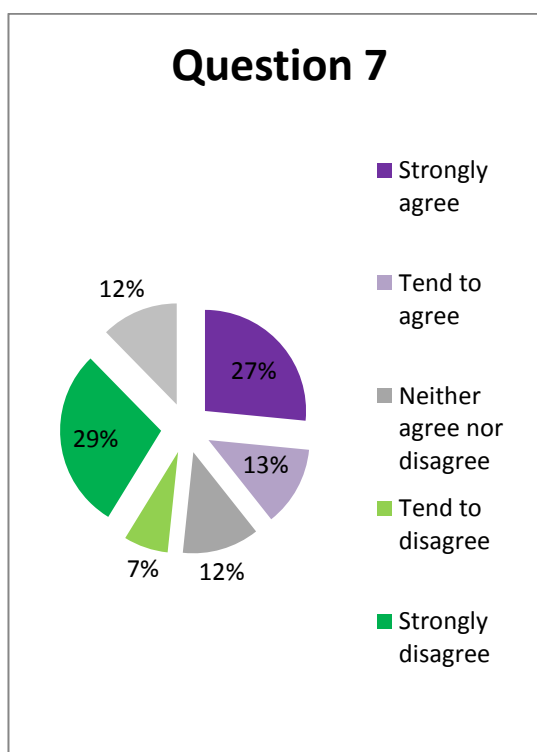
Responses Received	Number	% (out of 211)
In favour	83	40%
Not in favour	76	36%
Neither agree nor disagree/Don't know	52	24%

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)**



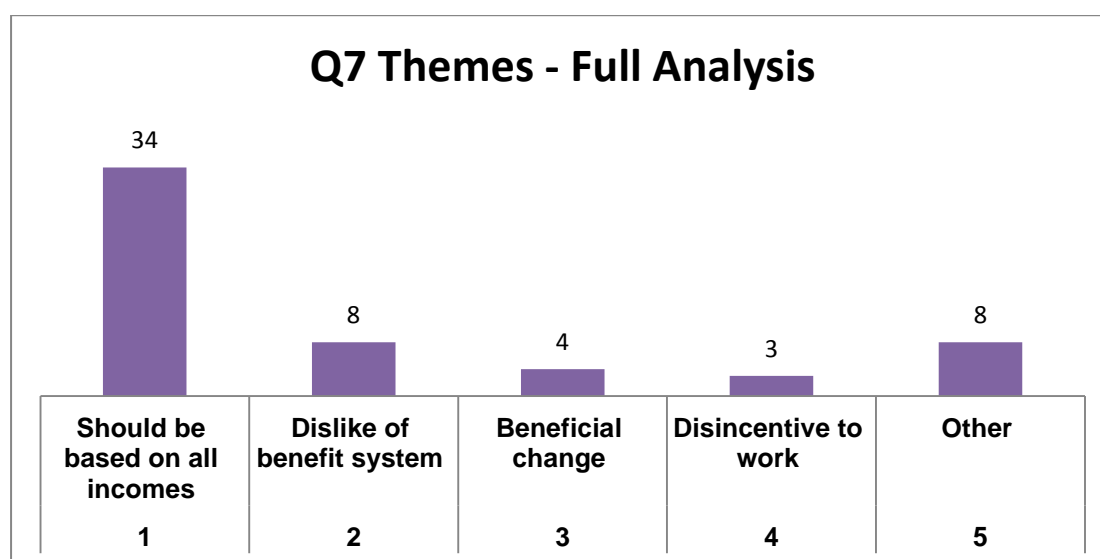
**Full Responses (total number of responses received 210)**



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:

*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. 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'.
3. 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

<b>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:</b>	<b>What people said</b>
<p>1. Should be based on all incomes</p>	<p>'Look at each applicants individual circumstances as not everybody is entitled to universal credit but they could still need support due to low income'</p> <p>'It means people who have the old Benefits would loose out and not be able to use the Council Tax Support scheme'</p> <p>'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'</p> <p>'It should be for all why is it only if you are in receipt of benefits?'</p> <p>'It needs to be fair on everyone.'</p> <p>'Look at everyone's circumstances '</p>
<p>Dislike of the benefits system</p>	<p>'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.'</p> <p>'It is unfair on working class people to pay for those not in work.'</p> <p>'Harrow needs to start attracting well-off people back into the area, rather than poor people from around the world'</p>

	dependent on my Council tax.
3. Beneficial change	<p>'Universal Credit is a low weekly sum paid therefore council tax support will definitely be needed.'</p> <p>'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 '</p> <p>'Removes duplicate assessments'</p>

### **In Summary**

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.



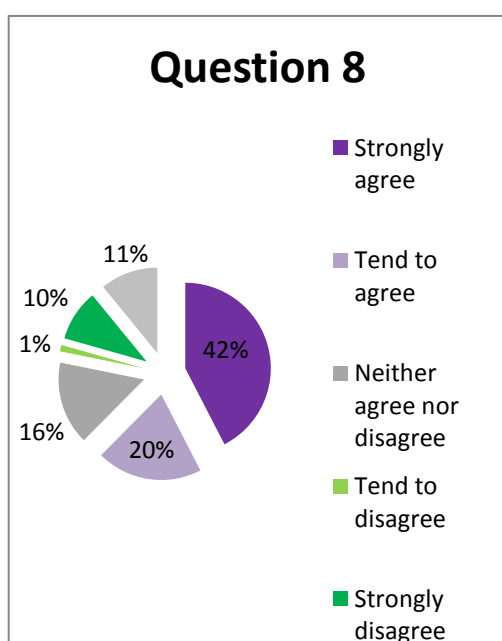
**Q8. Transitional protection should be offered to those in receipt of Universal Credit and Council Tax Support in Harrow as at 31/03/2020 who will see a reduction of 10% or more to their Council Tax Support entitlement**

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.

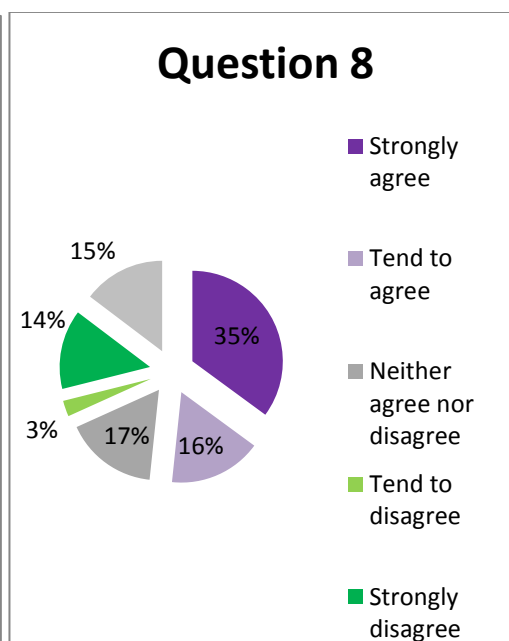
Responses Received	Number	% (out of 211)
In favour	109	51%
Not in favour	36	17%
Neither agree nor disagree/Don’t know	66	32%

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)**

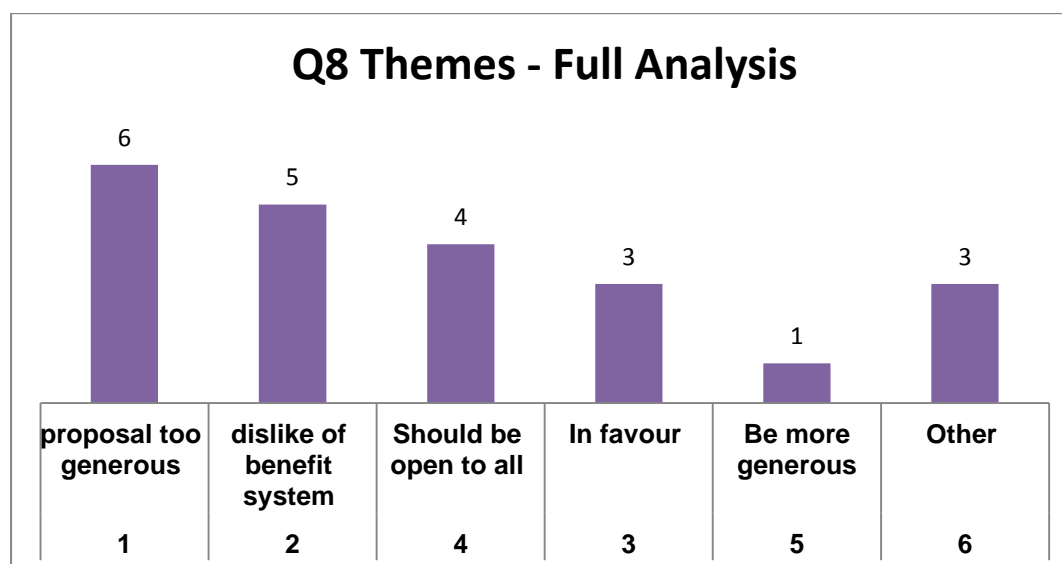


There was also a free text box for respondents to tell us why, and what we could do instead, if they selected tend to disagree or strongly disagreed to the proposal.

A 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'*

1. 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 given as to why transitional protection should not be offered to those that will	What people said
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<p><b>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:</b></p>	
<p>1. Proposal too generous</p>	<p>'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'</p> <p>'It is in year 2020 in March 6 months from now, if you inform claimant now they can start making provision'</p> <p>'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.'</p>
<p>2. Dislike of the benefits system</p>	<p>'Most people should work and not expect benefits'</p> <p>'They can move property and have been given enough notice'</p> <p>'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.'</p>
<p>3. Proposals should be more generous/ fair to all</p>	<p>'Nobody should lose '</p> <p>'It needs to be fair on everyone.'</p> <p>'Although I agree with in principle with transitional protection, I don't understand the need to penalise people in</p>

	hardship. '
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### **In Summary**

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.**

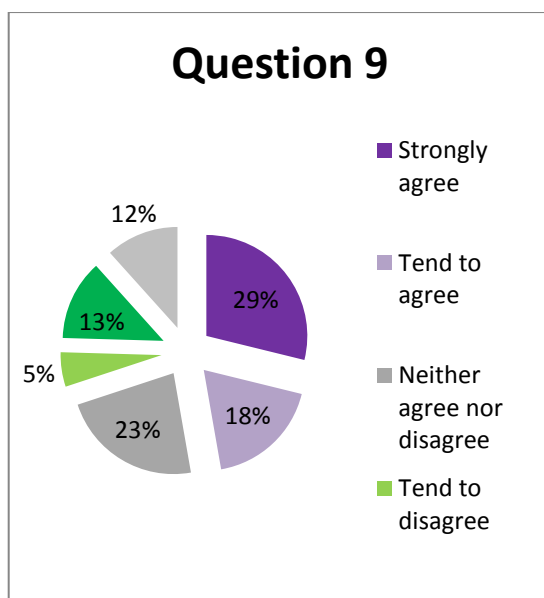
Respondents were asked to select one of 6 options ranging from whether they ‘strongly agreed’ to ‘don’t know’. The table below shows the number of responses received.

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

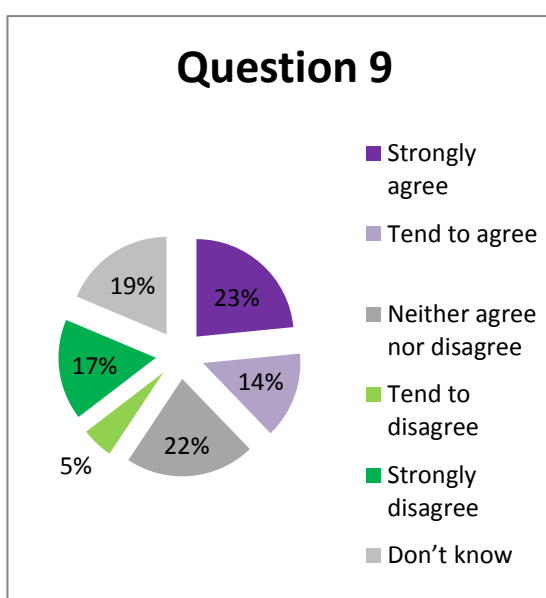
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was distorted. Analysis of responses excluding this cohort showed a greater percentage of those in favour of the proposal (set out in table Partial Responses below).

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)**



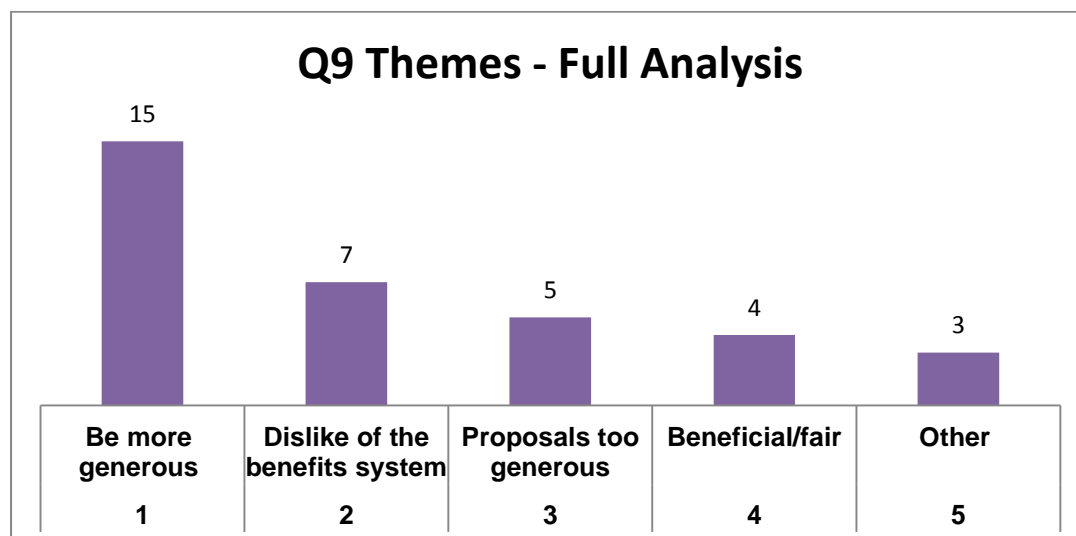
**Full Responses (total number of responses received 210)**



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 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'*

1. 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.

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

### **In Summary**

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.

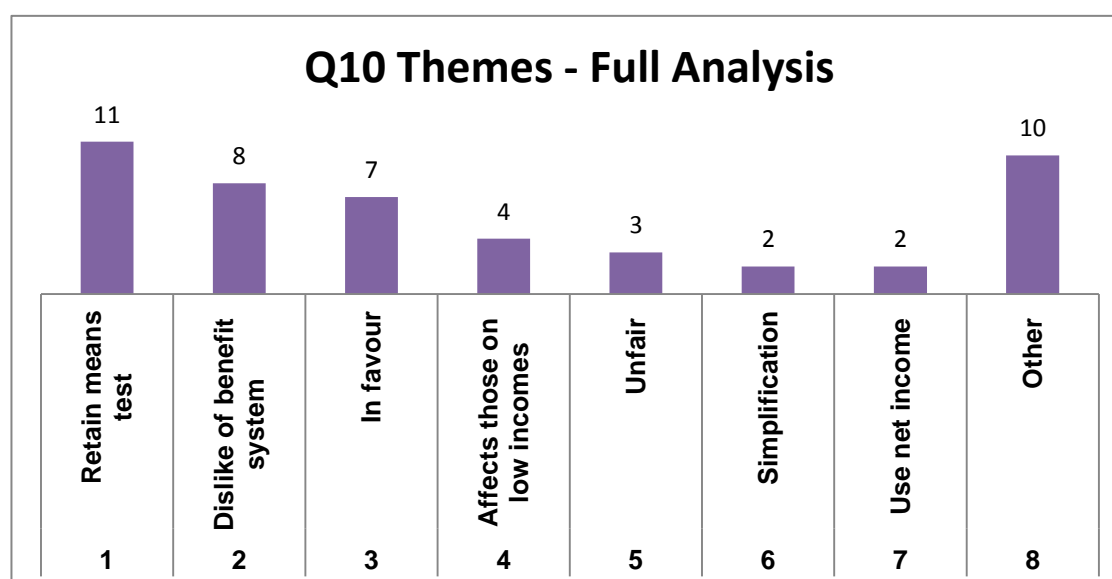
# **Q10. Is there anything else you would like to tell us about these proposals or any alternative options you would like us to consider?**

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.

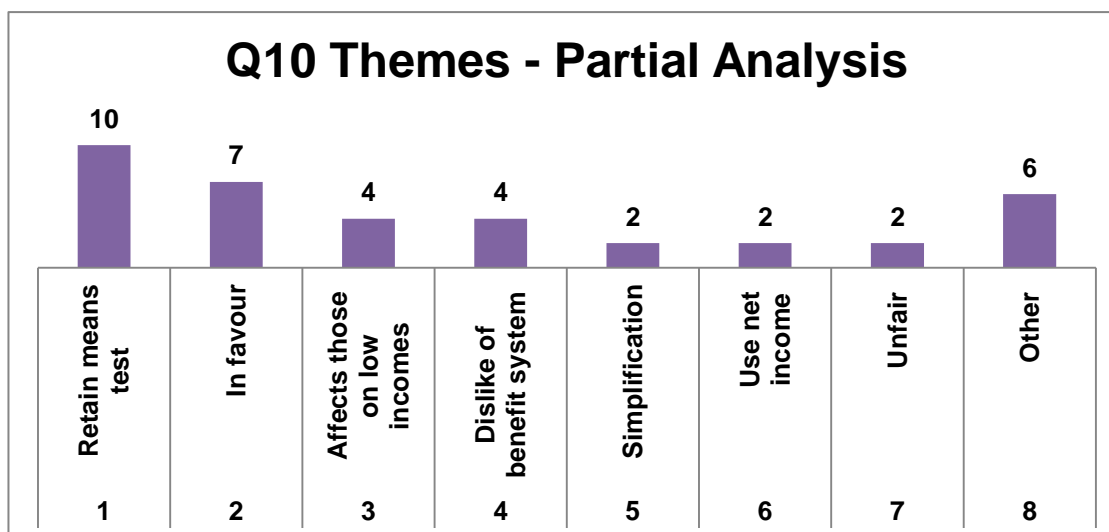
It is worth noting the free text comments and understanding the public's views on the proposals and any alternatives they may have asked us to consider. The issues most commonly raised were:

*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 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	<p>'Listen. Case by case. Everyone is individual.....'</p> <p>'It needs to be fair on everyone.'</p> <p>'Earners and non-earners should be treated equally.'</p> <p>'Keep the current scheme'</p> <p>'All benefits need to be counted. Figures need to be properly analysed and no extra cost to council and net income taken into account. '</p> <p>'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'</p>
2. Dislike of benefit system	<p>'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.'</p> <p>'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.'</p> <p>'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 '</p> <p>'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</p>

	save money and can reduce council tax who work hard to make ends meet.'
3. In favour/fair	<p>'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.'</p> <p>'Seems Fair'</p> <p>'Its palatable for todays market '</p> <p>'Well on the surface of these proposals they read pretty good so far'</p> <p>'Seems Ok as a whole'</p> <p>'Just do it. The proposal is the best for those who need more support financial. Good luck!'</p>

### **In Summary**

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.

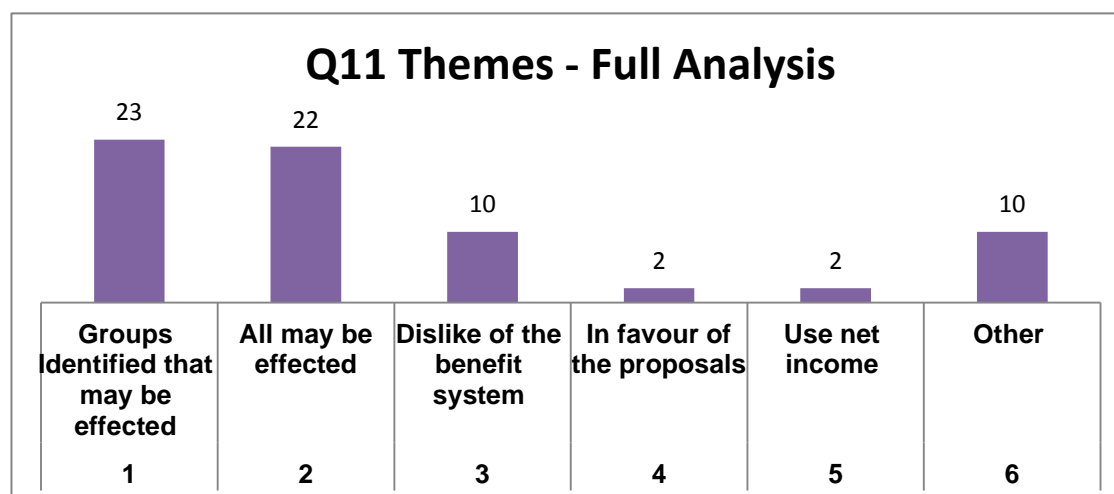
**Q 11. If you think the proposals will affect particular groups or individuals more than others, please give your view on this below stating what the impacts will be and how you think we may address this**

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.

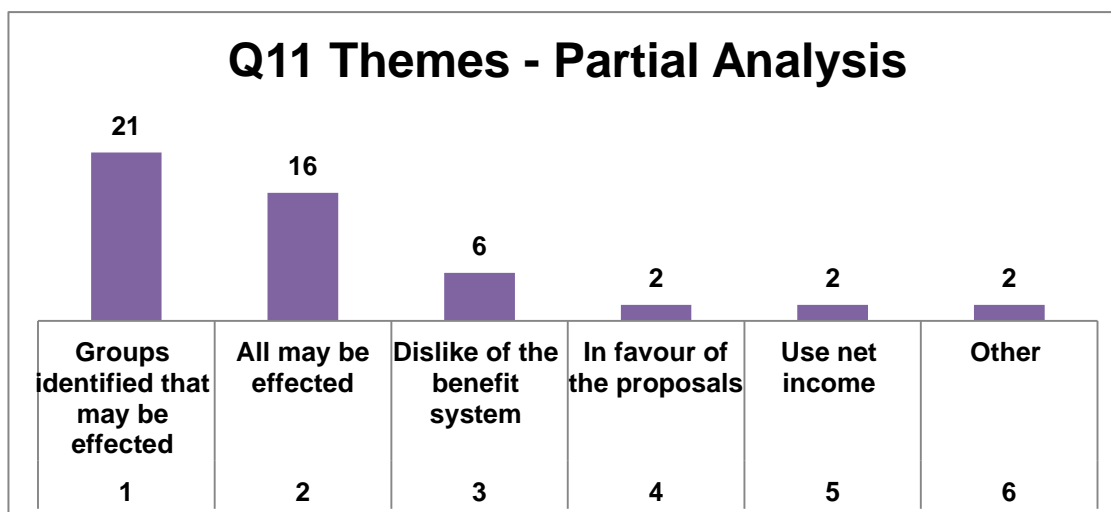
As mentioned in the section above and as a result of the cohort of persons that misunderstood the principles of the consultation the data was open to being distorted. However analysis has identified that this does not appear to be the case and there was little change in the themes identified

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	<p>'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?'</p> <p>'The proposal affects couples with children</p>

	<p>who earn more.'</p> <p>'Yes will effect those who earn more '</p> <p>'Young people might be effected'</p> <p>'More should be given to help single people. Multiple incomes in a house can not be compared to one household income.'</p> <p>'People with poor English'</p> <p>'This will definitely affect working class people when they would be able to survive during no income periods or low income periods.'</p>
2. All may be effected	<p>'Yes but don't know how '</p> <p>'Yes but don't know which groups will effect more '</p> <p>'Depends on their circumstances. Each case if different '</p> <p>'Groups and individual needs varies. Need to be considered'</p> <p>'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.'</p>
3. Dislike of the benefit system	<p>'Yes. Made too easy for not british resident to claim draining Council of resources'</p> <p>'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.'</p> <p>'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</p>

	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'
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### **In Summary**

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

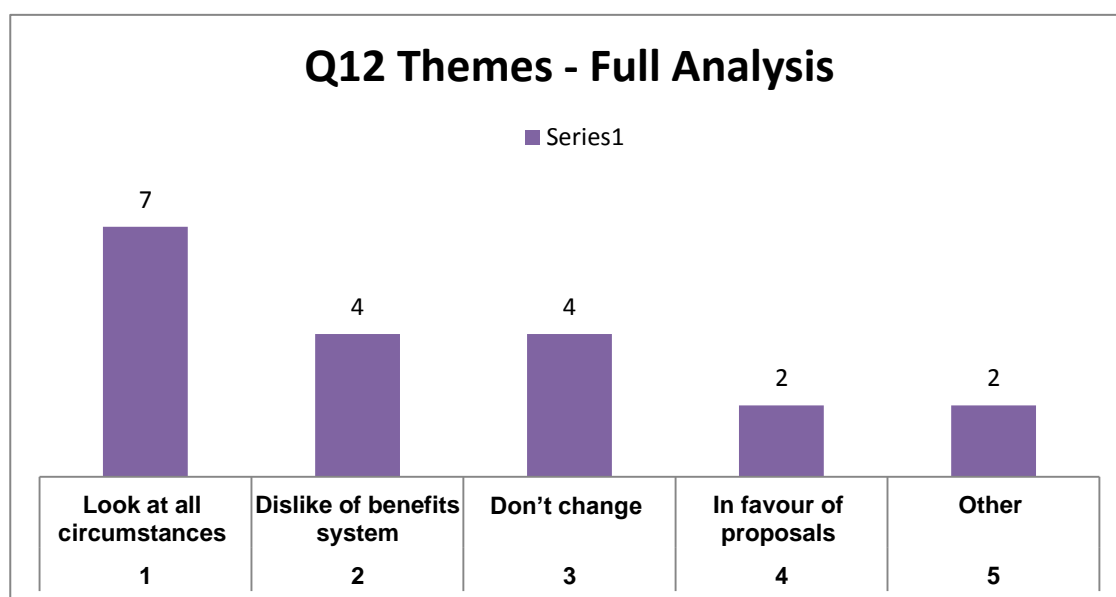
## Q12. Other Comments.

