

Report to: Executive / Council
Date: 21 / 23 January 2013
Report for: Decision
Report of: Executive Member for Finance and the
Acting Corporate Director for Transformation and Resources

Report Title

Proposed Changes to Council Tax and Council Tax Benefit

Summary

As part of the Government's welfare reform programme, the existing Council Tax Benefit scheme will end and be replaced with a new local scheme from April 2013.

As well as having to agree a new scheme, the Council must deal with a reduction of funding of 11% which equates to £1.25 million, and at the same time ensure that pensioners are fully protected from any changes. In July 2012, the Executive gave approval to proceed with a consultation based on the following proposals:

- A combined Council Tax Support Scheme based on a number of changes such as restricting the level of support to the charge for a band D property, abolishing Second Adult rebate etc. This is the Council's preferred option;
- A 20% Reduction Scheme, whereby all working age claims are reduced by 20%; and
- Removal of the 10% second homes discount and replacement of the empty and unfurnished property exemption.

The main purpose of this report is to summarise the outcomes of the consultation, so that a final decision can be taken. It is important that the consultation feedback is considered alongside the Equalities Impact Assessment (EIA) and the financial aspects of the proposals, in order to have an informed view.

This report outlines the views expressed by various groups and individuals during the consultation process.

Recommendations

Following the public consultation and feedback from individuals, groups and stakeholders, the Executive recommends that the Council approves:

1. The introduction of a local council tax support scheme as outlined in proposal 1 and set out in appendix 6;
2. Remove the 100% empty property council tax exemption and replace it with a 100% discount for one month, followed by the full charge;

3. Remove the second home council tax discount;
4. The above changes will be effective from 1 April 2013.

Contact person for access to background papers and further information:

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Background Papers: Equalities Impact Assessment – Council Tax Support Scheme

Implications:

Relationship to Policy Framework/Corporate Priorities	The localised scheme will impact on the wellbeing of residents and the level of Council Tax.
Financial	These are identified in section 5 of the report.
Legal Implications:	If the council does not adopt a scheme by the 31-01-13 it will have to use the Government's default scheme which would have significant financial implications.
Equality/Diversity Implications	An Equality Impact Assessment has been undertaken. The consultation feedback has been disaggregated by equality strand and is reported by exception throughout this report.
Sustainability Implications	None.
Staffing/E-Government/Asset Management Implications	Considerable staffing resources will continue to be taken up during 2012/13 in developing and implementing the new scheme. Workload for the Revenues and Benefits Service will peak during 2013/14 as the Service manages three separate benefit systems. Council Tax recovery activity will increase due to reductions in rebate awards for certain categories of claimant. It is inevitable that the new system will also lead to increased correspondence being received, more appeals against rebate determinations and additional enquiries from customers that will also place demands on Access Trafford. Every effort will be made to absorb the extra workload from existing resources.

Reasons for Recommendation

The Government is abolishing the current Council Tax Benefit Scheme and in its place each billing authority must devise its own local arrangements. This report has been prepared following a 3 month public consultation exercise and outlines various options along with recommendations.

Key Decision

This is a key decision currently on the Forward Plan: Yes

Other Options

An alternative Council Tax Support scheme (proposal 2) was put forward for public consultation and details of this scheme can be found in section 4.5. However, the Executive recommend the preferred scheme (Proposal 1) for the reasons outlined in section 13.

Consultation

An extensive public consultation took place between August and October 2013. A summary of the consultation can be found in section 18.

Finance Officer Clearance (type in initials).....IK.....

Legal Officer Clearance (type in initials).....MJ.....

[CORPORATE] DIRECTOR'S SIGNATURE (electronic) Appended in hard copy.

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1 Summary of Proposed Scheme and changes to Council Tax

- 1.1 To assist in the reading of this document, a summary of the main components of the recommended local council tax support scheme (Proposal 1) are set out below together with changes to council tax:

Council Tax Support scheme

Cost Components:

- (a) Abolish Second Adult Rebate
- (b) Restrict support to the charge for a Band D property
- (c) Increase the income taper from 20% to 30%
- (d) Include Child Benefit as income when working out entitlement
- (e) Abolish backdating so all awards are paid from the date of application
- (f) Increase the deductions made for other adults living in a property where the customer receives Council Tax Support and introduce a new charge for other adults receiving benefit.
- (g) Restrict benefit, so no awards are made under £5 per week

Protections:

- Protect claimants of pension age in line with Government policy.
- Protect claimants and/or their partners who receive the middle or high rate of Disability Living Allowance for Care or Mobility from all the above changes except for component (a) (abolish Second Adult Rebate) and (e) (abolish backdating).
- Protect households who have a dependent child under 5 years old from component (d) (include Child Benefit as income).
- Continue to apply our local discretion to disregard War Pensions and War Widows Pensions as income, when calculating awards of Council Tax Support.
- Set up a discretionary fund to help people in need on a case by case basis.
- Uprate applicable amounts in the calculation of Council Tax Support for 2013/14 in line with the national 1% increase for working age claimants.

Work Incentives:

- Increase Extended Reductions (formally Extended Payments) from 4 weeks to 8 weeks. This entitles some long term unemployed claimants for assistance with their Council Tax bill for up to 8 weeks when they start work.

- Increase child care disregards by 10%, where parents are working and children are in approved child care

Change the Council Tax charges for empty and unfurnished properties and second homes:

- Remove the 100% empty property exemption and replace it with a 100% discount for one month, followed by the full charge;
- Abolish the 10% Second Homes Discount;

The detail of the scheme will be contained within the Council Tax Reduction Regulations, which will be available on the Council's website. These are based upon the Government's default scheme, with the local exceptions above.

2 Introduction

- 2.1. In July 2012, the Executive agreed proposals to form the basis of a public consultation. They also approved the consultation process which is summarised in section 7.
- 2.2. The main proposals included:
 - A combined Council Tax Support Scheme based on a number of changes such as restricting the level of support to the charge for a Band D property, abolishing backdated benefit, increasing the income taper etc. This is the Council's preferred option;
 - A 20% Reduction Scheme, whereby all working age claims are reduced by 20%; and
 - Removal of the 10% second homes discount and replacement of the empty and unfurnished property exemption.
- 2.3. Following this decision an extensive 3 month public consultation took place to gather the views of residents and stakeholders about the Council's proposals for a new Council Tax Support scheme. The consultation took place between 6 August 2012 and 29 October 2012. The primary purpose of this paper is to summarise the outcomes of the consultation, so that a final decision can be taken.
- 2.4. This paper provides:
 - A summary of the Council's proposals (recapping on the initial report);
 - A number of relevant updates;
 - An up to date financial analysis which includes 2012/13 data; and
 - The outcomes of the public consultation.
- 2.5. This information should be considered alongside the EIA, which is available as a separate document, so that an informed decision can be taken.
- 2.6. It should be noted that the timescales for this project are very challenging and it is important that the final scheme is submitted to Government by 31 January 2013. If

this deadline is not met then the Council would be forced to implement the Government's default scheme, which means that the 11% shortfall in funding (not taking into account any transitional grant) would need to be found from elsewhere (i.e. not from the Council Tax Benefits scheme).

3 Background

- 3.1. During 2011/ 2012, Trafford Council awarded approximately £13.3 million in Council Tax Benefit to around 18,000 households.
- 3.2. As part of the Welfare Reform Programme, the Government announced that the existing national Council Tax Benefit scheme will be abolished on 1 April 2013 and Local Authorities will be given the freedom to design their own local schemes for working age claimants. These schemes will be known as "Council Tax Support" or "Council Tax Reduction" Schemes.
- 3.3. At the same time the Government announced that they will be reducing the level of subsidy to Local Authorities by approximately 10% from the levels assumed in the Comprehensive Spending Review of 2010. In reality this reduction is 11% compared to the figure for 2011/12, which equates to approximately £1.25 million for Trafford Council; this excludes the effect for Police and Fire Authorities.
- 3.4. It should be noted that the revised scheme will affect working age residents only. Pensioners, who account for approximately 46% of Trafford's Benefits caseload, will be protected from any reduction in benefit. Therefore a 10% reduction in the cost of Council Tax Benefit alone would actually equate to a 19% cut for non-pensioner claimants.
- 3.5. The Council has worked with partners and stakeholder groups to develop a number of cost reducing options for consultation. These included two proposals for the Council Tax Benefit scheme as well as further proposals to change the Council Tax second home discount and the empty property (unfurnished) exemption.
- 3.6. These options were carefully considered by the Overview and Scrutiny Committee, who agreed that they were an appropriate basis for the consultation. This was agreed by the Executive on 30 July 2012 and the consultation took place between 6 August 2012 and 29 October 2012.

4 The Council's Proposals

A summary

- 4.1. This section of the report provides a summary of the proposals, an up to date financial assessment and a brief outline of the impact they would have upon residents.
- 4.2. The Council agreed that the fairest way of making up the funding gap (for both benefit claimants and taxpayers) was to reduce spending by:
 - Introducing a new Council Tax Support scheme; and
 - Changing the Council Tax exemption and discount for second homes and empty properties.

4.3. **Summary of Proposal 1: Combined Scheme**

This is the Council's preferred scheme and consists of a number of different options which when combined together create one scheme.

4.4. The options to reduce Council Tax Benefit expenditure comprise of:

Component a: Abolish Second Adult Rebate

Component b: Restrict support to a Band D property charge

Component c: Increase the income taper from 20% to 30%

Component d: Include Child Benefit as income when working out entitlement

Component e: Abolish backdating so all awards are paid from the date of application

Component f: Increase the deductions made for other adults living in a property where the customer receives Council Tax Support.

Component g: Restrict benefit, so no awards are made under £5 per week

This scheme would affect approximately 3,339 claimants. These components are explained further within the consultation booklet (see appendix 4D)

4.5. **Summary of Proposal 2: 20% Reduction Scheme**

Option h: Under the current Council Tax Benefit rules, some residents who receive certain benefits such as Income Support, Job Seekers Allowance (income based) and Employment Support Allowance (income related) generally receive a full benefit award, which covers their Council Tax Bill. Under this proposal everyone who receives Council Tax Support (unless they are protected) would have their benefit reduced by 20%.

4.6. **Council Tax Options**

To reduce the funding gap, both Council Tax Support schemes outlined above would need to be implemented alongside changes to the Council Tax empty property exemption and the second homes discount (see options l, j and k below)

Option i: Remove the 100% empty property exemption and replace it with **either** a 25% discount for 6 months **or** a 100% discount for 1 month.

Option j: Abolish the 10% Second Homes Discount.

4.7. **Protections**

The options within schemes 1 and 2 could also contain an element of protection for certain groups. The protections within the preferred scheme (scheme 1) include:

- Protect customers with a disability (in receipt of the higher or middle rate of Disability Living Allowance for care or mobility, or the support component of Employment and Support Allowance);
- Protect families with children under 5 years old from the changes to the treatment of child benefit income (option d of scheme 1);

- To complement or replace these protections, a discretionary fund could be created whereby claimants facing financial difficulties could apply for temporary support on a case by case basis.

4.8. Work incentives

The proposals include a number of new specific work incentives. The options consulted on were increasing the length of time that that benefit continues when employment starts from 4 weeks to 8 weeks, and increasing the childcare disregard by 10%.

The schemes, the options and all the other elements are all explained within the consultation booklet (see appendix 4D).

5 A Financial Summary

5.1. This part of the report gives an indication of the financial effects of the various proposals and individual options. To ensure that the costs of each scheme are robust and up to date, financial modelling has been conducted on the actual data for 2011/12 and on forecasted award data for 2012/13.

5.2 **Proposal 1 – Combined Scheme** (Overall gross reductions in Council Tax Support expenditure with and without protections)

Ref:	Proposal 1	2011/12 (Actual)	2012/13 (Forecast)
A1	Total of combined options without protection	£796,632	£783,941
A2	Total of combined options with disability protection	£751,999	£742,690
A3	Total of combined options with disability protection and partial child protection	£650,000*	£656,865 Preferred option
A4	Total of combined options with disability protection and full child protection	£524,143	£539,175

Table 1

* This is an estimated figure which could not be modelled through the software.

5.3 **Proposal 2 – 20% Reduction Scheme** (Overall gross reductions in Council Tax Support expenditure with and without protections)

Ref:	Proposal 2	2011/12 (Actual)	2012/13 (Forecast)
B1	Total without protection	£1,509,000	£1,531,770

B2	Total with disability protection	£1,123,313	£1,271,431
B3	Total with disability protection and partial child protection (estimated)	N/A (explained below)	N/A (explained below)
B4	Total with disability protection and full child protection	£943,019	£978,866

Table 2

5.4 Terminology

Disability Protection: This protects customers receiving the middle or higher rate of Disability Living Allowance (any component) from any of the changes except the abolition of second adult rebate and backdating.

Partial Child (under 5) Protection: This protects families with young children as the Child Benefit income is disregarded where a child is under 5 year old. This protection only applies to Proposal 1 because child benefit is to be used as income, whereas in Proposal 2 it will still be disregarded.

Full Child (under 5) Protection: This protects families with children under 5 from all the changes except the abolition of second adult rebate and backdating.

5.5 Proposal 1 – A breakdown of the individual options (estimated reductions without protection)

Ref:	Individual options for Proposal 1	2011/12 (Actual)	2012/13 (Forecast)
A	Abolish Second Adult Rebate	£ 37,067	£36,593
B	Restrict support to a band D property charge	£65,241	£67,644
C	Increase the income taper from 20% to 30%	£190,665	£191,608
D	Include child benefit when working out how much support to pay.	£329,083	£314,027
E	Abolish backdating, so all awards are paid from the date of application only	£33,100	£29,000
F	Increase the deductions made for other adults living in a property and introduce a new charge for other adults receiving benefits.	£96,770	£109,716
G	Restrict benefit, so no awards are made under £5 per week	£52,337	£59,118

Table 3

5.6 Proposal 1 and 2 – Council Tax Changes (estimated additional income)

Ref:	Council Tax options	2011/12 (Actual)
CT1	Remove the 100% empty property exemption for 6 months and replace it with a 25% discount for 6 months	£1,003k

CT2	Remove the 100% empty property exemption for 6 months and replace it with a 100% discount for 1 month	£795k
CT3	Abolish the 10% second homes discount	£47k

Table 4

*This change affects approximately 420 properties

5.7 Proposals 1 and 2 – Work Incentives (estimated additional costs)

Ref:	Work Incentive options	2011/12 (Actual)
WI1	Increase the extended payment scheme from four weeks to eight weeks, helping with the transition to work	£35k
WI2	Increase Child care disregard by 10%*	£1k

Table 5 *Although this figure is low it is only based on existing caseload and does not take into account extra take up.

5.8 Proposal 1 – Overall financial summary (Net figures)

The figures below are based upon the preferred scheme including the middle and higher rates of disability protection and the child under 5 (partial) protection (see A3 on Table 1). The Council Tax empty (unfurnished) property figure is based on the 100% discount scheme for one month (see CT2 in Table 4). The amounts also include the cost of providing the two additional work incentives as detailed in the chart below in WI1 and WI2 on Table 5.

Ref:	Item:	£
P1a	The reduction from the combined scheme (Ref: A3 £657k x 85%)	558,450
P1b	Less provision for non-collection (30% estimate)	(167,535)
P1c	Less costs of work incentives (Ref: WI1 and WI2 x 85%**)	(30,600)
P1d	Plus changes to the Council Tax empty property exemption (Ref: CT2 £795k x 85%** less 2.5% bad debt allowance).	658,856
P1e	Plus removal of the Second Homes Discount (Ref: CT3 £47k x 85% less 2.5% bad debt allowance**)	38,951
P1g	Overall Net reduction	1,058,122

Table 6 ** Trafford's share of the council tax bill is 85%.

5.9 Variants of Proposal 1

A comparison of the financial consequences of the various options as set out in para. 4.2 above are as follows:

Option A1 - £1,133k

Option A2 - £1,108k

Option A3 - £1,058k

Option A4 - £ 987k

5.10 Proposal 2 – Overall financial summary (Net figures)

The figures below are based upon Proposal 2 with a disability protection and no child protection. The Council Tax empty (unfurnished) property figure is based on the 25% discount scheme for six months (see CT1 in Table 4). There is the option to use the alternative 100% discount for six months but this does not generate as much income (see CT2 in Table 4). The amounts also include the cost of providing the two additional work incentives as detailed in the chart below in WI1 and WI2.

Ref:	Item	£
P2a	The reduction from the 20% scheme (Ref: B2 £1,123 x 85%)	954,550
P2b	Less provision for non-collection (40% estimate*)	(381,820)
P2c	Less costs of work incentives (Ref: WI1 and WI2 x 85%**)	(30,600)
P2d	Plus changes to the Council Tax Empty property exemption (Ref: CT1 £795k x 85%** less 2.5% bad debt allowance)	658,856
P2e	Plus removal of the Second Homes Discount (Ref: CT3 in Table 4 £47k x 85% less 2.5% bad debt allowance**)	38,951
P2g	Overall Net reduction	£1,239,937

Table 7

* The provision for non-collection is higher for Proposal 2 as it will create a higher number of small debts, especially amongst residents who have received full benefit in the past.

** Trafford's share of the total Council Tax bill is 85%.

5.11. Impact on Budget

The provisional grant settlement announced by the Government on 19 December 2012 included £10.060m towards the cost of local council tax support for Trafford.

One aspect of the current subsidy regime is that a financial incentive exists to minimise the amount of overpayments during a financial year. We have been successful in maximising this incentive, to the extent that the budget assumes additional income of £360k. The ability to generate this level of additional income will be removed under the new arrangements and thereby becomes a budget pressure.

The draft budget proposals for 2013/14, issued on 22 October 2012, include an additional budget provision of £440k. This is a provisional amount until the Council's budget is approved on 20 February 2013 following confirmation of the final grant settlement.

The overall position (using Proposal A3) is therefore:

Variations to Current Budget	£000
Reductions in grant funding	1,250
Removal of subsidy incentives	360
Savings in Rebate awarded plus increased income from council tax	(1,058)
Additional Budget provision required	552

Table 8

As can be seen the current projection is that a shortfall will exist in the first year of the new scheme arrangements. This will be addressed in the final budget proposals to be considered by the Council on 20 February 2013.

5.12. Discretionary Fund

In the consultation there was clear support to have a discretionary fund to aid transition to the new arrangements. From the initial budget assessment there is insufficient resource to create a recurring fund. However as the current Council Tax Benefit system unwinds there is expected to be some recovery of overpayments made in 2012/13 and earlier. This current assumption is that could provide a source of finance for a discretionary fund in the first year. In the short term an amount has been identified as a one-off contribution from reserves.

6 An impact summary

6.1. The impacts of two proposals are shown in the charts and tables below. Based on 2011-2012 data, Scheme 1 affects 3,339 claimants in total, but most residents (over 70%) will be affected by less than £4 per week. Scheme 2 affects 12,255 residents across Trafford (without protection). However, when the disability protection is applied it can be assumed that this scheme would affect 9,162 residents.

6.2. Effect of the proposals on weekly benefit income

Proposal 1 (with protection)	
Weekly Difference	No. of claimants
Up to £1.00	1,148
£1.01 - £2.00	558
£2.01 - £4.00	745
£4.01 - £6.00	390
£6.01 - £8.00	222
£8.01 - £10.00	122
£10.01 - £12.00	68
£12.01 - £14.00	40
£14.01 - £16.00	23
£16.01 - £18.00	9
£18.01 - £20.00	7
Over £20 to £28	7
Grand Total	3,339

Table 9

Proposal 2 (with protection)	
Weekly Difference	No. of claimants
Up to £1.00	1,885
£1.01 - £2.00	1,609
£2.01 - £4.00	5,872
£4.01 - £6.00	356
£6.01 - £8.00	46
£8.01 - £10.00	8
£10.01 - £12.00	0
£12.01 - £14.00	0
£14.01 - £16.00	0
£16.01 - £18.00	0
£18.01 - £20.00	0
Over £20	0
Grand Total	9,776

Table 10

For a full analysis of the impact of the two schemes, including impact per equality strand, please refer to the EIA.

7. The Consultation Process

This part of the project comprised two parts:

- a representative sample survey, which was conducted by Ipsos MORI; and
- a public consultation, which was managed by Trafford Council.

These two components are detailed below:

7.1. The Representative Survey

A representative sample survey (shown in appendix 4D) was mailed out to a sample of general Council Tax payers across the borough with the resultant sample weighted to represent the demographic profile of adult residents (aged 18+) in Trafford. The same questionnaire was also mailed out to residents who receive Council Tax Benefit (CTB) and residents who own empty (unfurnished) properties or second homes. This strand was designed to give robust and representative views of those groups affected by the proposed Council Tax discount / exemption changes.

- 7.2. A total of 5016 surveys were issued to working age benefit claimants, which were stratified according to ward (see appendix 4A) and customer groups (e.g. working, non-working, disabled etc.). This ensured that those wards most affected by the changes received an equal weighting of surveys.
- 7.3. In addition another 5000 surveys were issued to the following groups of taxpayers:
- Those currently receiving an empty (unfurnished) property discount (764);
 - Those currently receiving a second home discount (529);
 - A random sample of taxpayers (3707).

In total 807 residents responded (an 8% response rate) to the representative survey. A breakdown of respondents can be found in appendix 4B.

8 Methodology – Representative Sample Survey

- 8.1. In August 2012, a 12-page booklet was sent to each address in the sample (see appendix 4D for a copy of the booklet). Pages 3-7 of the booklet contained the questionnaire, and all respondents were instructed (on the front page) to answer the questions only after they had read pages 8-11 of the booklet. These pages set out in detail the Council's proposals for the new Council Tax Support scheme and how they would achieve the required savings.
- 8.2. Respondents could either complete and return the paper-based questionnaire or complete the survey online via a link on the Council's consultation webpage. A unique serial number, printed on the paper questionnaire and entered online, identified and enabled Ipsos MORI to separate out the representative sample survey responses from consultation responses.

9 The Public Consultation

- 9.1. The public consultation enabled all interested parties including individuals and organisations to take part in the consultation which was available to access through a variety of channels:
- 9.2. An online survey, e-mail address and dedicated microsite were available throughout the consultation period. These were regularly updated and gave customers an opportunity to ask detailed questions and find out how the proposals would affect them. These online channels were promoted through social media, partner websites and the Council homepage. They were also promoted by a number of 'offline' methods, such as the benefit notification letter, posters, Access Trafford staff etc. The Webpages received in excess of 4000 visits.
- 9.3. The consultation forms and marketing material (FAQs and posters) were distributed to all Trafford libraries, the Council contact centre and local community centres. Stocks were also issued to partner organisations.
- 9.4. A consultation helpline was set up and Access Trafford officers were given training to help support customer enquiries. The helpline received 84 calls in total between August 2012 and October 2012.
- 9.5. A wider welfare reform steering group was established to help direct the project and consider the wider picture. This has proved to be extremely popular with internal and external stakeholders and will continue to meet on a regular basis. This group has been instrumental in shaping the consultation as well as providing valuable feedback on the proposed schemes and communicating to residents, especially those residents who would normally be hard to reach.
- 9.6. The project team worked with the Council's Communications and Marketing team to produce news releases, articles and ensure a social media presence.
- 9.7. A number of face to face meetings / focus groups were conducted throughout the twelve week consultation period. These included presentations at Neighbourhood Forums, a mobile advice centre and a number of meetings with various groups across Trafford including disability advisory and network groups. The road show events were targeted in wards with a higher proportion of benefit recipients affected by the changes.
- 9.8. Section 10 (below) provides a full summary of the consultation process. The table in appendix 4C shows the full profiles of all respondents to the survey.

10 Methodology – Public Consultation

- 10.1. A mail out was sent to 500 benefit recipients, a small number of individual responses from various organisations were received.
- 10.2. The public consultation was supported by a communication campaign which included news releases, a consultation microsite, a social media presence, posters, a

consultation helpline and promotion through partner agencies. Benefit notification letters were also amended to contain information and advice to customers.

- 10.3. The 12-page printed booklet was available in all customer facing Council offices, libraries and on request from Trafford Council throughout the consultation period. With the exception of the front page (which included instructions), the booklet was the same as that used in the representative sample survey. Pages 3-7 of the booklet contained the questions being asked, and all respondents were instructed on the front page to answer the questions only after they had read pages 8-11 of the booklet. Pages 8-11 set out, in detail, the Council's proposals for the new Council Tax Support scheme and how they would achieve the required savings.
- 10.4. Responses to the public consultation could be submitted either using the paper response form, online via a link on the Council's consultation website page or via written correspondence. The public consultation was open to any individual, organisation or group to submit a response.
- 10.5. In total, 200 responses from individuals were received during the consultation period, and five responses were received from organisations.

11 A Consultation Summary

The following dialogue methods took place during the course of the consultation:

Meetings / Letters - Precepting Authorities:

- Greater Manchester Fire and Rescue Authority
- Greater Manchester Police

Meetings / Focus Groups with community groups and representative agencies:

- Disability Advisory Group and Trafford Deaf Partnership
- Housing Options Service Trafford (HOST)
- Revenues and Benefits Staff workshop
- Troubled Families Steering Group
- Trafford Information Network
- Trafford Providers Meeting
- Voice of BME Trafford
- Welfare Reform Steering Group

Public Road Shows (Using the Mobile Advice Centre):

- | | | |
|-----------------------------|-------------------|---------------|
| • Sale Sainsbury's car park | 22 August 2012 | (6 visitors) |
| • Stretford Arndale Centre | 12 September 2012 | (22 visitors) |
| • Partington Central Road | 8 October 2012 | (14 visitors) |
| • Old Trafford | 9 October 2012 | (28 visitors) |

Neighbourhood Forums presentation and Q&A sessions:

- | | | |
|------------------------------------|-------------------|---------------|
| • Altrincham Town Hall | 4 September 2012 | (35 visitors) |
| • St Matthews Church, Stretford | 10 September 2012 | (18 visitors) |
| • Flixton House, Flixton | 11 September 2012 | (28 visitors) |
| • Springfield Primary School, Sale | 18 September 2012 | (22 visitors) |
| • St John's Centre, Old Trafford | 25 September 2012 | (9 visitors) |
| • The FUSE, Partington | 02 October 2012 | (36 visitors) |

Representative Survey:

- 807 responses received from a representative sample of residents.

Consultation Survey:

- 200 responses were received from members of the public.

Consultation responses received from organisations:

- Trafford Labour Group
- Citizens Advice Trafford
- Royal British Legion
- Imagine, Act and Succeed
- Plus one anonymised community group

12 Key Findings

MORI has analysed the key findings from the representative survey and the public consultation separately (below).