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

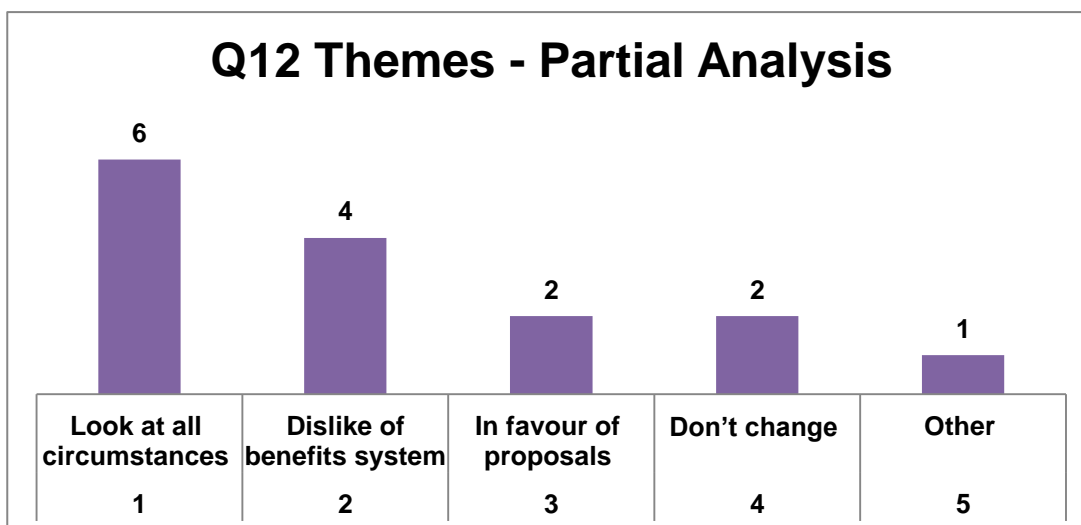
It is worth noting the free text comments and understanding the public's views on the proposals and in general. The issues most commonly raised were:

*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'*

1. 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,

	<p>here in Harrow one has to pay £1350. If claimant wants to stay on benefits should be asked to move or cut the benefits.'</p> <p>'Please help and give support and benefits for people who are working and in a low income due to many reasons.</p> <p>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'</p>
3. Don't change	<p>'As I said keep the current scheme in place and forget about the Universal Credit roll out in Harrow and elsewhere'</p> <p>'So far, things were running smoothly, this new proposed schemes is creating complications as theres no clear undesranding of the schemes purpose.'</p> <p>'Disagree with this approach'</p> <p>'Bad proposal'</p>

### **In Summary**

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	<ul style="list-style-type: none"> <li><input type="checkbox"/> Comments made that Council Tax is too high already and the annual increase in Council Tax.</li> <li><input type="checkbox"/> 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.</li> <li><input type="checkbox"/> Reductions should be considered for single parents and young adults and for the terminally ill to be considered.</li> <li><input type="checkbox"/> Suggestions that Council shouldn't be targeting the working age and the burden should be shared.</li> <li><input type="checkbox"/> Suggestions were made in respect of the Council Tax Bandings and that these should be reconsidered and re-banded.</li> <li><input type="checkbox"/> Questions raised on how Council Tax is spent.</li> </ul>
Council/Government spending	<ul style="list-style-type: none"> <li><input type="checkbox"/> Suggestions that Council Spending is better used for improved facilities and services including better customer services, waste collections and highways maintenance</li> </ul>

	<ul style="list-style-type: none"> <li><input type="checkbox"/> Many people raised concerns with Universal Credit as a benefit, the claiming process and the effect that this has on many claimants.</li> <li><input type="checkbox"/> 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</li> <li><input type="checkbox"/> Communication between Council and other agencies, for example the Department for Works and Pensions, should be improved.</li> </ul>
Employment	<ul style="list-style-type: none"> <li><input type="checkbox"/> More Government schemes should be available such as apprenticeships schemes</li> <li><input type="checkbox"/> Increase employment avenues for the low skilled/semi skilled workforce</li> <li><input type="checkbox"/> More need to be done to promote services to those that wish to enter the workforce through training and other methods</li> </ul>
Operational	<ul style="list-style-type: none"> <li><input type="checkbox"/> Can't get information about the help that is available in Harrow</li> <li><input type="checkbox"/> Find it difficult to contact the Council and access Council services i.e. Access Harrow</li> <li><input type="checkbox"/> Need a different collection policy for those who cannot pay.</li> </ul>

Consultation	<input type="checkbox"/> Suggestions put forward to ensure consultation inclusive  <input type="checkbox"/> Comments regarding the consultation and the consultation process.
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## 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 know	1	13%

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 know	1	13%

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 know	0	0%

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 fund, 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 know	2	25%

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 know	0	0%

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 know	0	0%

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 know	0	0%

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 know	1	17%

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 health 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	<ul style="list-style-type: none"> <li>• Most were agreeable that the proposals of using an income banded scheme and use of the Universal Credit notification as a claim were favourable.</li> <li>• 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.</li> <li>• It was queried how the bands had been determined.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• Queries made as to why we chose to consult now</li> <li>• 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.</li> </ul>
Citizens Advice Workshop	<ul style="list-style-type: none"> <li>• Would the proposal mean that people who have a change of circumstances e.g</li> </ul>

	<p>lose their job will still be eligible for CTS?</p> <ul style="list-style-type: none"> <li>• Non dependant deduction – 1 rate of Non dependant deduction does not align with Harrow Councils values to protect those with low income.</li> <li>• Same with families with children who lose out more - again does not align with Harrow Council's values to protect children.</li> <li>• Non dependant deduction – does not take into account families with more than 3 children – Universal Credit only counts 3 children in the household</li> <li>• 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?</li> <li>• 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.</li> <li>• The more children you have, the more Council Tax Support you should get – disadvantages larger families.</li> <li>• 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</li> <li>• General consensus was net income preferable as people understand this as it is what is in their hand.</li> <li>• 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</li> </ul>
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	<p>Council.</p> <ul style="list-style-type: none"> <li>• 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 rate of £3.30 would be significant.</li> <li>• What about those that have taken early retirement due to ill health 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.</li> <li>• 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.</li> <li>• One attendee stated that the information in the booklet was complex and it should have been simplified and the booklet should have been shorter!</li> <li>• One attendee could not understand why families with children were disadvantaged more.</li> </ul>
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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.



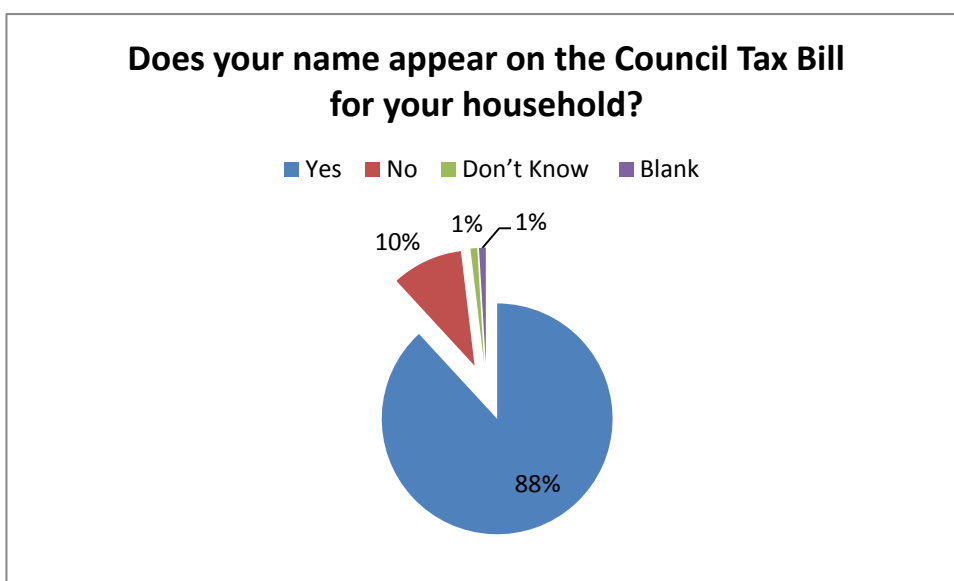
Notwithstanding the above comments, the GLA is content to endorse the broad approach proposed by Harrow for the scheme from 2020-21 onwards, recognising that the proposed scheme is in accordance with the general principles set out by Government, as set out above.

## 5. MONITORING INFORMATION

### 5.1 About You

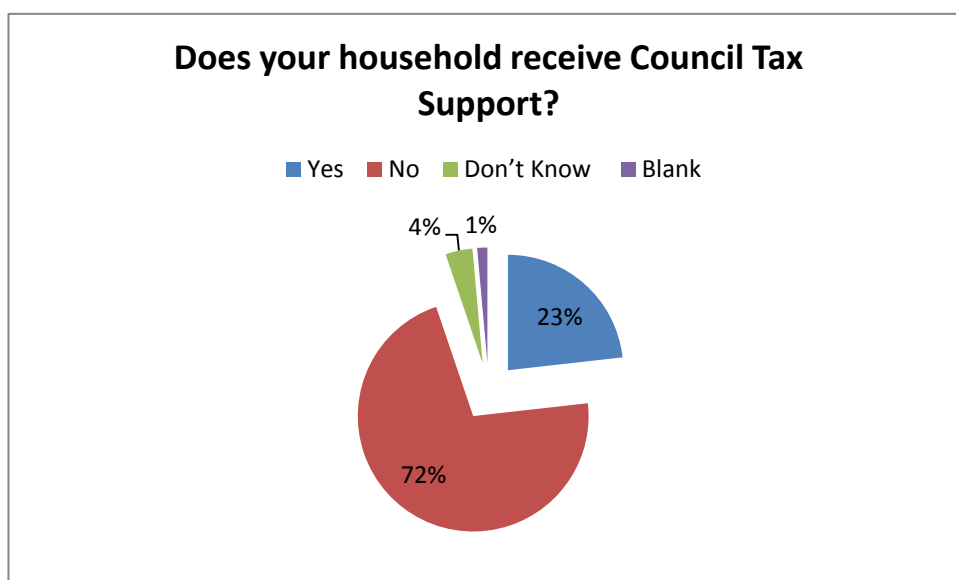
5.1.1 The Questionnaire asked respondents to confirm whether they appeared on the council Tax Bill and/or were in receipt of Council Tax Support. The table below are inclusive of the papers and online responses.

**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%

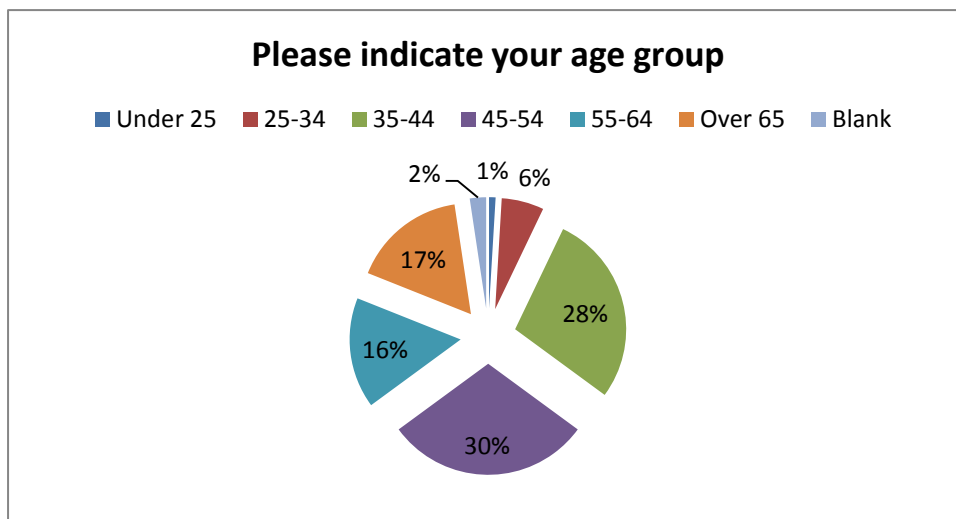
**Q: Does your household receive Council Tax Support?**



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

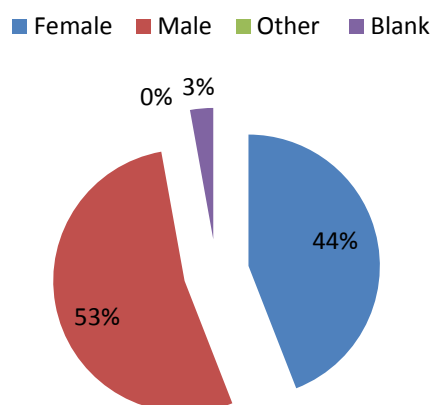


**Q: Please indicate your age group**

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

### What gender are you?

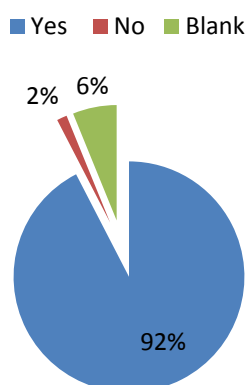


**Q: What gender are you?**

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

## 5.4 Gender Identity

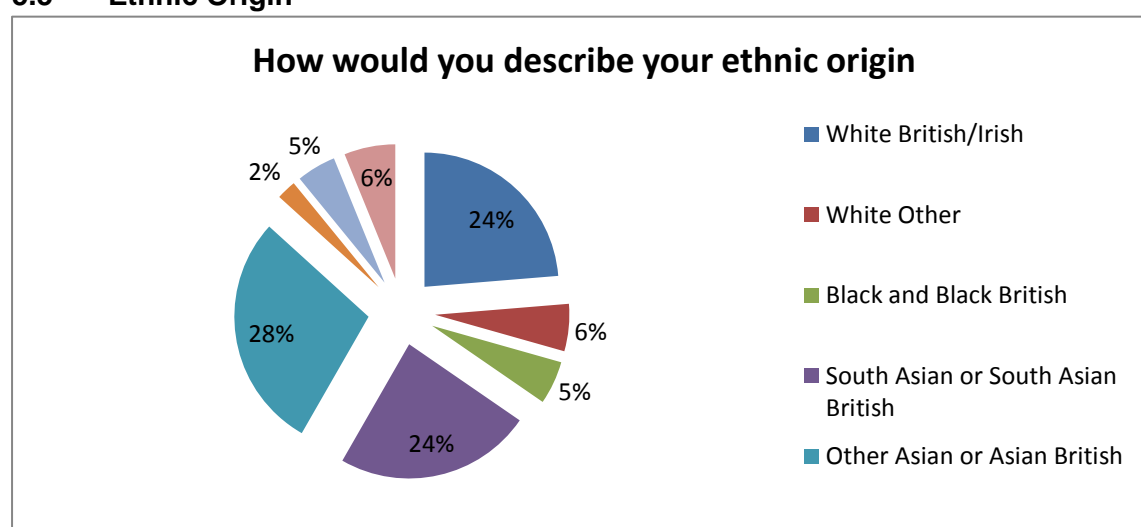
### Do you identify with the gender you were assigned at birth



**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%

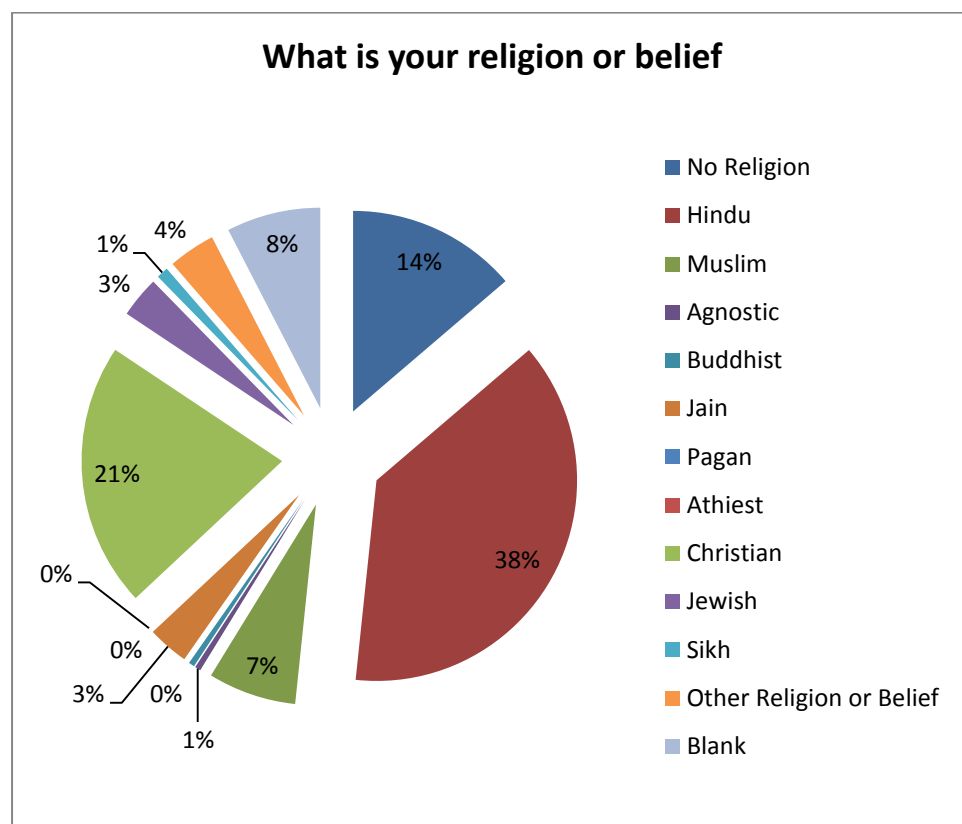
**5.5 Ethnic Origin**



**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%

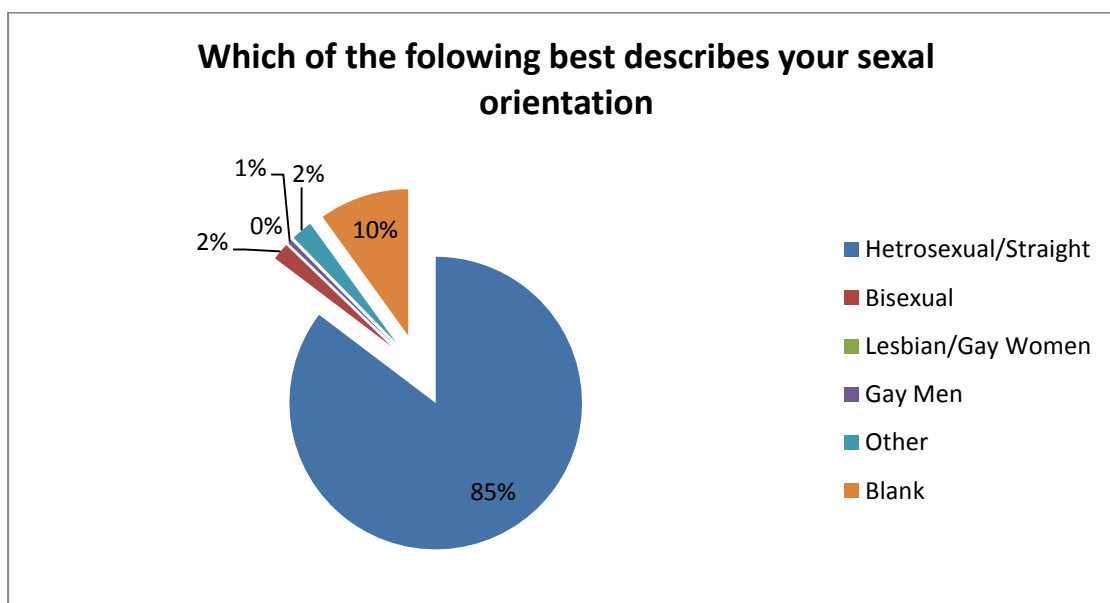
## 5.6 Religion or Belief



**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%

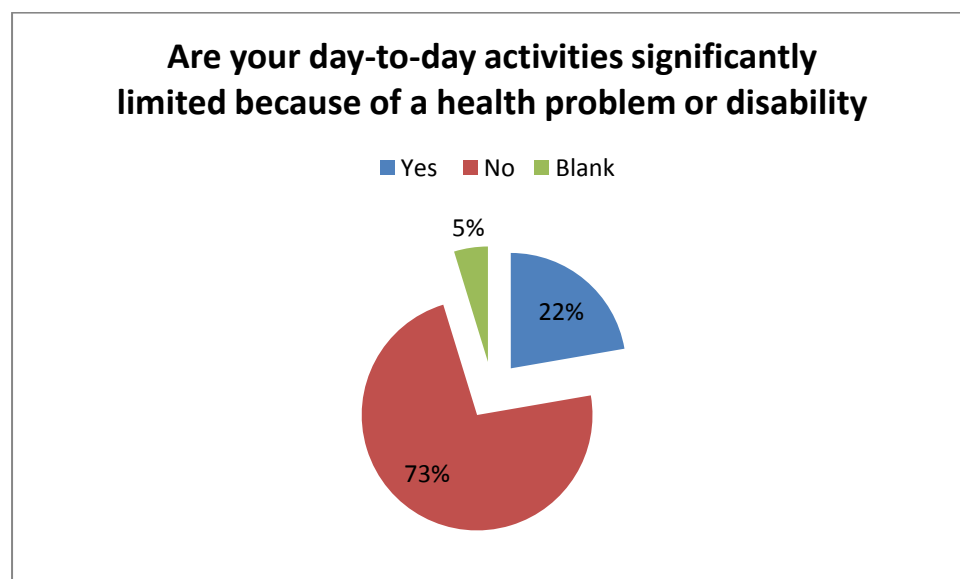
## 5.7 Sexual Orientation



**Q: Which of the following best describes 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.

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Chart to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

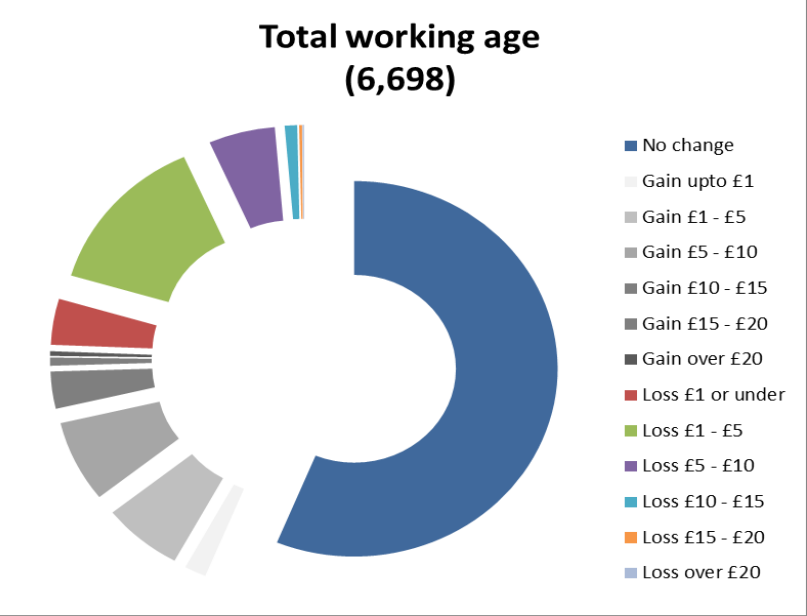
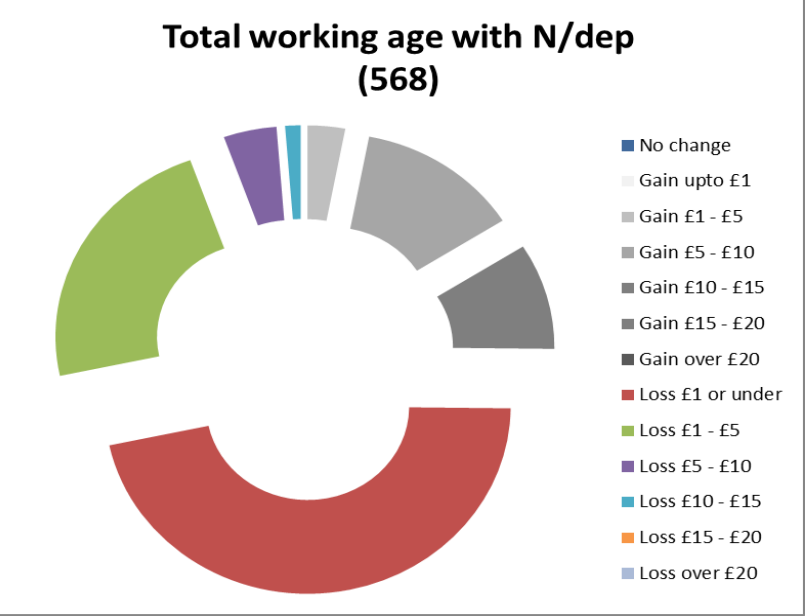


Chart to show the impact of the proposed change to non-dependant deductions only



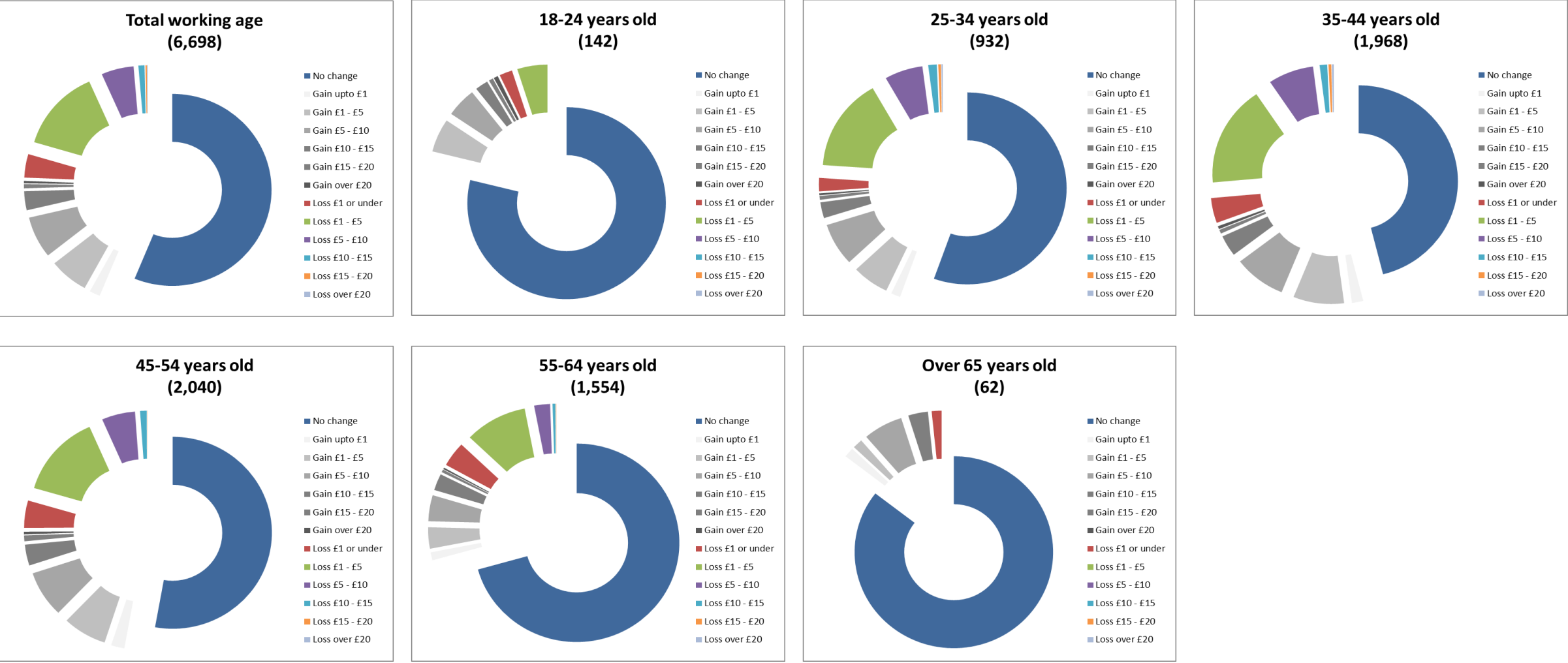
Note, there are a further 1,041 households with non-dependants who do not have a deduction taken and will experience no change as a result of these proposals

Age

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

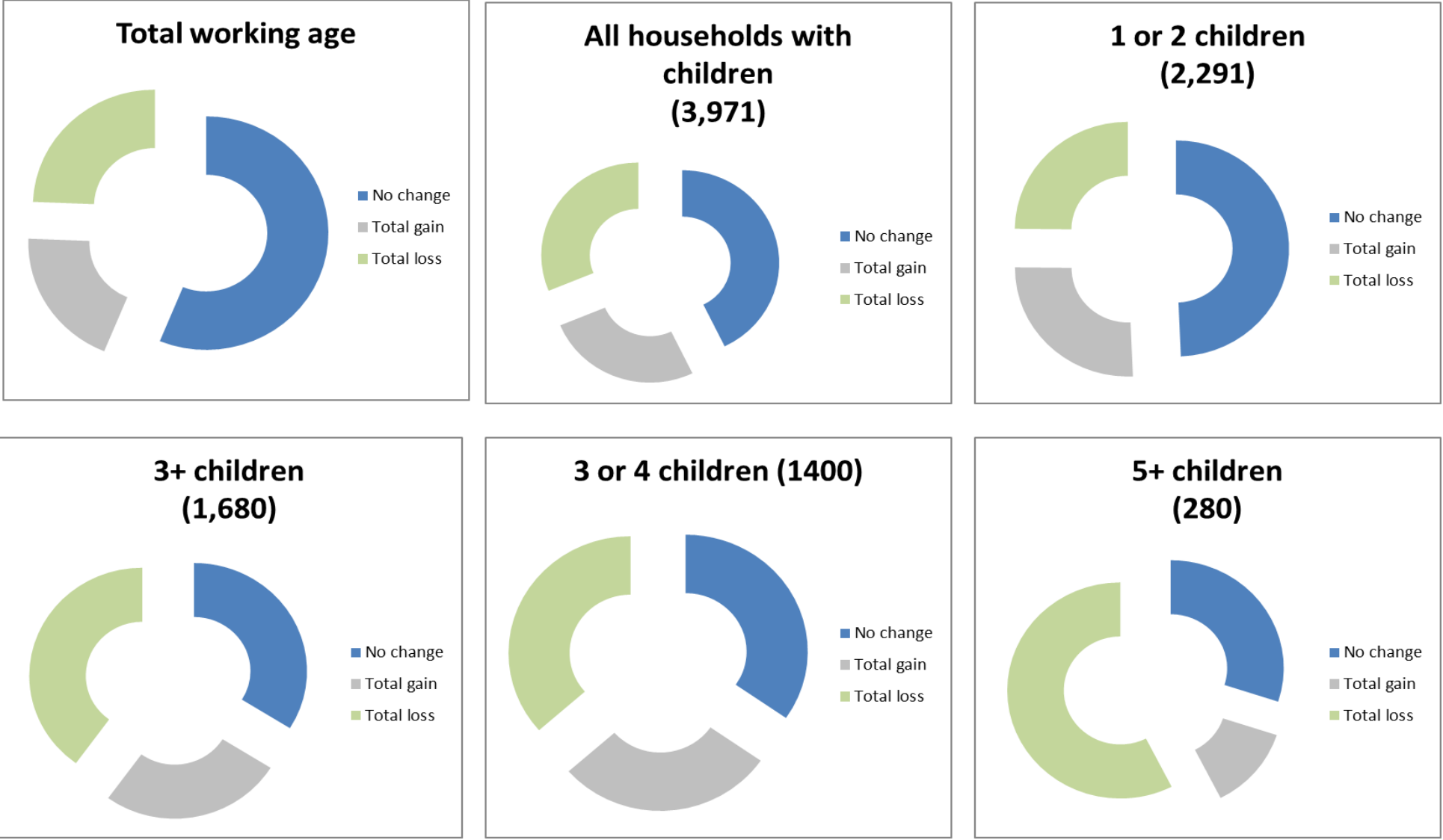


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

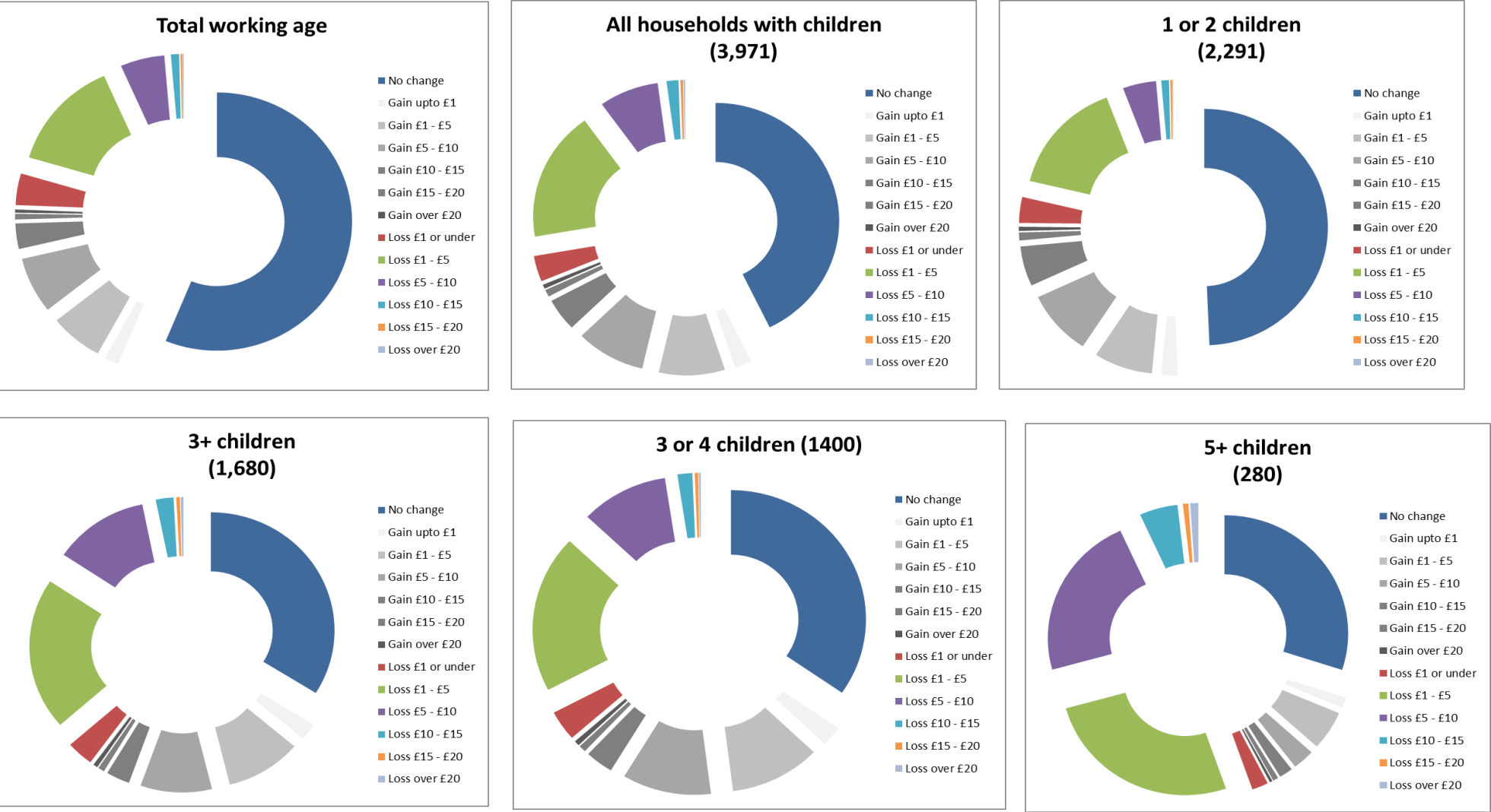


Households with children

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

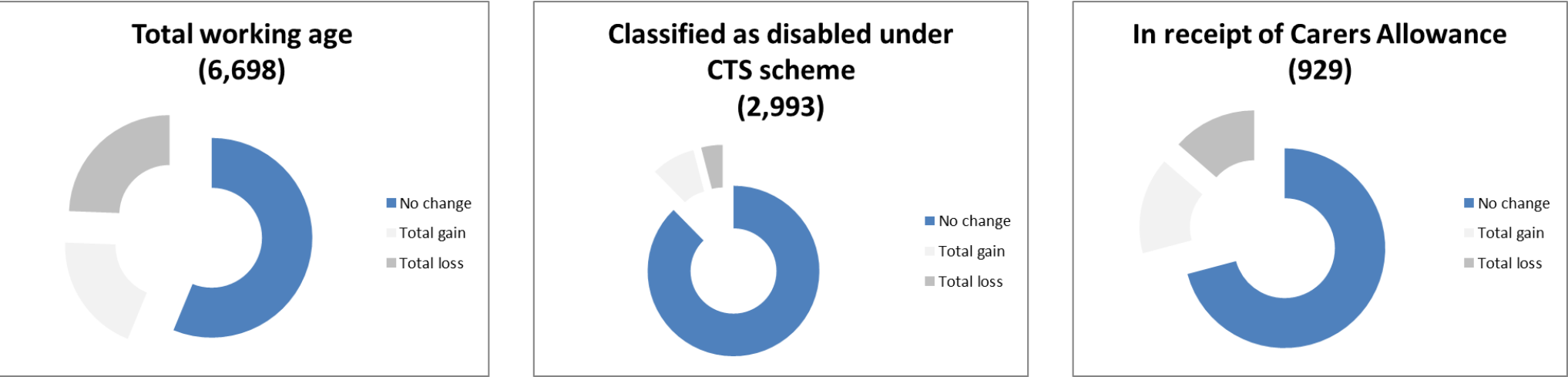


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

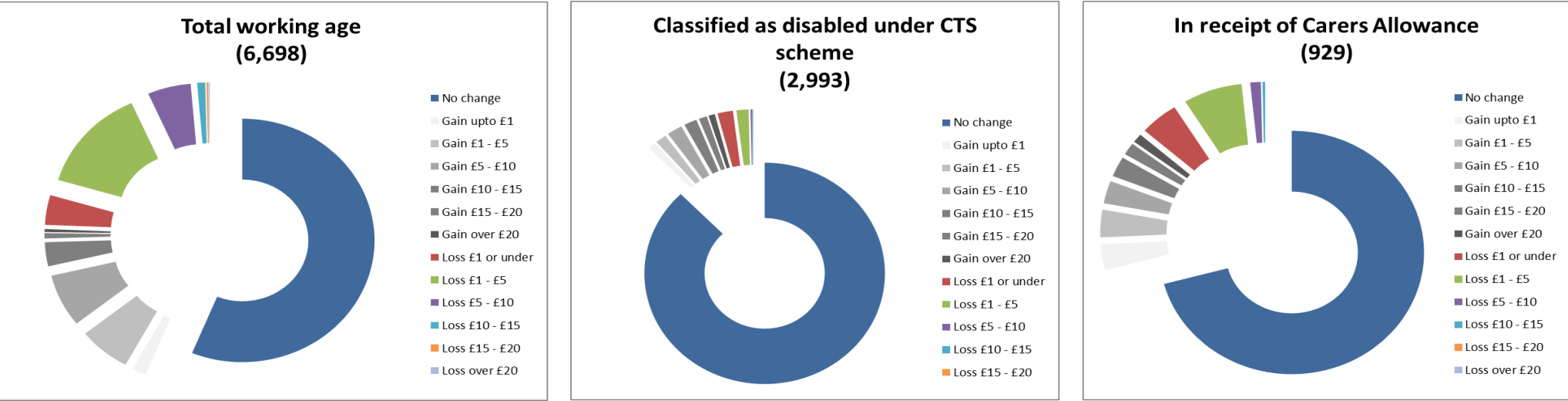


**Households classified as disabled under the Council Tax Support scheme or in receipt of Carers Allowance**

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

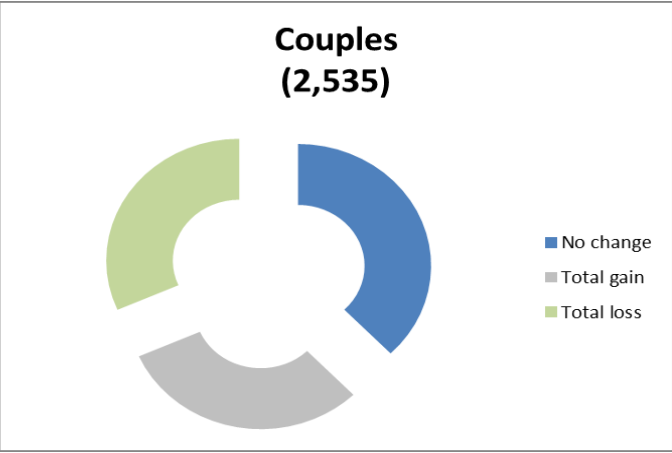
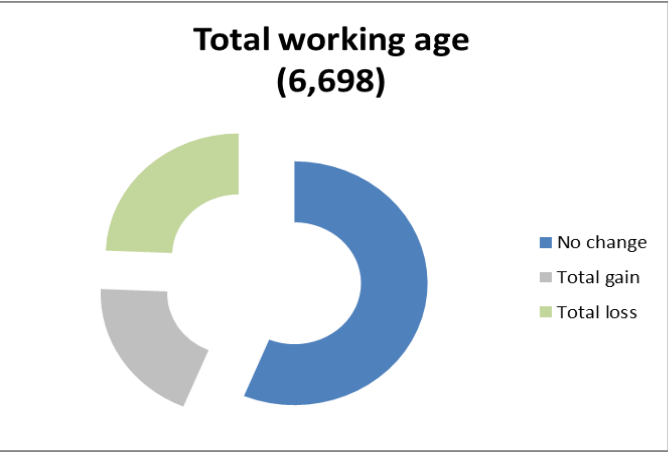


**Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support**

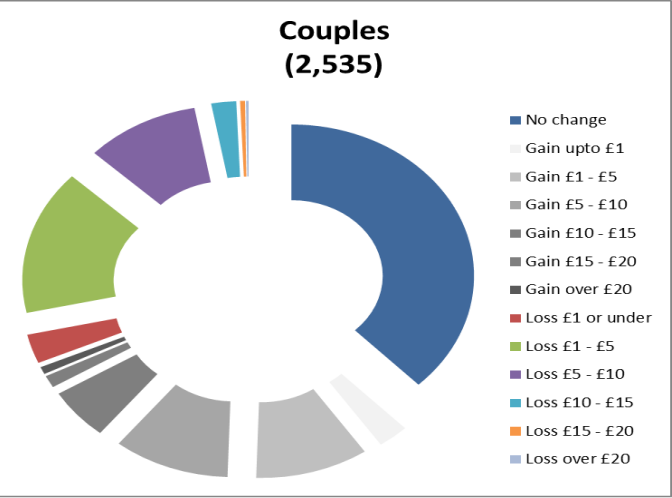
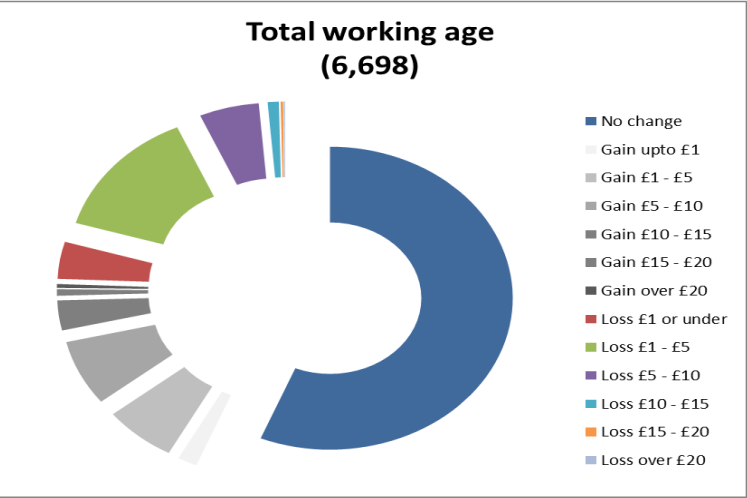


**Households where the claimant has a partner**

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

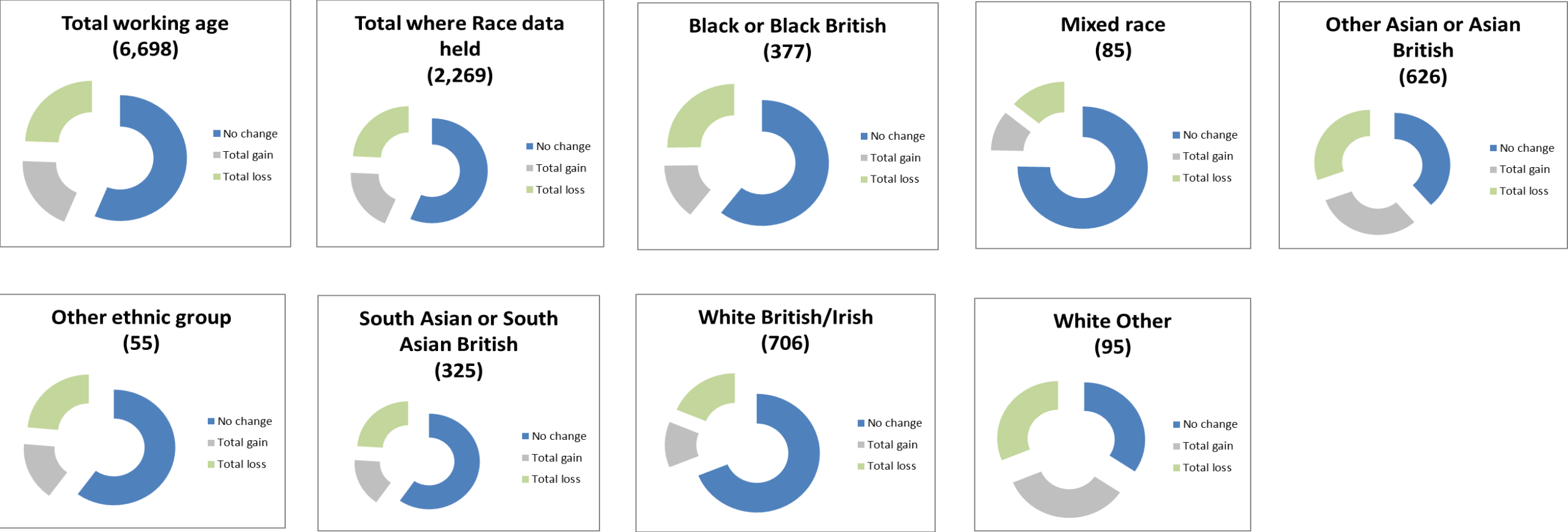


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

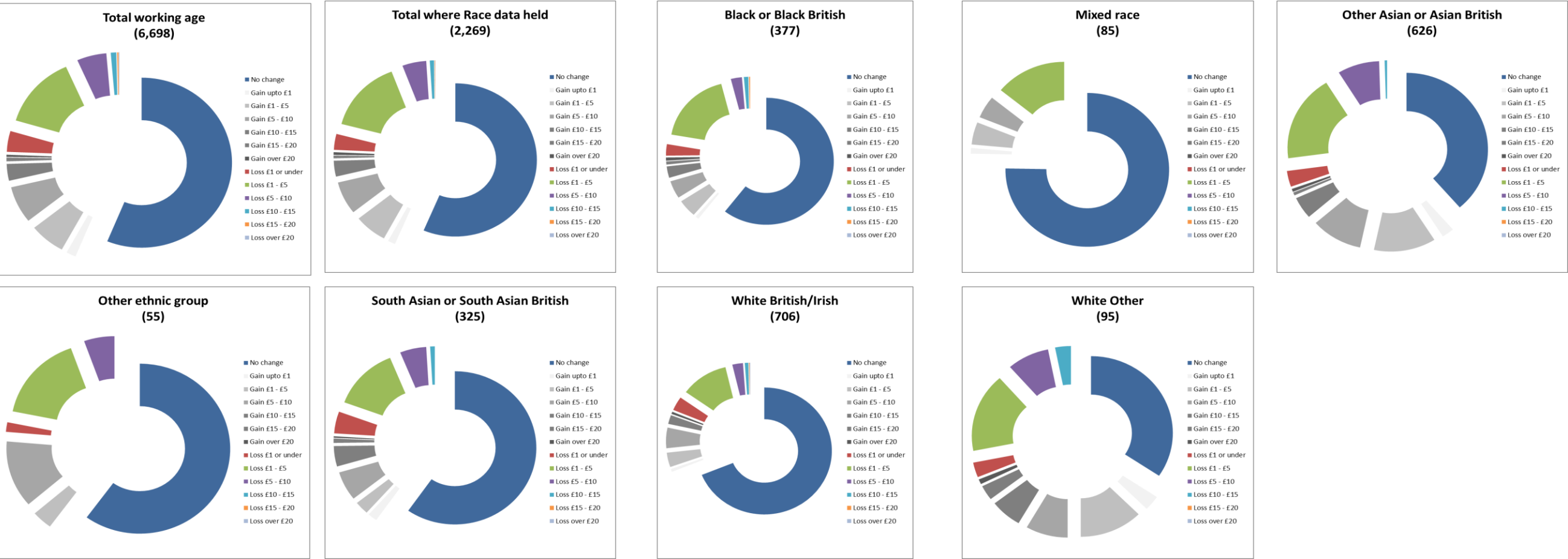


Households broken down by Race of claimant

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category



Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

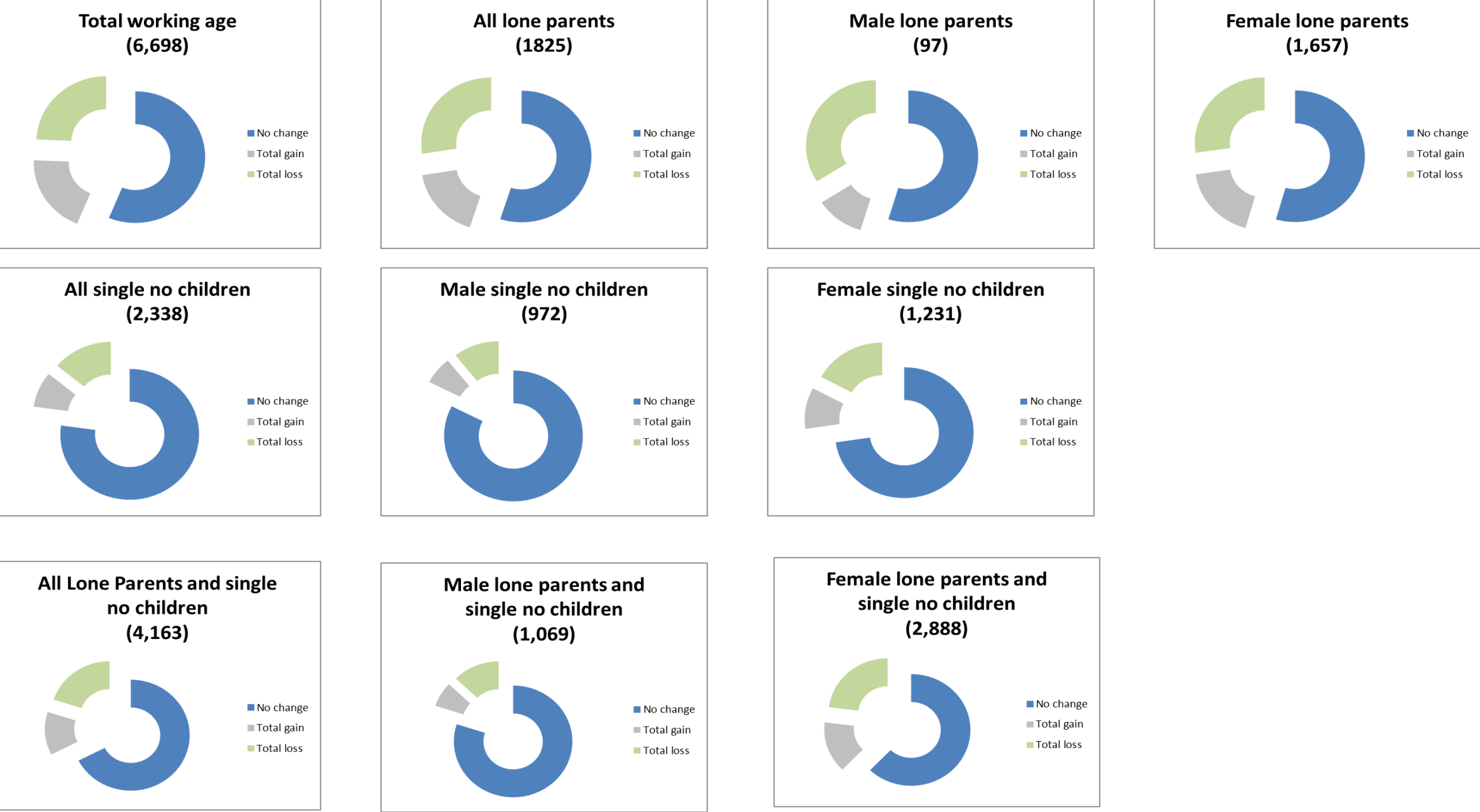




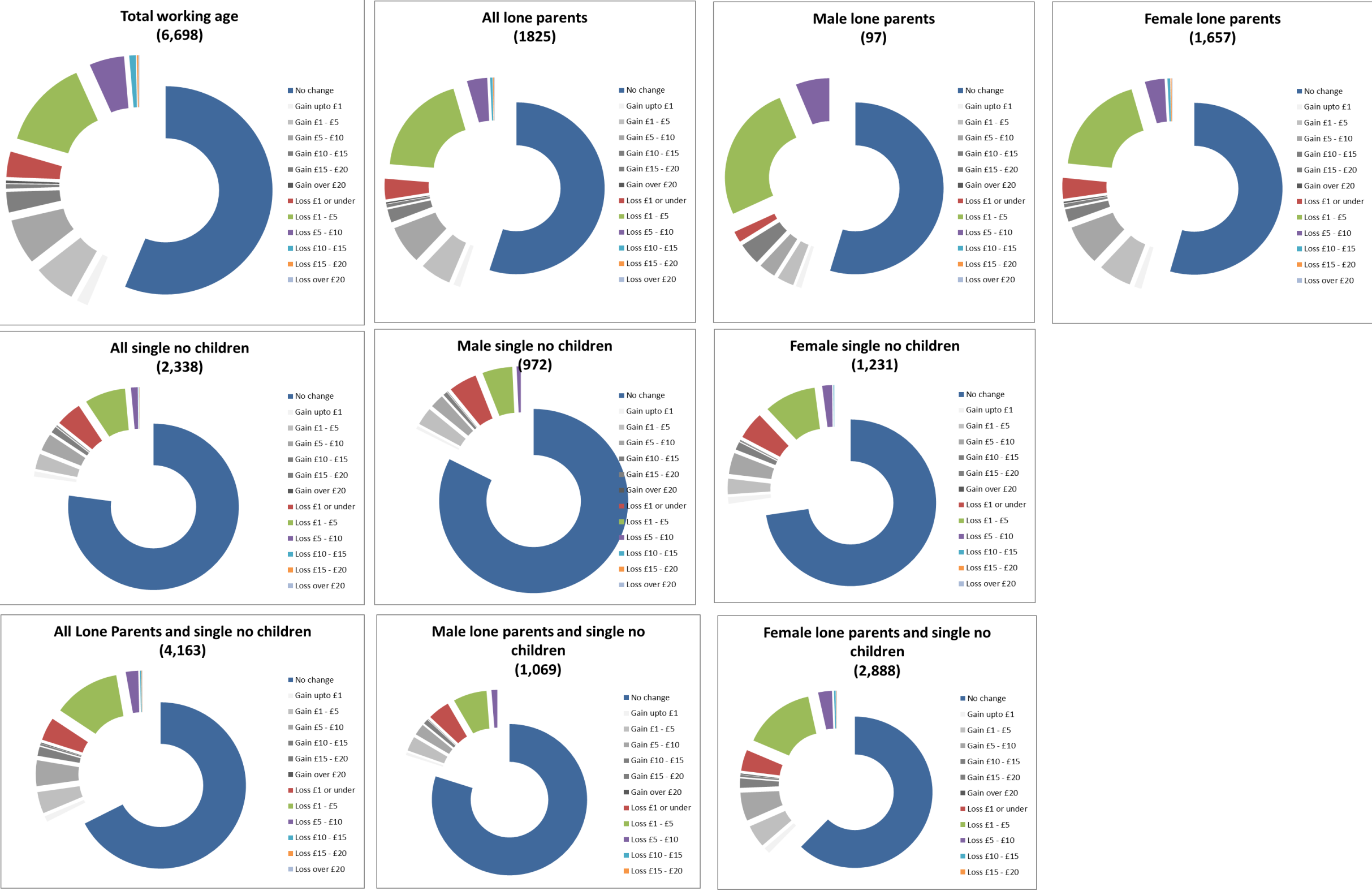
Households split by sex of claimant where there is no partner

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals

The value in brackets is the total number of households in each category



Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support



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### You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)		
Type of Decision:	<input type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input checked="" type="radio"/> Other (state) Full Council	
Title of Proposal	Technical Changes to Council Tax Support	Date EqIA created 29 <sup>th</sup> May 2019
Name and job title of completing/lead Officer	Jenny Townsley Housing Benefit Service Manager	
Directorate/ Service responsible	Housing Benefits, Resources	
Organisational approval		
EqIA approved by Directorate Equalities Lead	Name Alex Dewsnap  	Signature <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA  Date of approval 6/12/19

## 1. Summary of proposal, impact on groups with protected characteristics and mitigating actions

(to be completed **after** you have completed sections 2 - 5)

### a) What is your proposal?

Following consultation with stakeholders, Harrow's Council Tax Support scheme has been modernised to ensure it is fit for purpose following the roll out of Universal Credit. The proposed new scheme is being brought to Cabinet in January and February in February prior to implementation from 1<sup>st</sup> April 2020.