12.1 Key findings from the Representative Survey

Overall, four in ten residents (40%) prefer Proposal 2 and one in three (34%) prefer Proposal 1; one in six said they prefer “neither of these options” (8%) or they “don’t know” (10%).

- 12.2 General Council Tax payers and empty and second home owners are equally likely to support Proposal 2 (42% of both groups vs. 23% of CTB recipients). While support for Proposal 1 is highest among General Council Tax payers (35% vs. 29% of empty/unfurnished/second home owners and 23% of CTB recipients) CTB recipients are more likely than average to say ‘neither’ (28% vs. 8% overall) or ‘don’t know’ (19% vs. 10% overall).
- 12.3 Overall, Proposal 2 is more likely to be seen as simpler to administer and saving more money; Proposal 1 is seen as fairer to everyone.
- 12.4 When considering the individual options in Proposal 1 across the three sample strands the most consistent trend is for CTB recipients to be more likely to oppose each option, compared with both General Council Tax payers and empty/unfurnished/second home owners. This is even more pronounced with relation to the statement that all working-age claimants should pay at least 20% of their Council Tax bill where the difference is 35 percentage points between them and General Council Tax payers and 37 percentage points between CTB recipients and empty and second home owners. The only measure which empty and second home owners oppose as much as CTB recipients is the restriction of support to the charge for a band D property (24% and 25% respectively, compared with 14% of General Council Tax payers).
- 12.5 Proposals to reduce exemptions and discounts for second homes and empty properties are popular; as are the proposed initiatives to encourage people into work and protect vulnerable groups. Seven in ten (69%) support the idea of establishing a discretionary fund.

12.6 Key findings from the Public Consultation

In total, 200 responses were received from individuals and 5 from organisations.

- 12.7 The results are different from the representative survey and show a clear preference for Proposal 1 (52%, 104 responses) rather than Proposal 2 (26%, 52 responses). One in six prefer neither of these two options (16%, 32 responses).
- 12.8 Looking at the individual options in Proposal 1 the main trend is for those who receive Council Tax Benefit to show less support for each proposal.
- 12.9 There is overall support for removing or reducing exemptions and discounts for empty properties and second homes, while supporting return to work initiatives and protecting vulnerable groups. There is also strong support for establishing a Discretionary Fund.
- 12.10 All the organisations responding to the public consultation prefer Proposal 1, although support for the individual options within this Proposal is varied. Put simply those

organisations responding more strongly support protecting those in receipt of Disability Living Allowance than other elements or groups.

- 12.11 Most organisations oppose Proposal 2 in its entirety and this is backed up through the community meetings, focus groups and a number of written responses from organisations.
- 12.12 There is support to establish of a Discretionary Fund to provide temporary financial help with Council Tax bills.

12.13. What do these findings mean?

- 12.14 *'Firstly, it should be noted that the profiles of the representative survey and consultation survey are different: those responding to the public consultation are younger, more likely to be female and more likely to receive Council Tax Benefit (although by no means are all of those who responded to the public consultation CTB recipients).'*
- 12.15. *'As is often the case, the two parts of this project have produced different preferences, with the representative sample survey suggesting more support for Proposal 2 and the public consultation suggesting more support for Proposal 1. Those responding to the public consultation are more likely to have strong views although these are not necessarily representative of the overall population. However, a number of organisations have pledged support for Proposal 1 and most disagree with Proposal 2 in its entirety.'*
- 12.16. *'It should be noted that there are also differences across the sample strands in the representative sample survey, with CTB recipients less likely to express support for either option.'*
- 12.17. *'It should also be remembered that in both the representative sample survey and in the public consultation the majority of respondents are concerned about protecting vulnerable groups from reductions in Council Tax Support and also support the idea of the Council setting up a Discretionary Fund to provide assistance to those who experience severe financial hardship. This would suggest an underlying support for the principles behind Proposal 1, with the apparent complexity of the proposed scheme acting as a deterrent to those (General Council Tax payers) least likely to be affected by the change.'* Written by Ipsos Mori

13. Conclusion / Summary

- 13.1 From the evidence within the EIA and this report, particularly the 'Question by Question analysis section' (appendix 5A) the following conclusions can be drawn:

13.2 The proposals

- 13.3 Those who responded to the representative sample survey are more likely to prefer Proposal 2 (40%) than Proposal 1 (34%) and those who responded to the consultation are more likely to prefer Proposal 1 (52%) than Proposal 2 (26%). Overall, the net effect shows that there is marginally more support for Proposal 1. However, all other dialogue methods, including the community meetings and substantial responses all show general support for Proposal 1 (although they may not

agree with every option). In fact, many stakeholders were opposed to Proposal 2 in its entirety.

- 13.4 It is also worth noting that Benefit recipients, likely to be impacted by the changes, often preferred Proposal 1, whilst general taxpayers (not affected by the proposals) often preferred Proposal 2 (although this is by no means the total representative opinion for each Proposal).
- 13.5 The Equality Impact Assessment shows that Proposal 1 affects fewer people by far than Proposal 2 and does not have a significant impact on claimants, who currently receive full Council Tax Benefit i.e. those on the lowest incomes. As well as protecting this vulnerable group, proposal 1 ensures that the cost of collecting small debts is minimised.
- 13.6 These proposals must also be considered alongside the Government's wider welfare reform programme as the Council Tax Support scheme is due to be introduced in April 2013; the same time as many other changes included the under occupancy (bedroom tax) and Benefits cap. Therefore depending on the design of the CTS scheme, some benefit claimants may be affected by multiple benefit cuts. The evidence shows that more people would be affected by multiple cuts under Proposal 2 (1500) than Proposal 1 (450). This would result in an average combined reduction in benefits of £18.75 per week for these residents. (The full details of this can be found in the EIA).
- 13.7 **Individual options**
- 13.8 The individual components of Proposal 1 are considered in appendix 5A (Question 3). This shows that the most popular component is to restrict support to a band D property charge, whilst the least popular is to include child benefit as income (48% support).
- 13.9 However, the child benefit option needs to be put into context as parents with children already receive an extra allowance within their Council Tax Benefit award and this would continue under Council Tax Support. Further analysis (within the EIA) shows the net weekly effect of including child benefit as income, is much lower than the amount of child benefit they receive. For example a parent with 1 child would receive £20.30 per week in Child Benefit and would lose on average approximately £3.11 per week in Council Tax support if their child was over 5 years old.
- 13.10 **Protections and the discretionary fund**
- 13.11 There was strong support to include protections for certain vulnerable groups and to establish a discretionary fund. In fact, the support to set up a discretionary fund was higher (70.44%) than the overall support to protect people with disabilities (68%) and families with children under 5 years old (58.33%). A discretionary fund would also help to mitigate the backdating issue raised by some organisations.
- 13.12 Some people felt that a discretionary fund would be burdensome in terms of administration, but as the council already has a discretionary fund for Housing Benefit

and Council Tax Benefit and will be setting up a new fund for local welfare provision, the fund would sit alongside these funds to avoid duplication and increase efficiency.

13.13 The consultation raised some questions about protections and welfare reform as many people currently receiving Disability Living Allowance may not qualify for the higher rates of personal independence payments when this is introduced from April 2013 and DLA is phased out. Transitional protection could be considered as the modelling already accounts for a certain level of protection. See appendix 5A – Question 6 for more information.

13.14 **Work Incentives**

13.15 There was broad support for both work incentives which would help to underpin the Government's Welfare Reform agenda to make work pay.

13.16 **Council Tax options**

13.17 Support was also high to abolish the second homes discount and replace the 6 month empty property (unfurnished) exemption with either a 25% discount for 6 months or a 100% discount for 1 month only.

13.18 Although the 25% option was more popular it did not take into account the extra costs associated with this option in terms of collecting small amounts of Council Tax as a property may only be empty for one or two days. Therefore, it is possible that the increased cost of collection would outweigh the potential saving generated.

14 **Key updates - DCLG Transitional Grant**

14.1 This section of the report looks at a number of key updates which have occurred since the consultation process began. The first update is about the DCLG transition grant, available to Local Authorities.

14.2 On 16 October the DCLG announced that 'one off' transitional funding of £100m was available to Local Authorities, whose Council Tax Support schemes met certain criteria.

14.3 Unfortunately the timing of this announcement meant that many Local Authorities, including Trafford, had already designed their proposals for Council Tax Support and were coming to the end of their public consultation period.

14.4 The voluntary one-off grant is available to councils who choose to design their local schemes so that:

- those who would be on 100 per cent support under current council tax benefit arrangements pay between zero and no more than 8.5 per cent of their council tax liability;
- the taper rate does not increase above 25 per cent;
- there is no sharp reduction in support for those entering work - for claimants currently entitled to less than 100 per cent support, the taper will be applied to an amount at least equal to their maximum eligible award.

- the scheme should not impose any 'large' increases in non-dependant deductions.

14.5 The Council's preferred and alternative schemes do not meet these criteria in their current format and would require major rework in order to do so. The Band D restriction and the non-dependant deduction options would need to be abandoned and the income taper would need to be set at 25% instead of 30% in order to qualify. Under Proposal 2, the reductions would need to be lowered to 8.5% rather than the current 20%.

14.6 The Executive is not minded to take up the grant offer because:

- The preferred option already attempts to minimise the number of claimants affected (3,339 out of 12,500).
- The proposed changes to the Council Tax Support scheme meet less than 50% of the funding gap, already minimising the financial impact on benefit claimants,
- The funding is temporary and the Council would need to review its scheme in 2013. This would involve re-consulting and considering transitional protection.
- The Council has invested considerable resources in carrying out the consultation
- A significant number of small accounts would have to be issued, with a consequential impact on cost and non-collection.

15 Recommendations

15.1 Following the public consultation and feedback from individuals, groups and stakeholders, the following recommendations are made:

15.2 Introduce the **combined Council Tax Support scheme**, which comprises the following components:

15.3 Cost Components:

- (a) Abolish Second Adult Rebate
- (b) Restrict support to a Band D property charge
- (c) Increase the income taper from 20% to 30%
- (d) Include Child Benefit as income when working out entitlement
- (e) Abolish backdating so all awards are paid from the date of application
- (f) Increase the deductions made for other adults living in a property where the customer receives Council Tax Support and introduce a new charge for other adults receiving benefit.
- (g) Restrict benefit, so no awards are made under £5 per week

15.4 **Protections:**

- Protect claimants of pension age in line with Government policy.
- Protect claimants and/or their partners who receive the middle or high rate of Disability Living Allowance for Care or Mobility from all the above changes except for component (a) (abolish second adult rebate) and (e) (abolish backdating).

- Protect households who have a dependent child under 5 years old from component (d) (include child benefit as income).
- Continue to apply our local discretion to disregard War Pensions and War Widows Pensions as income, when calculating awards of Council Tax Support.
- Set up a discretionary fund to help people in need on a case by case basis.
- Uprate applicable amounts in the calculation of Council Tax Support for 2013/14 in line with the national 1% increase for working age claimants

15.5 Work Incentives:

- Increase Extended Reductions (formally Extended Payments) from 4 weeks to 8 weeks. This entitles some long term unemployed claimants to assistance with their Council Tax bill for up to 8 weeks when they start work.
- Increase child care disregards by 10%, where parents are working and children are in approved child care

15.6 Change the Council Tax charges for empty and unfurnished properties and second homes:

- Remove the 100% empty property exemption and replace it with a 100% discount for one month, followed by a full charge;
- Abolish the 10% Second Homes Discount

APPENDICES

Appendix 1A - Summary of stakeholder meetings

Appendix 1B - Welfare Reform Steering Group

Appendix 1C - Disability Advisory Group and Trafford Deaf Group

Appendix 1D - Housing Options Service Trafford (HOST)

Appendix 1E - Revenues and Benefits Staff Workshop

Appendix 1F - Trafford Providers Meeting

Appendix 1G - Trafford Information Network

Appendix 1H - Voice of BME Trafford

Appendix 2A – Summary of written responses from organisations

Appendix 2B - Greater Manchester Fire and Rescue Authority

Appendix 2C - Trafford Labour Group

Appendix 2D - Citizens Advice Trafford

Appendix 2E – The Royal British Legion

Appendix 2F - Imagine, Act and Succeed (Supporting people with learning difficulties)

Appendix 2G – Community Organisation

Appendix 3A - Summary of Neighbourhood Forums and Road Shows

Appendix 3B - Questions and Answers raised in Neighbourhood forums

Appendix 4A – Council Tax Options appraisal

Appendix 4B - Profiles of representative survey respondents

Appendix 4C - Profiles of consultation survey respondents

Appendix 4D - Representative survey questionnaire

Appendix 5A Question By Question Analysis

Question 1: 'Which of the following two schemes do you prefer?'

Question 2: 'What are your reasons for your answer to question 1?'

Question 3: To what extent do you support or oppose each of the following options?

Question 4: 'To what extent do you agree with the proposals to increase the charge for empty properties and second homes?'

Question 5: 'To what extent do you support or oppose each of the following proposals for providing council tax support which helps residents back into employment?'

Question 6: 'To what extent do you support or oppose Trafford Council giving some protection from the reduction in council Tax Support to each of the groups below?'

Question 7: 'Are there any other groups who you feel should receive some protection from the changes in the way Council Tax Support will work in the future in Trafford?'

Question 8: 'Do you think the Council should set up a discretionary fund to help with the change from Council Tax Benefit to Council Tax Support?'

Question 9: Do you have any other comments about the proposals set out in this consultation?

Appendix 1A (Responses from stakeholder meetings)

- 1B Welfare Reform Steering Group
- 1C Disability Advisory Group and Trafford Deaf Group
- 1D Housing Options Service Trafford (HOST)
- 1E Revenues and Benefits Staff workshop
- 1F Trafford provider Meeting
- 1G Trafford Information Network
- 1H Voice of BME Trafford

Appendix 1B (Welfare Reform Steering Group)

Members:

R Byrne	Revenues and Benefits
J Blandy	Communications, Publications and Marketing
D Bowden	Partnerships and Performance
Gaynor Burton	Equality and Diversity
Tina Colquhoun	Transformation Team
P Coward	Age UK Trafford
J Crawford	Care Management and Assessment
Claire Davies	Housing Options Service Trafford
Simon Davis	Customer Services
Stephen Gannon	Transformation Team
D Hill & S Jackson	Your Housing Group
Jane Hobson	Welfare Rights Team
Carl Lamb	Revenues and Benefits
Simon Lewis	Revenues and Benefits
Hazel Kimmitt	Stronger and Priority Communities
K Mackay	Multi Agency Family Support Service
Helen Malone	Trafford Housing Trust
Dale Maskell	Citizens Advice Trafford
Karen McDonald	Transformation Team
E Oldham	Irwell Valley Housing Association
G Renshaw	Commissioning and Service Development
J Tumbelty	Commissioning and Service Development
E Wood	Neighbourhoods and Funding Team

Meetings: Monthly meetings from May 2012

Purpose: This group was established to help plan, co-ordinate and support all areas of welfare reform including The Benefits Cap, Under Occupancy, Social Fund, Universal Credit and Council Tax Support.

Main Issues:

- Concerns raised about including Child Benefit as income in the CTS assessment;
- All members were opposed to Proposal 2 (20% reduction);
- The taper could be viewed as a work disincentive;
- Some members were opposed to abolishing the backdating provision completely. It was felt that a restricted period of 1, 2 or 3 months would be fairer, especially on vulnerable groups;
- All agreed with Council Tax discount changes (second homes and empty properties);
- Housing Associations prefer the 1 month empty property exemption rather than the 25% discount for 6 months as this will allow time to turnaround properties;
- All supported the discretionary fund;
- General support for child under 5 protection;
- Some members of the group felt that the disability protection should not be included as single people were more at risk, especially given other welfare reforms (For example: the under 35 shared room rate).

Appendix 1C (Disability Advisory Group & Deaf Partnership)

Present:

N Goodwin	DAG (Chair)
J B-Steadman	Resident
Gaynor Burton	Trafford Council
Tina Colquhoun	Trafford Council
Adele Coyne	Trafford Council
J Easy (minutes)	Trafford Council
Stephen Gannon	Trafford Council
R Hughes	DAG
Carl Lamb	Trafford Council
W Lambert	TDCN
M McDonald	Trafford Resident
A Sharp	TDCN
A Shortland	DAG

Interpreters: A Scott & H Crompton

Meeting:

Wednesday 26th September 2012

Purpose:

To gain feedback about the proposals; particularly from the perspective of disabled residents.

Main Issues:

- People on any rate of Disability Living Allowance benefit should be protected from any cuts, not just people on middle or high rates of DLA.
- Because English is deaf people's second language, they will not understand the information being presented and may not give feedback, therefore it is important to contact as many deaf people as possible.
- The presentation of the information is not clear enough to help deaf people understand. The response was that forms are available on the Internet and there is a helpline available which can be contacted via Minicom.
- Issues around the interaction of other welfare reforms and in particular about Personal Independence payments, which replace DLA from April 2013. The scheme will need to be flexible in order to deal with these changes and some kind of transitional protection should be available.
- Returning to work: There was a proposal to extend relief for 8 weeks for those returning to work. If children were involved and the children go into approved childcare then £175 for 1 child and £300 for more than 1 child would be disregarded. There was also a proposal to disregard the total amount being paid for child care. This would encourage people back into work.

Appendix 1D: Housing Options Service Trafford (HOST)

Present:

K Boulger
L Chandramani
G Choonara
T Colquhoun
W Dalzell
S Gannon
E Hodgson
R Millar
J Loftus
J Ratcliffe

Meeting:

3rd October 2012

Purpose:

To meet with the team who provide support to vulnerable residents who are trying to find accommodation. They deal with daily issues from residents who need support and advice especially concerning benefit entitlement. The purpose of this meeting was to raise awareness amongst the team to enable them to inform customers.

Main Issues:

- Too many welfare benefit changes are taking place at the same time
- The consultation form is complex for vulnerable residents
- Pleased that the Council are trying to bridge the funding gap with income generation from empty properties but concerned that poor people will lose more benefit

Appendix 1E: Revenues and Benefits Staff workshop

Present:

Approx. 35 Benefits staff and managers

Meeting:

16th May 2012

Purpose:

To gain the views of Benefit practitioners, especially those staff who deal with customers on a daily basis and gain feedback and understand customer experiences.

Main Issues:

- The group discussed ideas to reduce benefit expenditure
- Why protect elderly people as a blanket policy
- Consider restricting benefit to band levels
- Introduce a minimum income level for self-employed customers
- Ensure that staff receive sufficient training
- Ensure customers receive effective communication
- Change Single Person Discount

Appendix 1F: Trafford Provider Meeting

Present:

Homecare providers
Organisations working with people in supported living
Organisations providing housing support services

Meeting:

13th September 2012

Purpose:

To inform organisations that work with vulnerable residents (namely those with disabilities, mental health issues and the elderly) of the changes and ask that they communicate the information to partners and residents.

Main Issues:

- Too many welfare benefit changes taking place at the same time
- Concern over the empty property charges especially from housing providers who may have an empty property because they are awaiting a health and safety assessment for a new resident, or are awaiting a referral from Social Services
- Concern over poverty increasing
- Concern over lack of education for money advice as people will experience a reduction in money from April 2013

Appendix 1G: Trafford Information Network

Present:

Approximately 50 members

Meeting:

5th September 2012

Purpose:

Explain the proposals and seek feedback from groups representing various customers. The Trafford Information Network comprises various charities, organisations and groups that support the elderly, people with disabilities or physical or mental health issues, people from BME backgrounds and carers. Organisations such as Social Landlords, the DWP, NHS, Citizens Advice Trafford, Probation Service, VCAT and various Council Departments are involved.

Main Issues:

More support for Proposal 1.

Appendix 1H: The Voice of BME Trafford

Present

Various residents mainly from the Old Trafford area

Meetings:

20th September 2012

Purpose:

To meet groups of different ethnic backgrounds who may be harder to reach. This meeting was arranged in partnership with the equalities team. This meeting gave the project team the opportunity to understand some of the issues which residents in the Old Trafford area face and advise residents how they can support the consultation by providing their views.

This meeting also gave residents the opportunity to speak to the team on a one to one basis and discuss how specific people may be affected by the benefit changes.

Main Issues:

- The majority of residents preferred Proposal 1 over proposal 2, as it affected fewer people and did not target those who currently do not pay anything. I.e. the least well off
- Concern over the inclusion of child benefit in the calculation of Council Tax Support as this could increase child poverty.
- Pleased that pensioners will be protected
- Support protections for disabled benefit recipients
- More people should be protected – single people
- In favour of a discretionary fund
- The majority of feedback was in favour of reducing the discount / exemption for second homes
- The majority of feedback was In favour of work incentives although it was felt that the Government needed to create more jobs
- Comments were also made that the Government should be doing more to help people in the community and not cutting benefit from the most vulnerable.

Appendix 2A (Summary of written responses from organisations)

- 2B Greater Manchester Fire and Rescue Authority
- 2C Trafford Labour Group
- 2D Citizens Advice Trafford
- 2E Royal British Legion
- 2F Imagine, Act and Succeed (Supporting people with learning difficulties)
- 2G Community Organisation

Appendix 2B: Greater Manchester Fire and Rescue Authority

Your Reference
Our Reference DA/AG/TB
Contact David Acton
Date 25 July 2012



GREATER MANCHESTER
FIRE AND RESCUE AUTHORITY

Ian Duncan CPFA
Acting Corporate Director
Transformation & Resources
Trafford Council
Quay West
Trafford Wharf Road
Greater Manchester
M17 1HH



Fire Service Headquarters
146 Bolton Road
Swinton
Manchester
M27 8US
Telephone 0161 608 4010
www.manchesterfire.gov.uk
Email David.Acton@trafford.gov.uk

Councillor David Acton
Chairman

Dear Ian,

PROPOSED CHANGES TO COUNCIL TAX SUPPORT

I write in response to your letter and attachment outlining proposals for your replacement Council tax benefit scheme for 2013/14.

Whilst it is heartening to note that you are looking to bridge the potential funding gap through this change in legislation, you will appreciate that I am unclear as to the impact of the potential shortfall you describe on the Fire Authority.

As you are no doubt aware, the Fire Authority's cuts are back loaded, unlike local government and our budget reduction plans are finely balanced around cuts of 30% under this spending review. We are aware of the risks around collection rates through this change and the impact that they will have on us. Therefore any additional cuts passed on by local authorities from changing their scheme may mean significant change to our plans and the level of service we can provide.

In these circumstances you will appreciate that we support any scheme that looks to fully bridge the funding gap and not pass any shortfall in scheme design onto a preceptor.

Yours sincerely,

Councillor David Acton
Chairman, Greater Manchester Fire and Rescue Authority

TRAFFORD LABOUR GROUP
RESPONSE TO TRAFFORD COUNCIL TAX CONSULTATION
OCTOBER 2012



The national context

The Coalition Government's Comprehensive Spending Review of 2010 set out plans for the radical reform of Council Tax Benefit, to be introduced from April 2013. The new policy, which replaces the existing national Council Tax Benefit Scheme with localised Council Tax Support Schemes, places the responsibility for the administration of Council Tax Benefit on local authorities. It is the view of the Labour Group that it is absolutely unacceptable to introduce these changes in the current climate; and in particular to do so whilst providing authorities with only 90% of the current funding to administer the scheme.

It is immediately apparent that the decision to introduce locally administered schemes across the country runs the risk of creating a postcode lottery, with a range of approaches to the new Council Tax Support Scheme meaning that residents will be eligible for different levels of support dependent on the local authority in which they live. To this end, the Labour Group shares the concern of the Institute for Fiscal Studies that the new scheme creates both the opportunity and incentive for local authorities to encourage low-paid people to move elsewhere.¹

In addition to initial concerns about the funding cut of 10% to run Council Tax Support schemes locally and the potential this has in terms of creating a postcode lottery for claimants, the decision to allow local authorities to handle claims runs contrary to the principles of the Welfare Reform Act 2012. Rather than simplifying the administration of benefit claims, the Labour Group would contend that the decision to run multiple localised schemes will create a chaotic, two-tier benefits system with both local and central government setting policy. This in turn further undermines Ian Duncan Smith's already flawed Universal Credit due to be introduced in October 2013 - it seems utterly ridiculous to shatter the illusion of its 'universal' nature before it has even been introduced by establishing a localised system of Council Tax Support operating outside of this and administered at a local level.

In setting the introduction of localised schemes in the context of national changes and especially the new Universal Credit system, the Labour Group can not help but note the unfortunate timing of the scheme's introduction. It seems a waste of time for Trafford Council to go to great lengths in April 2013 to introduce the new scheme and assess claimants under the new criteria, only to face the prospect – just six months later – of having to reassess a number of claimants again following the introduction of Universal Credit in October 2013.

Aside from the impact that the Universal Credit will have on the lives of thousands of local people, this reassessment process has the potential to cost thousands of pounds in administration costs at a time when Trafford Council is looking to cut millions from its annual budget. In the current climate, local authorities simply can not afford to waste money in this

¹ <http://www.publicfinance.co.uk/news/2010/10/council-tax-benefit-changes-will-hit-poorest-families-says-ifs/>
accessed 4th October 2012

way as a result of poor planning by the Coalition Government, taking no account of the impact this would have on both councils and their residents.

In addition to providing local authorities with only 90% of the funding previously used to administer Council Tax Benefit, the government have further stipulated that any local proposals do not impact on those of pensionable age. This is a measure that Trafford Labour Group does not oppose and indeed accepts is necessary given the outrageous decision made by George Osborne in the 2012 Budget to fund a tax cut for millionaires by freezing the personal tax allowance for the over 65s and the impact of pension credit cuts on low-income pensioners.

However, whilst Trafford Labour Group accepts the decision to protect pensioners from the impact of the cut in funding to administer Council Tax Support, what this effectively means is that Trafford needs to identify not a 10% reduction in the Council Tax Benefit of working age claimants but a reduction of around 20%. This is an enormous figure in the context of the financial situation of many Council Tax Benefit claimants, and one which will have a significant impact on those affected.

It is particularly unjust therefore that the government has restricted the income generating options available to local authorities by ignoring calls for a review of Council Tax banding. To cut the Council Tax Benefit of millions of people across the country without tackling the injustice of an outdated banding system highlights once again the continued refusal of this Government to inflict its austerity measures in a fair and balanced way. It is the view of Trafford Labour Group that it is difficult enough for any local authority to devise a workable scheme, without the Coalition Government restricting potential income generating streams in this way.