Universal Credit will create additional work and therefore cost more to administer Council Tax Support in its current form. This is because Universal Credit is a monthly benefit which will potentially change on a monthly basis. Entitlement under the current Council Tax Support scheme will change every time Universal Credit changes. This not only costs more to administer but is also confusing to claimants who could struggle to know how much Council Tax they have to pay. It could also impact on the Council's ability to collect Council Tax. Furthermore, as the Council will no longer have to administer Housing Benefit, the economies of scale from aligning Council Tax Support with Housing Benefit are lost and the benefits of a complex means tested Council Tax Support scheme cannot be justified if information is not required for the assessment of Housing Benefit as well as Council Tax Support. This impact of Universal Credit was set out in the National Audit Office's report into the rollout of Universal Credit in June 2018. The report identified the impact of multiple changes on local authorities and suggested that local schemes could be changed to mitigate this impact <https://www.nao.org.uk/report/rolling-out-universal-credit/> (Figure 17, page 48 and figure 26 page 74).

Since the introduction of Universal Credit in Harrow it has also been identified that the number of claims from working age households has reduced at a faster rate than prior to Universal Credit rollout. The Department for Work and Pensions survey in March 2019 included findings that nationally 59% of Universal Credit claimants did not know they needed to make a separate claim to the local authority for help with their Council Tax, <https://www.gov.uk/government/publications/universal-credit-full-service-omnibus-survey>, indicating that low income households are not always claiming all of the benefits they are entitled to.

It is therefore proposed to make the following changes to the Council Tax Support scheme to mitigate the impacts of Universal Credit. As Council Tax Support for pensioners is under a prescribed scheme set by Ministry of Housing, Communities and Local Government, these proposals will only affect working age Council Tax Support claimants.

#### Introduce an income banded scheme

The proposed banded scheme will use the claimant and partner's total gross earned income. Gross earned income

includes earnings from employed and self-employed work before any deductions such as for tax, national insurance or pensions. The household will be placed in one of the income bands set out below depending on their income and the household make up. They will receive a maximum amount of Council Tax Support between 0% and 86% depending on the band they are in.

Disabled and War Pension recipients*		Not classified as disabled under the Council Tax Support scheme		Not in receipt of maximum Universal Credit and not classified as disabled under the Council Tax Support scheme							
% Award	In receipt of maximum Universal Credit or in-work	% Award	In receipt of maximum Universal Credit	% Award	Single people without children Gross earned income**	% Award	Couple without children Gross earned income**	% Award	Lone parents Gross earned income**	% Award	Couples with children 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	40%	£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

\* 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; people who are registered blind; people who live in a property which has been granted a disabled band reduction; or anyone who is working age and receives War Disablement Pension or War Widows Pension.

\*\* The gross income is calculated by totalling the claimant and partner's gross earned income. Gross earned income is the amount of earnings paid for either employed or self-employed work before any deductions are taken for tax, national insurance, pensions etc.

### Reduce the number of non-dependant deductions

A non-dependant is an adult in the household who is not the claimant or partner. The deduction is the amount of Council Tax Support that the claimant's award is reduced by for each non-dependant. The current amount of the deduction depends on the non-dependant's income. The deductions in the current scheme are set out below:

<b>Non Dependant Income</b>	<b>Rate of weekly deduction</b>
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 of 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 £207.70	£6.60
Gross income not less than £207.70 but less than £360.10	£13.10
Gross income not less than £360.10 but less than £447.40	£16.50
Gross income not less than £447.40	£19.80

It is proposed to replace the above with a single deduction for all non-dependants irrespective of their income. This would be at a rate of £7.00 a week for each non-dependant. As in the current scheme, if the claimant or partner receives Disability Living Allowance Care Component or the Daily Living element of Personal Independence Payment then a non-dependant deduction will not be applied. Furthermore, students will continue to be exempt from non-dependant deductions.

#### Use a Universal Credit notice as a claim for Council Tax Support

When a claim is made for Universal Credit the Department for Work and Pensions (DWP) ask the claimant if they would like to claim Council Tax Support. If the claimant agrees then the Department for Work and Pensions will send a notification to the Council to inform them of the claimant's intent to claim Council Tax Support. It is proposed to accept this notification as a claim for Council Tax Support. This proposal will make it easier for people to claim Council Tax Support and increase the number of people accessing the assistance they are entitled to in Harrow.

#### Making Universal Credit a qualifying benefit

It is proposed to only award Council Tax Support to households where the claimant or partner are in receipt of Universal Credit. When people start to receive Universal Credit they will move onto the new income banded scheme set out above. Once the rollout of Universal Credit is complete (Government currently expect this to be by end of 2023), the existing Council Tax Support scheme will be deleted and anyone who is not entitled to Universal Credit will no longer be able to receive Council Tax Support.

By adopting this approach Harrow's Council Tax Support scheme will retain elements from Universal Credit which some of the Council Tax Support schemes set by other boroughs have removed, such as a capital limit of £16,000 for claimant and partner.

An exception to the Universal Credit qualifying rule will be for people in receipt of contribution based Job Seekers Allowance and Employment Support Allowance if they meet the following criteria. These people will be treated as if they receive maximum Universal Credit in the income banded scheme



- 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

#### Transitional Protection for those detrimentally affected

Households in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020 will be assessed for Transitional Protection. Transitional Protection will be awarded where the loss of entitlement under the new scheme is 10% or more of entitlement under the existing scheme and will be calculated as 50% of the amount lost. The award will be made on 1<sup>st</sup> April 2020 for the year 2020/21 only and will not be adjusted irrespective of changes in the claimant's circumstances whether beneficial or detrimental, other than to not exceed their Council Tax liability..

When developing these proposals consideration was given to known potential impacts on groups with protected characteristics and steps were taken where possible to remove or minimise any negative impacts for those people. For example, people with disabilities will retain the protection of a higher rate of entitlement up to 86% of their council tax liability; and the inclusion of different categories for different groups of people e.g. people with and without children. Carrying out the Equality Impact Assessment helps to understand further any unforeseen impacts on protected characteristics.

This Equality Impact Assessment has initially been carried out in advance of the consultation to understand potential impacts on groups with protected characteristics. The data used is based on the whole Council Tax Support caseload having transferred onto Universal Credit. In reality this migration of customers onto Universal Credit is expected to be a phased change which is dependant on the Department for Work and Pensions rollout plan, currently scheduled to be completed by Dec 2023.

The impacts focus on the combined impact of all of the proposals.

Some data is not available for certain characteristics and for others it is limited. This is noted against each characteristic below.

Where comparisons are made to borough data, it should be recognised that borough data is frequently based on the population while Council Tax Support data is usually based on the person making the claim and not their partner or other members of the household. The data therefore gives an indication of whether there are impacts on certain characteristics but does not allow for a direct comparison across the borough.

An 8 week consultation will be carried out between 29<sup>th</sup> July 2019 to 22<sup>nd</sup> September 2019 to capture the views of Harrow residents and stakeholders on the proposed changes. The preceptor, GLA (Greater London Authority), will also be consulted as is required by statute. The consultation booklet and questionnaire can be found in Appendix 1 and 2.

**b) Summarise the impact of your proposal on groups with protected characteristics**

There are 6,698 working age households in receipt of Council Tax Support. The table below shows how many households will be affected and whether the impact is positive (gain) or negative (loss). It also shows the value of change to entitlement. Impacts can be seen in the charts held in Appendix 3

Impact on entitlement. Weekly	Number of households impacted	% of households impacted
<b>Total working age</b>	<b>6698</b>	
<b>No change</b>	<b>3764</b>	<b>56.2%</b>
Gain up to £1	115	1.7%
Gain £1 - £5	428	6.4%
Gain £5 - £10	470	7.0%
Gain £10 - £15	214	3.2%
Gain £15 - £20	47	0.7%
Gain over £20	27	0.4%
<b>Total gain</b>	<b>1301</b>	<b>19.4%</b>
Loss £1 or under	265	4.0%
Loss £1 - £5	925	13.8%
Loss £5 - £10	354	5.3%

<b>Loss £10 - £15</b>	66	1.0%
<b>Loss £15 - £20</b>	15	0.2%
<b>Loss over £20</b>	8	0.1%
<b>Total loss</b>	<b>1633</b>	<b>24.4%</b>

The main reason for change is the introduction of an income banded scheme in place of a means test. This results in relatively low levels of gain and loss of mostly under £5 a week.

Other key reasons households could gain are:

- if they have income other than earnings, for example a private pension as this is not taken into account in the assessment
- if they are classified as disabled and do not currently receive the maximum 86% award
- if they are on low earnings and receive tax credits
- if they have non-dependants who are in work

Other reasons some households may see a reduction to their entitlement are:

- they are not currently in receipt of tax credits they are entitled to and are in receipt of a higher rate of Council Tax Support than they should be if they claimed all the benefits they were entitled to. When they claim Universal Credit their tax credit equivalent will increase so their overall income will be higher even though their Council Tax Support entitlement is less
- the more children a working household has, they become more likely to lose because of the removal of the means test
- households who pay more for child care will lose more
- If their income is currently below their applicable amount (the amount the Benefits system says the household needs to live on)
- They will not qualify for Universal Credit

The table below shows the impact due to the proposed changes to non-dependant deductions.

Impact on entitlement due to proposed change to non-dependant deductions. Weekly	Number of households impacted	% of households impacted
<b>Total household with a non-dependant</b>	<b>1609</b>	
<b>No change</b>	<b>1041</b>	<b>64.7%</b>
Gain up to £1	0	0.0%
Gain £1 - £5	17	1.1%
Gain £5 - £10	74	4.6%
Gain £10 - £15	52	3.2%
Gain £15 - £20	0	0.0%
Gain over £20	0	0.0%
<b>Total gain</b>	<b>143</b>	<b>8.9%</b>
Loss £1 or under	264	16.4%
Loss £1 - £5	130	8.1%
Loss £5 - £10	24	1.5%
Loss £10 - £15	7	0.4%
Loss £15 - £20	0	0.0%
Loss over £20	0	0.0%
<b>Total loss</b>	<b>425</b>	<b>26.4%</b>

Households are more likely to gain because there is a non-dependant in the household who earns more than £207.70 a week. Households with non-dependants who are not in work or who earn less than £207.70 a week are more likely to lose as a result of this proposal. The more non-dependants in this situation, the greater the reduction to Council Tax Support, although it should be noted that while the claimant/partner remain liable for payment of the Council Tax, it is intended that the loss due to changes to non-dependant deductions is spread across each of the non-dependants. This lowers the level of loss per person.

The proposal to accept the Universal Credit notification as a claim for Council Tax Support is expected to reduce barriers for all residents to claim Council Tax Support. By not requiring a separate application to be submitted to the Council in addition to the Universal Credit claim made to Department for Work and Pensions, people who may not previously have known or felt able to make a claim for Council Tax Support should now be more likely to receive the assistance they are entitled to.

Amending the scheme to restrict eligibility to those who are in receipt of Universal Credit or contribution based Job Seekers Allowance/Employment Support Allowance is forecast to impact 23 households who are currently in receipt of Council Tax Support. This will not impact until the rollout of Universal Credit in the borough is complete.

### Age

Only working age claimants will be impacted by these proposals. There may be non-dependant pensioners or children living in affected households, but the changes won't affect pensioner claimants.

The 35 – 44 age group are slightly more likely to see a reduction to their entitlement than other households (31% compare to 24% of the total caseload). This is because they are more likely to be in-work, less likely to be classified as disabled and there are slightly more households with 5 or more children in this group.

Of the 23 households expected to lose entitlement in 2023 due to no entitlement to Universal Credit, 12 are in the 55-64 age group.

### Households with children

Households with children are more likely to be impacted proportionately to the caseload as a whole, in part because these households are more likely to claim Council Tax Support in the borough (59% of the working age caseload have children). This

means that while more will lose, there will also be more who gain.

31% (1,241) of households with children will lose compared to 24% of the total caseload.

The value of the reduction is also more likely to be greater with 9.9% (394) households with children losing more than £5 a week compared to 6.6% (443) in the caseload as a whole. 310 lose £5 - £10, 84 households lose more than £10 a week.

The more children there are in a household, the more they will lose: 15.7% of households with 3+ children will lose over £5 (5.7% in the total caseload) and 29.3% of households with 5+ children will also lose more than £5 a week.

The reasons for loss are:

- They are more likely to be in work (56%) than the caseload as a whole
- There are proportionately more households with children in receipt of Council Tax Support than there are in the borough as a whole
- A number of households with children are not claiming all of the tax credits they are entitled to
- Larger families will lose out due to the removal of the means test so there is no additional benefit awarded to account for the extra cost of having more children
- Households paying more child care costs will lose more Council Tax Support under these proposals. This is because, unlike in the current scheme, there is no deduction from earnings for child care costs in Council Tax Support so the level of earnings used to assess entitlement will be higher
- Proportionately less households with children are disabled than in the caseload as a whole. Disabled groups are less likely to be detrimentally impacted by these proposals

For households with children who gain, 26% will gain compared to 19% of the caseload as a whole. Households with 3 or 4 children are most likely to gain, while households with 5+ children are least likely.

The value of gain is also higher for households with children, except where there are 5+ children.

### Disability

Most households who are disabled will see no change as a result of these proposals: 2,625 (88%). This is because most are already in receipt of maximum Council Tax Support and non-dependant deductions are more likely to be disregarded.

8% (247) will gain. This is because households who are classified as disabled under the scheme and are in-work will now be treated the same as out of work households, receiving 86% of their Council Tax liability less any non-dependant deduction if they are not disregarded.

4% (121) will lose. Any losses are as a result of the proposals to change the non-dependant deductions. The value of loss is less than the caseload as a whole with 111 households losing less than £5 a week and 10 households losing £5 - £15.

While some of the loss is offset by gains from the banded scheme, 130 disabled households will lose due to the proposed changes to non-dependant deductions. 120 lose under £5, 10 lose £5 - £15

While low in number, disabled households are disproportionately impacted by the proposal to use Universal Credit as a qualifying condition for Council Tax Support. Of the 23 households who are forecast not to qualify for Universal Credit, 16 are classified as disabled under the Council Tax Support scheme. Most are in receipt of contribution based Employment Support Allowance with other incomes. Depending on the type of Employment Support Allowance the contribution based award may only last upto one year (for work related) after which the claimant may then be able to qualify for Universal Credit. If the scheme were amended to give access to these households it would risk opening up access for a large number of other households and therefore scheme spend will rise. This additional expenditure cannot be quantified as the Council only holds data on current claims, not potential claims.

### Carers

Households in receipt of Carers Allowance are also less likely to see a change and are less likely to lose as a result of these combined proposals.

They are however more likely to see a reduction to entitlement as a result of the proposed changes to non-dependant deductions, with 78% of those households with a Carer Allowance and a non-dependant deduction losing. 74% will lose under £5, 4% over

£5. This loss will in part be offset by other changes to the scheme so overall this group are less likely to lose than the caseload as a whole (13.6% compared to 24%).

Of the 23 households who are forecast not to be entitled to Universal Credit and will therefore not be eligible for Council Tax Support, 7 are in receipt of Carers Allowance. 6 of these are classified as Disabled under the scheme.

### Marriage and Civil Partnership

Data on civil partnerships is not available.

As couples in receipt of Council Tax Support are more likely to have children and are more likely to be in-work, they are more likely to experience change to their Council Tax Support (62% of couples compared to 43% of the total caseload). 32% (801) of couples' Council Tax Support will reduce as a result of the proposals. 13% (329) will lose more than £5 a week.

31% (377) will gain compared to 19% of the total caseload.

### Race

This information is based on 34% of the Council Tax Support caseload who provided Race monitoring data.

Black or Black British (total of 377 households), mixed race households (85) and White British or Irish (706) are more likely to see no change to their entitlement.

Other Asian or Asian British households (626) more are likely to lose (31% compared to 24% of the total caseload) but more are also likely to gain (31% compared to 19%). This is because households with this characteristic are more likely to not receive maximum Universal Credit.

Similarly, White Other households (95) more are likely to lose (31%) but more are also likely to gain (34%) because there are more households in this characteristic who are in work.

### Sex



Men are most likely to see no change to their entitlement. However, male lone parents (97 households) are more likely to see a reduction to their entitlement (34% compared to 24% of the total caseload) and less likely to see an increase (11% compared to 19%). 91 will lose under £5 a week and 6 will lose £5 - £10.

Single people without children are less likely to see any change to their entitlement. This is because a high proportion of this group are out of work or are classified as disabled.

### **c) Summarise any potential negative impact(s) identified and mitigating actions**

The main impact, both positive and negative, that this Equality Impact Assessment has identified is on households with children and households in work or not in receipt of maximum Universal Credit.

Households in work or not in receipt of maximum Universal Credit will see a relatively low level of change, mostly around £5 a week or less. Some will gain and some will lose. It is known that if the overall funding does not change, then when introducing an income banded scheme to replace a means tested scheme some recipients will receive more while others will receive less. However, the level of change has to be balanced with the potential impacts of not changing the scheme:

- The effect of a high number of changes in circumstance to a household's Council Tax Support entitlement as a result of fluctuations in earnings and Universal Credit.
- A simplified Council Tax Support scheme will prevent an increase in administration costs that will be experienced in the current scheme as more households move onto Universal Credit. Furthermore, as the Housing Benefit administration grant reduces due to housing costs moving into Universal Credit, the relative cost per claim of administering Council Tax Support will rise if the complex means test remains.
- The simplified scheme will be easier for residents to understand and to know what they are entitled to, and with less changes making it easier to budget.
- Less changes to entitlement will reduce the risk to Council Tax collection which could result from the recovery cycle continually being reset each time a new bill is issued.

Analysis of the impacts for larger families has identified that some households are not receiving all of the benefits they may be entitled to. This is usually tax credits which will be incorporated into the Universal Credit award so, while these households will receive less Council Tax Support, their overall income will be higher.

Some households also appear to have an income that is lower than their applicable amount (the amount the government say a household needs to live on). This could either be because they don't receive all of the tax credits they are entitled to, or because Council Tax Support do not hold current earnings details. The reduction to the amount of Council Tax Support these households will receive when they move onto Universal Credit is therefore at least in part due to them receiving the correct amount of tax credit equivalent, and Council Tax Support holding the correct income details for them, and not solely because of the mechanics of the proposed new Council Tax Support scheme.

Some households who pay child care costs will also be negatively impacted. Universal Credit gives an additional element toward Child care costs, but child care costs will no longer be taken as an expense from Council Tax Support. The level of impact of this change will depend on how much is spent on child care and how much the claimant and/or their partner earn.

In addition to above, feedback from the consultation has been taken into consideration. The full response from the consultation can be found in the Consultation Feedback report in Appendix 5. 211 questionnaires were returned from the public and feedback was captured from two workshops with the voluntary sector including return of 8 questionnaires. While overall most of the proposals were deemed to be favourable, key points from the consultation are:

- Income banded scheme is unfair and doesn't treat people equally. Scheme needs to take into account household size and expenditure. Particular concern was noted for families in this respect with the voluntary sector citing large families as being at risk
- Means test is fairer and most people who were not in favour of a banded income scheme who commented, stated they thought a means test should be retained
- More support should be given to lower income households
- Net earnings should be used in place of gross as this is easier for people to understand
- The single non-dependant deduction was detrimental to lower income people and £7 was too high. A number of respondents therefore believe that there should be more than one rate of deduction
- A level of concern was raised regarding the use of Universal Credit as a qualifying criteria for Council Tax Support
- Groups the consultation identified that respondents believed would be affected by the proposals were disabled, those in employment, families and young adults including non-dependants about to turn 18 years. Some of the voluntary sector respondents also raised concern about barriers to claiming for people with literacy and language barriers and people who have taken early retirement and are only in receipt of a private pension as these groups may struggle to access Universal Credit and therefore be unable to claim Council Tax Support.

In response to the equality impacts identified and consultation feedback, Members have allocated an additional £400,000 to the Council Tax Support scheme to assist in mitigating some of the above detrimental impacts. Following the consultation the scheme has been adjusted in the following ways:

- Include additional categories for households with 3 or more children
- Make the minimum award 70% across all non-vulnerable groups
- Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement
- Implement two non-dependant deductions in place of the proposed one
- Use net earned income instead of gross

The revised scheme is:

	Claimant Category C		Claimant Category D		Claimant Category E1		Claimant Category E2		Claimant Category F1		Claimant Category F2
Percentage award of weekly eligible Council Tax	Single people without children - weekly net income	Percentage award of weekly eligible Council Tax	Childless couples - weekly net income	Percentage award of weekly eligible Council Tax	Lone parents up to 2 children - weekly net income	Percentage award of weekly eligible Council Tax	Lone parents 3 or more children - weekly net income	Percentage award of weekly eligible Council Tax	Couples with up to 2 children - weekly net income	Percentage award of weekly eligible Council Tax	Couples with 3 or more children - weekly net income
70%	£0-£75	70%	£0-£75	70%	£0-£100	70%	£0-£100	70%	£0-£125	70%	£0-£125
60%	£75.01-£125	60%	£75.01-£125	60%	£100.01-£140	60%	£100.01-£150	60%	£125.01-£165	65%	£125.01-£150
40%	£125.01-£175	55%	£125.01-£175	55%	£140.01-£175	55%	£150.01-£200	55%	£165.01-£200	60%	£150.01-£200
0%	>£175	40%	£175.01-£225	40%	£175.01-£225	45%	£200.01-£275	40%	£200.01-£250	50%	£200.01-£275
		0%	>£225	30%	£225.01-£275	30%	£275.01-£325	30%	£250.01-£300	35%	£275.01-£375
				0%	>£275	0%	>£325	20%	£300.01-£375	20%	£375.01-£425
								0%	>£375	0%	>£425

The vulnerable group will remain at the originally proposed 86% and the maximum Universal Credit group at 70%.

Non-dependant deductions were proposed to be set at £3.30 a week for people not in work and £12 for people who are working to reduce the impact on those not in work. This proposal has been amended further as set out below

These proposed changes assist in reducing the impacts of the banded scheme on individual households but enable the scheme to

achieve the original objectives to mitigate the impact of the rollout of Universal Credit.

The total scheme impacts as a result of these changes are in the table below. Charts setting out monitoring data analysis for protected characteristics is in Appendix 4. The data is slightly different to the pre-consultation analysis because it is based on more current Council Tax Support data.

<b>Impact on entitlement. Weekly</b>	<b>Number of households impacted</b>	<b>% of households impacted</b>
<b>Total working age</b>	<b>6686</b>	
<b>No change</b>	<b>4470</b>	<b>66.9%</b>
<b>Gain up to £1</b>	114	1.7%
<b>Gain £1 - £5</b>	434	6.5%
<b>Gain £5 - £10</b>	497	7.4%
<b>Gain £10 - £15</b>	269	4.0%
<b>Gain £15 - £20</b>	101	1.5%
<b>Gain over £20</b>	36	0.5%
<b>Total gain</b>	<b>1451</b>	<b>21.7%</b>
<b>Loss £1 or under</b>	46	0.7%
<b>Loss £1 - £5</b>	477	7.1%
<b>Loss £5 - £10</b>	198	3.0%
<b>Loss £10 - £15</b>	32	0.5%
<b>Loss £15 - £20</b>	8	0.1%
<b>Loss over £20</b>	4	0.1%
<b>Total loss</b>	<b>765</b>	<b>11.4%</b>

By comparing the above table to the table of impacts for the original proposals, it is evident that the level of detrimental impact has

been reduced.

The impacts solely due to the non-dependant deduction change to the two rates of £3.30 and £12 are set out in the table below for comparison to the table based on the original proposal earlier in this assessment

<b>Impact on entitlement due to proposed change to non-dependant deductions.</b>	<b>Number of households impacted</b>	<b>% of households impacted</b>
<b>Weekly</b>		
<b>Total household with a non-dependant</b>	<b>1609</b>	
<b>No change</b>	<b>1041</b>	<b>64.70%</b>
<b>Gain up to £1</b>	33	2.05%
<b>Gain £1 - £5</b>	193	12.00%
<b>Gain £5 - £10</b>	83	5.16%
<b>Gain £10 - £15</b>	0	0.00%
<b>Gain £15 - £20</b>	7	0.44%
<b>Gain over £20</b>	0	0.00%
<b>Total gain</b>	<b>316</b>	<b>19.64%</b>
<b>Loss £1 or under</b>	0	0.00%
<b>Loss £1 - £5</b>	11	0.68%
<b>Loss £5 - £10</b>	109	6.77%
<b>Loss £10 - £15</b>	4	0.25%

<b>Loss £15 - £20</b>	<b>2</b>	<b>0.12%</b>
<b>Loss over £20</b>	<b>2</b>	<b>0.12%</b>
<b>Total loss</b>	<b>128</b>	<b>7.96%</b>

This proposal for non-dependant deductions had a disproportionate impact on low income employed non-dependants as they would potentially move from paying £6.60 in the current scheme to paying £12 in the new scheme. The proposal has therefore been adjusted to extend the £3.30 rate to include non-dependants who earn less than £144 gross a week (National Minimum Wage at 16 hours a week). While some additional funding has been allocated to pay for this change, the higher rate non-dependant deduction has also been increased slightly to offset some of the additional cost that this proposal brings and is proposed to be set at £13.10. 64 households will now lose as a result of the proposed change to non-dependant deductions compared to the 128 shown in the table above. Some now lose slightly more due to the increase at the higher rate to £13.10, some who have more than one non-dependant lose slightly less because of the combined impact of changing both deductions. 10 households lose £10 - £20, 44 households lose £5 - £10 and 10 lose under £3.20.

The residual equality impacts are:

#### Age

While the proposals continue to be for working age households only, there is no age group who is disproportionately impacted when compared to the proportion of the caseload that each group accounts for. However 37% of the households losing £5 or more are in the 35-44 age group. Of the 44 households losing more than £10, 22 are in the 35-44 age group, 10 in the 45-54 age group, 7 in 25-34 and 5 aged 55-64.

#### Children

Households with children continue to be overrepresented within the Council Tax Support caseload compared to the borough as a whole. Following the proposed changes, 17% of the caseload with children will lose compared to 11% of the total caseload.

The level of loss has reduced with 4.6% of households with children forecast as losing over £5 a week once the new scheme has fully rolled out in Harrow. 5.1% of households with 3 or more children will lose £5 or more while they account for 30% of the total caseload.

Of those households who are forecast to lose £5 or more entitlement, the spread of the impact across households with children is more even compared to the proportion of the caseload that they account for, so there is not a disproportionate impact for larger families. Households with children, however, do remain more likely to lose £5 or more than households without children, with 75% of those predicted to lose at this rate are households with children compared to 59% of the total caseload being this cohort.

There are 39 households with children who are forecast to lose more than £10 a week. 56% of these (22 households) have 1 or 2 children, while 44% (17) have 3 or more children. These groups account for 58% and 42% of the households with children so again the impact is more evenly distributed across these households. However, households with children are much more likely to see a higher level of loss than other households with 5 of the total 44 households forecast to lose more than £10 not having children in them.

### Disabled

The proposed changes to the scheme reduce the proportion of disabled households who are forecast to lose from 4% to 1.2% (37 out of 3,020 households). The main reason for loss is the change to the non-dependant deduction. Using the rates of £3.30 and £12, 33 of the 34 disabled households who are expected to lose more than £5 a week, do so because of the non-dependant deduction proposal. 3 of the 4 disabled households losing more than £10 a week do so because of this proposal.

By extending the lower non-dependant deduction rate to include low income earners and increasing the higher rate to £13.10, less disabled households are impacted. 38 disabled households are forecast to lose following this change, with 3 losing £1 - £5, 28 losing 5 - £10, 5 losing £10 - £15 and 2 losing over £20.

### Carers

The changes to the proposals are expected to result in less households where the claimant or partner receive Carers Allowance losing some of their entitlement to Council Tax Support. 4.8% (45 of the 923 households in this cohort) are forecast to lose. Of these, 3.4% (31) are forecast to lose more than £5.

### Couples

Data for civil partnerships and same sex couples is not available.

Data for people living together as a couple indicates that the number experiencing no change will increase following the changes to the proposals (from 38% to 55%) and the number losing will reduce (from 32% to 19%). As the majority of couples have children (85%), the impacts will be similar to those for households with children.

### Race

Following analysis of the available monitoring data for Race, it has been identified that Other Asian or Asian British and White Other households are more likely to lose than the caseload as a whole (16%, 98 households, and 20%, 18 households, respectively compared to 11% for the total caseload. South Asian or South Asian British households are more likely not to lose (6%).

The value of loss is split proportionately across the caseload when analysing Race impacts relative to the proportion that each group accounts for in the caseload as a whole. The highest number losing £5 or more is Other Asian or Asian British and White British/Irish who each have 24 households forecast to lose at this rate which equates to 30% of the total number losing. Black or Black British account for 20% of households losing £5 or more, equivalent to 16 of the 81 households.

Households where Race data is held, 44 will lose as a result of non-dependant deduction changes. 17 of these are White British/Irish and 10 each account for Black or Black British or Other Asian or Asian British households.

Following the further change to non-dependant deductions, 16 households where Race data is held will lose as a result of non-dependant changes to the scheme. 8 of these households are White British/Irish while the other 8 are spread across different groups.

### Sex

There are 1,076 households of single men with no children or lone parents and 2,896 single females with no children or lone parents. This is split over 99 male lone parents and 1,655 female lone parents.

None of these groups are more likely to lose or to lose more as a result of the revised proposals proportionate to the number of claims they account for in the caseload. 188 lone parent households are forecast to lose, with 56 losing more than £5 a week and 11 losing more than £10. 2 male lone parents are forecast to lose more than £5 and 52 female lone parents. 10 female lone



parents are forecast to lose more than £10. Note, where numbers don't total it is due to the sex of the claimant not having been declared.

The impacts resulting from the use of Universal Credit as a qualifying criteria remain unchanged under the revised proposals. The voluntary sector flagged this as a concern in the consultation particularly for people with language or literacy barriers and people who have taken early retirement and are living off a private pension. The mitigation of additional funding and the review of the Council's Council Tax Hardship fund policy under s13A(1)(c) will however potentially help these households.

To mitigate the impact of any loss to Council Tax Support if the proposals are implemented and to assist households who are more negatively impacted the following actions are proposed. This activity also sets out how the Council seeks to support people as they transition on to the new scheme. It is important to recognise that the impacts set out in this assessment are based upon the whole caseload having transitioned onto Universal Credit but this will be a phased approach over the course of 3 – 4 years:

- A publicity campaign will be carried out to inform people how their Council Tax Support entitlement could change in advance of them moving onto the new scheme. The campaign will set out the new scheme in simple terms to ensure residents are able to understand how it works.
- The Council will write to people who are expected to lose out under the new scheme to advise them of the change in advance to help them to start to budget accordingly and to access support if required.
- An online calculator is available for Harrow's bespoke Council Tax Support scheme. This enables residents to see how much Council Tax Support they will be entitled to. A Universal Credit 'better-buy' calculator is also available through the Harrow website which informs residents of whether they will be better off on Universal Credit and what benefits they could be entitled to.
- Anyone identified as not receiving the full benefits they are entitled to will be written to and advised of this. They will either be able to claim additional tax credits to reflect their true circumstances, or, if they don't currently receive any tax credits, then they will be informed that if they claim Universal Credit that their income could increase.
- It is possible to include additional categories for households with children (lone parents and couples) to give higher awards to those with 3 or more children. This proposed change will be considered depending on the outcome of the consultation and to what extent modelling indicates it will mitigate the impact of the proposals.

- A review of earned income claims will be carried out to ensure the correct amount of earnings is held on the Council Tax Support claim. This will reduce the impact of change when the household moves onto Universal Credit. Due to the volume of claims and resources required, it is not possible to review all self-employed claims, but resources will be targeted toward claims that have not been reviewed for the longest to bring the income held up to date, again with the intention of reducing the level of impact when the household moves on to Universal Credit and the new Council Tax Support scheme.
- The scheme parameters will be reviewed annually with a view to uprate if appropriate to ensure the scheme continues to offer a similar level of support to low income residents
- For households who are already in receipt of Universal Credit and Council Tax Support as at 31<sup>st</sup> March 2020 and who lose more than 10% of their current entitlement, a level of transitional protection will be awarded for the first year of the new scheme. 50% of the loss will be awarded to give households time to adjust their budgeting in anticipation of the further reduction in 2021. The number of households meeting this criteria will reduce if the amendments to the proposals are made as the scheme is more generous.
- The proposal to use the Universal Credit notification sent to the Council by the Department for Work and Pensions will increase the number of working age people in the borough who claim Council Tax Support. This will help to ensure residents receive the support they are entitled to at the earliest point.
- The Council already has in place a Recovery Policy to ensure consideration is given to vulnerable households when collecting monies owed to the Council. This policy will be reviewed to consider what impact the proposed changes to the Council Tax Support scheme may have on recovery and potentially vulnerable households.
- In exceptional cases, consideration will be given to exercising the Council's discretion under s13A(1)(c). Funding from the additional £400,000 allocated to the scheme that is not spent due to the full caseload not yet having transitioned onto Universal Credit will be allocated to s13A(1)(c)

The feedback from the consultation will be used to inform the decision of whether to implement the proposed changes to the Council Tax Support scheme and to identify any alternatives to the scheme and mitigations to assist any households negatively impacted by a new scheme.

2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to <a href="#">borough profile data</a> , <a href="#">equalities data</a> , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on <b>each</b> group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For <b>each</b> protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p><b>Harrow profile</b></p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18 sets out that of a population of 248,750:</p> <ul style="list-style-type: none"> <li>• 20.6% of the population are aged 0 – 15</li> <li>• 64.2% are working age</li> <li>• 15.2% were aged 65 and over</li> </ul> <p>Research shows that number of children living in workless households in the borough is reducing. While this may mean that some will not be in receipt of benefits, those that are will be more likely to be impacted by these proposals</p> <p><b>Council Tax Support profile by household type</b></p> <ul style="list-style-type: none"> <li>• Harrow has 11,695 Council Tax Support claims.</li> <li>• 42.51% (4,971) are pensioners</li> <li>• 57.49% (6,724) are working age</li> <li>• 59.07% (3,972) of the working age households have children aged 0 - 18</li> </ul> <p>The table below shows the split of the working age caseload by the age of</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

the claimant. Over 65s are either due to mixed age couples who are classified as working age under Council Tax Support legislation or people aged 66 or 67 who are still classed as working age

Age of claimant	% of working age total	Number of households
<b>Total working age</b>		<b>6698</b>
18-24 years old	2%	142
25-34 years old	14%	932
35-44 years old	29%	1968
45-54 years old	30%	2040
55-64 years old	23%	1554
Over 65 years old	1%	62

#### Impact of proposed changes

*The negative impact of the proposals for households with the Age characteristic has been classified as minor. As shown in the table below, for the majority of Council Tax Support claimants this is expected to be the case. However, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (354 will lose £5-£10 a week and 89 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.*

The proposals will only affect working age claimants as the pensioner

scheme is set by the Ministry of Housing, Communities and Local Government and cannot be changed locally. 3,764 (56%) of the 6,698 working age claimants will see no change to their entitlement.

All households will be affected differently by the proposals. The average impact on all working age households is set out in the table below:

Impact on entitlement. Weekly	Number of households impacted	% of households impacted
<b>Total working age</b>	<b>6698</b>	
<b>No change</b>	<b>3764</b>	<b>56.2%</b>
<b>Gain up to £1</b>	115	1.7%
<b>Gain £1 - £5</b>	428	6.4%
<b>Gain £5 - £10</b>	470	7.0%
<b>Gain £10 - £15</b>	214	3.2%
<b>Gain £15 - £20</b>	47	0.7%
<b>Gain over £20</b>	27	0.4%
<b>Total gain</b>	<b>1301</b>	<b>19.4%</b>
<b>Loss £1 or under</b>	265	4.0%
<b>Loss £1 - £5</b>	925	13.8%
<b>Loss £5 - £10</b>	354	5.3%
<b>Loss £10 - £15</b>	66	1.0%
<b>Loss £15 - £20</b>	15	0.2%
<b>Loss over £20</b>	8	0.1%
<b>Total loss</b>	<b>1633</b>	<b>24.4%</b>

	<p>The majority, 17.8% (1,190), who lose will see less than a £5 a week change to their entitlement. 5.3% (354) will lose £5 - £10 and 1.3% (89) will lose more than £10 a week.</p> <p>The 35 – 44 age groups are slightly more likely to see a reduction to their Council Tax Support entitlement than across the working age caseload as a whole (31% compared to 24%)</p> <p>The 35 – 44 age group is more likely to be negatively impacted because there are more households in this group who are:</p> <ul style="list-style-type: none"> <li>• in-work – working households are most likely to see a change to their entitlement as a result of these proposals;</li> <li>• less likely to be disabled – disabled households are most likely to see no change or a beneficial change</li> <li>• There are slightly more households with 5 or more children (8% compared to 4% of the total caseload). These groups are more likely to lose under the proposed changes</li> </ul> <p>Of all households who gain, 8.1% (543) will see less than a £5 a week change to their entitlement. 7% (470) will gain £5 - £10 a week and 4.3% (288) will gain more than £10.</p> <p>18 – 24, 55 – 64 and those aged over 65 years are less likely to gain (14%, 12% and 13% respectively compared to 19% of the total caseload)</p> <p>25 – 34, 35 – 44 and 45 – 54 groups will see similar levels of gain to the caseload as a whole.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes</p>				
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	<p>to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Households with children</u></p> <p>Of the 6,698 working age households, 3,971 (59.3%) have children. Recognising that this is based on households with children up to the age of 18, while the borough data is based on population up to the age of 16, there are proportionately more households with children in receipt of Council Tax Support than there are in the borough (20.62% of population aged 0 – 16). Any changes to entitlement are therefore going to disproportionately impact on households with children.</p> <p>As a whole, households with children are more likely to see a reduction in their entitlement compared to the caseload as a whole (31% compared to 24% respectively).</p> <p>The level of loss for households with children is also more likely to be greater, with 9.9% (394) households losing more than £5 a week compared to 6.6% (443) in the working age caseload as a whole. This means that 88.9% of all households who will lose more than £5 are households with children. 310 of these households with children will lose £5 - £10 a week and 84 will lose more than £10 a week</p> <p>Households with 3 or more children are more likely to lose over £5 than households with 1 or 2 children (15.7% and 5.7% respectively). 29.3% of households with 5 or more children will lose more than £5 a week. 63 will lose £5 - £10 and 19 will lose over £5.</p> <p>The reasons households with more children will lose more is because:</p> <ul style="list-style-type: none"> <li>• They are more likely to be in work (56%) than the caseload as a whole</li> <li>• There are proportionately more households with children in receipt of Council Tax Support than there are in the borough as a whole</li> <li>• A number of households with children are not claiming all of the tax</li> </ul>				
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	<p>credits they are entitled to</p> <ul style="list-style-type: none"> <li>• Larger families will lose out due to the removal of the means test so there is no additional benefit awarded to account for the extra cost of having more children</li> <li>• Households paying more child care costs will lose more Council Tax Support under these proposals</li> <li>• Proportionately less households with children are disabled than in the caseload as a whole. Disabled groups are less likely to be detrimentally impacted by these proposals</li> </ul> <p>More households with children are likely to gain as a result of these proposals compared to the caseload as a whole (26% and 19% respectively)</p> <p>Households with 3 or 4 children are most likely to gain, 29% (404). While households with 5 or more children are least likely to gain, 13% (35).</p> <p>15.1% (600) of households with children will gain more than £5 a week compared to 11.3% of the caseload as a whole. This higher level of gain is spread across all households with children except those with 5 or more children where 5.7% (16) households will gain more than £5 a week.</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are proportionately more working age claims and claims from households with children for Council Tax Support than the borough population,</p>				
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	<p>these groups will benefit from this proposal.</p> <p>Pensioners cannot claim Universal Credit and the pensioner scheme is legislated for by Ministry of Housing, Communities and Local Government. This proposal can therefore not be extended to pensioners claiming Council Tax Support.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>23 households in the current Council Tax Support caseload are forecast as not being able to qualify for Universal Credit and do not meet the exception criteria to be eligible for the proposed new Council Tax Support scheme. Of these, 12 are in the 55-64 age group. One has a child in the household.</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
<b>Disability</b>	<p><b>Harrow Profile</b></p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> <li>• 13.7% of the working age population classify themselves as disabled</li> <li>• 2.6% of Harrow's population receive Disability Living Allowance</li> <li>• 1,044 carers have been assessed or supported by the local authority</li> </ul>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>during 2016-17. 36% of these were aged 65 or over</p> <ul style="list-style-type: none"> <li>Research shows that 10.6% of carers in Harrow reported that their caring responsibilities caused them a lot of financial hardship. This was an increase from 9.6% the previous year</li> </ul> <p><b>Council Tax Support profile</b></p> <ul style="list-style-type: none"> <li>Of the 6,698 working age households who receive Council Tax Support in Harrow, 2,993 are classified as disabled under the scheme. For the purposes of Council Tax Support a household is classified as disabled if the following criteria are met:</li> <li>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; people who are registered blind; people who live in a property which has been granted a disabled band reduction; or anyone who is working age and receives War Disablement Pension or War Widows Pension.</li> <li>Data is not held to show how many Council Tax Support households classify themselves as disabled outside of the above criteria.</li> <li>929 working age households where Carers Allowance is in payment receive Council Tax Support</li> </ul> <p><b>Impact of proposed changes</b></p> <p>The majority of households classified as disabled under the scheme will experience no change as a result of the proposals, 88% (2,625). This is because most disabled households are already in receipt of maximum entitlement. They are also more likely to have non-dependant deductions</p>				
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	<p>disregarded if they are in receipt of certain disability benefits.</p> <p>8% (247) will gain which is proportionately less than across the working age scheme as a whole, but this group generally receive a higher rate at 86% rather than 70% already.</p> <p>The number who will see a reduction to their Council Tax Support is less than the total caseload at 4% (121) compared to 24%. All who lose are impacted by the proposals to change non-dependant deductions, not the introduction of a banded scheme. This proposal is expected to be borne by the non-dependants and will therefore be spread at a lower level across each individual. The claimant and partner will however remain liable for the Council Tax should the non-dependants not contribute as expected.</p> <p>The amount disabled households will lose is less than the caseload as a whole, with 0.3% (10) losing over £5 compared to 1.6%. None will lose more than £15 a week.</p> <p>All working age households where the claimant or partner are in work (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme. While there are fewer disabled households where the claimant or partner are in work (under 200), they will still benefit from this proposal.</p> <p>The proposal to make further changes to the non-dependant deductions reduces the above impact further. 38 disabled households are forecast to lose following this change, with 3 losing £1 - £5, 28 losing 5 - £10, 5 losing £10 - £15 and 2 losing over £20.</p> <p><u>Carers</u></p> <p>Households in receipt of Carers Allowance are also less likely to see a change</p>				
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	<p>to their entitlement: 71% (658) will see no change compared to 56% of the total caseload.</p> <p>The proportion of those with Carers Allowance who will gain is similar to that of the wider caseload</p> <p>The proportion of those who lose is less than the wider caseload 14% (126) compared to 24%. 15 households where the claimant or partner receive Carers Allowance will lose £5 a week or more.</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are a proportionately high number of disabled households and households where Carers Allowance is received, who are claiming Council Tax Support, this group will benefit from this proposal.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>The proposal to also include contribution based Employment Support Allowance as an eligibility benefit will assist in helping the majority of people in receipt of this benefit continue to have the opportunity to be assessed for Council Tax Support.</p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. 16 of these households are classified as vulnerable and 7 are in receipt of Carers Allowance (6 are in both of these categories).</p>				
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	<p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
Gender reassignment	<ul style="list-style-type: none"> <li>This information is not available within Harrow profiling or the Council Tax Support caseload</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marriage and Civil Partnership	<p><b>Harrow Profile</b></p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> <li>54% of Harrow residents are married</li> <li>As at 31<sup>st</sup> December 2016 there have been 142 Civil Partnerships, 19 of which have been converted to marriage</li> <li>There have been 32 same sex marriages in Harrow since inception on 29<sup>th</sup> March 2014</li> </ul> <p><b>Council Tax Support profile</b></p> <p>2,535 households in the working age Council Tax Support caseload are couples.</p> <p>Data is either not held or cannot be extracted to identify whether Council Tax Support customers are married, if they are in same sex marriages or in Civil Partnerships</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p><b>Impact of proposed changes</b></p> <p><i>The negative impact of the proposals for households in this characteristic has been classified as minor. For the majority of Council Tax Support claimants who are couples this is expected to be the case. However, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (329 will lose £5-£10 a week and 73 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></p> <p>The impacts experienced by couples are similar to those of households with children as 85% of couples have children. The level of impact will depend on how many children the couple have. See the 'Age' characteristic for more information.</p> <p>Couples are also more likely to work so are therefore more likely to see change to their entitlement (62% of couples work compared to 39% of the caseload as a whole). See the 'Age' characteristic for more information on the impacts of being in work.</p> <p>32% (801) of couples will see a reduction to their entitlement as a result of these proposals compared to 24% of the total caseload. 13% (329) will lose more than £5 compared to 6.6% of the total caseload. 256 will lose £5 - £10 a week and 73 will lose over £10</p> <p>31% (777) will gain compared to 19% of the total caseload. 17.9% (454) will gain over £5 a week compared to 11.3% of the total caseload. 261 will gain £5 - £10 a week and 193 will gain over £10.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested</p>				
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	<p>scheme</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. 9 of these households are couples</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p>People in receipt of contribution based Job Seekers Allowance or Employment Support Allowance who do not receive Universal Credit, will still be able to access the Council Tax Support scheme due to the exception to the Universal Credit eligibility rule for this group.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
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Pregnancy and Maternity	Council Tax Support data is not available for this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Race/ Ethnicity	<p><b>Harrow profile</b></p> <p>Our Harrow, Our Community – Equality Profile data report 2017/18:</p> <ul style="list-style-type: none"> <li>• 61.8% of Harrow residents classify themselves as belonging to a minority ethnic group</li> </ul> <p>2011 census data:</p> <ul style="list-style-type: none"> <li>• 8.2% Black or Black British</li> <li>• 4% Mixed race</li> <li>• 12% Other Asian or Asian British</li> <li>• 1.5% Other ethnic group</li> <li>• 30.2% South Asian or South Asian British</li> <li>• 34% White British or Irish</li> <li>• 8.2% White Other</li> </ul> <p>Research shows that Harrow's BAME population rate is growing, most notably in White Other (Romanian)</p> <p><b>Council Tax Support caseload</b></p> <p>Ethnicity data is held for 34% (2,269) of the Council Tax Support working age</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



	<p>caseload. The monitoring data is completed by the applicant so gives information relating to the claimant which could differ from other household members. While this means a complete picture is not available, it gives an indication of any ethnic group that may be disproportionately impacted by the proposals. Analysis of the impacts on the 34% where Race data is held reflects the impacts on the caseload as a whole which indicates that the data is more reliable than not.</p> <p>Furthermore it should be noted that the Harrow data is based on population while the Council Tax Support data is based on households. If any ethnic group is more likely to have larger or smaller number of members in the household, this could influence the data</p> <ul style="list-style-type: none"> <li>• 69% classify themselves as being from an ethnic minority group</li> <li>• 16.6% Black or Black British</li> <li>• 3.7% Mixed race</li> <li>• 27.6% Other Asian or Asian British</li> <li>• 2.4% Other ethnic group</li> <li>• 14.3% South Asian or South Asian British</li> <li>• 31% White British or Irish</li> <li>• 4.2% White Other</li> </ul> <p>There are proportionately more claims from households in the Black or Black British and Other Asian or Asian British groups. This means these groups are disproportionately likely to be impacted by these proposals.</p>				
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	<p>South Asian or South Asian British and White Other households are less likely to be in receipt of Council Tax Support than compared to the number in the population. This means they are disproportionately less likely to be impacted by these proposals. The main ethnic group within South Asian or South Asian British is Indian at 26.4% of the population and 7.6% of the Council Tax Support caseload.</p> <p><b>Impacts of the proposals</b></p> <p><b><i>The negative impact of the proposals for households with the Race characteristic has been classified as minor. For the majority of Council Tax Support claimants this is expected to be the case, however as stated in other characteristics there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (90 households classified as an ethnic minority will lose £5-£10 a week and 14 will lose over £10 a week). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></b></p> <p>Below sets out where any ethnic group is disproportionately impacted compared to the caseload as a whole. Total caseload data is:</p> <ul style="list-style-type: none"> <li>• 24% lose</li> <li>• 19% gain</li> <li>• 56% will see no change</li> </ul> <p>Black or Black British (377) are less likely to gain 14% (54) but are also less likely to lose 25% (95). This is because disproportionately more households with this characteristic are not in work and therefore more likely to see no change to their Council Tax Support as a result of these proposals</p>				
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	<p>Mixed race (85) are less likely to gain 11% (9), less likely to lose 14% (12) and more likely to see no change 75% (64). This is because disproportionately more households with this characteristic are not in work and therefore more likely to see no change to their Council Tax Support as a result of these proposals</p> <p>Other Asian or Asian British (626) are more likely to lose 31% (191), more likely to gain 31% (193) and less likely to see no change 39% (242). This is because these households are more likely to be in-work and therefore more likely to be affected by the proposals.</p> <p>White British or Irish (706) are less likely to lose 19% (132), less likely to gain 12% (88) and more likely to see no change 69% (486). This group are less likely to see any change because they are more likely to be out of work.</p> <p>White other (95) are more likely to lose 31% (30), more likely to gain 34% (33) and less likely to see no change 34% (33). This is because these households are more likely to be in-work and therefore more likely to be affected by the proposals.</p> <p>No Race characteristic is identified as being disproportionately impacted by having more children compared to the total caseload</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing</p>				
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	<p>the barriers to claim.</p> <p>As there are proportionately more Black or Black British and Other Asian or Asian British groups claims, these groups will benefit from this proposal.</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. Race monitoring data is held for 7 of these households: 3 are Asian or Asian British Indian, 3 are White British and 1 is Asian or Asian British Pakistani.</p> <p>The exception to this rule will be for households in receipt of contribution based Job Seekers Allowance and Employment Support Allowance who may not receive Universal Credit. This exception is expected to mitigate the impact of this proposal for people in receipt of these benefits.</p> <p>People in receipt of contribution based Job Seekers Allowance or Employment Support Allowance who do not receive Universal Credit, will still be able to access the Council Tax Support scheme due to the exception to the Universal Credit eligibility rule for this group.</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future changes they may experience (up to maximum liability).</p>				
Religion or belief		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Council Tax Support data is not available for this characteristic				
Sex	<p><b>Harrow Profile</b></p> <ul style="list-style-type: none"> <li>• Our Harrow, Our Community – Equality Profile data report 2017/18:</li> <li>• 49.9% of Harrow's population are male</li> <li>• 51.1% are female</li> </ul> <p>Harrow's vitality profile 2011/13 states there are 5,560 lone-parent households in Harrow, accounting for 16,542 residents. 6.6% of Harrow's households are lone parent households.</p> <p><b>Council Tax Support profile</b></p> <ul style="list-style-type: none"> <li>• Couples account for 38% (2,535) of the Council Tax Support working age caseload. It is not possible to state how many of these are mixed sex and how many are same sex.</li> <li>• There are 3,957 where there is no partner and the sex of the claimant is known. 73% (2,888) are female and 27% (1,069) are male</li> <li>• 26% (1,754) of working age Council Tax Support households are lone parents</li> <li>• 94% (1657) of lone parents are female and 6% (97) are male</li> <li>• 56% (1,231) of single people with no children in their benefit household are female and 44% (972) are male</li> </ul> <p>Data is either not held or cannot be extracted to identify whether Council Tax Support customers are married, if they are in same sex marriages or in Civil</p>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>Partnerships</p> <p><b>Impact of the proposed changes</b></p> <p><i>The negative impact against the sex characteristic has been classified as minor. This is because for the majority of households the impact will either be positive, no impact or a minor negative impact. However,, there are some households who may experience a major negative impact because of the amount of Council Tax Support they will lose each week (13 single male claimants will lose £5-£10 a week and none will lose over £10 a week. 83 single female households will lose £5 - £10 a week and 15 will lose over £10). While there are mitigations proposed to reduce this impact, it should be recognised that for some the impact will continue to be classified as major.</i></p> <p>Analysis of the impacts for people who are not in a couple (lone parents and single people without children) shows that men are most likely to see no change to their Council Tax Support (80% compared to 56% of the caseload as a whole).</p> <p>Male lone parents are more likely to see a reduction in their entitlement (34% compared to 24% of the total caseload) and less likely to see an increase (11% compared to 19%). There are 97 lone parent households where the claimant is male. The majority who lose will lose under £5 a week (27) with 6 households forecast to lose £5 - £10 and none over this rate</p> <p>Female lone parents are not disproportionately impacted compared to the caseload as a whole, but there are a proportionately high number of lone parents in receipt of Council Tax Support (27% of the caseload are lone parents compared to 6.6% in the borough) and most of these are women</p> <p>All single people without children are less likely to see a loss or gain with men most likely to see no change at 83% compared to 56% of the total caseload.</p>				
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	<p>73% of single women without children will see no change. This is because most of this group are out of work and a high proportion are disabled (around 68% of men and women are disabled and single without children compared to 45% of the total caseload)</p> <p><u>Proposal to use Universal Credit notification as a claim for Council Tax Support</u></p> <p>All households who are eligible for Council Tax Support will benefit from this proposal as they are more likely to receive the assistance with Council Tax Support that they are entitled to and the claim process will be easier, reducing the barriers to claim.</p> <p>As there are proportionately more female claimants than male, females are more likely to benefit from this proposal</p> <p><u>Proposal to make Universal Credit a qualifying benefit</u></p> <p>There are 23 households who are forecast to not be entitled to Universal Credit in the future and do not meet the exemption criteria in the proposed Council Tax Support scheme. The sex of the claimant is known on 13 of these households: 3 are male and 10 female. All are single with no children.</p> <p>All working households (2,590) are likely to benefit from the proposal to introduce an income banded scheme as they will not see such frequent changes to their Council Tax Support entitlement as they would under a means tested scheme</p> <p><u>Transitional Protection</u></p> <p>Transitional Protection will assist those households already in receipt of Universal Credit and Council Tax Support in Harrow as at 31<sup>st</sup> March 2020. If they are expected to lose more than 10% of their entitlement, they will be awarded 50% of this loss for the full year 2020/21 irrespective of any future</p>				
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	changes they may experience (up to maximum liability).				
<b>Sexual Orientation</b>	Council Tax Support data is not available for this characteristic	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</b> <input type="checkbox"/> Yes                      No <input checked="" type="checkbox"/>					
If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below  					
<b>2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?</b> <input checked="" type="checkbox"/> Yes                      No <input type="checkbox"/>					
If you clicked the Yes box, Include details in the space below  <p>Large families are most likely to lose a higher amount of Council Tax Support as a result of these proposals. Other changes to the benefit system will also negatively impact this group, for example the two child limit in many benefits and the Benefit Cap being applied to all benefit income when a household moves onto Universal Credit and not just the housing costs.</p> <p>The change to Council Tax Support will come at the same time as a household moves on to Universal Credit. These multiple changes could make it harder for the household to budget initially. Publicity of the Council Tax Support changes is expected to help this situation. Furthermore, reducing the number of changes to a household's Council Tax Support entitlement as their earnings change should assist with giving some stability after this initial change.</p> <p>Following Government's announcement to allow local authorities to continue to increase council tax to fund social care, it is very likely that there will</p>					



be ongoing annual increases in council tax charges which residents, including those with a low income and in receipt of Council Tax Support, will be asked to pay.