There can be no doubt that the principle driver behind the decision to localise Council Tax Benefit is political. Under the plans the government will save £0.5 billion by 2014/15 and it is clear that the government is passing the burden of making this cut on to local authorities in order to wash its hands of the responsibility and avoid any potential electoral fallout. Huge cuts to welfare and benefits will see the poorest struggle even further in a climate with little scope for finding work and a UK economy which is spluttering with zero growth in the past year. To expect local authorities to do the Coalition's dirty work is not localisation: it is the decimation of the low-paid at the hands of this tory-led government.

Trafford Labour Group firmly believes that the Coalition Government should think again about this policy. Council Tax Benefit cuts hit the poorest hardest, and it is our belief that Trafford Council should show strong leadership and speak up for its residents by publicly denouncing this policy. Whatever the government may claim, this is another funding cut for councils when they have already had cuts imposed greater than that of any government department. As Simon Parker of the New Local Government Network has said: "just because the government cuts Council Tax Benefit, doesn't mean fewer poor and elderly people need

it. The level of need remains the same. Many councils are already making huge cuts to their budgets and will struggle to top up what they get from central government.”²

What other councils are doing

It is important, in the context of discussing Trafford’s approach to devising a Council Tax Support Scheme, to consider the proposals being put forward by other local authorities. There are a range of different approaches across Greater Manchester and this is understandable given the different demographics of the ten boroughs. However for the purposes of this exercise it is perhaps most useful to look at the approach of the largest authority in the area, Manchester, and that of what is probably the most comparable authority, Stockport.

Manchester:

Manchester Council is faced with an enormous £5 million pound cut from central government to administer Council Tax Support. The key difference between Manchester’s approach and that of Trafford is a proposal to reduce all working-age claimants’ entitlement by 15% (85% pay on liability). Whilst this does not provide the full saving required, it enables Manchester to propose the following when assessing claims:

- Disregard Child Benefit when calculating Council Tax Support
- Retain the Council Tax Support income taper at 20%
- Establish a minimum payment threshold of £1 per week (as opposed to £5 proposed by Trafford)

In addition, as opposed to a blanket capping for claims on a property at Band D level (the Trafford proposal) Manchester will assess claims and cap according to the size of property required by the claimant. For example, a single person’s claim would be capped at Band A level, while the proposed cap for a family requiring two or more beds would be at Band C level.

Details of Manchester’s proposals can be found at:

http://www.manchester.gov.uk/info/200028/council_tax/5718/council_tax_support_consultation/1 (accessed 3rd October 2012)

Stockport:

Stockport Council is facing a deficit of £2.4 million against the current level of funding for Council Tax Benefit claimants in Stockport. In addition to income generating options, Stockport’s proposals differ from Trafford’s as follows:

² <http://www.nlgn.org.uk/public/2011/councils-can%E2%80%99t-administer-benefit-cuts-without-the-tools-to-deal-with-the-consequences-says-think-tank/> accessed 10th October 2012

- There will be a capital limit on claimants of £8000
- Establish a minimum payment threshold of £1 per week
- Cap claims by property size to Band A for single person claims and Band B for families

Details of Stockport's proposals can be found at:

http://www.stockport.gov.uk/services/councildemocracy/your_council/counciltax/counciltaxconsultation/counciltaxsupportconsultation/ (accessed 3rd October 2012)

Both of these proposals differ vastly from Trafford's and many features of their approach should be given real consideration by Trafford Council. It is particularly interesting to note that neither authority is looking to include Child Benefit as assessed income.

Looking outside of the Greater Manchester Conurbation it is perhaps most pertinent to consider the proposals of the only other Conservative-controlled Metropolitan Borough, Solihull. Facing a shortfall in government grant of around £1.5 million, Solihull have decided that – in the short term at least – they will not develop a policy of localised Council Tax Support and will absorb the cost of the scheme enforced by central government.

It is a damning indictment of the failure of the Coalition Government to provide jobs and growth that one of their flagship councils is refusing to devise a localised scheme. Ken Meeson, the Leader of Solihull Council, has himself acknowledged the need to provide greater support to help people back in to work before a localised scheme – with considerably less funding – could be considered. He has stated that “we are proposing not to make any changes to the council tax benefits scheme for next year as we wish to use the time to develop services to support people back into work before making any changes to their benefit.”³

Trafford Labour Group wholeheartedly concurs with Ken Meeson that before any cuts to Council Tax Benefit are introduced, people need greater support and a better economic climate in which to find work. It is fundamentally wrong to attack benefits claimants and cut the welfare bill when the government has spectacularly failed to provide a climate where people are able to support themselves back into work and our economy is flatlining. We therefore call upon Trafford Council to look at other options beyond cutting Council Tax Benefit until need is substantially reduced and people are better able to find work.

Furthermore, it is not lost on the Labour Group that Conservative-controlled councils across Yorkshire have shown the courage to publicly oppose the cuts to Council Tax benefits imposed by central government.⁴ They correctly assert that these cuts will be devastating for millions of people across the country and are right to call for the government to change course. Moreover, they share the concerns of the Labour Group in Trafford that localised schemes create a postcode lottery for benefits claimants due to variant demography borough-by-borough. Similar concerns have been expressed in a joint letter to the Chair of the Local Government Association by the leaders of 12 Surrey councils who are particularly

³ <http://www.solihull.gov.uk/news/27935.htm> accessed 5th October 2012

⁴ <http://www.independent.co.uk/news/uk/politics/eight-conservative-led-town-halls-to-campaign-against-council-tax-benefit-cuts-8008807.html> accessed 5th October 2012

concerned about the impact on 'troubled families'.⁵ It was also illuminating more recently to see that even David Cameron's own West Oxfordshire District Council has joined the rebellion, slamming the changes for disincentivising work because of the way the benefit would be reduced progressively as incomes rise.⁶

The Labour Group is extremely concerned that the Conservative administration here in Trafford has not spoken out against these proposals. The impact on local residents is so severe that local Conservatives – and in particular the Leader of the Council and relevant Executive Member – should have the courage to join calls for a rethink on this policy. By blindly following the guidance of the Conservative-led Government the Ruling Group are guilty of placing political allegiance before the needs of local residents. They should set aside narrow political interests and follow the lead of dozens of Conservative councils across the country in opposing this policy in order to get the best outcome for the residents of Trafford.

The Trafford Proposals

Trafford Labour Group fully appreciates the difficulties faced by the local authority in trying to design a workable scheme that is both fair for claimants and affordable when a funding cut of 10% is taken in to consideration. We pay tribute to the work of the staff involved with this project however there are several specific concerns with Trafford's proposals that the Labour Group feel the need to place on record. It is apparent from the consultation document that Trafford has clearly identified Option 1 as its preferred model for the administration of Council Tax Support. This is known as the 'Combined Scheme' and is made up of several key changes to existing Council Tax Benefit arrangements which when combined with new income generating options will save the required £1.4 million per annum.

Whilst the Labour Group remains opposed to all aspects of the localisation of Council Tax Benefit as it amounts to little more than a means of making brutal cuts to Council Tax Benefit, the Group has some specific concerns with the Council's preferred option, which are set out below:

Implementing a minimum cap on claims of £5 per week: It is the view of the Labour Group that this proposal will have an adverse impact on claimants who could potentially lose benefit of up to £260 per year as a result. This is a significant amount of money to have to find elsewhere in the current financial climate, when household budgets are being squeezed and families are struggling to make ends meet.

In addition, this measure potentially undermines Trafford's supposed aim of 'incentivising work' as there would be a point at which – should household income increase by a small amount – that household would lose all of their Council Tax Support because entitlement to

⁵ <http://www.guardian.co.uk/politics/2012/aug/26/council-tax-benefits-revolt> accessed 6th October 2012

⁶ As above, accessed 6th October 2012

benefit below £5 per week would no longer exist. This creates a climate where people could potentially be up to £260 a year better off if they receive a minimal pay increase which would take them over this cut off point. It is simply too high a threshold for low paid residents across Trafford and is absolutely unacceptable.

Abolish all backdated claims: It is simply not possible to abolish all backdating as there will always be cases where the claimant has genuinely been unable to claim; for example if they have been hospitalised for several weeks or even months. It is unfair that such an individual would lose their entitlement to Council Tax Support because of specific personal circumstances out of their control. The creation of a 'discretionary fund' to handle such occurrences does nothing to satisfy the Labour Group that vulnerable residents who may have been very ill will be able to access the support they need for the full period they have needed it. Residents who are entitled should not be penalised for severe illness nor should they have to jump through hoops applying to a discretionary pot for support they would have been entitled to if well enough to claim.

Increase the excess income taper from 20% to 30%: This proposal again fundamentally undermines Trafford Council's principle of 'incentivising work' as claimants would lose a greater proportion of their earned income thus removing the incentive to make more money through their employment. This is a particularly risky move and the Labour Group would assert that if adopted could be extremely damaging to the economy, further restricting claimant's ability to spend by reducing their disposable income. In a fragile economy this is a negative step that does nothing to encourage growth or drive up consumer sales.

Inclusion of Child Benefit in a claimant's assessable income: Trafford Labour Group is very concerned at the proposal to include Child Benefit as assessable income for Council Tax Support claimants. The last Labour Government ensured in the Childcare Act 2006 that Child Benefit would be disregarded from CTB claims and to reintroduce it as part of the calculation now would be a devastating blow for low income families. Such a measure could have the effect of further exacerbating child poverty when these vulnerable families are already struggling and we are extremely disappointed that this option is being considered by the local authority. It is utterly abhorrent to target children in such a way and highlights how damaging the funding cut by the tory-led Government will be to local families.

There are several other areas of significant concern to the Labour Group in analysing the proposals set out in Option 1 which, when combined with the issues set out above, highlight exactly why the Government's decision to make this brutal cut is so unfair and will have such a devastating impact on low paid people in Trafford. Given this, the ruling-Conservative Group should accept that their Government has made a massive error with this policy and again Trafford Labour Group calls upon the Council to reject both this Scheme and indeed their Option 2 proposal. Instead the Ruling Group should, as outlined earlier, refuse to accept this draconian cut and challenge their Government to rethink on this most critical of issues.

Conclusion

Trafford Labour Group remains fundamentally opposed to the localisation of Council Tax Benefit. This is a disastrous policy which will have a number of adverse effects on the millions of claimants across the country. It will, when combined with wider welfare reform measures, create a two-tier benefit system and a postcode lottery with different authorities operating vastly different Council Tax Support schemes. Moreover, as the new schemes are to be funded with only 90% of the existing allocation for the national Council Tax Benefit Scheme, people will face real hardship as a result of this policy. It is simply disgraceful to introduce such a scheme that attacks the low paid on the very same day that those earning over £1 million per annum will receive a tax cut of £40,000.

Trafford's Conservative administration simply must reject this edict from central government. To accept it is to accept a bad deal for the people of Trafford and in particular some of our most vulnerable residents. The Labour Group can not state more categorically the need for Trafford's Conservative Group to join the dozens of other Conservative-led authorities that have set political affiliation to one side and are pressurising the Government to rethink. This is the wrong policy at the wrong time and refusing to put up any sort of meaningful challenge is a damning indictment on the willingness of Trafford's Tories to place narrow party politics ahead of the best interests of local residents. The people of Trafford deserve better and the Labour Group demands it.

End.

Appendix 2D (Citizens Advice Trafford)

CAT Council Tax Benefit Reform Response

CAT welcomes the opportunity we have been given to contribute to the reform of Council Tax Benefit in the borough. We are pleased that our many years of experience of working with residents of Trafford are valued and that our clients' experiences have informed the consultation process.

Council Tax Benefit Enquiries have made up approximately 4% of our benefit enquiries to date this year. This reflects the fact that the scheme is well established and that local administration of Council Tax Benefit is not problematic for residents. We anticipate a sharp increase in enquiries as the new scheme, regardless of which is adopted, comes into effect.

The reform of Council Tax Benefit comes at a time when reform and change is unprecedented across the whole of social welfare. As a service, we applaud attempts to make the welfare system simpler and easier to navigate. As an organisation, we also recognise that the most effective way out of poverty is through work. However, this is not to say that we do not have some broader concerns about the means used and the speed of change.

The Council Tax Benefit Reform comes at the same time as the 'Bedroom Tax', the Benefits Cap, the introduction of Universal Credit, the reform of Disability Living Allowance and the reform of the Social Fund. At the same time, the price of energy and food continues to rise and presents a further challenge for households on a low income or on means-tested benefits. We are concerned that this will create a 'perfect storm' of change and uncertainty for many people living in our borough, with many struggling to cope and understand the changes happening to them.

We would urge the Council to work with partners to ensure that the changes are communicated effectively and that extra support for residents is resourced adequately. We would also urge the council to reach out to those communities who find council services hard to reach to ensure that there is support available to all of Trafford's communities.

Our response to the Council Tax Benefit reform proposals follows broadly the same format as the official consultation document. We attempt to understand the need addressed by the current system and how this may be affected by the new proposals. In each section, we have made suggestions about communities that may be disproportionately affected by the proposals. We hope that this will support the council in deciding on a scheme to implement in Trafford.

Dale Maskell
Chief Officer – Citizens Advice Trafford

PROPOSAL 1

OPTION A: Abolish Second Adult Rebate

The need Second Adult Rebate is designed to address: This aspect of CTB was introduced to support those claimants who live with another, adult non-dependent living in the household on a low income. The maximum discount that can be awarded for the Second Adult Rebate is 25% of the CT. The aim of the Second Adult Rebate scheme is to ensure that people liable for CT are not penalised for sharing a household with a person who is on a low income and unable in practical terms to contribute to the CT bill.

Consequences and impact of the proposal: When considered in the broader context of welfare reform, it would appear that removing this aspect of the scheme might act as a disincentive to people sharing accommodation with those on a low income. This would occur because potentially, the person liable for the CT will lose their CT single person discount and therefore would be better off living alone.

In light of the changes with regards to the 'bedroom tax' there may be a situation created where people on a low income cannot find a household to share because of the reluctance of liable persons to lose their 25% discount and struggle to find one bedroom properties. The demand for single bedroom properties locally will overwhelm the supply and this leaves those on a low income with very few, if any, options.

The Council should be mindful of the impact this proposal has on those living in households where the Second Adult Rebate applies. We do not have access to this data here at CAT but we suspect that this proposal is likely to have a disproportionate impact on young people and in particular, young women, who are often low-paid. We do recognise that this is a small aspect of the overall scheme and that the numbers of people affected will be small but the changes are important to each individual.

OPTION B: Restrict support to a Band D property charge

The need the banding structure in CT and CTB is designed to address: CTB was introduced because of the failure of the poll tax and Community Charge Benefit. In particular, it was designed to cover up to 100% of CT liability, regardless of the CT band a property fell in to. This system was introduced in response to the difficulties of collecting small amounts of tax from those on means-tested benefits who were disproportionately affected by the poor design of the previous system.

Consequences and impact of the proposal: Larger families in Trafford are likely to live in larger houses, and therefore be included in the higher bands of CT valuation. This proposal will therefore affect these people disproportionately (at least those who are currently in receipt of CTB).

The Council should be mindful of the impact this proposal has on those living in larger family households with a low-income. We do not have access to this data here at CAT but we suspect that this proposal is likely to have a disproportionate impact on the communities in Trafford that traditionally have larger family units.

This proposal will also have an impact on older people (not quite of pension age) living in the family home who have been widowed/are widowers/are divorced and live alone. A high proportion of these people, we suspect, will be women and the Council should use its data to establish any disproportionate impacts.

OPTION C: Increase the Council Tax Benefit taper from 20% to 30%

The need the Council Tax Benefit taper set at 20% is designed to address: The taper for CTB is designed to support claimants with making a proportional contribution to the CT by decreasing the amount of CTB awarded and increasing the amount they have to contribute. The taper is applied at a rate of 20p in every £1 over a threshold amount.

Consequences and impact of the proposal: This proposal will affect those in low income households as the impact of having to pay more towards CT will be felt more keenly. This is because the relatively small amount of disposable income available will be reduced further and taken into account, with the increases in food and energy bills and the wider welfare reforms this will be a struggle for many.

OPTION D: Include Child Benefit as income

The need Child Benefit disregarded as income addresses: The withdrawal of Child Benefit from the calculations for CTB was enacted in 2009. The intention was to boost the incomes of many of the lowest paid families, including those who are the parents of children in poverty. It is well established that 'Universal Benefits', such as CB, are the most successful at reaching people living in poverty.

Consequences and impact of the proposal: Low paid families with children will feel the impact of this proposal as it will represent a reduction in their income. This is money that they will have been using for everyday living expenditure e.g. food, heating etc. Although Child Benefit is a small amount of money in itself, as a proportion of a low-income household it is a significant amount.

OPTION E: Abolish backdating so all benefit is paid from the date of application

The need that backdating addresses: The difficulties and vagaries of everyday life are recognised in the current legislation and case law regarding the backdating of CTB. Currently, CTB can be backdated in the following circumstances:

- a. You sought advice about your rights but were misled by someone on whom you were entitled to rely.

- b. You did not seek advice about your rights because you misunderstood them or you mistakenly thought that you understood them or you mistakenly thought you had no entitlement and there was nothing for you to enquire about.
- c. The delay was due to some factor beyond your control e.g. postal failure, or somebody acting on your behalf failed to submit your claim.
- d. You were unable to claim because of physical or mental ill health.
- e. You have difficulty communicating in English or understanding documents, or have little knowledge of the benefits system.
- f. You only qualify for HB and CTB when a 'qualifying benefit' is awarded.

Consequences and impact of the proposal: The proposal will affect a number of people who will have struggled to make a claim in good time. The proposal will also result in arrears of Council Tax that in all reality will be small and difficult to collect. Indeed, in many cases the claimants will not have any disposable income with which to pay off these arrears.

- a. This provision supports people who might rely on other organisations to advise on entitlements against negligent advice. CAT has its quality of advice audited, our volunteers are closely supervised and we have insurance against any poor advice given. Many smaller community groups do give advice but their quality processes are not so robust. There is also the issue of Housing Association/Local Authority contact-centre type staff member who express an opinion on entitlement but is incorrect.

To remove this will potentially leave some clients open to losing out through no fault of their own. Trafford Council will have more detailed data on the number of backdating claims that are made under this provision and the demographic of these claimants. We suspect that members of BME communities may potentially be disproportionately affected by removing this protection.

- b. This provision is intended to protect those claimants who make a genuine mistake about their entitlement to a benefit or otherwise.

To remove this provision will mean that those claimants who have little or no understanding of the benefits system will be penalised for this and will therefore suffer a detriment.

- c. This proposal protects those who had no control over the date of claim and were powerless to submit it sooner. This would affect those who become suddenly ill or have an accident and are in hospital, for example.

Trafford Council will have more detailed data on the number of backdating claims that are made under this provision and the demographic of these claimants

- d. This provision is intended to protect those clients who do not make a claim in time and have mental health and/or physical disabilities that contributed to this.

To remove this provision means that disabled people may suffer a detriment purely because of their disability. The Council should be mindful of this, particularly as it may be argued that this provision is a reasonable adjustment. The Council cannot discriminate on the grounds of disability and should implement a scheme that will not have the effect of doing so.

Trafford Council will have more detailed data on the number of backdating claims that are made under this provision and the demographic of these claimants. We suspect that disabled members of our communities will be potentially disproportionately affected by removing this protection.

- e. This provision is intended to protect those clients who have difficulty communicating in English and those who have difficulty in understanding forms and the benefits system.

Trafford Council cannot discriminate on the basis of race, religion or disability. The council should be mindful that many people who have difficulty in communicating in English might be from minority communities. The Council should also be mindful of the fact that people with learning disabilities may also have difficulty in understanding forms and the benefits system.

Trafford Council will have more detailed data on the number of backdating claims that are made under this provision and the demographic of these claimants. We suspect that disabled and minority members of our communities will be potentially disproportionately affected by removing this protection.

- f. This provision is intended to protect those clients who have made a claim for a benefit but are waiting for a decision in order to qualify for CTB. It allows CTB to be backdated once a decision on the other benefit has been made. This is largely out of the control of clients as they wait on government agencies to make a decision on their claims.

OPTION F: Increase the deductions made for other adults living in a property

The need that non-dependent deductions address: Non-dependent deductions are intended to ensure that other adult residents of a property make a contribution to the CT. This is done by reducing the amount of CTB awarded.

Consequences and impact of the proposal: This change is likely to affect those households that have another adult residing and not financially dependent on the person liable for the CT and receiving CTB.

Trafford Council will have more detailed data on the number of claims that are made under this provision and the demographic of these claimants. The Council will be aware of any disproportionate impacts this may have.

OPTION G: Restrict benefit to a minimum of £5 per week

The need that is addressed by all payments being made: The CTB system is designed to support clients with payments of CT based on means testing. This means that the benefit is paid according to your circumstances on a sliding scale, based on the ability to pay. At the heart of the system is the allocation of minimum amounts that are regarded as minimum income standards, depending on your circumstances.

Consequences and impact of the proposal: This proposal is likely to impact on low earners who are just above the applicable amounts and only receive a small amount of benefit.

Trafford Council will have more detailed data on the number of claims that are made under this provision and the demographic of these claimants. The Council will be aware of any disproportionate impacts this may have.

PROPOSAL 2

Consequences and impact of the proposal: This proposal would affect all Council Tax Benefit claimants. Our concerns with this proposal can be summarised as....

- The scheme has a disproportionate impact on those with a low income and those on means-tested benefits.
- These members of Trafford's Communities are living on household incomes, which are on the very edge of what people can be expected to live on.
- Asking for a contribution from all claimants means that these people will be forced into even more difficult decisions – whether to eat, heat or pay the CT.
- In reality, when faced with this choice, people will not pay the CT.
- The amount of CT that is not paid is likely to be small amounts that are uneconomical to recover.
- If recovery is pursued aggressively then this will cause resentment.

The issues outlined in our response to Proposal 1 regarding disproportionate impacts should be considered again for Proposal 2. This analysis should be based on an analysis of the data available and any conclusions and mitigating factors identified.

CHANGING THE COUNCIL TAX EXEMPTIONS AND DISCOUNTS FOR SECOND HOMES AND EMPTY PROPERTIES

CAT is in favour of measures that encourage property owners to get their properties back on to the market, as housing and homes are in short supply in the borough. It would appear that reducing the exemption for unfurnished properties after 1 month would be the most efficient way of achieving this.

CAT has no strong views on the proposal to remove the 10% discount on second homes.

CONCLUDING COMMENTS

In conclusion, providing that the above issues are fully explored and that disproportionate impacts are mitigated, CAT believes that option 1 will affect a smaller number of low-income households, while achieving the required cuts. However, we do have particular concerns about the backdating proposal, which we have detailed earlier in our response.

Appendix 2E (Royal British Legion)

The following Correspondence was received from the Royal British Legion. This urges the Council to disregard 100% of military compensation payments when calculating Council Tax Support. This includes War Disablement pensions, War Widows Pensions and Armed Forces compensation scheme payments. **Both schemes will continue to disregard these payments.**



Patron Her Majesty The Queen

*Dr. Chris Simpkins DMA, Hon.DUniv,
Director General*

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T 020 3207 2361
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Ms T Grant
Acting Chief Executive
Trafford Metropolitan Borough Council
Quay West
Trafford Wharf Road
Trafford Park
MANCHESTER M17 1HH

Date: 1 November 2012

Reference: 12/077

Contact: dmartin@britishlegion.org.uk

Dear Ms Grant

Localised support for council tax – consultation submission

As you will no doubt be aware, as part of the Government's localisation agenda local authorities are now required to design and operate their own council tax support schemes. As part of this process local authorities must consult stakeholders on the proposed design of their schemes. Please accept this letter as The Royal British Legion's submission to your authority's consultation process.

I strongly urge you to ensure that your local authority provides a 100% disregard of military compensation payments when calculating entitlement to council tax support. This includes all War Disablement Pensions, War Widow's Pensions and Armed Forces Compensation Scheme payments. These payments are not an income support payment but are paid as compensation for injury, illness or loss as a result of Service in HM Armed Forces. It is therefore not appropriate, nor a recognition of commitment to the nation, to include such compensation payments in calculations for means tested benefits.

Until the recent changes local authorities were statutorily required to disregard the first £10.00 of these compensation payments. However, following our campaigning work, almost every local authority in the country has used its discretionary power to fully disregard these payments, and this is an approach that we strongly support.

The Government, in its guidance to local authorities, provides a reminder that the discretion to provide a full disregard to them is still available under the new regulations. Indeed it encourages them to do so, in line with the principles of the Armed Forces Covenant¹.

An increasing number of authorities are signing up to the Armed Forces Community Covenant and we are very grateful to those who have done so, or are looking to do so. I believe that the provision of a full disregard of military compensation payments when it comes to calculating council tax support is an essential step in delivering on the principles of the Covenant at a local level.

¹ Localising Support for Council Tax: Vulnerable people – key local authority duties, Communities and Local Government, May 2012.

I would be very grateful if you could confirm to me that your local authority intends to provide a full disregard of War Disablement Pensions, War Widow's Pensions and Armed Forces Compensation Scheme payments in the design of your council tax support scheme.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Simpkins', with a horizontal line drawn underneath the name.

Chris Simpkins DMA, Hon.DUniv, DL

Director General

Appendix 2F (Trafford Imagine, Act and Succeed)

Organisation: Imagine, Act and Succeed (Supporting people with learning difficulties)

Group represents 13 people

Preferred option

Imagine, Act and Succeed prefer Proposal 1 (combined options) over Proposal 2. The main reason being that Proposal 1 will not have as much an impact on vulnerable people.

The group are strongly opposed to Proposal 2 (20% reduction in working age claimants' benefit)

The group supports many of the components of Proposal 1, however there are some components that the group does not support. The table below provides a breakdown:

	Option	Response
a,	Abolish Second Adult Rebate	Tend to oppose
b,	Restrict support to Band D	Tend to support
c,	Increase the income taper to 30%	Tend to support
d,	Include Child Benefit as income	Strongly oppose
e,	Abolish backdates	Tend to oppose
f,	Increase non-dependant deductions	Strongly support
g,	Introduce a £5 minimum award	Strongly support

Empty Properties / Second home proposals

The group has not stated any views around the empty property or second home questions.

Work Incentives

The group has not stated any views around the work incentive proposals.

Protections and Discretionary Fund.

The group has not stated any views on protecting households with children under 5 years old.

The group has shown strong support to protect people on all rates of Disability Living Allowance, but also to protect people who are in receipt of Severe Disability Allowance (this benefit is being phased out) and Incapacity Benefit.

The group has stated that they do think that the Council should set up a discretionary fund.

Appendix 2G (Community Organisation)

Organisation: **Organisation does not wish for name details to be published but happy for reference to being a community organisation which promotes stronger bonds between communities**

Preferred option

A community organisation prefers Proposal 1 (combined options) over Proposal 2. The main reason being that Proposal 1 will affect fewer people. The group tend to oppose Proposal 2.

Although the group prefers Proposal 1 over Proposal 2, they tend to oppose the majority of the options within Proposal 1. The table below provides a breakdown:

	Option	Response
a,	Abolish Second Adult Rebate	Tend to oppose
b,	Restrict support to Band D	Tend to support
c,	Increase the income taper to 30%	Not stated
d,	Include Child Benefit as income	Tend to oppose
e,	Abolish backdates	Tend to oppose
f,	Increase non-dependant deduction	Tend to oppose
g,	Introduce a £5 minimum award	Tend to oppose

Empty Properties / Second home proposals

The group tends to support charging for empty properties, but has not shown a preference between the two options. The group also tends to support charging for second homes.

Work Incentives

The group tends to support all the work incentives proposed.

Protections and Discretionary Fund.

The group has shown that it tends to support protecting households with children under 5 years old and protecting people on all rates of Disability Living Allowance.

The group has stated that it believes the Council should set up a discretionary fund.

Appendix 3A (Neighbourhood Forum and Roadshow summary and Q&As)

Forum / Event	Date	No of residents / attendees	No of Councillors
Neighbourhood forum events			
Altrincham	04.09.12	22	13
Stretford	10.09.12	6	12
Urmston	11.09.12	21	7
Sale	18.09.12	14	8
Old Trafford	25.09.12	6	3
Partington & Carrington	02.10.12	34	2
Welfare Advice Centre – Roadshow events			
Sale	22.8.12	6	0
Stretford	12.9.12	22	0
Partington	8.10.12	12	0
Old Trafford	9.10.12	28	0

Appendix 3B Questions raised

Council Tax Benefit Changes - Frequently Asked Questions

What is Council Tax Benefit?

Council Tax Benefit is a national welfare benefit which helps people on a low income to pay their Council Tax bill. It is administered by local councils using rules set nationally by the Government.

What is changing?

From April 2013, The Government is abolishing the current national Council Tax Benefit scheme and giving local authorities the freedom to set up their own local schemes. These local schemes will be known as Council Tax Support.

The Government is giving councils less money to pay for their new schemes. We estimate that Trafford Council will receive a reduction in funding of approximately £1.4million in 2013/14. This shortage means that we will need to make some difficult decisions about who gets Council Tax Support and how much.

Why are we replacing the current Council Tax Benefit scheme?

The Government is reducing the amount of funding it pays to Trafford for Council Tax Support and therefore the Council has to reduce expenditure.

If Trafford Council did not make changes to the scheme, the funding may have to be found from other Council services. The Council is looking to make up the shortfall from both the Council Tax Support scheme and from income from empty and unfurnished properties and second homes.

What are the Council's proposals?

The Council has considered a wide range of options to make up for the shortfall in funding and believes the fairest proposal (for both benefit claimants and taxpayers) is to:

- Reduce benefit expenditure through a new Council Tax Support scheme; and
- Generate income by changing the Council Tax exemptions and discounts for second homes and empty properties.

All current working age Council Tax Benefit claimants may be affected by these changes and might see their benefit reduce. Although pensioners will move onto the new scheme, they will be protected and will continue to receive the same level of support as they would under the current Council Tax Benefit rules.

Taxpayers may also be affected by the proposed changes to the Council Tax empty property exemption and second home discount, or may move onto benefit in the future. The Council is consulting on whether other vulnerable groups should receive some protection from these changes.

How much will I have to pay under the new scheme?

Depending on the outcome of the consultation, it is likely that some working age people who qualify for Council Tax Support will have to pay more than they do now. The consultation will help us to determine how much more people in different groups will have to pay. You can view our proposals in more detail by completing a survey or looking at our draft scheme.

Why are we consulting?

We consulted with local residents and a wide range of community and welfare groups between 6th August 2012 and 29th October 2012 to gather views about our proposals.

The purpose of the consultation was to understand what people thought about the proposals, and how we could improve the scheme to support people back into work and protect the most vulnerable groups.

Will I need to fill in a new application form to claim Council Tax Support?

If you currently receive Council Tax Benefit you will not have to re-apply. You will automatically be re-assessed using the new rules and will be sent a new Council Tax Bill and benefit decision letter in February 2013. Your award may be reviewed once you have moved across to the new benefit.

Single Person Discount

Is Single Person Discount affected by the changes?

No, single person discount is not affected by these changes. Anyone who currently receives Single Person Discount will continue to do so unless their circumstances change.

Empty and Unfurnished Properties

What happens to the Council Tax charge when a house is repossessed?

What happens if a property is uninhabitable?

What happens if a resident leaves a fully furnished home to go into a care home?

What happens if a resident dies and their property remains fully furnished whilst their personal affairs/probate is being attended to?

The empty and unfurnished exemption does not apply to any of the specific cases listed above. Please see [the exemptions page on our website for more information.](http://www.trafford.gov.uk/adviceandbenefits/counciltax/reducingyourbill/)
<http://www.trafford.gov.uk/adviceandbenefits/counciltax/reducingyourbill/>

Has the Council considered abolishing the discount for empty properties altogether and charging full Council Tax from day one?

Yes, the Council has considered a number of options. However, charging from the first day the property becomes empty would not allow home owners and Housing Associations any time to find a tenant or buyer, especially if work was required on the property. It would also involve raising more small debts, placing an administrative burden on the Council.

Second Homes

What happens where a landlord is letting out a second home? Is there a Council Tax discount for owning the second home?

A second home discount does not apply as the tenant residing at the property would be liable to pay the Council Tax.

How many second homes and empty and unfurnished properties are there in the borough?

Over the course of last year there were approximately 634 second homes and approximately 8000 empty and unfurnished properties in Trafford.

What happens if a Pensioner owns a second home in Trafford? Will they be protected?

Pensioners are only protected from the proposed changes to Council Tax Benefit. Anyone who owns a second home or has an empty property in Trafford would be affected by the proposed changes to these discounts.

Protections

Who is exempt from the scheme?

The Government has told us that Pensioners must be protected from the changes to Council Tax Benefit. We have asked for people's views on who else should receive either full or partial protection, such as people with disabilities, households with children under 5, or any other groups.

What age is pension age?

For Council Tax Support purposes, pension age is the age at which a person qualifies for state pension credit. This is currently 61.5 years old for both men and women but this age is increasing over future years.

Will pensioners be protected if they currently receive full Council Tax Benefit?

Yes, all pensioners will be protected from the changes to Council Tax Benefit so they will continue to receive the same level of support as they do now, unless their circumstances change.

Is the Council aware that the Government is planning to change Disability Living Allowance? This may have implications for the level of protection being offered in the proposed schemes.

Yes the Council is aware that Disability Living Allowance is changing. Further consideration will be given to protections from the Council Tax Support Scheme once all the consultation responses have been considered.

Children never stop costing money - why do the proposals only suggest protecting people with children under the age of 5?

This protection is designed to help people who have to pay child care costs, or who do not work because their children are not of school age. This is consistent with Job Seekers Allowance, as single parents are not required to sign on until their child reaches 5 years old. However, the Council is asking for people's views on any groups that should be protected.

Would the discretionary help fund be as well as, or instead of, protecting certain groups?

The Council will need a full understanding of all the consultation feedback before making a final decision on which groups to protect. The discretionary help fund could be used as well as or instead of other protections, depending on the outcome of the consultation.

Funding

How will the shortfall be met?

Savings from the preferred Council Tax Support Scheme are expected to be between £500,000 and £800,000. Income from the proposed changes to empty and unfurnished properties and second homes will make up the remainder of the £1.4m shortfall.

In cases where people have to pay towards their Council tax bill where they didn't before, has the Council considered the cost of administering this?

Yes, the Council is considering the cost of collecting debts under the new scheme.

If the Government cuts are 10%, why does Proposal 2 have a 20% cut for working age customers?

Approximately 50% of people receiving benefit in Trafford are over pension age and are not affected by these changes. Therefore a 20% reduction would be required from the remaining working age claimants.

Other Local Authority Schemes

Are we following what other Councils are doing in respect of Council Tax Support? Is there a risk that residents might move to another borough if other Councils are offering a more generous scheme?

We are aware of how other Councils are consulting with residents and other interested parties but we are not following their proposals.

Trafford's proposals have been arrived at following numerous meetings with Councillors, managers, staff and a range of community stakeholders. In addition the options have been modelled financially to ensure that we understand the impacts on benefit recipients and non benefit recipients across the borough.

Are any other Authorities proposing to take Child Benefit into account as income when calculating Council Tax Support entitlement?

Many councils are applying a blanket reduction in the amount of Council Tax Support that is paid to benefit claimants and some Councils are considering a range of options, such as the inclusion of Child Benefit.

The Proposals

What happens if someone has a genuine need for backdating a claim, such as being hospitalised?

It is proposed that Council Tax Support claims will be paid from the date of the claim only. The proposed Discretionary Fund may help to alleviate this on a case by case basis.

Does the proposed increase to the income taper act as a disincentive to work?

There are no easy choices for the Council. The income taper is one of a number of options in the council's preferred scheme, but depending on the outcome of the consultation some of these options might be amended or removed. The council is also including work incentives such as increasing extended payments from 4 weeks to 8 weeks and increasing child care disregards by 10%

Including Child Benefit as income will make it very difficult for some people to manage.

One of the proposals is to protect people with children under the age of 5. It is also proposed that the Council will have a discretionary fund to help residents facing a reduction in Council Tax Support and experiencing severe financial hardship.

How many people are affected by the changes?

The council has carried out significant analysis into the numbers of people likely to be affected by each of the options, and how much benefit they would lose.

The council has also been gathering information about the locality, age, household type and ethnic origin of the people likely to be affected by the proposals.

This information will form part of the Equalities Impact Assessment and will be published at the end of the consultation period.

Has the Council considered that some people may be affected by welfare reforms such as the benefits cap and under occupancy rules, and could now also be faced with a reduction in their Council Tax Benefit?

The Council has carried out analysis on people potentially facing a double or triple impact as a result of all of the changes. Proposal 1 is the Council's preferred option, which affects fewer residents and has fewer multiple impacts than Proposal 2.

The Consultation

How has Trafford consulted with residents?

We have published details of the consultation on our website and have asked for residents' views on our proposals. We sent out 10,500 response forms to residents in all parts of the Borough; response forms have also been available in community centres and libraries, and online. We have also attended a number of Neighbourhood Forums and the Mobile Advice Centre has visited various parts of the borough, and have been in consultation with a number of community groups. In addition to this, there have been press releases in the local press and Manchester Evening News.

Who received the questionnaires that were sent out?

Trafford sent out 10,500 response forms. 5500 of these were sent to people currently receiving Council Tax Benefit and 5000 were sent to non- benefit recipients, including people who have a second home or empty property in Trafford.

Next Steps

Who will make the decision about what the new Council Tax Support Scheme will look like?

Once all the feedback from the consultation has been considered, The Council will then vote on the new scheme.

Appendix 4A (Council Tax Options Appraisal)

Needs Analysis for: Effects of Possible Changes to Council Tax Discounts and Exemptions

Required Outcome	Raise Additional Income Under Proposed Council Tax Regulation Changes in order to Support Budget Pressures	
	Advantages	Disadvantages
<u>Option 1</u> Replace 6 month exemption with 1 month 100% discount.	<p>Will allow manageable amount of time for landlords to let between tenancies.</p> <p>Will encourage timely occupation of empty property.</p> <p>Avoids the problems involved in the billing and collection of small sums.</p> <p>Significant sum raised (£650k)</p>	<p>May discourage builders to invest in new developments.</p> <p>Avoidance schemes may occur (difficult to verify sole occupier discount claims).</p> <p>Complaints from affected council taxpayers.</p>
<u>Option 2</u> Replace 6 month exemption with 25% discount from day 1.	<p>Significant sum raised (£800k)</p> <p>Should not impact on fraudulent sole occupier discount claims as both receive 25%.</p>	<p>May discourage builders to invest in new developments.</p> <p>Accounts will have to be raised for very small periods between tenancies.</p> <p>The collection of these can be very time consuming and costly.</p> <p>Does not allow landlords any turnaround time between tenancies.</p> <p>Complaints from affected council taxpayers.</p>
<u>Option 3</u> Remove 10% discount on furnished empty property.	<p>Administratively straight forward to introduce.</p>	<p>Avoidance schemes may occur (difficult to verify sole occupier discount claims).</p> <p>Relatively small gain (£40k)</p>
Timescale for the changes, any phasing of changes	Introduced for the start of the 2013/14 financial year	

Appendix 4B (Profile of residents who responded to the Representative Survey)

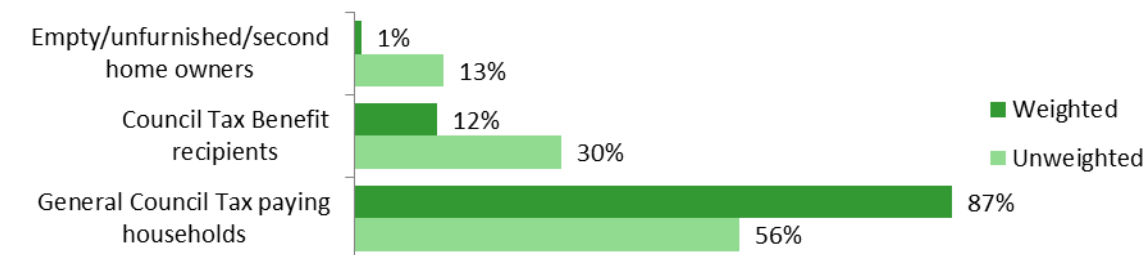
Who responded?

This section looks at the profile of those who responded to the representative sample survey in terms of which sample strand the respondent belongs to and the demographic profile both before and after weighting. It also looks at whether those who responded pay council tax and whether they receive Council Tax Benefit or other benefits. This latter information is useful in providing context for opinions given about the Council's proposals.

Sample strand

Reflecting the profile of the initial mailout, the profile of unweighted respondents is particularly concentrated among recipients of Council Tax Benefit and empty/unfurnished/second home owners. In order to make the profile of responses representative of the Trafford adult population overall, responses from the CTB recipients respondents have been weighted downwards and responses from general Council Tax payers have been weighted upwards to the true relative proportions within the population of Trafford as a whole.

Sample strand



Base : All responding (807)
Source: Ipsos MORI

Age, gender and ethnicity

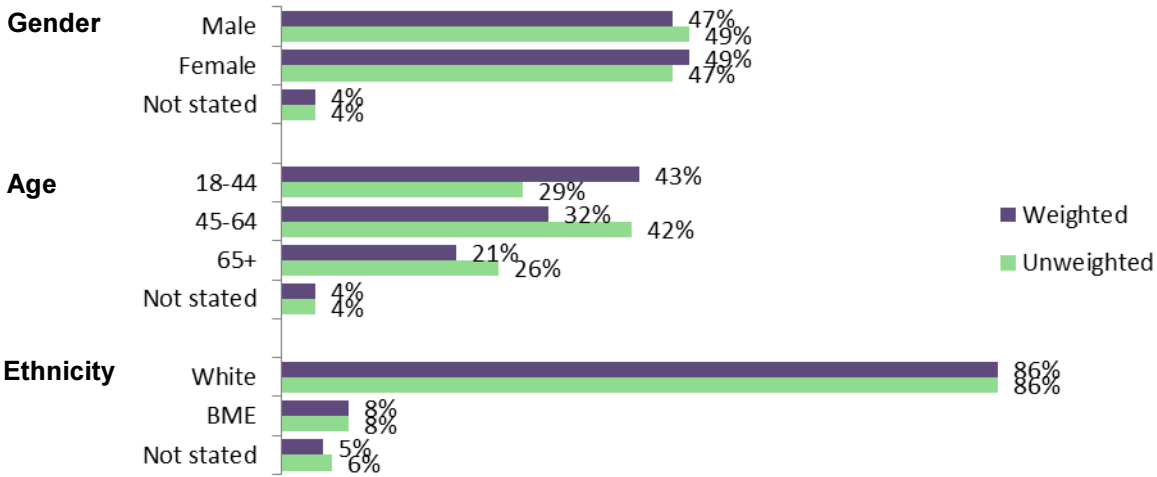
Only responses from General tax payer households were weighted to reflect the population of Trafford in terms of age, gender and ethnicity. It was not possible to weight the results from empty/unfurnished/second home owners and CTB recipients because there is no known accurate demographic profile of these recipients.

The following chart shows that for general Council Tax payers, there is relatively little difference between the weighted and unweighted profile by gender. However, there is a significant divergence by age, with older people aged 45+ having a much higher representation in the unweighted sample than younger people aged 18-44. This has been substantially corrected in the weighting process which has weighted up the responses from young people.

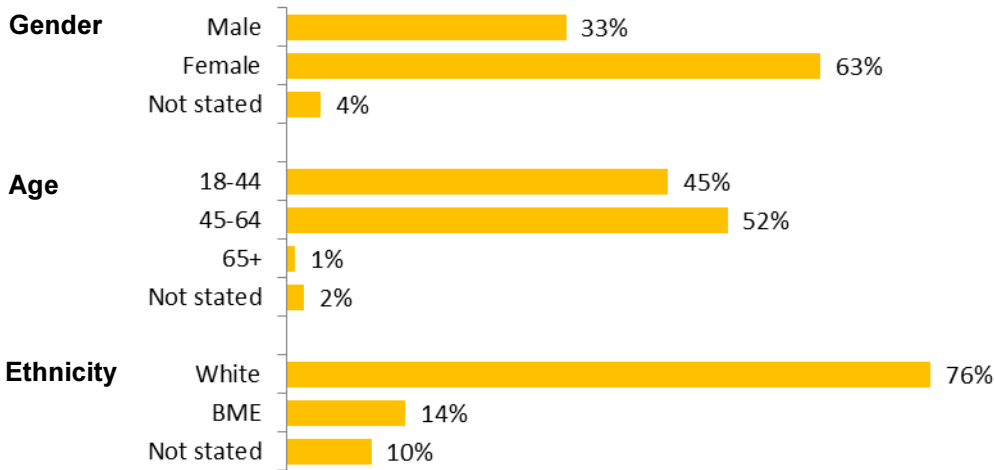
The profiles of the three sample strands are significantly different to each other.

- Most responses from empty/unfurnished/second home owners are from men (68%) but most responses CTB recipients are from women (61%). In contrast, General Council Tax payers are evenly split by gender (47% male and 49% female).
- Responses from empty/unfurnished/second home owners tend to be from the older age groups, with one in three (32%) being aged 65+ compared with one in five General Council Tax payers (21%) and only 1% of responses CTB recipients.
- Responses from CTB recipients have a higher representation of ethnic minorities (14% vs. 8% of General Council Tax payers and 5% of empty/ unfurnished/second home owners).

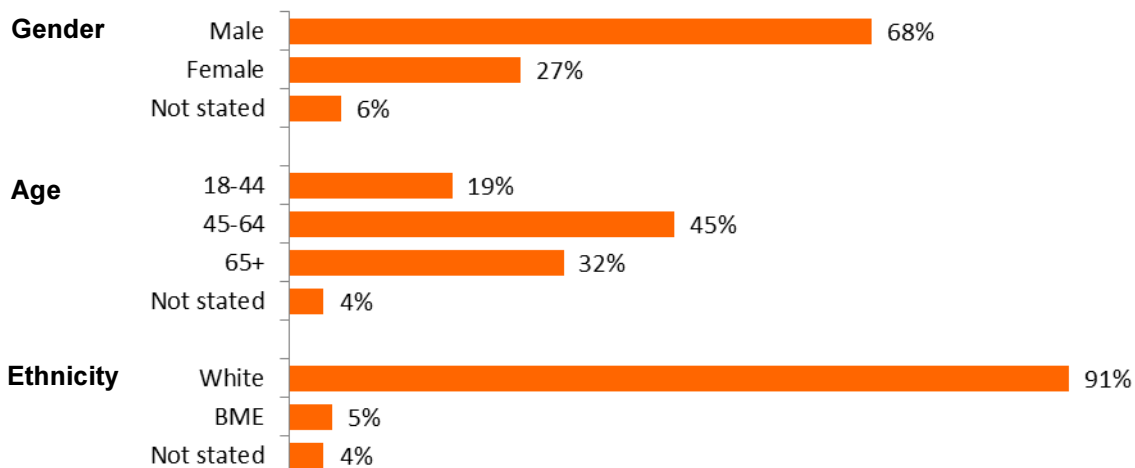
Personal information 1: General Council Tax payers



Personal information 1: CTB Recipients (unweighted)



Personal information 1: Empty/unfurnished/second home owners (unweighted)



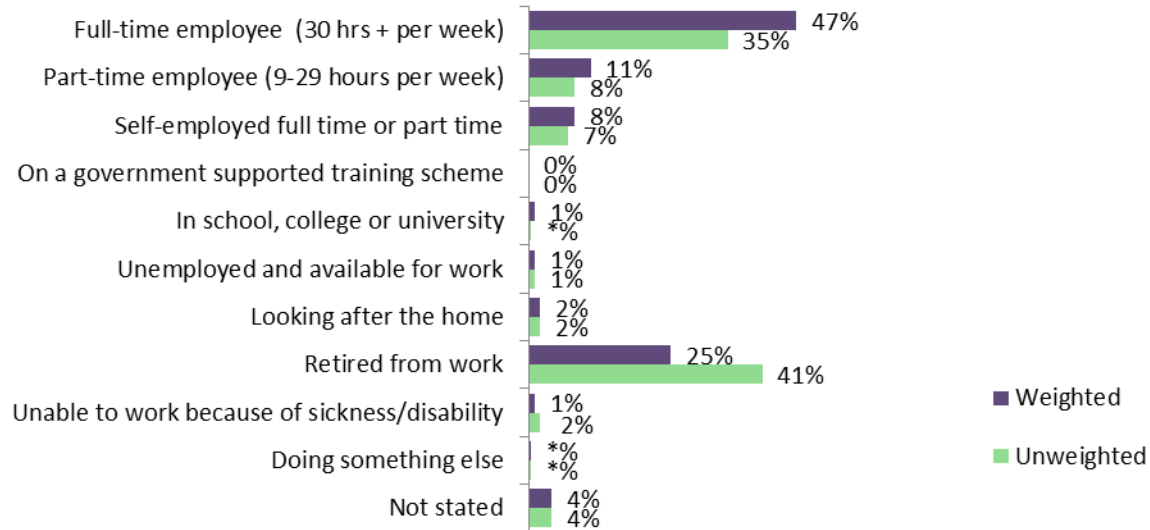
Base : All responding: General Council Tax payers (453), CTB recipients (246); Empty/unfurnished/second home owners (108)
Source: Ipsos MORI

Other key demographic data

Among General Council Tax payers, there are major differences by work status, which reflects the fact that older people were more likely to respond. The unweighted profile has a higher concentration of retired respondents, and a lower number of full-time workers. As a result of the weighting process for age, the responses of full-time workers have been weighted upwards and retired people have been weighted downwards to match the true population of those in this audience.

Personal information 2: General Council Tax payers

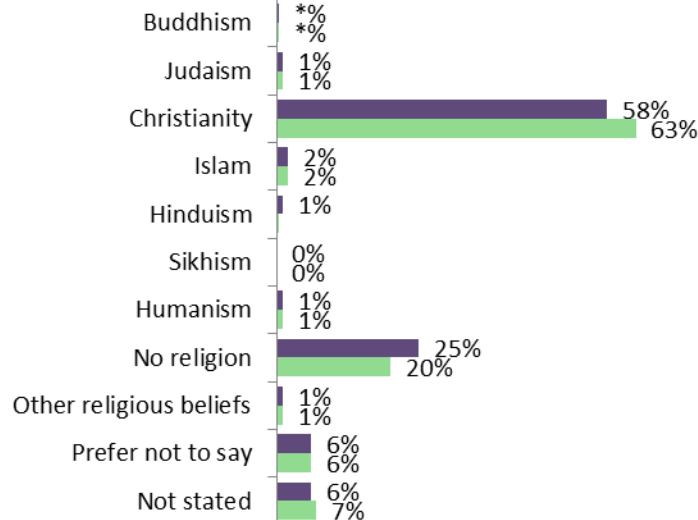
Employment status



Disability



Religion



Base : All responding: General Council Tax payers (453)

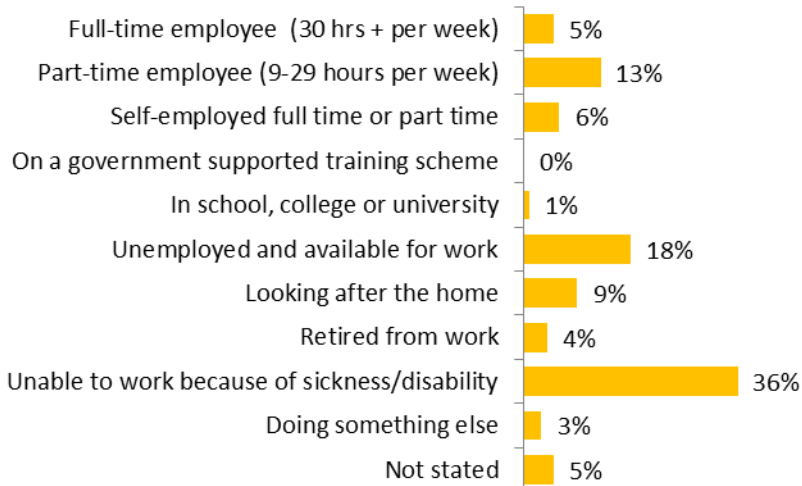
Source: Ipsos MORI

The profile of CTB recipients is very different to the weighted profile of General Council Tax payers. The CTB recipients are much more likely to have a disability (37% vs. 8%) or to be unable to work because of sickness or disability (36% vs. 1% overall).

One in four of the CTB recipients (25%) is in work, compared with two in three General Council Tax payers (66%). One in six of the CTB recipients is unemployed (18%) compared with 1% of General Council Tax payers.