Under Brexit and the uncertainty surrounding our status in Europe, there may be unforeseen impacts which we have not been able to quantify

The Birmingham University Financial Inclusion Monitor 2019 finds that being in work is not a way out of poverty, with more than 8 million people who were living in poverty in 2016/17 having at least one paid worker in their family. Furthermore means-tested benefits for people out of work are not sufficient for people to live on e.g. in 2009 a lone parent with one child received two thirds of what she needed. Ten years later, she received less than half. For those households who will receive less Council Tax Support as a result of these proposals, if they are already struggling to manage their finances the revised scheme could create further financial hardship <https://www.birmingham.ac.uk/research/chasm/financial-inclusion/3-poverty.aspx>

### 3. Actions to mitigate/remove negative impact

**Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.**

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for <b>each</b> group, identified in section 2. In addition, you should also consider and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact please state below.	Deadline date	Lead Officer
All working age households	The proposed new scheme will monitor caseload volumes and expenditure of the scheme on a monthly basis to identify any unexpected changes in claim numbers or spend. As claimants transfer onto Universal	Monthly data to be shared with Portfolio Holder along with indepth data if it identifies that there have been unforeseen impacts or that impacts are greater than anticipated	Monthly	Fern Silverio

	Credit and the number of people claiming Council Tax Support from the new scheme grows, more detailed reviews will be carried out to identify any unforeseen impacts		Annual	
<p>All working age households to reduce the impact of losing entitlement compared to the current scheme and the level of potential loss. Particularly targeted to mitigate the impacts for families, notably larger families. The impact on this group had knock on impacts across other protected characteristics.</p> <p>Proposed scheme has been amended as set out in section 1c above to incorporate additional expenditure of £400,000 either directly in to scheme spend or in a hardship fund while households transition onto Universal Credit and therefore the new Council Tax Support scheme.</p> <p>There are still losses identified across different groups as set out</p>	<ul style="list-style-type: none"> <li>• Include additional categories for households with 3 or more children</li> <li>• Make the minimum award 70% across all non-vulnerable groups</li> <li>• Adjust the bands to make the scheme fairer and less households experiencing a reduction to their entitlement</li> <li>• Implement two non-dependant deductions in place of the proposed one at rates that support low income part time workers</li> <li>• Use net earned income instead of gross</li> </ul>	<p>Scheme to be monitored to understand caseload impacts and level of loss</p>	<p>To be implemented by 1/4/20</p>	<p>Fern Silverio</p>

above. This approach carries risk to scheme expenditure as it will open up the scheme to some residents who can not currently qualify.				
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	A publicity campaign will be carried out to inform people how their Council Tax Support entitlement could change in advance of them moving onto the new scheme. The campaign will set out the new scheme in simple terms to ensure residents are able to understand how it works.	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.  Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.	March 2020 and periodically depending on the rollout schedule for Universal Credit in Harrow	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The Council will write to people who are expected to lose out under the new scheme to advise them of the change in advance to help them to start to budget accordingly and to access support if required.	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.  Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are	March 2020 and periodically depending on the rollout schedule for Universal Credit in Harrow	Fern Silverio

		responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	An online calculator is available for Harrow's bespoke Council Tax Support scheme. This enables residents to see how much Council Tax Support they will be entitled to. A Universal Credit 'better-buy' calculator is also available through the Harrow website which informs residents of whether they will be better off on Universal Credit and what benefits they could be entitled to.	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.  Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.	March 2020	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	Anyone identified as not receiving the full benefits they are entitled to will be written to and advised of this. They will either be able to claim additional tax credits to reflect their true circumstances, or, if they don't currently receive any tax credits, then they will be informed that if they claim Universal Credit that their income could increase.	Level of change when the new scheme is implemented. Potential to carry out further publicity if low take up	31/3/20	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the	A review of earned income claims will be carried out to ensure the correct amount of earnings is held on the Council Tax Support claim. This will reduce the	Monitor number of in-work claims reviewed	Quarterly	Fern Silverio

proposals	impact of change when the household moves onto Universal Credit. Due to the volume of claims and resources required, it is not possible to review all self-employed claims, but resources will be targeted toward claims that have not been reviewed for the longest to bring the income held up to date, again with the intention of reducing the level of impact when the household moves on to Universal Credit and the new Council Tax Support scheme.			
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The scheme parameters will be reviewed annually with a view to uprate if appropriate to ensure the scheme continues to offer a similar level of support to low income residents	Monitor the average level of support, liaise with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme and monitor collection rates to understand whether the scheme is providing the appropriate level of assistance	Annually	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	For households who are already in receipt of Universal Credit and Council Tax Support as at 31 <sup>st</sup> March 2020 and who lose more than 10% of their current	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are	31/3/20	Fern Silverio

	entitlement, a level of transitional protection will be awarded for the first year of the new scheme. 50% of the loss will be awarded to give households time to adjust their budgeting in anticipation of the further reduction in 2021.	managing the changes.  Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The proposal to use the Universal Credit notification sent to the Council by the Department for Work and Pensions will increase the number of working age people in the borough who claim Council Tax Support. This will help to ensure residents receive the support they are entitled to at the earliest point.	Monitor Council Tax Support caseload volumes as Universal Credit rolls out	1/4/20	Fern Silverio
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	The Council already has in place a Vulnerability Policy to ensure consideration is given to vulnerable households when collecting monies owed to the Council. This policy will be reviewed as part of the Recovery Policy to consider what impact the proposed changes to the Council Tax Support scheme may have on recovery and potentially vulnerable households	Council Tax collection for households in receipt of Council Tax Support will be monitored to understand how residents are managing the changes.  Liaison with stakeholders such as through the Harrow Advice Forum will help to inform the Council on how residents are	31/3/21	Fern Silverio

		responding to a new Council Tax Support scheme.		
Working age households who will see a reduction to their Council Tax Support as a result of the proposals	<p>In exceptional cases, consideration will be given to exercising the Council's discretion under s13A(1)(c). Policy to be reviewed</p> <p>Funding to be allocated to this hardship scheme from the additional £400,000 while the numbers claiming on the new scheme are lower and therefore not spending the new allocation in full.</p>	Monitor expenditure under s13A(1)(c) and reasons for awards	30/6/20	Fern Silverio

#### 4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

**Include details in the space below**

By accepting the Universal Credit notification as a claim for Council Tax Support, all low income working age groups in the borough who claim Universal Credit will also be assessed for Council Tax Support. This reduces barriers to groups who may otherwise have been less likely to claim e.g. because of language barriers. This will be further advanced by simplifying the scheme, making it easier for residents to understand how much they can receive and how their entitlement has been calculated.

The proposals are most likely to positively impact households classified as disabled under the scheme who are in-work, incentivising disabled households in to work if viable for them. The level of entitlement for an in-work disabled household will be the same as a disabled household where the claimant or their partner are not in work.

#### 5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

☐ Outcome 1

**No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed**

☒ Outcome 2

**Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4**

☐ Outcome 3

**This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.**

Include details here



**Appendix**

- Appendix 1 Consultation booklet
- Appendix 2 Consultation questionnaire
- Appendix 3 Equality Impact Assessment charts – CTS scheme consulted on
- Appendix 4 Equality Impact Assessment charts – revised version of proposed scheme post consultation
- Appendix 5 Consultation feedback report

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Chart to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

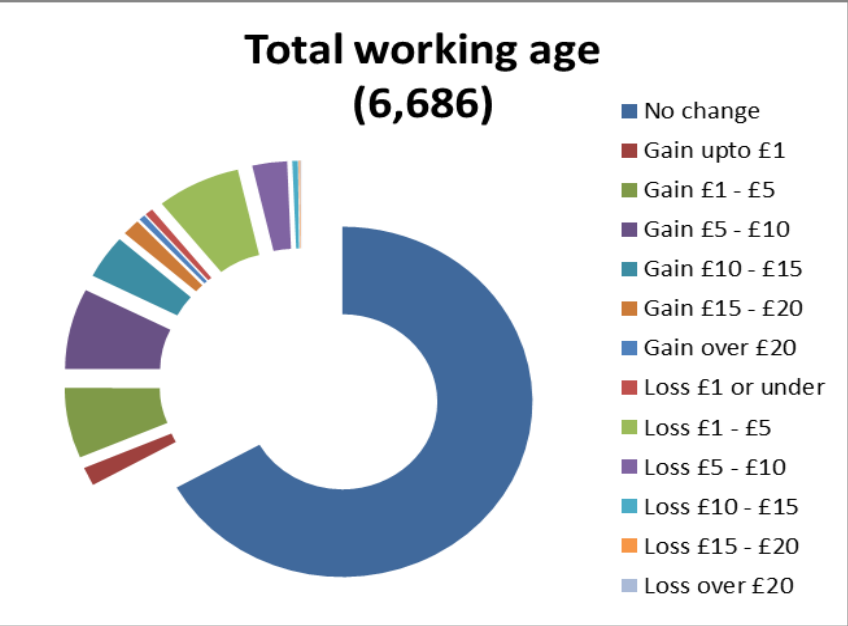
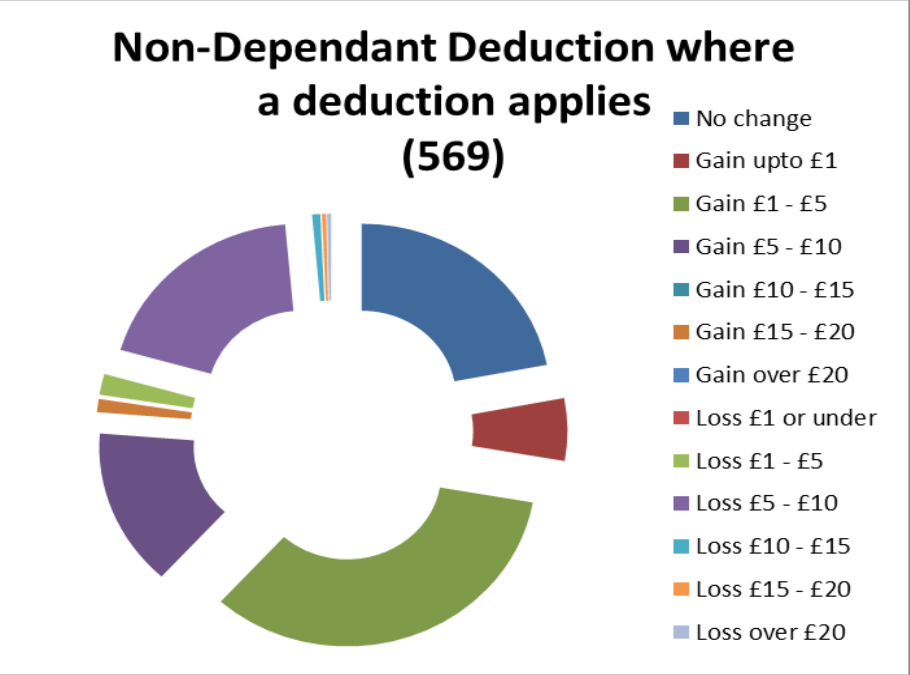


Chart to show the impact of the proposed change to non-dependant deductions only



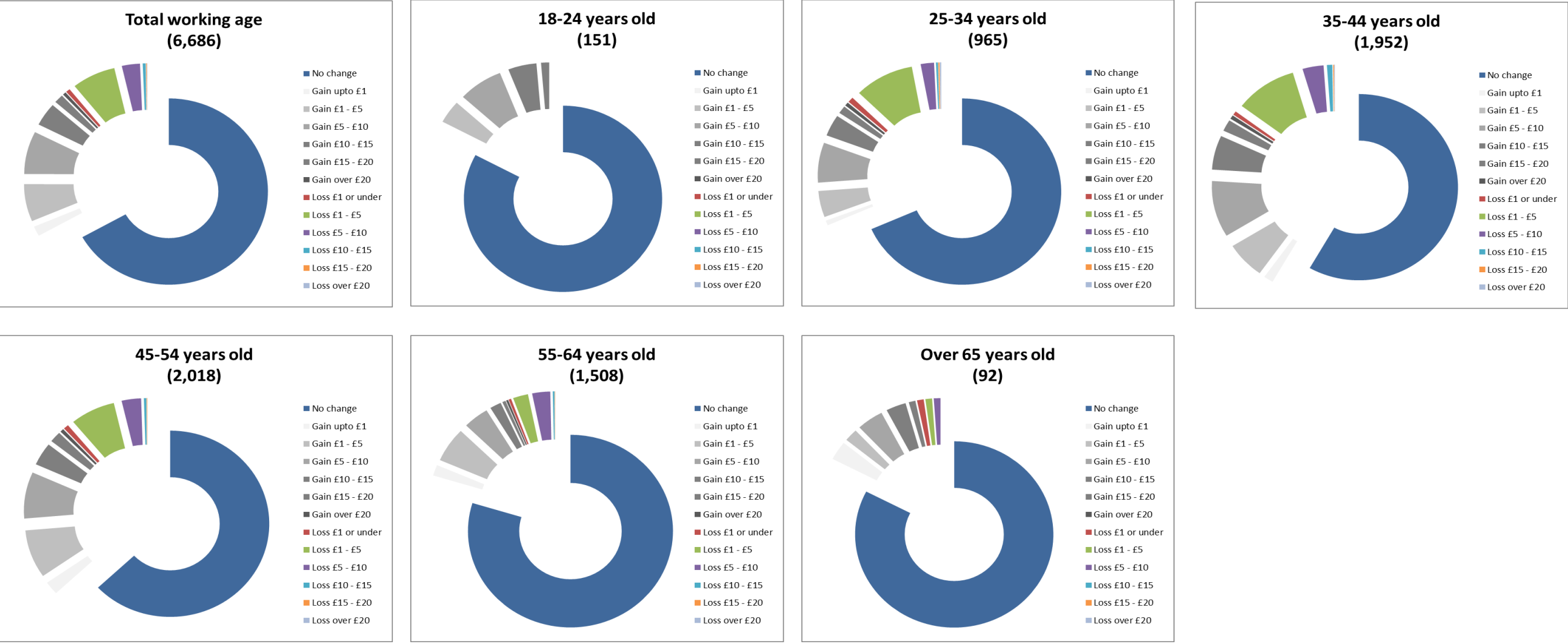
Note, there are a further 1,041 households with non-dependants who do not have a deduction taken and will experience no change as a result of these proposals

Age

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

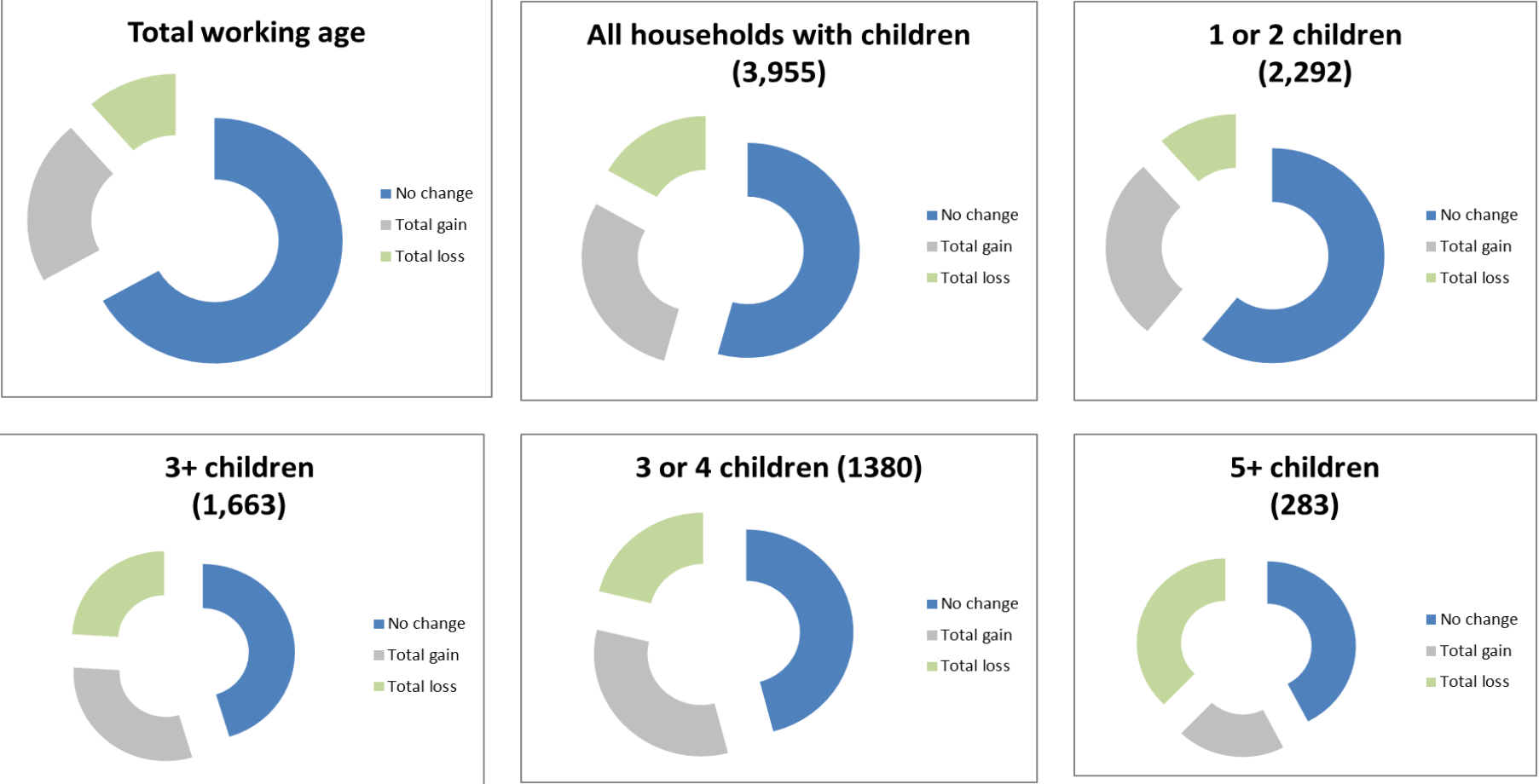


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

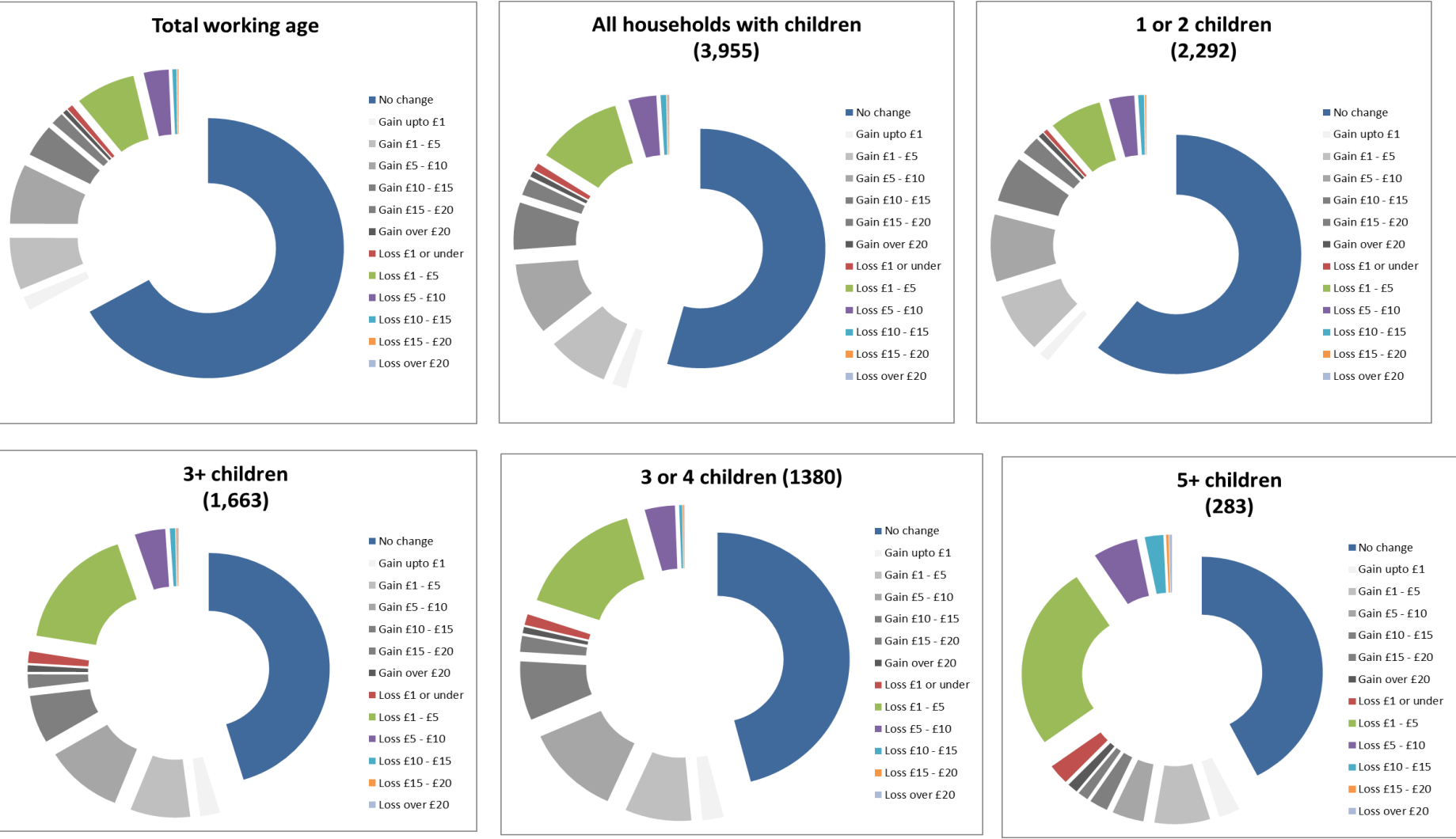


Households with children

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

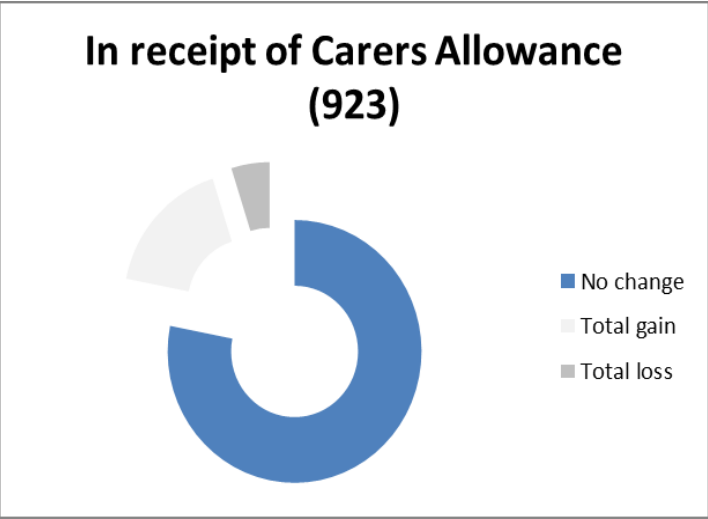
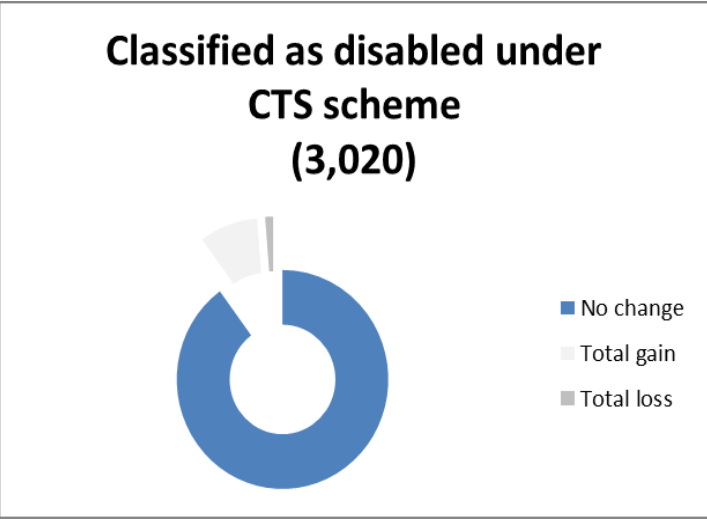
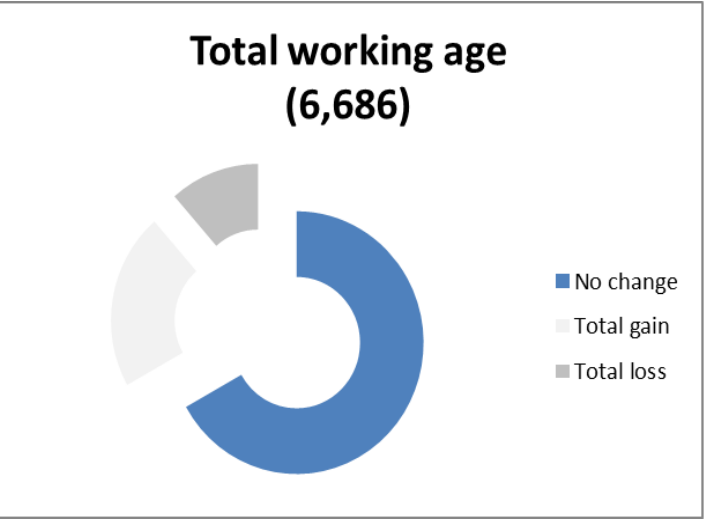