Personal information 2: CTB recipients (unweighted)

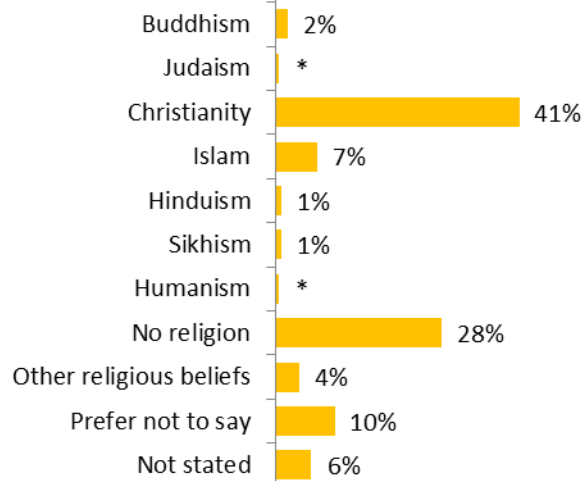
Employment status



Disability



Religion



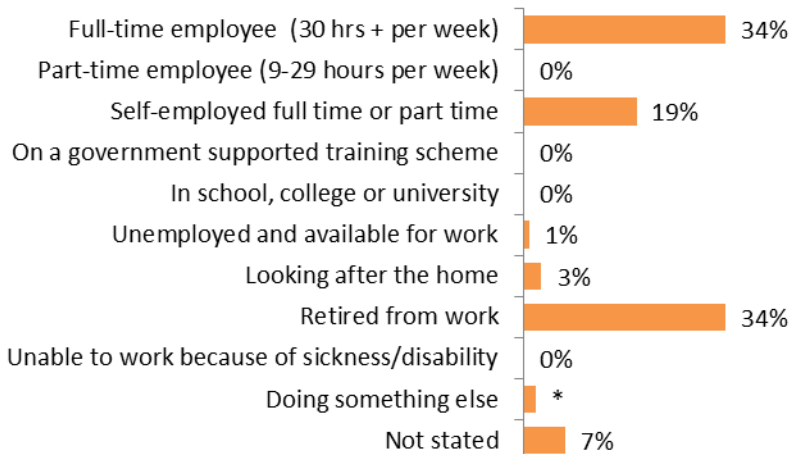
Base : All responding: CTB recipients (246)

Source: Ipsos MORI

The profile of empty/unfurnished/second home owners is closer to the weighted profile of General Council Tax payers. The main difference is that the recipients are more frequently self-employed (19% vs. 8% of General Council Tax payers).

Personal information 2: Empty/unfurnished/second home owners (unweighted)

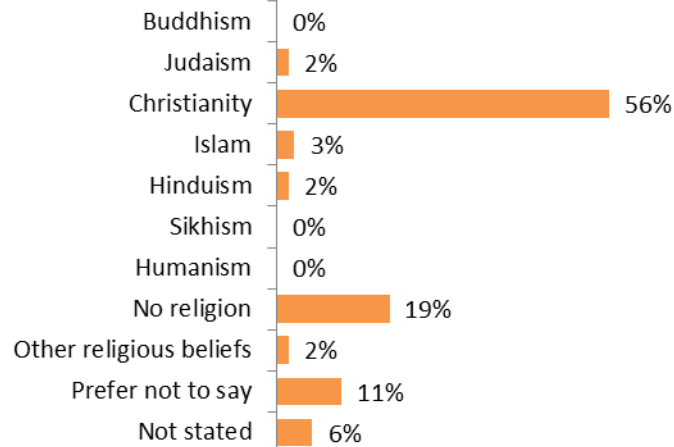
Employment status



Disability



Religion

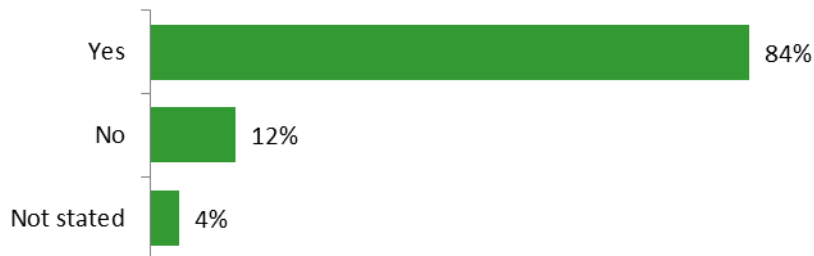


Base : All responding: Empty/unfurnished/second home owners (108)
Source: Ipsos MORI

Council Tax payment and benefits claimed

The great majority of respondents to the representative sample survey pay Council Tax (84%); one in eight (12%) do not do so.

Q11. Do you or others in your household pay Council Tax to the Council?



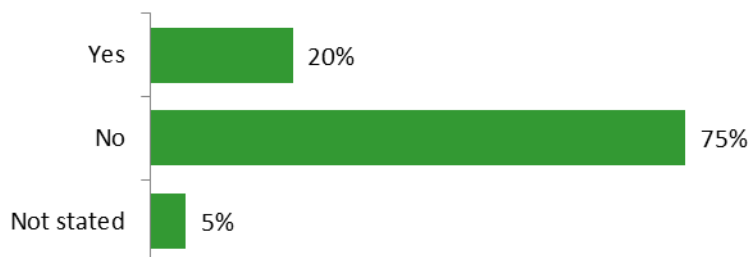
Base : All responding (807)
Source: Ipsos MORI

The proportion paying Council Tax is higher among General Council Tax payers (89%). It is significantly lower among empty/unfurnished/second home owners (75%), and lowest of all among CTB recipients (48% pay at least part of their Council Tax).

The great majority of working or retired people pay Council Tax (92% and 86% respectively) but this figure is much lower among those who are neither in work nor retired (56%).

One in five respondents (20%) receive Council Tax Benefit, three-quarters (75%) do not.

Q12. Do you or others in your household receive Council Tax Benefit?



Base : All responding (807)
Source: Ipsos MORI

The proportion receiving Council Tax Benefit is low among those in the General Council Tax payer (12%) and empty/unfurnished/second home owner (7%) sample strands. Among CTB recipients a majority (85%) say they receive Council Tax Benefit.

Overall, one in four retired people (25%) and one in ten working respondents (9%) say they receive Council Tax Benefit.

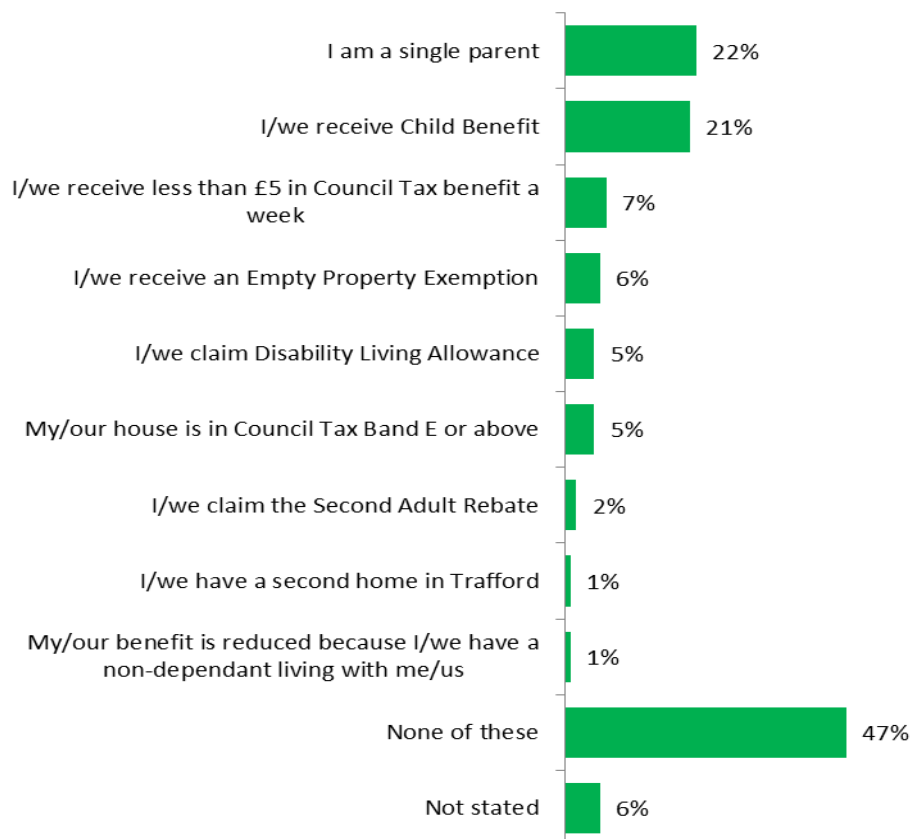
The questionnaire asked if respondents were members of groups who are currently eligible for Council Tax Benefit, or if they belong to a group which will be directly affected by the proposed changes.

One in five respondents to the representative sample survey receives Child Benefit (21%). Among other benefits received are Disability Living Allowance (5%) an Empty Property Exemption (6%) and a Second Adult Rebate (2%).

Of those circumstances that might affect eligibility for support, one in five respondents (22%) say they are a single parent. Around one in twenty receives less than £5 a week in Council Tax Benefit (7%) or resides in a house in Council Band E or higher (5%).

One per cent of respondents has a second home in Trafford or has their benefits reduced because a non-dependant person lives with them.

Q10. Which, if any, of the following apply to you?



Base : All responding (807)
Source: Ipsos MORI

Representative survey responses by neighbourhood forum areas

Urmston “cluster” = 124 unweighted, 131 weighted, responses
 Stretford “cluster” = 176 unweighted/194 weighted responses
 Altrincham “cluster” = 166 unweighted/151 weighted responses
 Partington “cluster” = 71 unweighted/85 weighted responses
 Sale “cluster” = 145 unweighted/137 weighted responses
 Old Trafford “cluster” = 80 unweighted/75 weighted responses

Appendix 4C (Profile of residents who responded to the Consultation Survey)

Who responded?

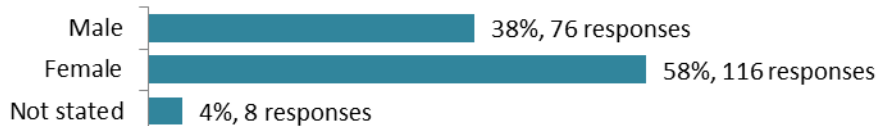
This section shows the profile of responses to the public consultation received from individuals. There is a separate section detailing the responses received from organisations.

Age, gender and ethnicity

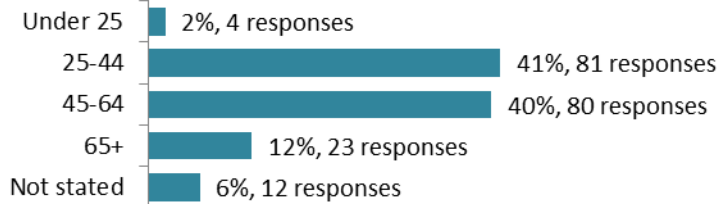
The following chart shows that most respondents to the public consultation are women (58%, 116 responses) and are aged either 25-44 (41%, 81 responses) or 45-64 (40%, 80 responses). The great majority are also White (81%, 162 responses).

Personal information 1

Gender



Age



Ethnicity



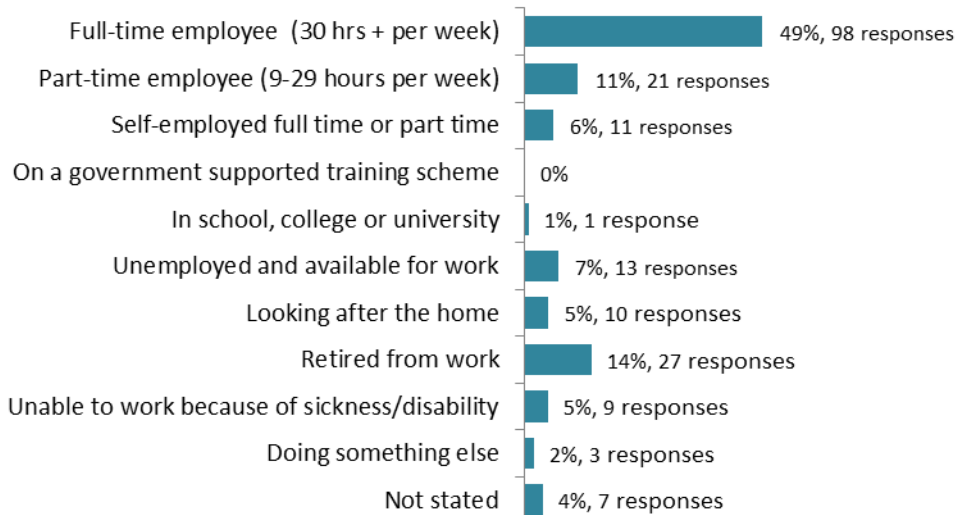
Base : All individual responses (200)

Source: Ipsos MORI

Half of those responding to the public consultation are in full-time work (49%, 98 responses) and most are in some form of employment (65%, 130 responses). Only a small proportion (13%, 25 responses) are disabled.

Personal information 2

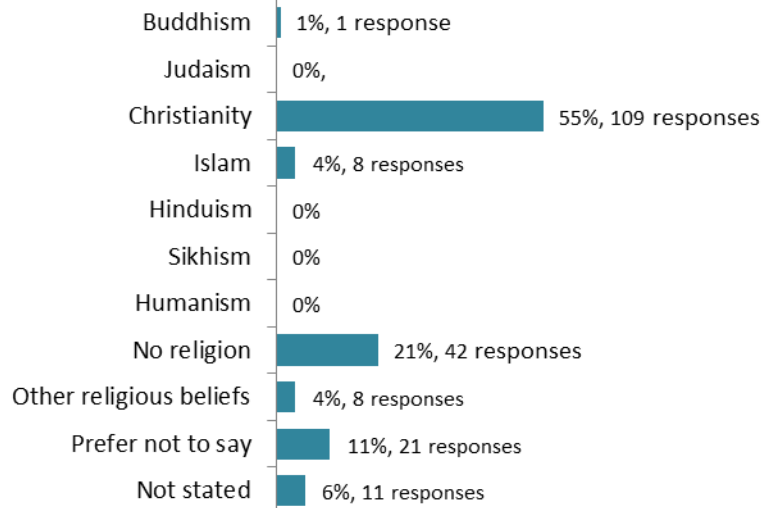
Employment status



Disability



Religion



Base : All individual responses (200)

Source: Ipsos MORI

Council Tax and benefits claimed

The great majority of respondents to the consultation pay Council Tax (87%, 174 responses), one in eight (12%, 24 responses) do not do so.

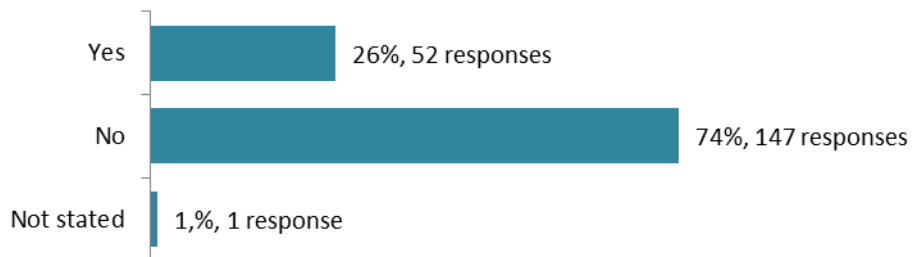
Q11. Do you or others in your household pay Council Tax to the Council?



Base : All individual responses (200)
Source: Ipsos MORI

Reflecting this, one in four public consultation respondents (26%, 52 responses) receives Council Tax Benefit, compared with most who do not (74%, 147 responses).

Q12. Do you or others in your household receive Council Tax Benefit?



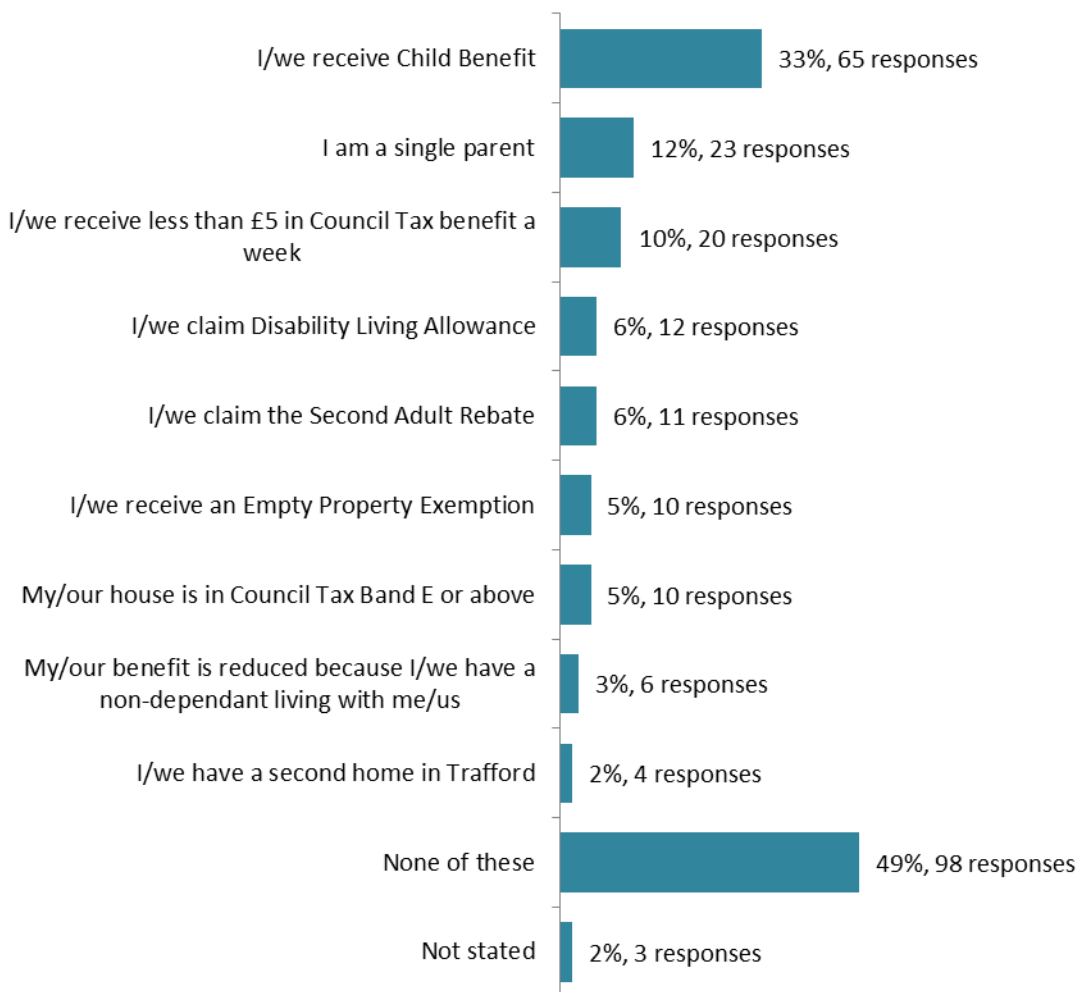
Base : All individual responses (200)
Source: Ipsos MORI

One in three respondents to the consultation receives Child Benefit (33%, 65 responses). Among other benefits received are Disability Living Allowance (6%, 12 responses), a Second Adult Rebate (6%, 11 responses) and an Empty Property Exemption (5%, 10 responses).

Of those circumstances that might affect eligibility for support, one in eight consultation respondents (12%, 23 responses) is a single parent; one in ten receives less than £5 a week in Council Tax Benefit (10%, 20 responses) or is in a house in Council Band E or higher (5%, 10 responses).

Three per cent of consultation respondents (6 responses) have their benefits reduced because a non-dependant person lives with them and 2% (4 responses) have a second home in Trafford.

Q10. Which, if any, of the following apply to you?



Base : All individual responses (200)
Source: Ipsos MORI

Appendix 4D (Representative Survey)

Dear Resident or other interested party,

TRAFFORD COUNCIL TAX CONSULTATION – RESPONSE FORM

Trafford Council is running a consultation to gather people's views on the future of Council Tax Support in Trafford. We are proposing to make a number of important changes to the Council Tax and the way that benefit is administered, and we would like to hear your views before we make a decision. **More details about how Council Tax and Benefits might change can be found on pages 8-11 of this booklet. It is very important that you read these proposals before you answer any of the questions in this booklet.**

Why are we consulting?

From April 2013, the Government is abolishing the current national Council Tax Benefit scheme and giving Local Authorities the freedom to set up their own local schemes. These local schemes will be known as Council Tax Support. The Government is giving Councils less money to pay for their new schemes and we estimate that Trafford Council will receive a reduction in funding of approximately £1.4 million in tax year 2013/14. This shortage means that we will need to make some difficult decisions about who gets Council Tax Support and how much.

Everyone currently entitled to Council Tax Benefit, except for pensioners, could be affected by these changes. Taxpayers may also be affected by the proposed changes to the Council Tax Empty Property Exemption and Second Home Discount or if they move onto benefits in the future, so it's important that everyone has their say. We need your views, so we can develop a scheme which best suits the needs of Trafford residents.

We have to make changes and I would encourage everybody to tell us how they feel about the proposed changes by answering and returning the questions in this booklet by 29th October 2012, or filling in an online response by visiting www.trafford.gov.uk/ctsconsultation. The council has a statutory obligation to consult on the proposed Council Tax Support Scheme and this consultation has been fully funded by a Government grant at no additional cost to the taxpayer.

If you want to explain any of your answers, or you feel the questions have not given you the chance to express your views fully, or if you think there are options we have not considered that we should have done, please say so in the box at the end of the form (at Question 9), you may add extra sheets if needed.

Important: Please do not provide the names of any individuals in the feedback boxes.

Thank you for your help.



Councillor Sean Anstee, Executive Member for Finance

The information you provide, including personal information, may be subject to publication or release to other parties or to disclosure under regimes such as the Freedom of Information Act 2000, the Data Protection Act 1998 and the Environmental Information Regulations 2004. Please note that any queries or complaints submitted via this process cannot be counted as part of the formal consultation.

Trafford Council will undertake the analysis and reporting of the information in the response forms. Please read this booklet all the way through, and then give us your answers to the questions in this response form. In the response form we have shown which sections of this booklet cover the issues raised by each of the questions. Please refer to these sections as you answer the questions.

1234567890

Page 7

BARCODE

Electronic and hard copies of this combined Consultation Document and Response Form are available in other formats such as large print and other languages. These are available on request by contacting Trafford Council's Consultation Helpline on 0161 912 2090 or on Minicom 0161 912 2102. An electronic version of the response form can be found at www.trafford.gov.uk/ctsconsultation or by emailing cts@trafford.gov.uk

If you have any queries or complaints regarding the consultation process or consultation documentation please phone Trafford Council's Consultation Helpline on 0161 912 2090. This line is open from 8.00am to 7.00pm Monday to Friday.

Background information

QA. Are you responding on your own behalf or on behalf of an organisation or group?

- Providing my own response – **go to Q1**
- Providing a response on behalf of an organisation or group – **continue to QB**

QB. What is your name, your position in the organisation/group, and the name and address of the organisation/group on whose behalf you are submitting this response? The name and details of your organisation or group may appear in the final report. **Please write below in block capitals**

Name:

Position in the organisation/group:

Name of organisation/group:

Address of organisation/group:

How many people does your organisation or group represent?

QC. Please tell us which type of organisation you represent? **Please tick one box only**

- | | |
|--|--|
| <ul style="list-style-type: none"> <input type="radio"/> Social Landlord (e.g. a housing association) <input type="radio"/> Private landlord <input type="radio"/> Community group (e.g. a residents group) | <ul style="list-style-type: none"> <input type="radio"/> Welfare organisation (e.g. a charity) <input type="radio"/> Other (PLEASE WRITE IN BELOW) |
|--|--|

Preferred scheme

Please read Pages 8 to 10, which describe Trafford Council's proposals for the new Council Tax Support scheme before answering these questions.

Q1. Which, if any, of the two options described on **page 8** of this booklet do you prefer? **Please tick one box only**

- Proposal 1: Combined Options.** Reduce the amount of Council Tax Support paid on behalf of working age claimants by applying the 7 options listed on **Pages 8, 9 and 10** of this booklet

- Proposal 2: Reduce all Working Age Claims by 20%.** Reduce the amount of Council Tax Support paid on behalf of working age claimants by 20% as listed on **Page 8** of this booklet
- Neither of these options
- Don't know

Q2. What are your reasons for your answer to Q1?
Please summarise your key comments in the box below

Options to reduce Council Tax Support

Q3. To what extent do you support or oppose each of the following options? Options a-g form Proposal 1 (described above) and option h forms Proposal 2 (described above). These options are explained further on **Pages 8 to 10. Please tick one box only for each row**

		Strongly support	Tend to support	No views either way	Tend to oppose	Strongly oppose	Don't know
a)	The Second Adult Rebate scheme for working age claimants should be abolished (See page 9)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b)	Council Tax Support should be restricted to the charge for a Band D property, so people in Band E or higher value properties do not get as much support (See page 9).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c)	The income taper should be increased from 20% to 30% (See page 9).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
d)	Child benefit should be treated as income when working out an application for Council Tax Support (See page 9).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e)	Benefit should be awarded based on the date that the person made their application and not from an earlier (i.e. backdated) period (See page 9).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
f)	The deductions made for other adults living in a property (such as an adult son) should be increased by 20% and a minimum deduction should be introduced for other adults (who live in the property) who are receiving benefit (See page 10).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
g)	A minimum level of award should be set so people receiving less than £5 per week do not qualify for any Council Tax Support (See page 10)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
h)	All working age claimants should pay a minimum of 20% of their Council Tax (See page 8)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Options to reduce Council Tax Exemptions and Discounts

Please read Page 10, which describes Trafford Council's proposals to reduce the Council Tax Exemptions and Discounts which currently exist before answering these questions.

Q4. To what extent do you support or oppose each of the Council's proposals to increase the charge for empty properties and second homes? These options are explained further on Page 10. **Please tick one box only for each row**

	Strongly support	Tend to support	No views either way	Tend to oppose	Strongly oppose	Don't know
a) Remove the 100% (no charge) exemption for residents who have an empty and unfurnished property within Trafford and replace it with a 25% discount for 6 months. This would generate income of approximately £800,000. (See page 10 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Reduce the 100% (no charge) exemption for residents who have an empty or unfurnished property from six months to one month. This would generate income of approximately £650,000. (See page 10 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
c) Remove the 10% discount for residents who have a second home in Trafford. This would generate income of approximately £40,000. (See page 10 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Work incentives – Helping residents back into employment

Please read Page 11, which describes Trafford Council’s proposals for providing Council Tax Support incentives which help residents back into employment before answering these questions.

Q5. To what extent do you support or oppose each of the following proposals for providing Council Tax Support incentives which help residents back into employment? These options are explained further on Page 11. **Please tick one box only for each row**

	Strongly support	Tend to support	No views either way	Tend to oppose	Strongly oppose	Don't know
a) Give people who receive Council Tax Support extra support for a limited period of 8 weeks to help pay their Council Tax when they start work. The current period is 4 weeks (See page 11 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Increase the child care disregards by 10%, so that people with children can continue to receive Council Tax Support if they are in work and on a low income. The child care disregard is the amount of money that is not counted as income when working out entitlement to benefit. (See page 11 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Protecting Vulnerable Residents

Please read Page 11, which describes Trafford Council’s proposals to give some protection from the reduction in Council Tax Support to specific groups before answering these questions.

Q6. To what extent do you support or oppose Trafford Council giving some protection from the reduction in Council Tax Support to each of the groups below? These proposals are explained further on Page 11. **Please tick one box only for each row**

	Strongly support	Tend to support	No views either way	Tend to oppose	Strongly oppose	Don't know
a) Families with children under 5 who receive benefits. (See page 11 of this booklet).....	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
b) Single parent households with children under 5 who receive benefits. (See page 11 of this booklet)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

- c) People receiving the middle or higher rate of Disability Living Allowance. (See page 11 of this booklet)
- d) People receiving any rate of Disability Living Allowance. (See page 11 of this booklet)

Q7. Are there any other groups who you feel should receive some protection from the changes in the way Council Tax Support will work in future in Trafford?
Please summarise your key comments in the box below

Protecting Vulnerable Residents

The Council is considering setting up a discretionary fund, so that residents facing a reduction in Council Tax Support who experience severe financial hardship, can apply for additional temporary financial help towards their Council Tax bill on a case by case basis.

Q8. Do you think the Council should set up a discretionary fund to help with the change from Council Tax Benefit to Council Tax Support? **Please tick one box only**

- Yes No Don't know

Other information

Q9. Do you have any other comments about the proposals set out in this consultation?
Please summarise your key comments in the box below

Personal Information

We would be grateful if you could answer the following questions so we can establish if we have responses from a wide range of people, and allow us to analyse these results.

Q10. Which, if any, of the following apply to you?

Please tick all that apply

- | | | | |
|---|---|---|--|
| <input type="radio"/> I/we receive Child Benefit | <input type="radio"/> I/we claim Second Adult Rebate | <input type="radio"/> I/we receive an Empty Property Exemption | <input type="radio"/> I am a single parent |
| <input type="radio"/> I/we claim Disability Living Allowance | <input type="radio"/> I/we receive less than £5 in Council Tax Benefit a week | <input type="radio"/> My/our home is in Council Tax Band E or above | <input type="radio"/> I/we have a second home in Trafford |
| <input type="radio"/> My/our benefit is reduced because I/we have a non-dependant (i.e. grown up son or daughter) living with me/us | | | <input type="radio"/> None of these |

Q11. Do you or others in your household pay Council Tax to Trafford Council?

Please tick one box only

- Yes No

Q12. Do you or others in your household receive Council Tax Benefit?

Please tick one box only

- Yes No

Q13. Are you..?

Please tick one box only

- | | |
|---|---|
| <input type="radio"/> Full-time employee (30 hrs + per week) | <input type="radio"/> Unemployed and available for work |
| <input type="radio"/> Part-time employee (9-29 hours per week) | <input type="radio"/> Looking after the home |
| <input type="radio"/> Self-employed full time or part time | <input type="radio"/> Retired from work |
| <input type="radio"/> On a government supported training scheme (e.g. Modern Apprenticeships) | <input type="radio"/> Unable to work because of sickness/disability |
| <input type="radio"/> In school, college or university | <input type="radio"/> Doing something else |

Q14. Are you..?

Please tick one box only

- Male Female

Q15. What is your age?

Please write in years

Q16. The Equality Act 2010 considers that you are disabled if you have a physical or mental impairment which has a long term and substantial adverse effect on your ability to carry out normal day-to-day activities. Do you consider yourself to be disabled? **Please tick one box only**

- Yes No

Q17. How would you describe your ethnic group?
Please tick one box only

White

- British
- Irish
- Polish
- Any other white background (WRITE IN)

Asian or Asian British

- Indian
- Pakistani
- Bangladeshi
- Kashmiri
- Vietnamese
- Chinese
- Any other Asian background (WRITE IN)

Mixed

- White and Black Caribbean
- White and Black African
- White and Asian
- Any other mixed background (WRITE IN)

Black or Black British

- Caribbean
- African
- Somali
- Any other black background (WRITE IN)

Other groups

- Travellers and Gypsies
- Any other ethnic group
- Prefer not to say

Q18. What is your religion/belief?
Please tick one box only

- | | | |
|------------------------------------|-----------------------------------|---|
| <input type="radio"/> Buddhism | <input type="radio"/> Hinduism | <input type="radio"/> Other religious beliefs |
| <input type="radio"/> Judaism | <input type="radio"/> Sikhism | <input type="radio"/> Prefer not to say |
| <input type="radio"/> Christianity | <input type="radio"/> Humanism | |
| <input type="radio"/> Islam | <input type="radio"/> No religion | |

Q19. What is the first part of your postcode? e.g. M16, M17, M41
Please write in

**Please reply by 29 October 2012 online, in the envelope supplied or send to the following address:
Freepost RSLG-AYZE-KLGS, Trafford Council Tax Support Consultation, RS House, Elmgrove Road,
Harrow, HA1 2QG**

Thank you for your help in shaping our future Council Tax and Benefit scheme.

Where to get more information

Visit our website at www.trafford.gov.uk/ctsconsultation for more information about the consultation including a copy of the proposed draft schemes.

Trafford Council wants to ensure that all residents in the borough (including organisations and voluntary groups) have an opportunity to take part in this consultation. Electronic and hard copies of the Consultation Document and Response Form are available in other formats such as large print and other languages. These are available on request by contacting Trafford Council's Consultation Helpline on 0161 912 2090 or on Minicom 0161 912 2102. An electronic version of the response form can be found at www.trafford.gov.uk/ctsconsultation or by emailing cts@trafford.gov.uk

If you need help with any other aspect of this consultation please phone the Council's consultation helpline on **0161 912 2090 between 8.00am and 7.00pm Monday to Friday** or email us at cts@trafford.gov.uk. This is one of a number of welfare benefit reform changes, which the council will be implementing over the next 12 months. For more information on welfare reforms visit our website at www.trafford.gov.uk/welfarereform

CONSULTATION DOCUMENT

Please read these proposals before completing the questions.

Trafford Council's proposals

Trafford Council has considered a wide range of options to make up for the shortfall in the Council's funding and believes the fairest proposal (for both benefit claimants and taxpayers) is to reduce spending by:

- A.** Introducing a new Council Tax Support scheme (with **2** proposals for how it would work); **as well as**
- B.** Changing the Council Tax exemptions and discounts for second homes and empty properties.

A: INTRODUCING A NEW COUNCIL TAX SUPPORT SCHEME

As noted above, we have produced a draft Council Tax Support scheme, based largely upon the existing Council Tax Benefit rules. However, we have created two draft proposals for how this scheme would work (see below).

In the questions, you are asked which of these two proposals you prefer. Before you answer the questions please read through the details of the two proposals so that you have a good understanding of them.

PROPOSAL 1: COMBINED OPTIONS

The following options could be combined together to help Trafford Council reduce benefit expenditure. The options are flexible and can be changed, depending on the outcome of this consultation. The options include:

- Option a: [Abolish Second Adult Rebate](#)
- Option b: [Restrict support to a Band D property charge](#)
- Option c: [Increase the income taper from 20% to 30%](#)
- Option d: [Include Child Benefit as income when working out entitlement](#)
- Option e: Abolish backdating so all awards are paid based on the date of application
- Option f: [Increase the deductions made for other adults living in a property where the customer receives Council Tax Support.](#)
- Option g: [Restrict benefit, so no awards are made under £5 per week.](#)

Please read [Pages 9 to 10](#) for a more detailed explanation of these options.

We estimate this proposal would reduce benefit expenditure between £500,000 and £800,000 depending on the [protections](#) applied. The rest of the funding would come from changes to the empty property exemption and second home discount.

The new scheme should include a number of new incentives to make work pay and help protect vulnerable residents.

PROPOSAL 2: REDUCE ALL WORKING AGE CLAIMS BY 20%

Under this proposal everyone who claims Council Tax Support (unless they are a member of a [protected group](#)) would have a 20% reduction in the amount of support they get. They would still receive 80% of the payments currently made, but they would have to pay the remaining 20% themselves. This proposal would affect approximately 12,000 residents of working age.

We estimate this proposal would reduce benefit expenditure by approximately £1million a year, depending on the [protections](#) applied. The rest of the savings would come from changing the Empty Property Exemption and Second Homes Discount. The new scheme should include a number of new incentives to make work pay and help protect vulnerable residents. To show how this proposal might work, see the example scenario below:

Proposal 2 example

Current scheme example

A resident who qualifies for full Council Tax Benefit and lives in a Band D property would currently receive help of £1,302.21 per year towards their Council Tax bill. Their benefit meets the full cost of their Council Tax bill.

Proposed scheme (based on Council Tax amount remaining at the rate for the tax year 2012 / 2013). Under this scheme the same resident would receive help of £1,041.77 (80% of what they would currently receive) per year towards their Council Tax bill and would need to contribute £260.44 themselves.

EXPLANATION OF THE OPTIONS IN PROPOSAL 1

OPTION A: Abolish Second Adult Rebate

Second Adult Rebate was designed to compensate people who would normally qualify for a sole occupier discount (25% off their bill) if a second adult did not live with them. Currently, Second Adult Rebate cannot be claimed if the claimant lives with a partner, a boarder or joint tenant and is often awarded when a grown up son or daughter lives with one of their parents. The amount of rebate given depends upon the second adult's income, regardless of the claimant's income. Under this proposal the Second Adult Rebate Scheme would be abolished.

OPTION B: Restrict support to a Band D property charge

Under the current Council Tax Benefit Scheme it is possible to receive enough benefit to pay your Council Tax bill in full, no matter which Council Tax Band your property is in. Under this proposal, support would be restricted to a Band D property charge. This would affect people living in Band E properties and above.

Current scheme example

A couple living in a Band E property may receive full Council Tax Benefit of £1,591.59 in tax year 2012-2013.

Proposed scheme*

Under the new scheme Council Tax Support is capped at the charge for a Band D property. Therefore, the couple would receive Council Tax Support of £1,302.21 in tax year 2013-2014 and would need to contribute £289.38 towards their Council Tax bill. *based on current benefit rates

OPTION C: Increase the Council Tax Support income taper from 20% to 30%

If a claimant earns more than the minimum amount the Government says he/she needs to live on, they must pay some of the remainder towards their Council Tax bill. The percentage of the remaining income that they need to pay towards their bill is called the taper. At present the taper is set at 20%. This means that for every £1 extra a person has above the minimum amount, they are currently expected to pay 20p towards their Council Tax bill.

Under this proposal the taper would increase to 30%, so that a person would be expected to pay 30p for every £1 they had in income above the minimum level.

Current scheme example

A couple earn £60 above the minimum income level. If their Council Tax bill was £25 per week they would have to pay £12 per week towards their Council Tax bill and would receive £13 per week in Council Tax Benefit.

Proposed scheme

Under the new scheme the couple would need to pay £18 towards their Council Tax bill and would receive £7 Council Tax Support.

OPTION D: Include Child Benefit as income when working out how much support to pay

Under the current scheme Child Benefit is not included as income when working out an award of Council Tax Benefit. Under this proposal Child Benefit would be taken into account as income.

Current scheme example

A couple with 2 children (over 5 years old) receive Council Tax Benefit of £15 per week. They receive £33.70 per week in child benefit and this income is not taken into account when working out their award.

Proposed scheme

Under the new scheme the same couple would now receive £10.11 per week in Council Tax Support because their child benefit is now taken into account as income.

OPTION E: Abolish backdating so all awards are paid based on the date of application

Currently Council Tax Benefit awards can be backdated for up to 6 months if the claimant can show a good reason why they did not claim from an earlier date. Under this proposal all claims would be awarded based on the date of the application only.

OPTION F Increase the deductions made for other adults living in a property where someone receives Council Tax Benefit / Support.

Council Tax Benefit is worked out on the needs of the claimant, partner and dependant children. Other adults (aged 18 or over) living within the household (usually a grown up son or daughter) are expected to contribute towards the Council Tax bill depending on their income. The contribution these other adults are expected to make is deducted from the amount of benefit that the claimant receives.

Under this proposal, the deductions will increase by 20% and a new charge of £4 per week would be made for other adults not in work.

Current scheme example

A couple live with their 26 year old daughter who earns £400 per week, and their 20 year old son who receives income support.

A deduction of £9.90 per week is taken from the claimant's Council Tax Benefit for their daughter and no deduction is taken for their son.

Proposed scheme

Under the new scheme the deduction from the claimant's Council Tax Support would increase to £11.88 per week for their daughter and £4 per week for their son. The total deduction is now £15.88 per week.

OPTION G: Restrict benefit to a minimum of £5 per week

Under the current Council Tax Benefit Scheme there is no minimum weekly Council Tax Benefit payment. Under this proposal a minimum award of £5 per week would be introduced. This means that any awards of £4.99 per week or less would not be payable from 1 April 2013.

Current scheme example

A claimant receives Council Tax Benefit of £2.50 per week.

Proposed scheme

Under the new scheme the claimant would no longer receive a reduction from their Council Tax bill.

CHANGING THE COUNCIL TAX EXEMPTIONS AND DISCOUNTS FOR SECOND HOMES AND EMPTY PROPERTIES

The proposed Council Tax Support scheme alone does not make up the full shortage in funding. Therefore, in addition to either Proposal 1 or Proposal 2, we want to hear your views on further proposals to change the Council Tax exemptions and the discounts for empty properties and second homes.

Remove the Empty Property Exemption for unfurnished properties (25% discount for 6 months)

Residents can currently receive up to 6 months exemption (with no charge) from Council Tax payments where a property is empty and does not contain furniture. It is proposed to remove this exemption from 1 April 2013 and award a 25% Council Tax discount for up to 6 months. Full Council Tax payments would be due after 6 months.

Current scheme example

A resident moves out of a property but the property has not yet been sold. There is no Council Tax charge for the first 6 months. After 6 months Council Tax is charged in full.

Proposed scheme

Under the new scheme the resident would need to pay 75% of their Council Tax bill for the first 6 months. After 6 months Council Tax is charged in full.

Reduce the Empty Property Exemption for unfurnished properties (100% discount for 1 month)

Residents can currently receive up to 6 months exemption (with no charge) for Council Tax payment where a property is empty and does not contain furniture. It is proposed to apply a discount of 100% for 1 month from when the property becomes empty. Full Council Tax payments would be due after 1 month.

Remove the current 10% discount for second homes

Residents who own a second home (which is empty and furnished) in the borough currently receive a 10% discount off their Council Tax bill. It is proposed to remove this discount from 1 April 2013.

Current scheme example

A resident who owns a second home in the borough receives a 10% discount off their Council Tax bill for the second property.

Proposed scheme

Under the new scheme the discount would be removed from 1 April 2013 and the resident would need to pay the full Council Tax charge for the second home.

MORE INFORMATION ON THE COUNCIL TAX SUPPORT SCHEME:

How is Trafford Council helping people back into work whilst protecting the most vulnerable?

We want the new Council Tax Support scheme to encourage and support people back into work, whilst reducing the impact on the most vulnerable. We have therefore set out our proposals below on how we aim to achieve this.

How will the new scheme encourage and support people back into work?

Trafford Council is keen that the new Council Tax Support scheme encourages people back into employment if they are seeking a job. This underpins the Government's welfare reform principles, set out below:

- People should get more overall income in work than out of work.
- People should get more overall income from working more and earning more.
- People should be confident that support will be provided whether they are in or out of work, that it will be timely and correct, and that claiming will not be a complicated and frustrating experience.

We propose that the new Council Tax Support scheme should build upon the existing work incentives already available (under the Council Tax Benefit scheme), and include the following additional support:

- 1) Give people receiving Council Tax Support extra financial help towards their Council Tax bill for a limited period of 8 weeks when they start work and stop receiving certain benefits. The current period is 4 weeks.
- 2) Increase the child care disregards by 10%, so that people who work and pay child care can continue to receive Council Tax Support if they are on a low income. The child care disregard is the amount of money that is not counted as income when working out entitlement to benefit. Under this proposal we would disregard child care costs at the rate of £192.50 for 1 child and £330 for 2 or more children.

How will the new scheme protect the most vulnerable?

The Council is committed to protecting the most vulnerable residents where possible and is keen to seek your views on which groups are more likely to be affected by the new Council Tax Support scheme. We have identified some possible groups, but there may be others you wish to add.

Under our draft proposals we are considering introducing some form of protection for people with a disability and families with a child under 5 years old. Residents over pension age are automatically protected. To protect vulnerable residents we could introduce a discretionary fund where residents receiving Council Tax Support could apply for short-term help on a case by case basis.

We want to hear your views on these proposals and how we can best minimise the impact these changes will have on vulnerable groups.

WHAT HAPPENS NEXT?

We will use this information to help decide on the final Council Tax Support Scheme which will be introduced from 1 April 2013. The results from this consultation will be published later this year on our website. The final decision on the scheme will be made by the council, no later than 31 January 2013.

Appendix 5A Question by question analysis

The following provides an analysis of the responses received (in survey order) to each of the questions. This section examines attitudes to the two overall proposals and looks at which of them people prefer, their stated reasons why, and how much they support or oppose the specific options listed within Proposal 1. A copy of the survey can be found in appendix 4D.

Each sub-section is structured as follows:

a) A summary of the results

This is brief narrative of the key findings.

b) The survey results

This sub-section provides a quantitative analysis showing the results from both the representative survey and the consultation survey both separately and as an overall combined figure. However the combined figure should be treated with caution due to the differing profiles of the respondents to the two surveys. These differences are discussed in section 10.13.

c) The results from other dialogue methods

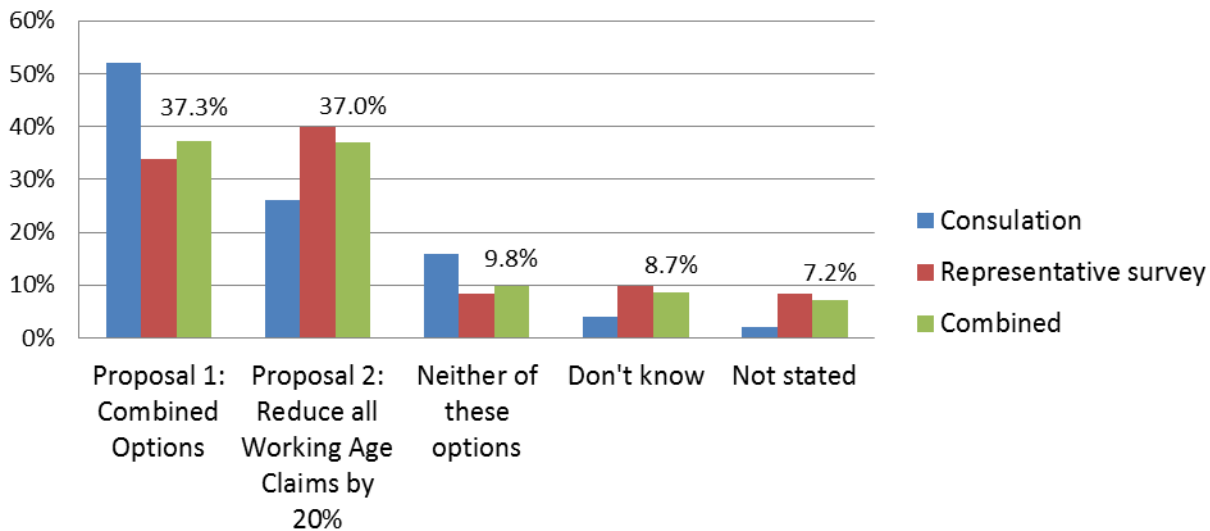
This sub section is a qualitative analysis based upon dialogue methods such as public meetings, stakeholder forums and organisational responses. All evidence is shown in the appendices and referenced throughout this section, to highlight relevant points.

Question 1: 'Which of the following two schemes do you prefer?'

A summary of the results

Those who responded to the representative sample survey are more likely to prefer Proposal 2 (40%) than Proposal 1 (34%) and those who responded to the consultation are more likely to prefer Proposal 1 (52%) than Proposal 2 (26%). Overall, the net effect shows that there is marginally more support for Proposal 1. However, all other dialogue methods, including the community meetings and substantial responses all show general support for Proposal 1 (although they may not agree with every option). In fact, many stakeholders were opposed to Proposal 2 in its entirety.

The survey results (percentage in favour)



The results from other dialogue methods

All groups who provided a written response were in favour of Proposal 1. However, the level of support for the individual options varied. The most popular option was to restrict support to a Band D property charge and the least popular option was to include child benefit as income. This is also reflected in the survey results as detailed in Tables 15 and 16.

The summaries from the following organisations show the levels of support for the two proposals. The full responses can be found in the appendices (see section 2A).

Citizens Advice Trafford

Citizens Advice Trafford (CAT) does not support the benefit cuts, but would prefer Proposal 1 over Proposal 2 as it affects far fewer people. However, it has raised particular concern around option e (abolishing backdating) because a number of people struggle to make a claim in good time, and cite 5 potential consequences, which are detailed in appendix 2D.

Trafford Labour Group

Trafford Labour group provided a comprehensive response to the Consultation. In summary the group are opposed to cuts in Council Tax Benefit, especially at a time when other Welfare Benefit changes are taking place, stating that the changes are completely unacceptable.

Trafford Labour group highlighted the main concerns with Proposal 1 as follows:

- *'Minimum cap of £5.00 per week – This cap is too high and will have an adverse impact on claimants.'*
- *'Abolishing backdates: There will always be cases where the claimant has a genuine need for backdated benefit, especially when specific circumstances are out of their control. A discretionary fund for these scenarios does not satisfy the Labour group as some vulnerable residents would "jump through hoops" to get further support.'*

- *'Increase the taper from 20% to 30%. This proposal does not incentivise work and reduces a greater proportion of a claimants earned income. This would reduce a claimant's disposable income.'*
- *'Inclusion of child benefit: This is a concern to the group. This would be devastating for low income families, This could exacerbate child poverty. Trafford Labour Group are very disappointed that this option is being considered.'*

Neighbourhood Forums and Partnership Meeting

The general consensus at these meetings was that Proposal 1 would affect fewer residents and therefore would have a reduced impact on households compared to Proposal 2. However, some residents did feel that Proposal 2 would be easier to administer and easier to understand whilst spreading the cuts evenly.

Housing Associations

The Housing Associations (involved in the Welfare Reform Steering Group) were against Proposal 2 in its entirety and believed it would cause an increase in the level of rent and Council Tax arrears especially at a time when other welfare reform changes are taking place. They were particularly concerned that a 20% reduction would affect many families on the breadline, who currently receive a full rebate due to their circumstances. There was general support for Proposal 1, although concern was raised around increasing the income taper.

The Royal British Legion

The Royal British Legion has urged the Council to continue to disregard (in full) all military compensation payments when calculating Council Tax Support. This includes War Disablement pensions, War Widows Pensions and Armed Forces compensation scheme payments. These payments are intended as compensation for injury, illness or loss as a result of service in the HM Armed Forces.

A response has been provided to The Royal British Legion to advise that the Council will continue to disregard these income types in the Council Tax Support scheme.

Imagine, Act and Succeed (Supports people with learning difficulties)

The organisation supports many of the components of Proposal 1, but does not agree with including Child Benefit as income, abolishing backdating provisions and abolishing Second Adult Rebate. The group are strongly opposed to Proposal 2.

A community organisation (which promotes stronger bonds between communities)

The organisation prefers Proposal 1 over Proposal 2, the main reason being that Proposal 1 will affect fewer people. However it must be noted that although the preference is Proposal 1, the organisation tends to oppose the majority of the options within it.

Precepting Authorities

A written response from the Precepting Authorities was received prior to the public consultation. This does not go into any detail about the two schemes. See appendix 2B for more information.

Question 2: 'What are your reasons for your answer to question 1?'

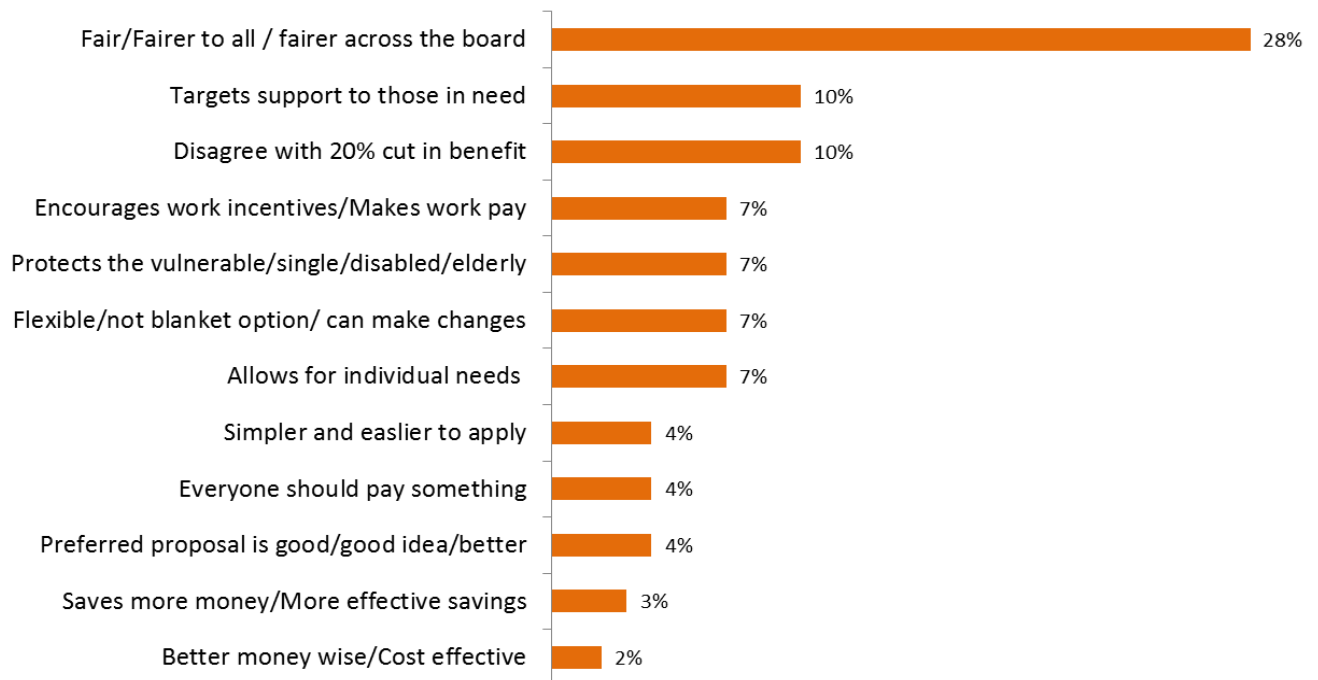
A summary of the results

Residents who prefer Proposal 1 often stated that this is because the scheme is fairer and targets support to those in need and that they disagree with the 20% reduction (Proposal 2).