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

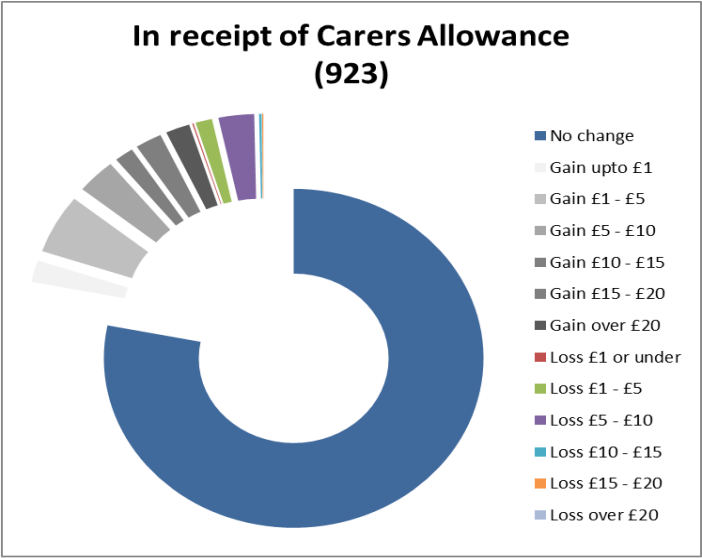
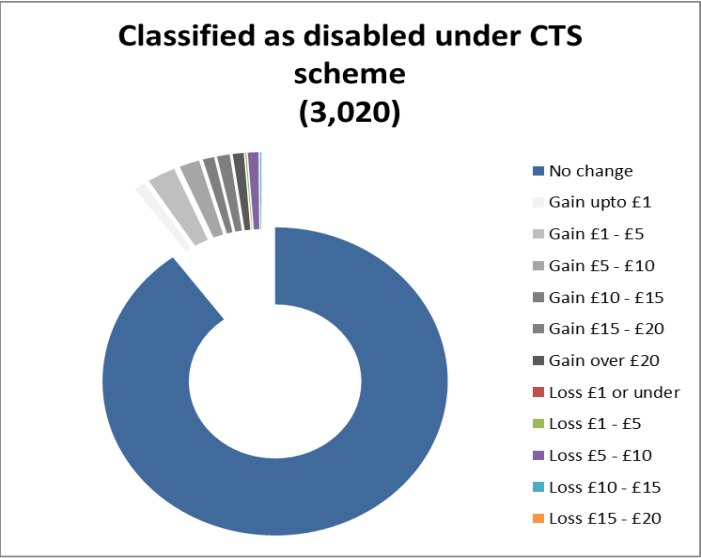
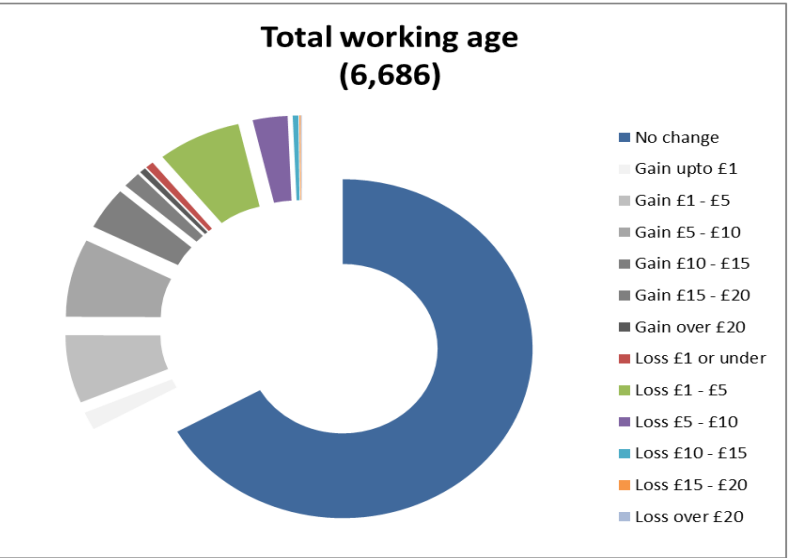


**Households classified as disabled under the Council Tax Support scheme or in receipt of Carers Allowance**

Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

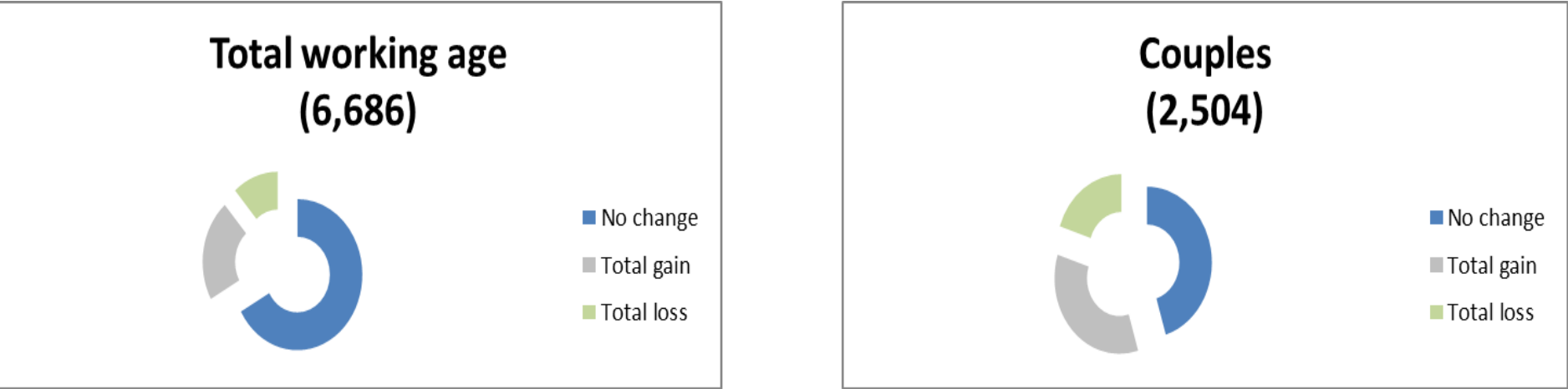


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

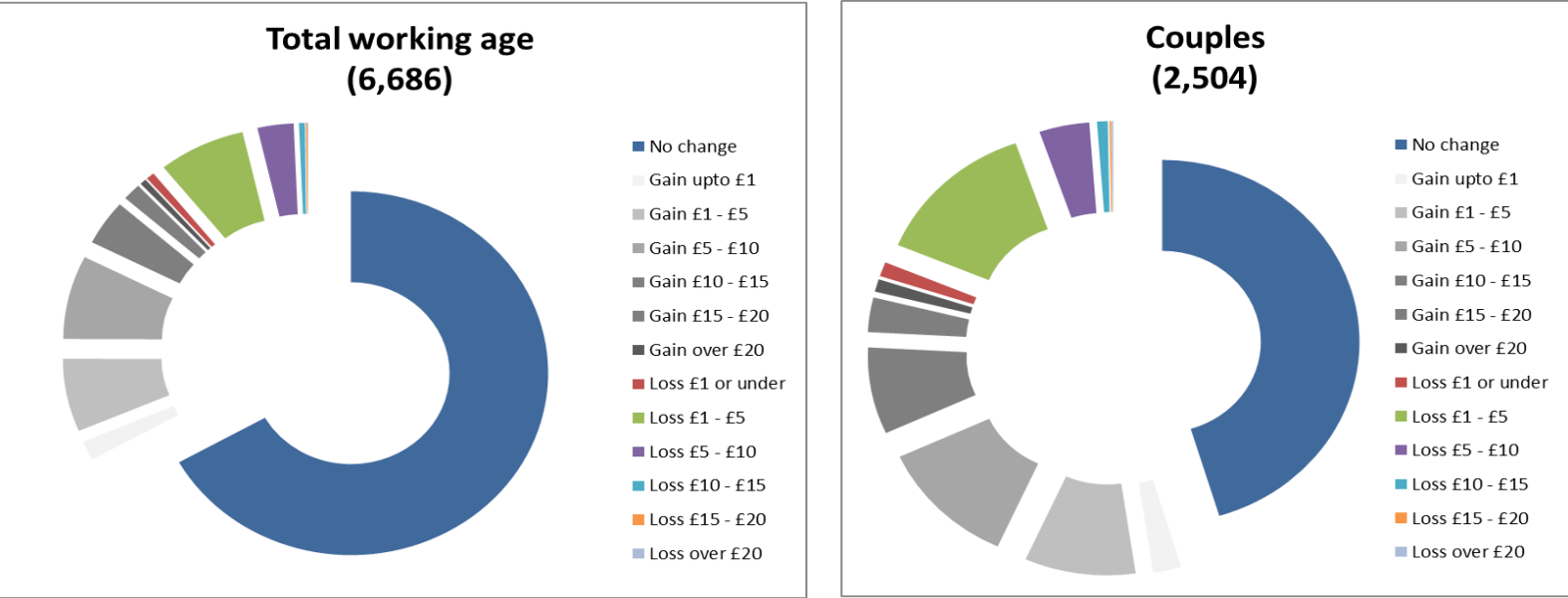


**Households where the claimant has a partner**

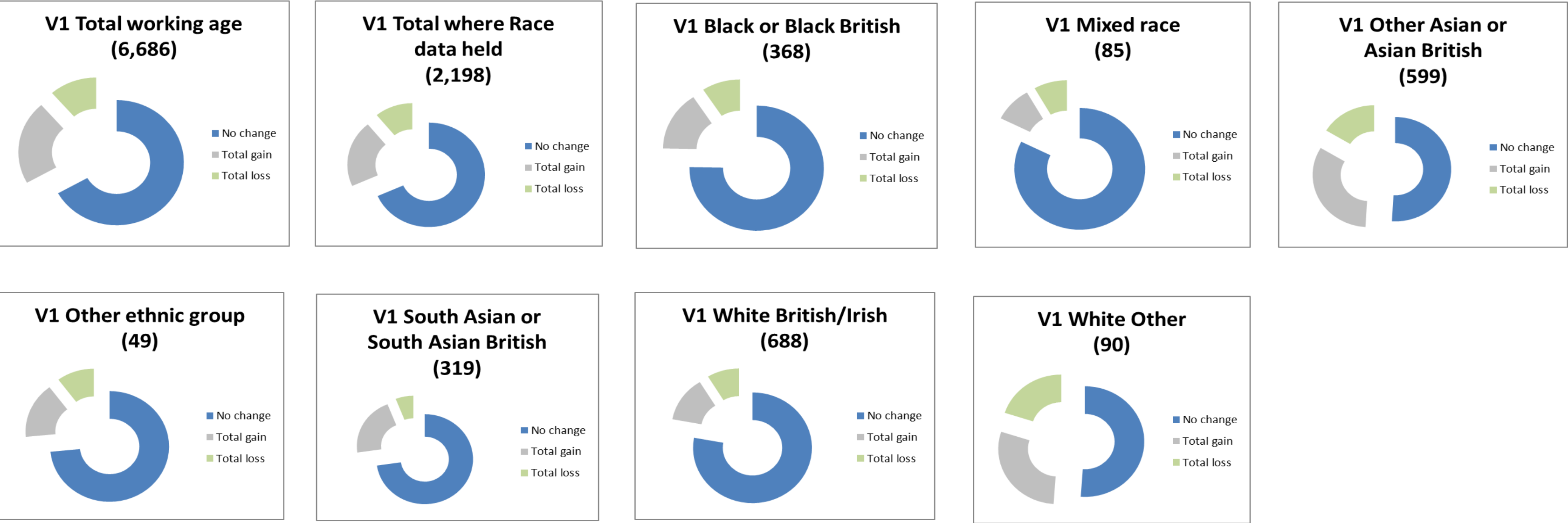
Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category



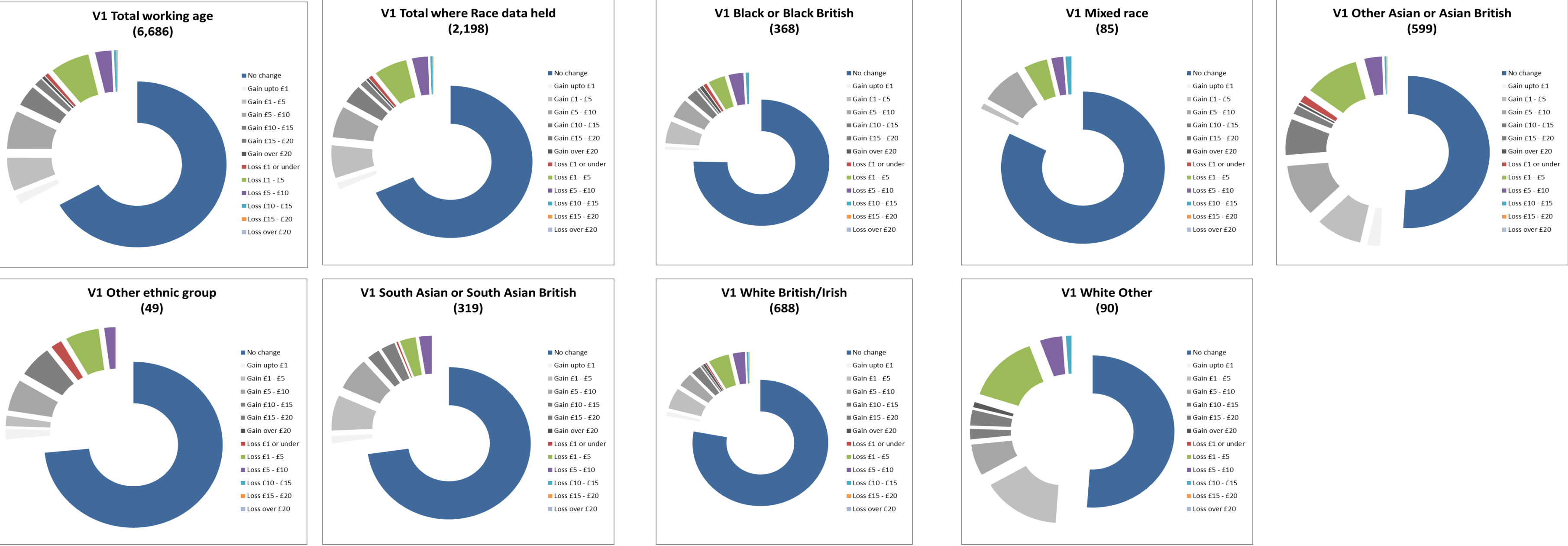
Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support



Households broken down by Race of claimant  
Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category

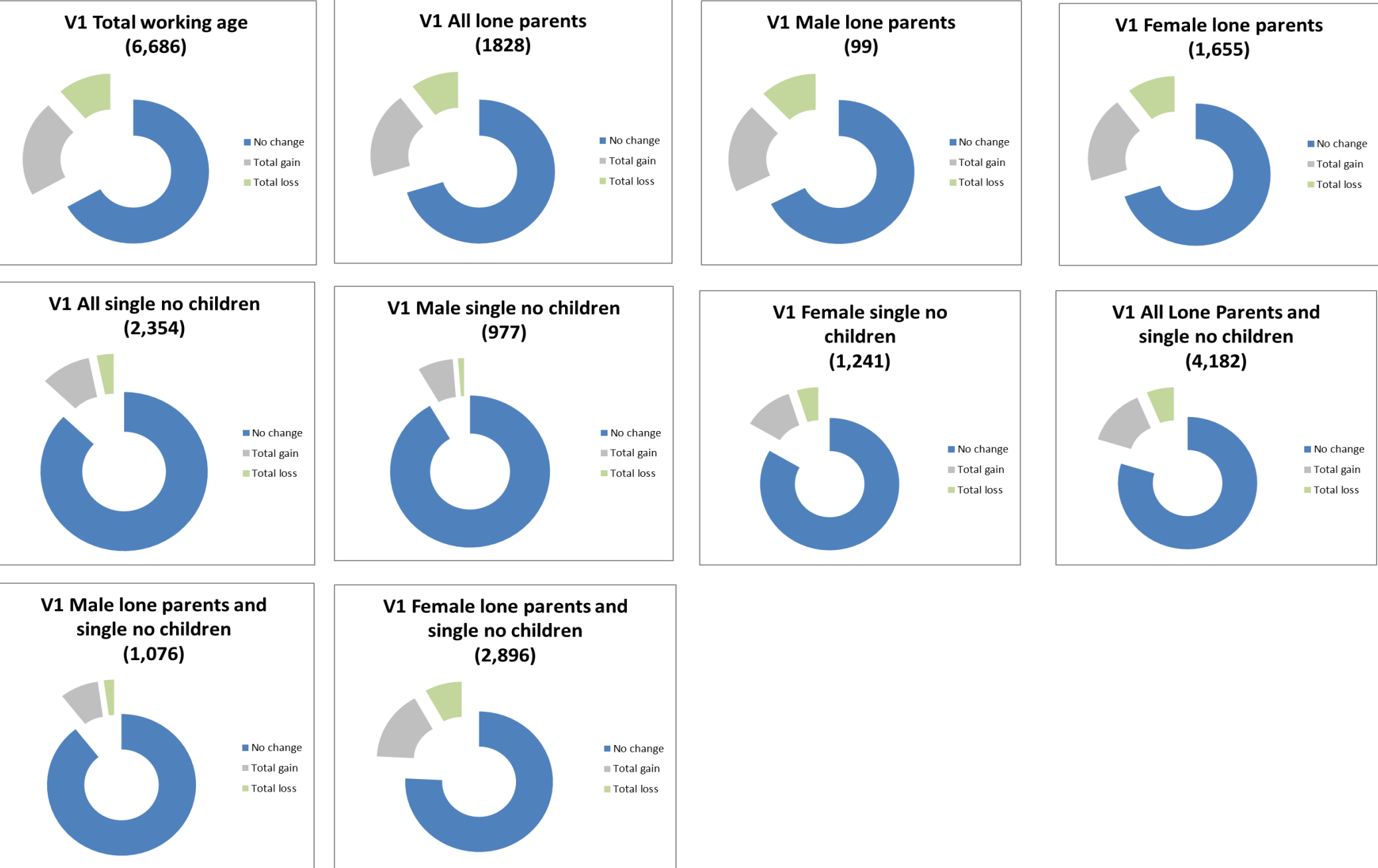


Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support

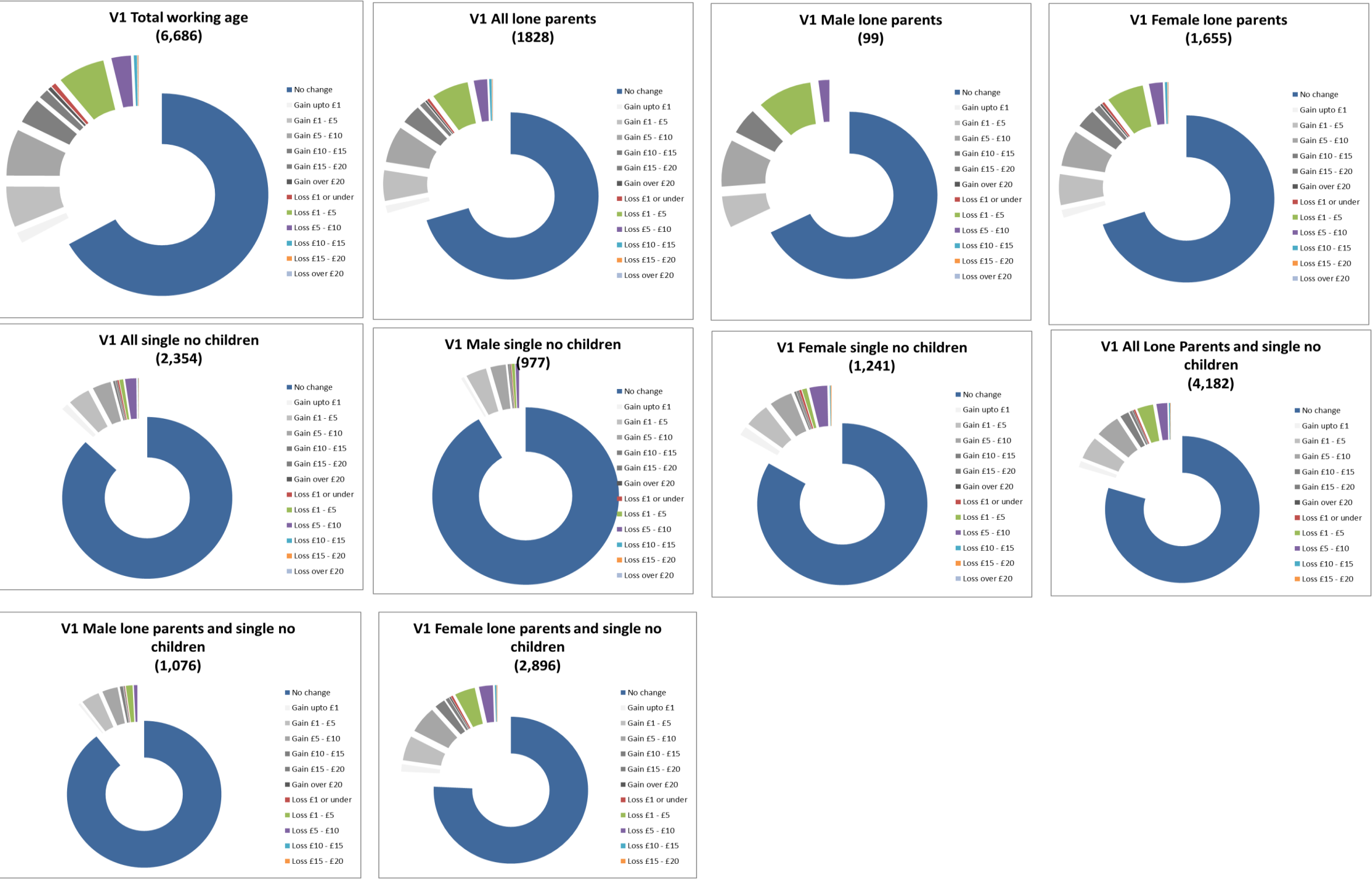




Households split by sex of claimant where there is no partner  
Summary charts to show proportion of households experiencing no change to their Council Tax Support, gaining or losing as a result of the combined proposals  
The value in brackets is the total number of households in each category



Charts to show how much households will gain or lose as a result of the proposed changes to Council Tax Support



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## **COUNCIL TAX PROTECTION FUND 2020/21 TO 2022/23**

### **Council Tax – ‘Section 13A’ Discretionary Relief Awards Policy Document**

#### **OBJECTIVES OF THIS POLICY**

- The purpose of this policy is to set out how Harrow Council intends to deliver short term debt relief for customers experiencing exceptional hardship as a direct result of their obligation to pay Council Tax

It should be noted that where the Council has a discretionary power, it must not fetter its discretion by having a set of rules that are inflexible. Each case must be considered on its own merits, determined within the budget provided and administered under the framework set out in this scheme.

The Council Tax Protection Fund (CTPF) has financial limitations and as such awards can only be made based on eligibility and having regard to the level of funding available or remaining funds within the CTPF scheme each financial year. If available funds have been exhausted from the scheme, no further awards will be made.

The Council is committed to equality and fairness. Equality is about ensuring people are treated fairly and given fair chances. It is also about ensuring that people receive fair outcomes in the standard of service they receive from the Council and equality of access to Council Services. This incorporates everyone, regardless of their race, gender, age, religion or belief, sexual orientation, marital or civil partnership status and/or disability in line with the principles set out in the Equalities Act 2010, amended 2018.

#### **INTRODUCTION**

Under s.13A of the Local Government Finance Act 1992 a local authority has the power to reduce the amount of Council Tax due ‘as it sees fit.’ This section (as amended by the Local Government Finance Act 2012) also allows a local authority to create a ‘scheme’ to reduce the Council Tax for persons or a class of persons that it considers being in financial need.

The cost of any reduction awarded under Section 13A(1)(c) must be met in full by Harrow Council. Decisions whether to award a reduction under Section 13A(1)(c) will be on a case by case basis. Schemes adopted under this policy are discretionary. This policy, once adopted, will be available on the Council’s website.

#### **LEGISLATIVE BACKGROUND**

Section 13A (1) (C) of the Local Government Finance Act 1992, provides the Council with additional discretionary powers to enable it to reduce the council tax liability after discounts, exemptions and reductions are applied.

These discretionary awards can be given to:

- Individual Council Taxpayers;
- Groups of Council Taxpayers defined by a common set of circumstances;
- Council Taxpayers within a defined area: or
- To all Council Taxpayers within the Council’s area.

The legislation states:

*.....in any case, council tax may be reduced to such extent or, if the amount has been reduced under S13a (1) (a) (Council Tax Reduction Scheme) such further extent as the billing authority for the area in which the dwelling is situated thinks fit.....*

The provision allows the Council the discretion to provide assistance to taxpayers where either the existing legislation does not provide a discount, exemption or reduction or in such circumstances where the Council feels that the level of discount; exemption or reduction is insufficient given the circumstances.

When deciding on whether to grant a discretionary award, principles of reasonableness will apply in all cases. Each application will be considered on its own merits, whilst having due consideration to this policy, national legislation and any guidance issued by the Secretary of State.

Any decision made will be without reference to any budgetary considerations; however, consideration in all cases will be given to the interests of the council taxpayers of the district who will ultimately pay for any reduction given. All awards of relief are only intended as short term assistance and will not extend beyond the current financial year of the bill and should not be considered as a way of reducing Council Tax liability indefinitely.

These schemes will take effect for all applications made / eligible tax payers in respect of Council Tax liabilities incurred from 1<sup>st</sup> April 2020, and shall apply for a period of three years, (ie.until 31/3/23), or unless determined sooner, or where group categories specify that they apply for a specific period only.

For the purposes of administration, the decision to grant any reduction in liability shall be considered for the following classes / categories:

**Groups of Council Taxpayers defined by a common set of circumstances -  
Universal Credit Migration Category**

Under the "Migrating to Universal Credit" (UC) category of Harrow Council Tax Support scheme, a working age claimant in receipt of council tax support and migrating to the DWP's UC benefit may be eligible for a reduction under this scheme.

From 1<sup>st</sup> April 2020, claimants in receipt of council tax support who migrate across to Universal credit in any of the financial years 2020/21, 2021/22 & 2022/23, will be eligible to receive an additional reduction in their council tax liability from the date of their migration to UC, for a period of two weeks.

The amount of the reduction permitted shall be the equivalent of 2 weeks net council tax (after Council Tax Support entitlement, single person discounts and other discounts are taken into account) at the time that they migrate across to Universal Credit. This relief will only be granted once to any recipient of CTS, regardless they may come off UC and resume being entitled to UC again in the future.

### **Working Age CTS recipients affected by 2020/21 Council Tax inflation increase**

Under this category, working age CTS claimants having to pay more council tax for the financial year 1<sup>st</sup> of April 2020 due to the impact of the 3.99% council tax increase, may be eligible for a reduction under this scheme.

From 1<sup>st</sup> of April 2020, council tax support claimants who are liable for payment of council tax on 1<sup>st</sup> of April 2020 and who remain council tax payers in Harrow for the full 2020/21 financial year, will be eligible for a reduction from their council tax, equivalent to the additional amount they would otherwise have had to pay solely due to the effect of council tax inflation included in the 2020/21 bill and assuming all other circumstances prevailing on 1/4/2020 remained the same.

For the avoidance of doubt, this will be calculated based on net council tax liability at the end of the financial year or other date as may be practicable.

The award will be calculated as follows;

Regarding the percentage of Council Tax weekly liability covered by CTS

(31/03/20 Council Tax weekly liability less CTS award)    Less

(31/03/20 Council Tax weekly liability plus 4% less CTS award)

= Hardship Relief award amount to be granted

Weekly amount will be prorated over the year.

### **Individual Council Taxpayers - Exceptional Financial Hardship**

In accordance with Section 13A (1) (C) of the Local Government Finance Act 1992, the Council has a Council Tax (CTS) Scheme which provides support, through a discount, to those deemed to be within financial need.

Applications will be accepted under this part of the scheme from claimants who have qualified for a reduction under the Harrow Council Tax Support Scheme but who are experiencing severe financial hardship.

Applications will only be granted in exceptional or unforeseen circumstances that threaten a taxpayer's ability to discharge their liability for council tax and may threaten their ability to stay in their home. It is a pre-requisite that other eligible welfare benefits and council tax discounts, reliefs and exemptions have been considered, applied for and exhausted, to deal with council tax hardship and affordability issues. In these circumstances, Harrow Council will give consideration to reducing Council Tax liability for any applicant within the borough, including to those taxpayers not in receipt of CTS. Additionally, any sum of unpaid Council Tax must not be the result of wilful refusal to pay or culpable neglect.

The amount and duration of an award under this section shall be determined on the merits of each individual case. Generally awards are anticipated to equate to one months' worth of the annual net council tax liability for the year in which an application is received (around £150 based on a band D council tax bill for 2019/20). In exceptional cases and on individual merit, higher amounts may be granted dependent on circumstances. Applications in this category will be via a completed

application form and provision of satisfactory evidence that demonstrates financial need.

### **The Award**

For the category award regarding UC, the amount shall not exceed 2 weeks equivalent of net annual council tax. An award will only be given once, normally in the financial year when the claimant migrates to UC.

For the category award regarding working age CTS recipients affected by council tax inflation, the amount will be worked out as per the formula set out in the policy under the appropriate group category. An award will only be given once, and apply to the 2020/21 financial year only.

For individual awards under the Hardship category will normally only be given once in any financial year.

### **Changes in an applicant's circumstances**

Should an applicants' circumstances change dramatically for the better whilst an application is being considered (cash / asset inheritance, obtained employment etc), the authority retains the right to refuse the application.

### **Payment**

In line with legislation, any award shall be granted as a reduction in the liability of the Council Tax Payer thereby reducing the amount of Council Tax payable. Where a reduction in liability has been granted incorrectly or in error, either due to a failure to provide the correct or accurate information to the Council or some other circumstances, the amount will be recovered from the Council Taxpayers account in the normal way.

### **Recovery Costs**

Where an award is made under the individual tax payers "exceptional financial hardship" scheme, should there remain any unpaid summons or Enforcement Agent costs or charges, consideration will be given to have these costs waived so the tax payer does not have to pay them.

### **Fraud**

Where a customer has failed to provide information, the Council reserves the right to withdraw any award made under this scheme. If an award has been made due to an applicant knowingly supplying false or misleading information, Harrow Council reserves the right to cancel any reduction that may have been given and reserves the right to prosecute.

### **Application Process**

For individual hardship relief, requests will need to be made in writing, via the appropriate application form, detailing hardship suffered. The Council will consider applications on a case-by-case basis in consultation with other organisations as appropriate. Harrow Council may request evidence that is relevant to the application. No costs will be borne by the Council in the provision of this request for evidence.

For category cases (migrating to UC & affected by inflation), these will be assessed automatically by the local authority, following either receipt of instructions from the DWP that the claimant is to migrate to UC, or from the Housing Benefits Team confirming that the working age CTS claimant's council tax bill in 2020/21 is higher than the 2019/20 bill solely due to council tax inflation. A notice will be sent showing the award.

As part of the process of applying for additional support, all applicants (but excludes those eligible for awards under the group categories) must be willing to undertake all of the following:

- Make a separate application for assistance.
- Provide full details of their income and expenditure.
- Satisfy the Council that they are not able to meet their full Council Tax liability and that they have taken all reasonable steps to do so; including making applications for employment or additional employment.
- Accept reasonable assistance from a third party such as the Citizens Advice Bureau or similar organisation, to enable them to manage their finances more effectively including the termination of non-essential expenditure.
- Assist the Council to minimise liability by ensuring that all discounts, exemptions and reductions are properly claimed.
- Satisfy the Council that they have applied for all appropriate Benefits and support available from the DWP.

The Council will treat all applications on their individual merits, however all of the following criteria must be met for each case:

- There must be evidence of financial hardship or personal circumstances that justifies a reduction in council tax liability
- The applicant has applied for council tax support / DWP benefits
- All other appropriate council tax discounts/reliefs have already been awarded
- The applicant does not have access to other assets that could be used to pay council tax
- The amount outstanding must not be the result of deliberate non-payment or failure to make payments as required through neglect.
- The purpose of the award is to allow the customer time to put mechanisms in place to allow them to pay their ongoing council tax liability in the medium term

The Council will be responsible for assessing applications against this policy and an officer will consider the following factors when applying this policy:

- Current household composition and any specific circumstances including disability or caring responsibilities.
- The exceptional circumstances of the applicant and/or their family's circumstances that impact on finances;
- The length of time they have lived in the property;
- The amount available in the Hardship Fund at the time of the application.
- Entitlement to Council Tax Reduction.
- Current financial circumstances.

- Determine what action(s) the applicant has taken to alleviate the situation.
- Consider alternative means of support that may be available to the applicant by:
  - i. the re-profiling of council tax debt or other debts;
  - ii. applying for a discretionary housing payment for Housing Benefit or the housing element of Universal Credit (where applicable);
  - iii. maximising other benefits; and
  - iv. determining whether in the opinion of the decision maker the spending priorities of the applicant should be re-arranged.

Applications for relief should be one of last resort. Applicants will need to ensure they are able to satisfy the Council that they have taken all reasonable steps to resolve their own situation prior to award.

### **Who can apply?**

Those persons liable to pay Council Tax to Harrow Council who can apply are:-

- Owner occupiers
- Tenants
- Liable residents (but not formally a 'tenant')
- Persons acting on behalf of a liable person i.e. an appointee, solicitor or someone with power of attorney

### **Who cannot apply?**

Any person not liable to pay Council Tax to Harrow Council, but also specifically:-

- Landlords of properties where the tenant is liable
- Landlords, if liable
- Estate agents/managing agents on behalf of a landlord
- Previous Harrow Council Tax payers who are no longer resident or liable for on-going council tax in Harrow at the time of application
- Friends/relatives of the liable person (unless acting as an appointee or under a power of attorney)
- Support agencies (unless acting as an appointee or under a power of attorney)
- Banks or other holders of a mortgage or other legal charge on a property
- Owners or those in possession of empty properties (including long-term empty and furnished second homes)

The Council reserves the right to request any additional evidence in support of an application and will act consistently and reasonably in doing so. Where the applicant is unable to, or does not supply the required evidence, the Council consider the application on the information available, including documentation held on the housing benefit/council tax support case file. The Council may consider the household's overall financial capability when determining an award for discretionary relief. Applications where the applicant has failed to provide information required / requested within a reasonable timescale provided will be refused unless good cause can be shown as to why the delay occurred.



## **Consideration of Applications**

In exercising its discretion, Harrow Council shall have regard to this scheme document and the considerations set out within it.

This is not to say that an application which appears to comply with the scheme will necessarily be granted or one that does not will necessarily be refused. Harrow Council will ensure that each application is considered on its own merits, and this scheme document is intended to act as a guide rather than a 'hard and fast' rule. That said, it will not be possible to consider the application without a statement of reasons for hardship and a financial statement.

Applications will be considered within 14 working days of receipt of the application or soon as is reasonably practicable and all supporting information being received and Harrow Council will notify the applicant should there be a delay in processing the application.

Decisions on eligibility for an award will normally be made by the Head of Service, Collections & Housing Benefits, or an officer delegated by them within the Council's Scheme of delegation. The applicant will be notified of the decision in writing.

When the application is received, careful consideration must be made to the reasons for financial hardship. There must be clear evidence of hardship or personal circumstance that justifies a reduction in Council Tax liability, the following will be considered before awarding any reduction;

- a) The applicant must demonstrate in their application that they have taken all reasonable steps to resolve their own situation prior to making an application.
- b) Income and allowable expenses; reference can be made to the National Debtline budget figures which give a guidance on how much should be allowed for day to day living expenses. If these seem unnecessarily high, further information may be sought as there may be a reason for such high expenditure.
- c) Luxuries and 'lifestyle' choices; this can include taking out of the calculations any excessive commitments for non-basic items (eg TV channel subscriptions, excessive mobile subscriptions, monies spent on cigarettes or alcohol, going out/entertainment expenses)
- d) Prospect of a change in the applicants circumstances; is the applicant able to work and likely to return to work?
- e) Whether the applicant has access to other assets that could be used to pay the Council Tax if there was a surplus income then it would be difficult to support the position that there is hardship.

Additional factors to be considered;

- i. Reasons for hardship? i.e. historical debt problems, sudden change in circumstances or a recent financial burden. If an applicant has had bereavement or life change such as divorce or separation, it could be considered that there are valid reasons that hardship is being experienced. However if there is evidence that a applicant has continued to seek credit beyond their means then it may be more appropriate to refer them for debt counselling than apply a s.13A reduction.

- ii. How has the applicant sought to relieve their financial hardship? – i.e. maximising income or seeking advice on debt management or working out a budget.
- iii. Will a discretionary award address the hardship or will it be a temporary solution to other ongoing issues? Whilst it could be beneficial to the applicant to relieve a financial burden in the short term, a s.13A reduction should never be viewed as an ongoing solution.
- iv. Is there any other assistance that can be offered – e.g. Discretionary Housing Payment or Council Tax Reduction?
- v. Are there any other methods of reducing financial hardship? Does the applicant have any other debts with the Council? If an applicant has a housing benefit overpayment or sundry debt, it may be possible to spread the payments over a longer period of time to ensure that the applicant is paying something towards all their debt.
- vi. Any issues of vulnerability.

### **Appeals procedure**

Appeals against decisions to award a Section 13A(1)(c) reduction are to be made to the Valuation Tribunal under section 16 Local Government Finance Act 1992. Applicants will be notified of the appeals process in writing at the time that they are notified of the outcome of their application.

An appeal must be made within 28 days of the issue of the letter notifying them of the decision. The appeal must be made in writing.

Submitting an appeal does not affect the appellant's legal rights to challenge a decision made by the Council through the Judicial Review process.

End



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**REPORT FOR: HEALTH AND WELLBEING BOARD**

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<b>Date of Meeting:</b>	14 <sup>th</sup> January 2020
<b>Subject:</b>	Health and Wellbeing Board Change to Terms of Reference
<b>Responsible Officer:</b>	Paul Hewitt Corporate Director – People Services
<b>Public:</b>	Yes
<b>Wards affected:</b>	All Wards in the Borough
<b>Enclosures:</b>	The existing Terms of Reference are attached with the proposed changes highlighted in red font (see Nos. 2.3; 4.1; 4.8; 4.9)

## **Section 1 – Summary and Recommendations**

This report sets out the reasons for the proposed amendments to the Terms of Reference.

### **Recommendations:**

The Board is requested to agree to the proposed changes to the Terms of Reference. The Board is requested to recommend that the Amended Terms of Reference is adopted at Full Council.

## Section 2 – Report

### Background – A move towards integrated care

Health and Wellbeing Boards (HWBs) were formed under the Health and Social Care Act 2012. Their original purpose was to improve the health and wellbeing of the local population by providing a forum for health leaders (including those from NHS, local government and public health) to come together and agree health priorities and actions for the area. HWBs have a statutory duty to work alongside the Clinical Commissioning Group (CCG) to produce a Joint Strategic Needs Assessment (JSNA) and a joint health and wellbeing strategy for the local population.

In recent years there has been a growing movement towards more integrated care. This is when organisations work together to meet the needs of the local population and aim to improve population health by tackling the underlying causes of illness and wider determinants of health.<sup>1</sup> It is important that HWBs reflect the movement towards integrated care whilst retaining their original purpose of improving health and wellbeing locally.

#### *Integrated care at a local level*

Integrated care already exists at a local level. Integrated Care Partnerships (ICPs) are alliances of NHS providers and local authority partners that deliver integrated care. They work together collaboratively rather than competing with each other.<sup>2</sup> In Harrow ICP partners include Central and North West London NHS Foundation Trust, Harrow CCG, Harrow Council and Harrow Primary Care Networks. In Harrow there is also joint commissioning of services. For example, Harrow CCG and London Borough of Harrow jointly commission services for children and young people.

#### *Integrated care at a regional level*

In 2015 sustainability and transformation plans were introduced by NHS Planning Guidance. These were designed to be long-term plans made jointly by local NHS organisations and local authorities. Forty four designated geographical areas in England were mapped out for these plans. The planning guidance for sustainability and transformation plans highlighted the importance of engagement with local government partners through HWBs. Over time sustainability and transformation plans became Sustainability and Transformation Partnerships (STPs) as the emphasis became more about developing and strengthening ties between NHS and local authorities. Although HWBs were intended to engage with the development of STPs, in many areas this did not happen. There was some concern that STPs were taking over the role of HWBs, except focusing on larger areas so that local areas risked being neglected. A recent review found that HWBs and STPs took on different roles in different places and there was often a lack of coordination between them.<sup>3</sup>

STPs are now developing into Integrated Care Systems (ICSs) which promote greater collaboration between the NHS and local authorities, and give them more

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<sup>1</sup> <https://www.kingsfund.org.uk/publications/making-sense-integrated-care-systems>

<sup>2</sup> <https://www.kingsfund.org.uk/publications/making-sense-integrated-care-systems>

<sup>3</sup> <https://www.cqc.org.uk/publications/themed-work/beyond-barriers-how-older-people-move-between-health-care-england>

responsibility for managing resources with less involvement from national bodies and regulators.<sup>4</sup> The NHS Long Term Plan published in January 2019 stated that ICSs would be rolled out across the country by 2021, fully replacing STPs. The benefits of ICSs include reducing variation between areas and having more power to tackle complex, intractable problems, thus improving health and social outcomes. An ICS covers multiple local authorities and therefore comprises several HWBs. Harrow will be part of North West London ICS.

HWBs appear to be playing a larger role in the development of ICSs than they did with STPs. This may be because HWBs have found they share the same priorities as ICS', specifically improving population health and tackling health inequalities.

However, there is a risk with the development of ICSs that HWBs could become marginalised over time and unable to influence ICSs. Their functions could also become incorporated into those of the ICSs, especially if there is poor leadership and poor working relationships between and within HWBs. To prevent this HWBs must have good leadership, remove barriers to collaboration and hold their ICS to account. They should also continue to develop local health and wellbeing strategies which the ICS should take into consideration; through the Local Integrated Care Partnership (ICP).

### **Proposed changes to HWB Terms of Reference**

With the move towards more integrated care both locally and regionally it is important that Harrow HWB is in the best position to support and work with the North West London ICS as it is rolled out, as well as facilitate integrated care locally through a strong ICP. The following changes proposed for the Harrow HWB Terms of Reference are designed to reflect the wider move towards more integrated care along with maintaining the HWB's role of delivering health and wellbeing for Harrow: (The numbers below refer to the numbering in the existing Terms of Reference in Appendix 1).

#### **2.3** Scrutiny of the Board's activities will be performed by the Council's Health Scrutiny committee.

This will allow the HWB to implement changes and ensure they are accountable to the Health Scrutiny Committee. (This makes the point that the Health and Well-Being Board is not to be used or perceived to be a Scrutiny Body).

#### **4.1** The Chair of the Board will be the Leader of Harrow Council; or a nominated deputy.

This change will permit the Leader of Harrow Council to nominate and delegate to a deputy as the Chair of the Board as opposed to previously where the Leader of Harrow Council would have always been the Chair. Allowing a nominated deputy to be Chair should improve flexibility and ensure that there is always strong leadership. It may also improve expertise in decision-making if the nominated Chair has specific experience in health and wellbeing.

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<sup>4</sup> <https://www.kingsfund.org.uk/publications/making-sense-integrated-care-systems>

**4.9** Other agencies and organisations will be invited as the Integrated Care Partnership [ICP] develops to enable good outcomes to be delivered for Harrow citizens.

This proposed change will allow key local providers and other relevant stakeholders to be invited to Board meetings routinely; where previously they were only allowed to attend if invited for a particular item. This should allow collaboration between stakeholders and therefore improve the commissioning and delivery of integrated care locally; in line with the aims and objectives of the Harrow Integrated Care Partnership (ICP).

#### Acknowledgements

The main source of information for this report was 'Health and wellbeing boards and integrated care systems' which can be available at:  
<https://www.kingsfund.org.uk/publications/articles/health-wellbeing-boards-integrated-care-systems>

### **Ward Councillors' comments**

None

### **Financial Implications/Comments**

There are no financial implications arising directly from this report.

### **Legal Implications/Comments**

Legal note there are no specific implications and risks identified within this Report. Any decisions undertaken in relation to the Changes to the HWB's Terms of Reference will be subject to any relevant governance considerations.

### **Risk Management Implications**

No risks identified as all relevant stakeholders are in agreement with the proposed changes.

### **Equalities implications / Public Sector Equality Duty**

Was an Equality Impact Assessment carried out? No

If no, state why an EqIA was not carried out.

Not required as no equalities have been identified.

### **Council Priorities**

The Health and Wellbeing Board oversees the Health and Well-Being Strategy which helps deliver all 5 Council Priorities described below.

**1. Building a Better Harrow**

- Create a thriving modern, inclusive and vibrant Harrow that people can be proud to call home
- Increase the supply of genuinely affordable and quality housing for Harrow residents
- Ensure every Harrow child has a school place
- Keep Harrow clean
- More people are actively engaged in sporting, artistic and cultural activities in ways that improve physical and mental health and community cohesion

**2. Supporting Those Most in Need**

- Reduce levels of homelessness in the borough
- Empower residents to maintain their well-being and independence
- Children and young people are given the opportunities to have the best start in life and families can thrive
- Reduce the gap in life expectancy in the borough

**3. Protecting Vital Public Services**

- Harrow has a transport infrastructure that supports economic growth, improves accessibility and supports healthy lifestyles
- Healthcare services meet the needs of Harrow residents
- Everyone has access to high quality education
- A strong and resourceful community sector, able to come together to deal with local issues
- Harrow continues to be one of the safest boroughs in London

**4. Delivering a Strong local Economy for All**

- A strong, vibrant local economy where local businesses thrive and grow
- Reduce levels of in-work poverty and improve people's job opportunities
- Harrow is a place where people and businesses invest

**5. Modernising Harrow Council**

- Deliver excellent value for money services
- Reduce the borough's carbon footprint
- Use technology and innovation to modernise how the Council works
- Improving access to digital services

### **Section 3 - Statutory Officer Clearance (Council and Joint Reports)**

Name: Donna Edwards	<input checked="checked" type="checkbox"/>	on behalf of the Chief Financial Officer
Date: 20 December 2019		
Name: Sarah Inverary	<input checked="checked" type="checkbox"/>	on behalf of the Monitoring Officer
Date: 20 December 2019		

Name: Paul Hewitt	<input checked="checked" type="checkbox"/>	Corporate Director
Date: 19/12/2019		

<b>Ward Councillors notified:</b> <b>MANDATORY</b>	<b>NO</b>
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### **Section 4 - Contact Details and Background Papers**

**Contact:** Paul Hewitt, Corporate Director People Services  
Email: paul.hewitt@harrow.gov.uk

**Background Papers:**

None apart from the existing Terms of Reference, which are attached as an Appendix.



# TERMS OF REFERENCE

## COUNCIL

### HEALTH AND WELLBEING BOARD

#### 1. Accountability

The Health and Wellbeing Board is set up in accordance with section 102 of the Health and Social Care Act 2012. The Council can choose to delegate decision making powers to the Health and Wellbeing Board. Any recommendations are subject to the agreement of the Leader of the Council if they are not covered by the delegated authority.

Members of the Board will be required to abide by the Code of Conduct.

#### 2. Purpose of the Board

2.1. The Government proposes that statutory health and wellbeing boards will have 3 main functions:

- to assess the needs of the local population and lead the statutory joint strategic needs assessment
- to promote integration and partnership across areas, including through promoting joined up commissioning plans across NHS, social care and public health
- to support joint commissioning and pooled arrangements, where all parties agree this makes sense

The Board will cover both adult and children's issues.

2.2. The purpose of the Board is to improve health and wellbeing for the residents of Harrow and reduce inequalities in outcomes. The Board will hold partner agencies to account for delivering improvements to the provision of health, adult and children's services social care and housing services.

2.3. Scrutiny of the Board's activities will be performed by the Council's Health Scrutiny Committee.

### **3. Key Responsibilities**

- 3.1. The key responsibilities of the Health and Wellbeing Board shall be:
  - 3.1.1. To agree health and wellbeing priorities for Harrow
  - 3.1.2. To develop the joint strategic needs assessment
  - 3.1.3. To develop a joint health and wellbeing strategy
  - 3.1.4. To promote joint commissioning
  - 3.1.5. To ensure that Harrow Council and the CCG commissioning plans have had sufficient regard to the Joint Health and Wellbeing strategy
  - 3.1.6. To have a role in agreeing the commissioning arrangements for local Healthwatch
  - 3.1.7. To consider how to best use the totality of resources available for health and wellbeing.
  - 3.1.8. To oversee the quality of commissioned health services
  - 3.1.9. To provide a forum for public accountability of NHS, public health, social care and other health and wellbeing services
  - 3.1.10. To monitor the outcomes of the public health framework, social care framework and NHS framework introduced from April 2013)
  - 3.1.11. To authorise Harrow's Clinical Commissioning Group annual assessment
  - 3.1.12. To produce a Pharmaceutical Needs Assessment and revise every three years
  - 3.1.13. Undertake additional responsibilities as delegated by the local authority or the Clinical Commissioning Group e.g. considering wider health determinants such as housing, or be the vehicle for lead commissioning of learning disabilities services.

### **4. Membership**

- 4.1. The Chair of the Board will be the Leader of Harrow Council; **or a nominated deputy.**
- 4.2. The voting membership will be:

- Members of the Council nominated by the Leader of the Council (5)
- Chair of the Harrow Clinical Commissioning Group (vice chair)
- GP representative of the Harrow Clinical Commissioning Group
- A further representative of the Harrow Clinical Commissioning Group
- CCG Accountable Officer or nominee
- Representative of Healthwatch Harrow

4.3. The following Advisors will be non-voting members:

- Director of Public Health
- Chief Officer, Voluntary and Community Sector
- Senior Officer of Harrow Police
- Chair of the Harrow Safeguarding Children and Adult Board
- Chief Operating Officer – CCG
- Corporate Director, People
- Director Adult Social Services

4.4. The voluntary and community sector representative shall be nominated by the Voluntary Community Sector Forum on an annual basis.

4.5. Members are appointed annually. Members of the Board shall each name a reserve who will have the authority to make decisions in the event that they are unable to attend a meeting.

4.6. Board members shall sign a register of attendance at each meeting and should not normally miss more than one meeting within a financial year.

4.7. The chair of the Clinical Commissioning Group will serve as the vice chair of the Health and Wellbeing Board.

4.8. **Key Providers in Harrow** will be invited to attend meetings as required depending on the subject under discussion.

4.9. **Other agencies and organisations will be invited as the Integrated Care Partnership [ICP] develops to enable good outcomes to be delivered for Harrow citizens.**

#### **4.10. Participation of the NHS England**

4.10.1. NHS England must appoint a representative to join Harrow's Health and Wellbeing Board for the purpose of participating in the Boards preparation of the JSNA and JHWS.

4.10.2. The Health and Wellbeing Board can request the participation of the NHS England representative when

the Health and Wellbeing Board is considering a matter that relates to the exercise or proposed exercise of the commissioning functions of NHS England in relation to Harrow.

#### **4.11. Meeting Frequency**

4.11.1. The Board shall meet bi monthly subject to review

4.11.2. An extraordinary meeting will be called when the Chair considers this necessary and/or in the circumstances where the Chair receives a request in writing by 50% of the voting membership of the Board

#### **4.12. Health and Wellbeing Board Executive**

4.12.1. The purpose of the Health and Wellbeing Board Executive is to:

- Develop and deliver a programme of work based on the Joint Commissioning priorities and the Joint Health and Wellbeing Strategy
- Shape future years joint commissioning
- Shape the agenda for future HWB meetings
- Engage and understand the views of different organisations (including providers)
- Bring together a collective view of partners and providers to the bi-monthly Health and Wellbeing Board
- Share Commissioning Intentions and common priorities
- Govern and quality assure the Health and Wellbeing Board work programme
- Be aware and discuss emerging policy and strategy
- Problem Solving

4.12.2. The meetings of the Executive will be scheduled to meet before the Board.

4.12.3. Membership will consist of senior representatives from both the Council and Clinical Commissioning Group, including the Directors of Adults, Children's, and Public Health services, the Chair of Harrow Clinical Commissioning Group, Accountable Officer, Chief Operating Officer, GP Clinical Directors, and finance officers.

- 4.12.4. The chairing of the Executive will alternate between the council's Corporate Director of People Services and the Chief Operating Officer, Harrow CCG.

#### **4.13. Local Safeguarding Boards**

- 4.13.1. The Council's two Local Safeguarding Boards have a horizontal link to the Health and Wellbeing Board and include:
  - 4.13.1.1. Local Safeguarding Adults Board
  - 4.13.1.2. Harrow Local Children's Safeguarding Board

#### **4.14. Conduct of Meetings**

- 4.14.1. Meetings of the Board will be held in public except where the public are excluded from the meeting by resolution in accordance with Access to Information Act.
- 4.14.2. The quorum of the Board shall be 50% of the voting membership – however there must be attendance of at least one voting member from both the Council and the Clinical Commissioning Group. Should the quorum not be secured the meeting will not take place.
- 4.14.3. Decisions shall be made on the basis of a show of hands of a majority of voting members present. The Chair will have a second or casting vote.
- 4.14.4. Each meeting will have provision for the public to ask questions. There will be a total limit of 15 minutes for the asking and answering of public questions.
- 4.14.5. Harrow Council Democratic Services will service the meetings including the preparation and circulation of agenda and the production of minutes.
- 4.14.6. Minutes of the meetings will be available on the website of the council.
- 4.14.7. The Chair shall sign off the minutes as a true and accurate record of the meeting.
- 4.14.8. Agendas and supporting papers will be available on the website of the council at least five working days before the meeting.

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