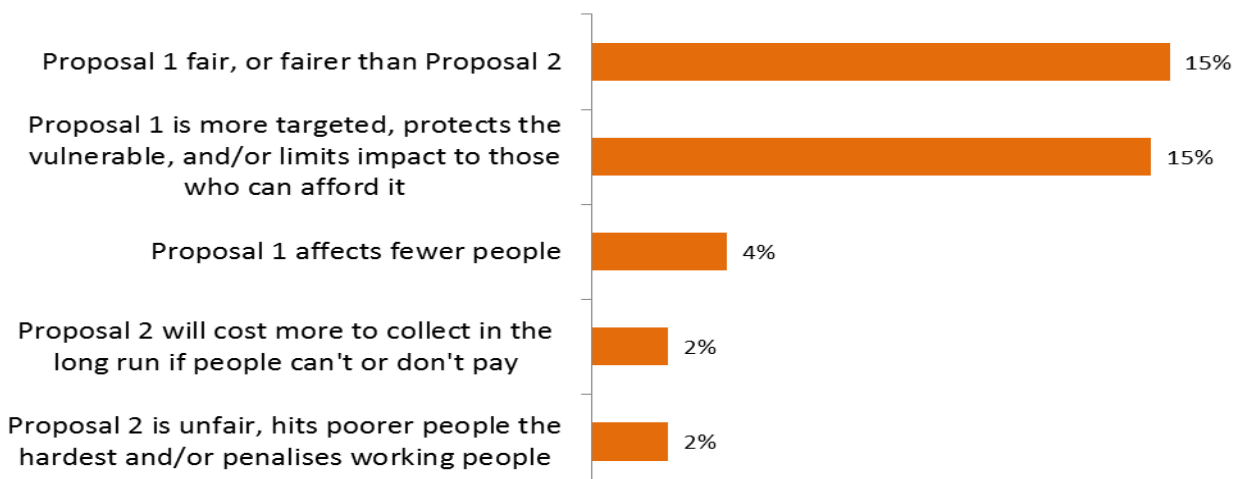
Those who prefer Proposal 2 often stated that it is because the scheme is simpler and easier to apply and saves more money.

The results from the surveys

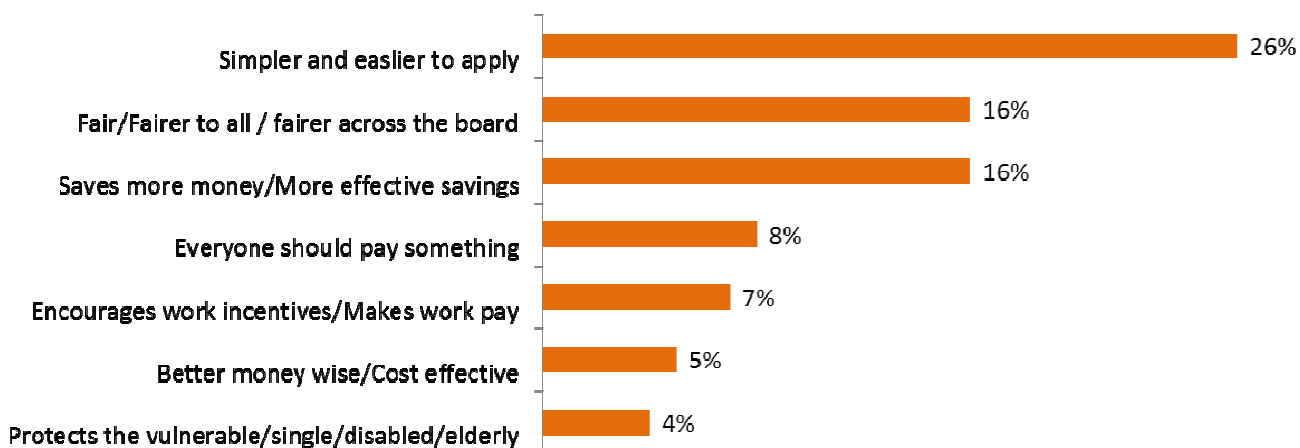
Reasons for choosing Proposal 1 (Representative Survey)



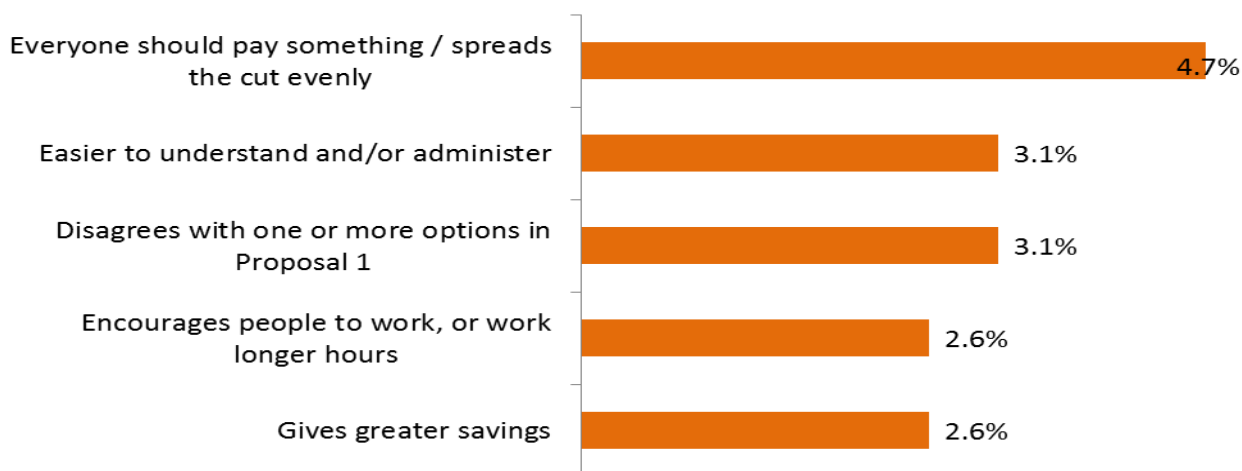
Reasons for choosing Proposal 1 (Consultation survey):



Reasons for choosing Proposal 2 (Representative survey)



Reasons for choosing Proposal 2 (Consultation survey):



Question 3: ‘To what extent do you support or oppose each of the following options?’

Note: Options a-g form Proposal 1 and option h forms Proposal 2.

A summary of the results

Question 3 on the questionnaire identified the extent to which respondents supported or opposed each of the individual options in the two proposals.

In the representative survey the level of support for the individual options in Proposal 1 ranges from 48% supporting “Child benefit should be treated as income” to 70% supporting “Council Tax Support should be restricted to the charge for a Band D property”.

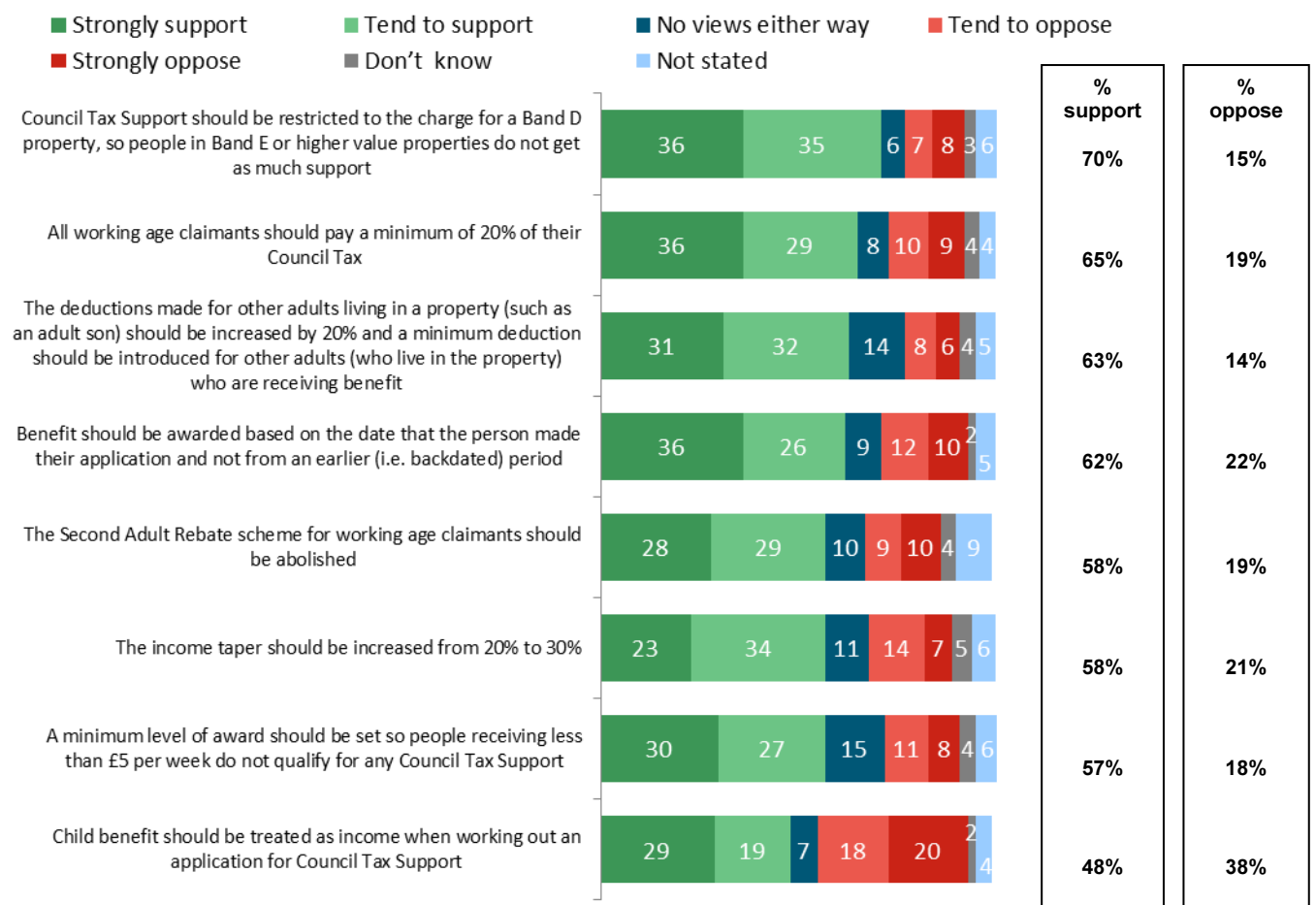
This is fairly consistent with the consultation survey results although the least popular option (in terms of support) was to increase the income taper from 20% to 30%. Again the support for a Band D restriction was high at 74%.

Of the other parts of Proposal 1, nearly two in three support “increased deductions for other adults in a property” (63% representative survey respondents and 62% consultation survey respondents) and support the option to abolish backdated claims (option e) (62% representative survey and 66% consultation survey respondents). This is followed by those who support the “abolition of the second adult rebate” (58% representative survey and 57% consultation survey respondents).

Levels of opposition to the individual options are relatively consistent with around one in five opposing each element. The only exception being “treating child benefit as income” which is opposed by 38% of representative survey respondents and 41% of consultation survey respondents.

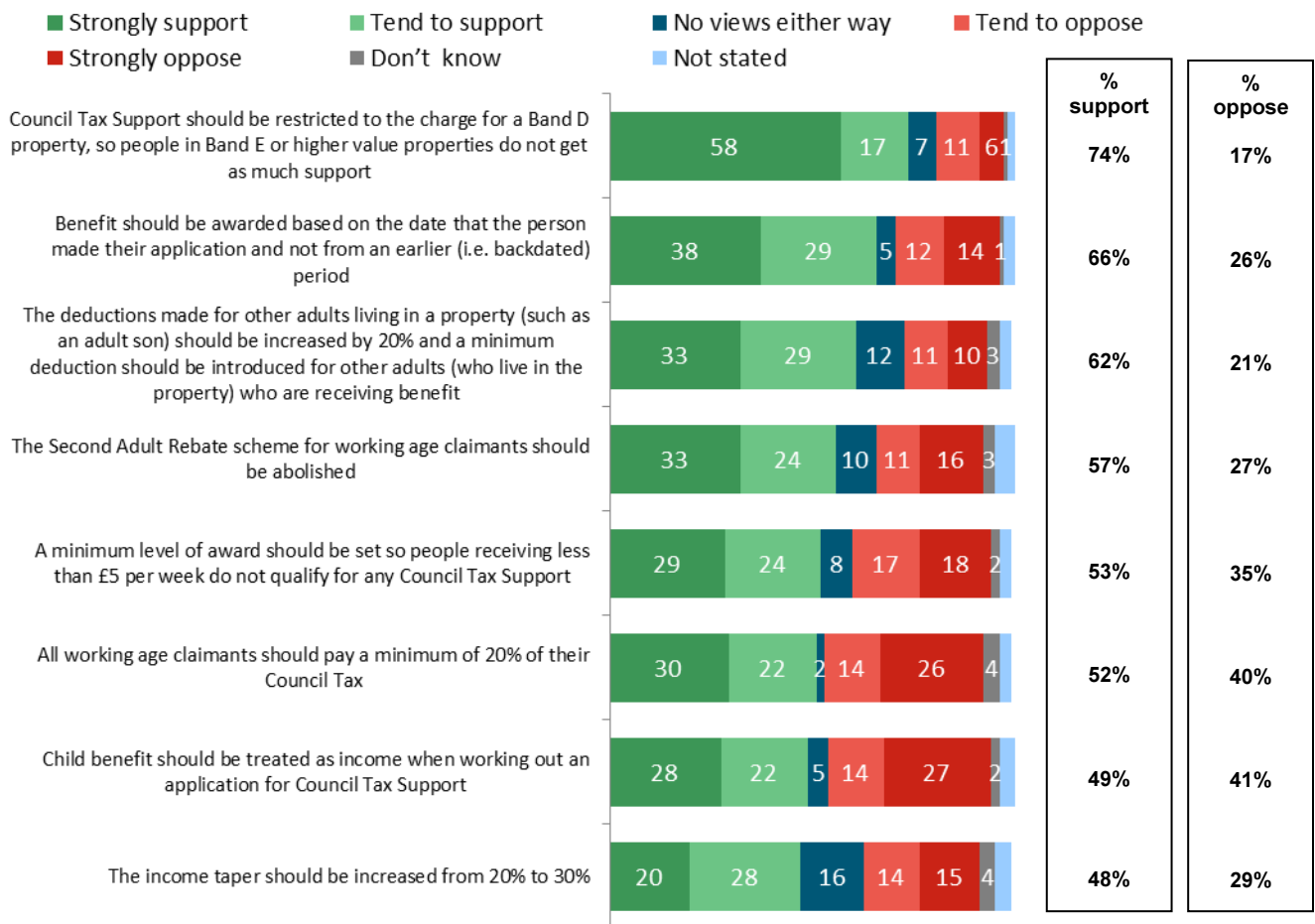
The tables below show the level of support for each of the seven options and the 20% benefit reduction option. These are then explored in further detail one by one.

Representative Survey results



Based on 807 respondents

Consultation Survey results

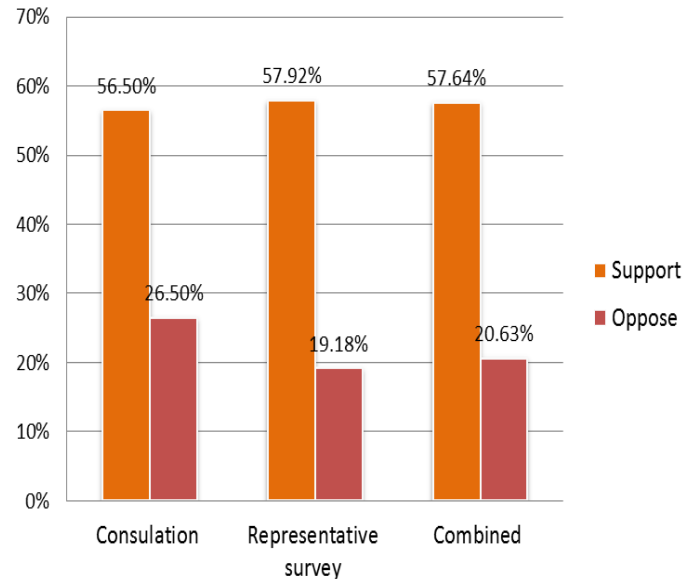
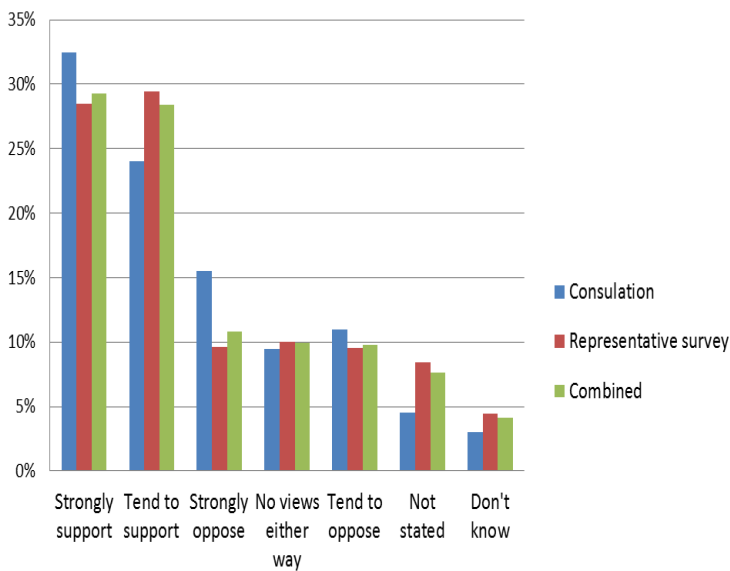


Based on 200 respondents

The individual options

This section builds upon the previous two tables and provides an in-depth analysis of each option. The tables on the left show the overall results whilst the tables on the right show the 'support versus opposition' for each option. These have also been supplemented with examples of free text responses.

Option A: Second Adult Rebate



overall results

- This option received more support than opposition

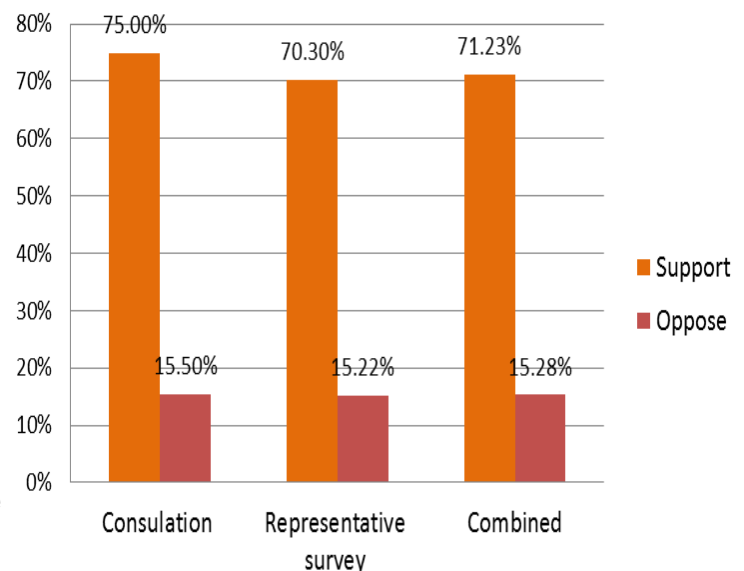
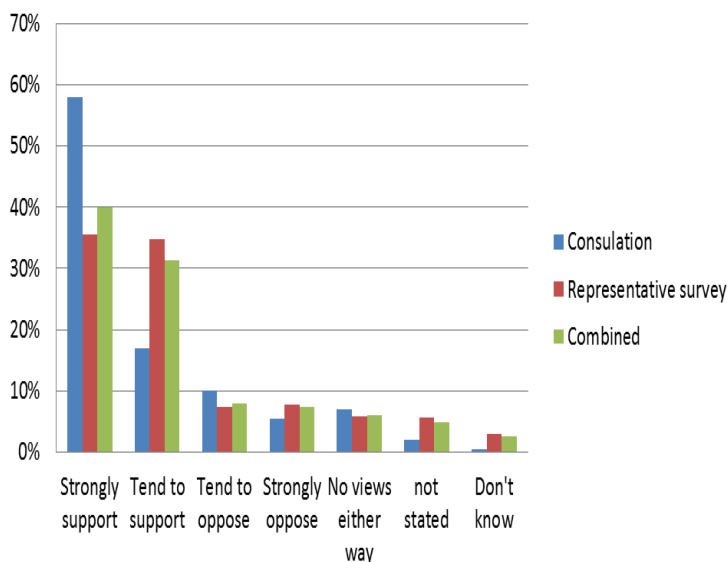
Free Text Quotes:

For: "Where people who are working or are on benefit and live in the same house as the liable person for Council Tax, they should be contributing to council tax"

Against: "I feel it is unfair for a single person, in employment, living with one other adult who is on a low income, to lose the second adult rebate"

support vs opposition

Option B: Restrict Benefit to Band D



Overall results

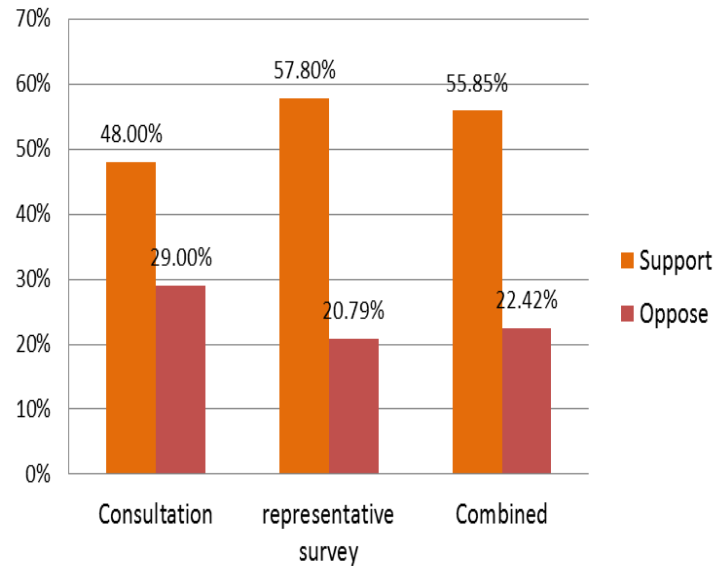
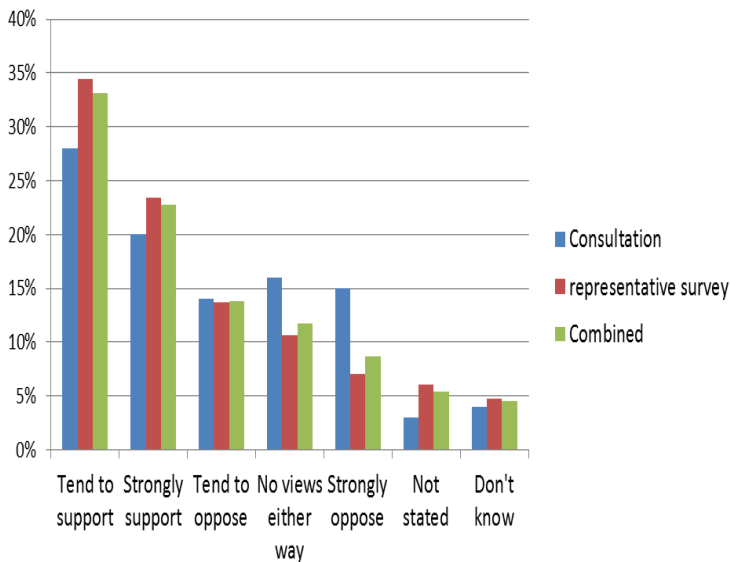
support v opposition

- This option was the most widely supported in both surveys
- Not directly opposed by any organisations

Free Text Quotes:

For: “Allowing benefit up to Band D value seems reasonable as those in properties A-D would get full benefit, but there would still be some assistance for those in E upwards.”

Option C: Increase the income taper to 30%



overall results

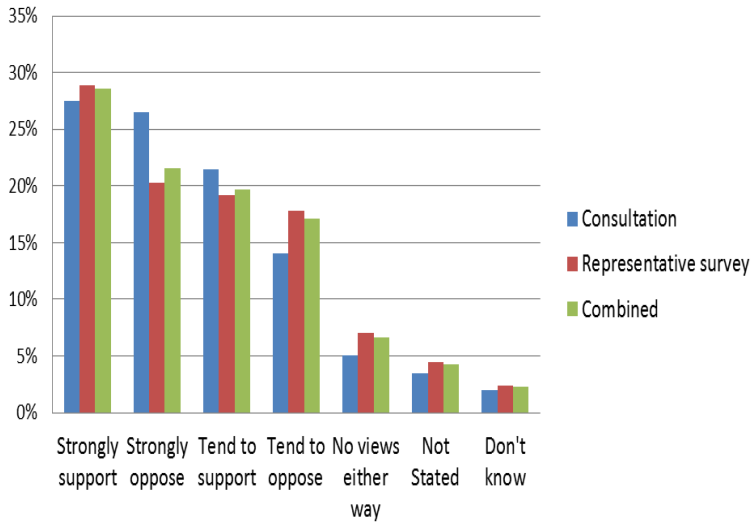
support vs opposition

- This option raises concern over work incentives

Free Text Quotes:

Against: “Surely a 30% taper reduces work incentives, at least for tenants facing a 65% taper on their Housing Benefit too.”

Option D: Include Child Benefit as income



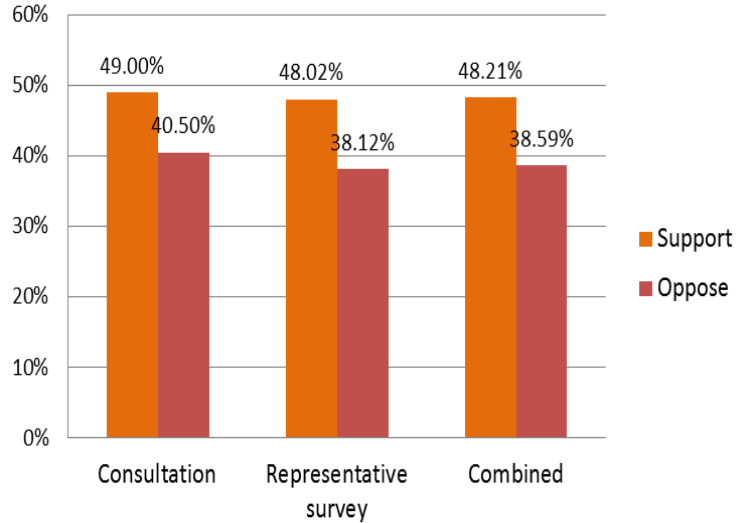
overall results

- This option raised the highest level of opposition throughout the consultation
- There was slightly more support than opposition to the option

Free Text Quotes:

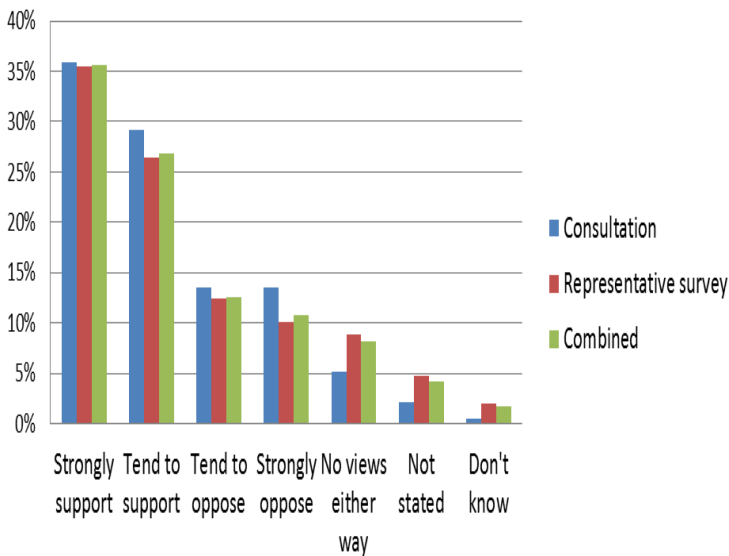
For: "All forms of income should be taken into calculations for the amount of benefits."

Against: "Child Benefit is surely intended to support the life conditions of children."



support vs opposition

Option E: Abolish backdating

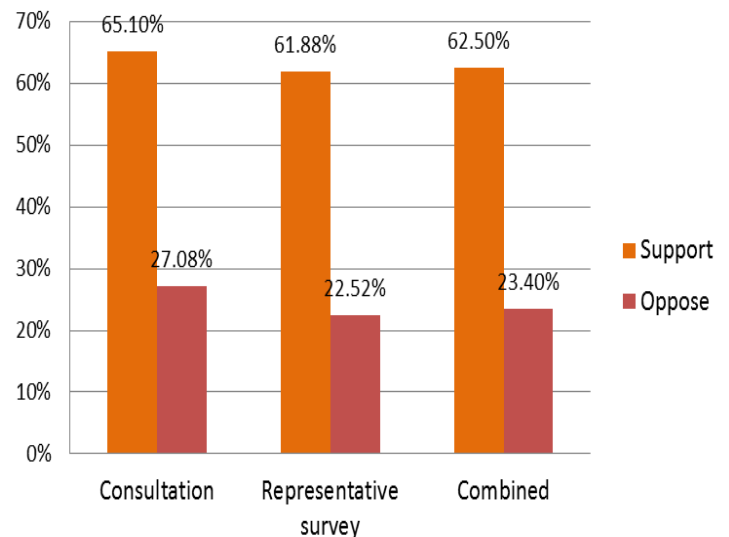


overall results

- This option was opposed by two organisations
- A discretionary fund could help mitigate the impact of this change

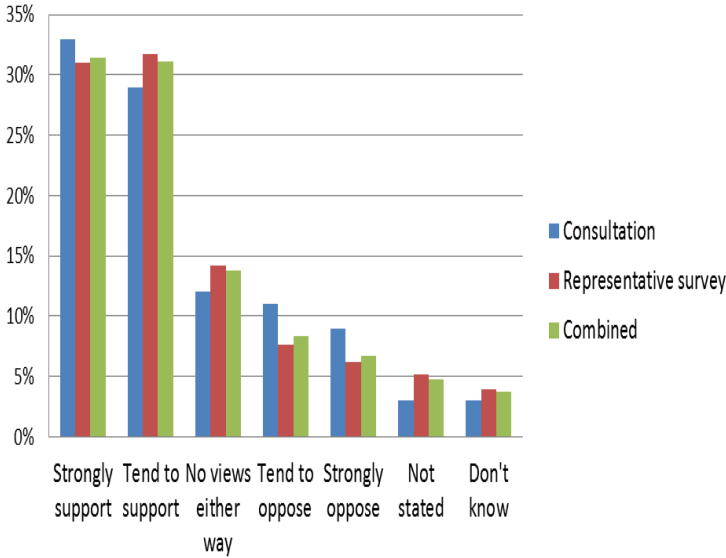
Free Text Quotes:

Against: "Some people claim belatedly through lack of knowledge."

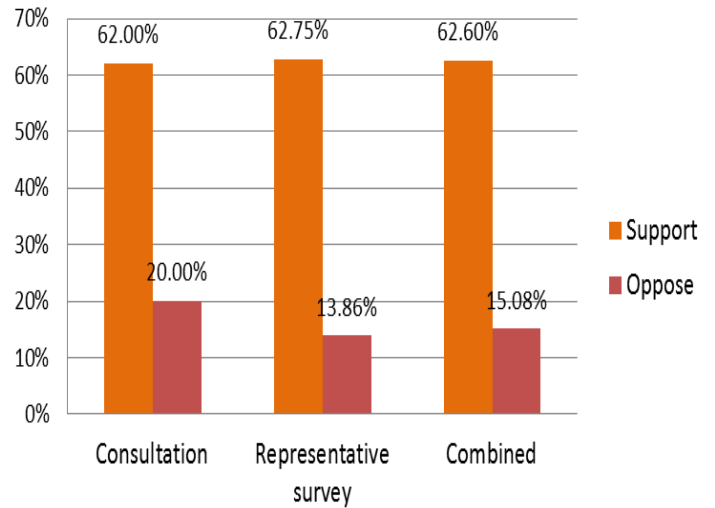


support vs opposition

Option F: Increase Non-dependant deductions



overall results



support vs opposition

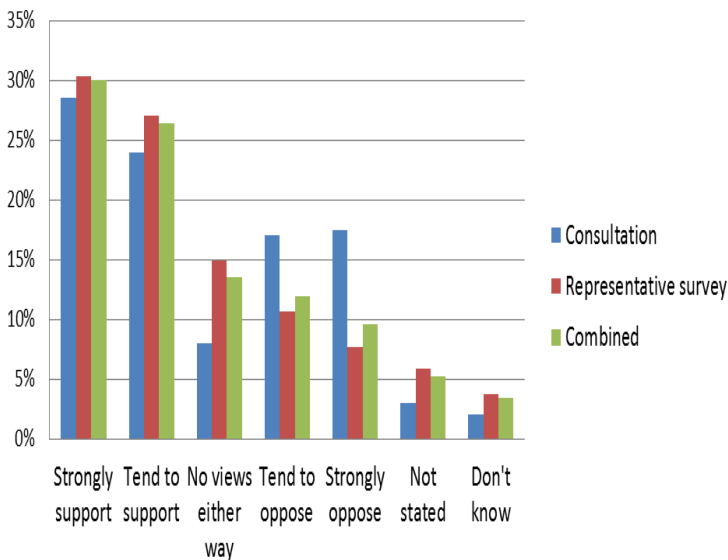
- This option received strong levels of support

Free Text Quote:

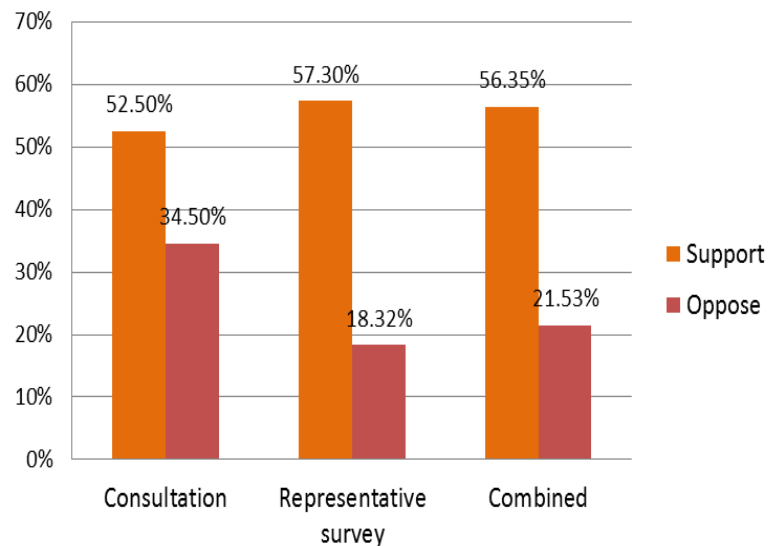
For: *“Non dependants should contribute more towards a household to give them a more realistic idea of how expensive it is to run a home for when they leave.”*

Against: *“I think 20% increase is too high especially against the rate of inflation”*

Option G: Introduce a minimum award level of £5 per week



overall results

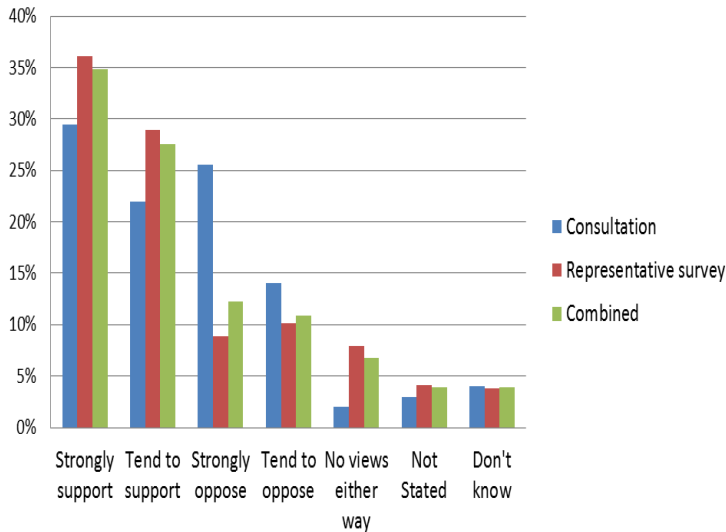


support vs opposition

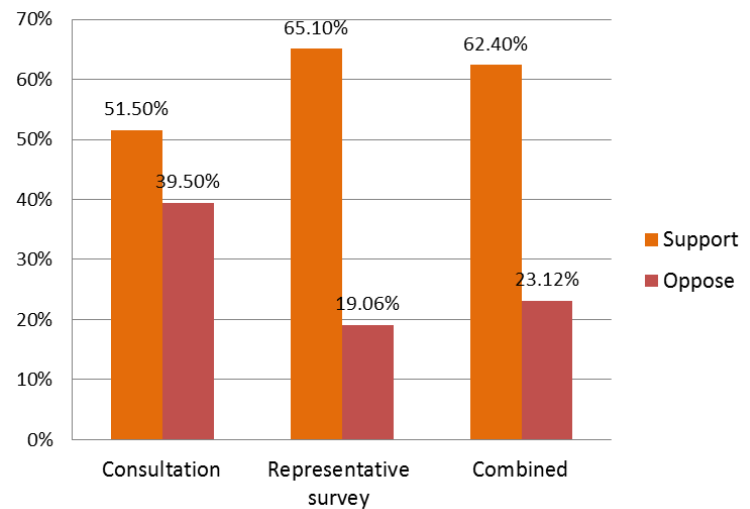
Free Text Quotes:

Against: *“I do not agree with restricting benefit to amounts of £5.00 per week. When on limited income even £2.50 a week is a help in ensuring that food is on the table.”*

Option H: Introduce a 20% reduction in benefit (Proposal 2)



overall results



support vs opposition

Free Text Quotes:

For: *"it is fair because it spreads the reduction evenly"*

Against: *"I think it is unfair to expect those on the lowest incomes to face the prospect of losing 20% of their council tax benefit when there are ... wealthy people living in Trafford who will remain unaffected."*

Question 4: 'To what extent do you agree with the proposals to increase the charge for empty properties and second homes?'

A summary of the results

Residents were asked to provide their views about potential changes to the discounts and exemptions available to those with a second home or empty/unfurnished property in Trafford.

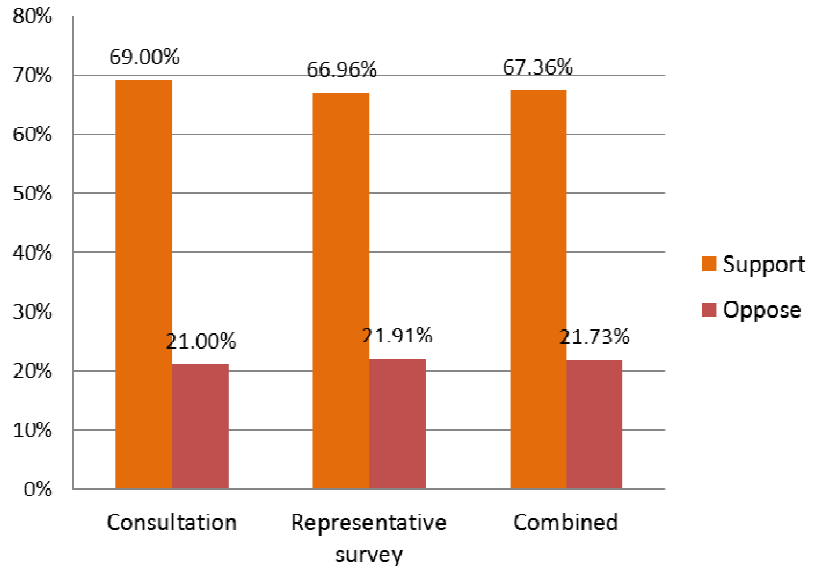
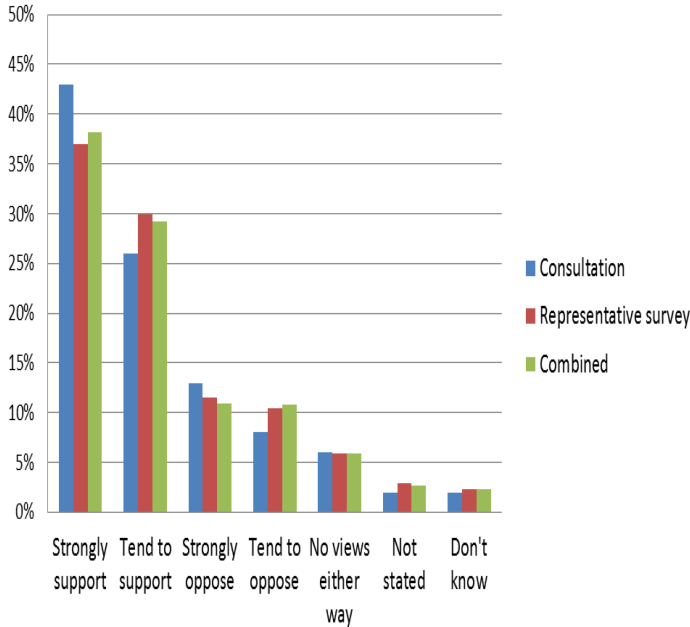
- 76% of respondents for the representative survey and 85% of those who responded to the public consultation support the removal of a 10% discount for those who have a second home in Trafford.
- 60% of respondents to the representative survey and 73% of those who responded to the public consultation support replacing the 100% exemption for residents who have an empty and unfurnished property in Trafford with a 100% discount for 1 month only.
- 67% of respondents to the representative survey and 69% of those who responded to the public consultation support replacing the 100% exemption for residents who have an empty and unfurnished property in Trafford with a 25% discount for 6 month.

Those who responded to the public consultation and prefer Proposal 1 are most likely to support these three changes to Council Tax Discounts. In terms of demographic analysis, men responding to the public consultation are most likely to favour reducing the 100% exemption for residents with an empty or unfurnished property from six months to one month: 78% (59 out of 76 men) say they support the idea.

However, there are significant differences between residents in different strands of the representative sample survey sample. As expected General Council Tax payers and CTB recipients are more likely to support all three of the options than those residents currently receiving an empty property or second homes discount.

The results from the surveys:

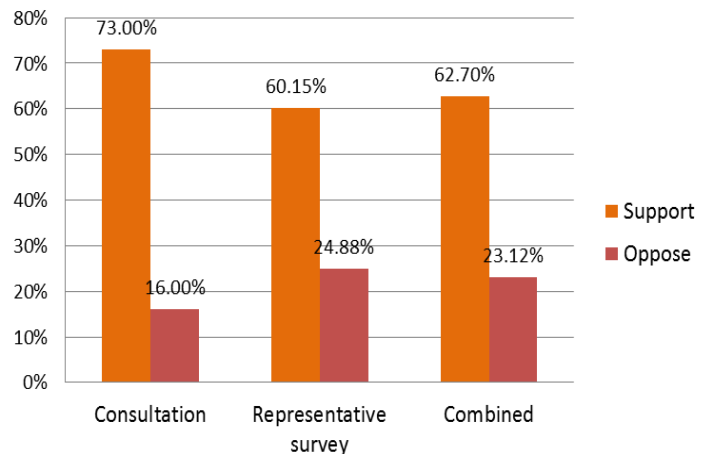
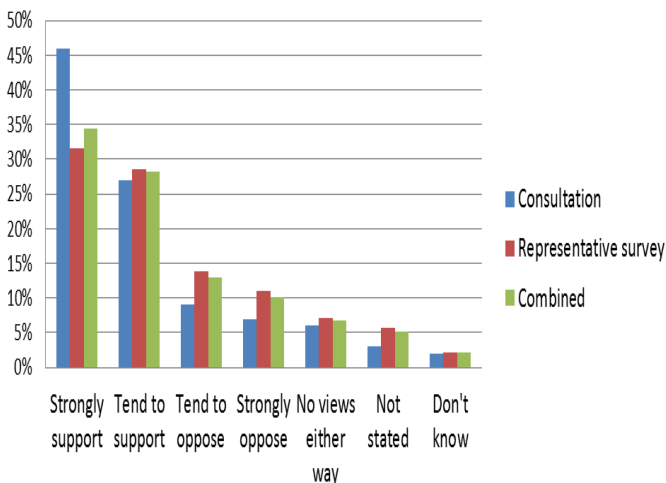
Option I: Replace the empty property exemption with a 25% discount for 6 months



overall results

support vs opposition

Option I (alternative): Replace the Empty property exemption with a 100% discount for 1 month



overall results

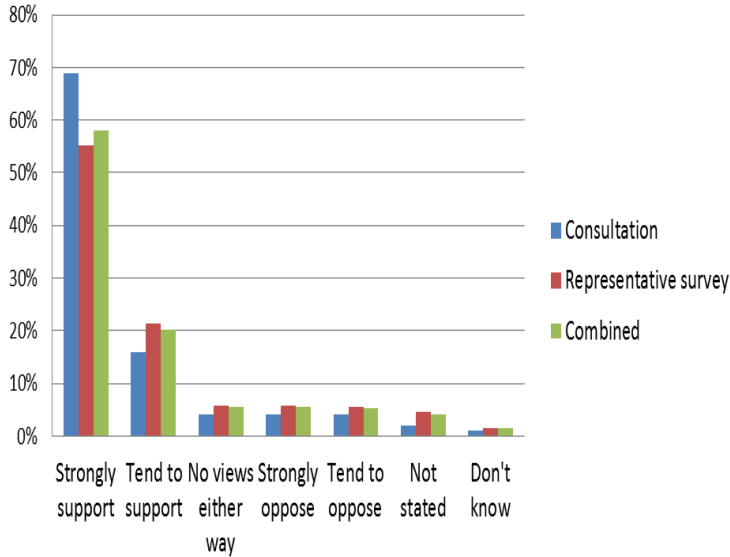
support vs opposition

Free Text Quotes:

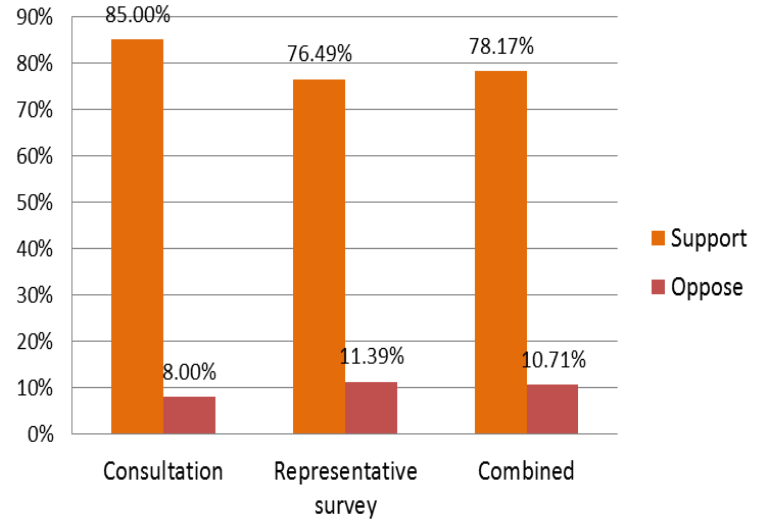
For: *"I think the empty homes policy is good as it may encourage some landlords to refurbish and rent them out and therefore creating more housing."*

Against: “Property renovation costs a significant amount of money and the 6 month relief is beneficial An exemption should be applied for 6 months if the property is undergoing refurbishment or is uninhabitable.”

Option J: Remove the 10% Second Homes discount



overall results



support vs opposition

Free Text Quote:

For: “Make those with second homes etc. pay more. They have the option of selling that second home, where most people are struggling to pay for one home to live in let alone two!”

The results from other dialogue methods

The results show that there is a high level of support from all parts of the consultation to abolish the 10% second homes discount. They also show a high level of support to remove the 100% empty and unfurnished empty property discount. However, the results from the representative survey show a higher preference for the 25% over 6 month’s option, while the public consultation survey results show a higher preference for the 100% discount for 1 month. The 1 month option is also preferred by many groups, especially Social landlords who think that the 1 month discount is fairer as it acts as an incentive and reward for turning properties around quickly.

Appendix 4A shows the pros and cons of these two options for consideration. In terms of financial benefits, the 25% option over 6 month generates more income (see section 5.6)

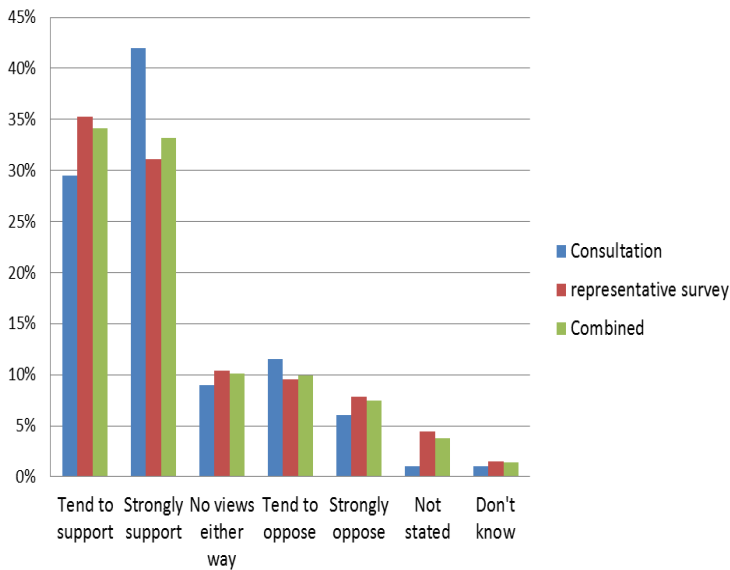
Question 5: ‘To what extent do you support or oppose each of the following proposals for providing council tax support which helps residents back into employment?’

A summary of the results

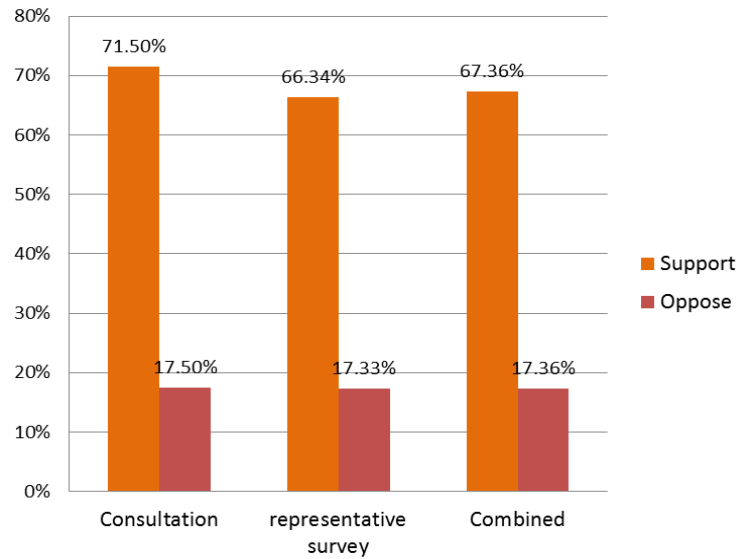
- Residents were asked for their opinions about different ways in which people out of work could be helped back into employment.
- 70% of residents responding to the representative survey and 75% of residents responding to the public consultation support increasing the childcare disregards by 10%, while 66% of residents responding to the representative survey and 72% of residents responding to the public consultation support giving people who receive Council Tax Support extra help for a limited period of eight weeks when they start work.
- While there is a broad approval of both options from all three strands of representative survey respondents, support for the idea of giving people extra support for when they start work is highest amongst CTB recipients: over three-quarters (77%) of this group support the idea of giving people extra support when they start work (vs. 66% overall). There are no significant differences between the different strands with regard to increasing the childcare disregards.
- Support for providing extra support to those who start work is higher amongst those who stated they are not working (72% vs. 66% overall). However, the small base size of those not working means these results are not statistically significant and therefore this difference can only be treated as indicative rather than definitive.
- Those with a disability are significantly more likely to support giving those who receive Council Tax Support extra help when they start work: four in five (81%) favour the idea compared with two in three (65%) of those without a disability.
- Those who state they are opposed to Child Benefit being counted as income at Q3 are more likely to support the proposal of increasing the childcare disregards by 10% – four in five (81%) answer positively compared with 70% of Trafford residents overall and 65% of those who support Child Benefit being counted as income.

The results from the surveys

Increase the extended payment from 4 to 8 weeks when a claimant returns to work

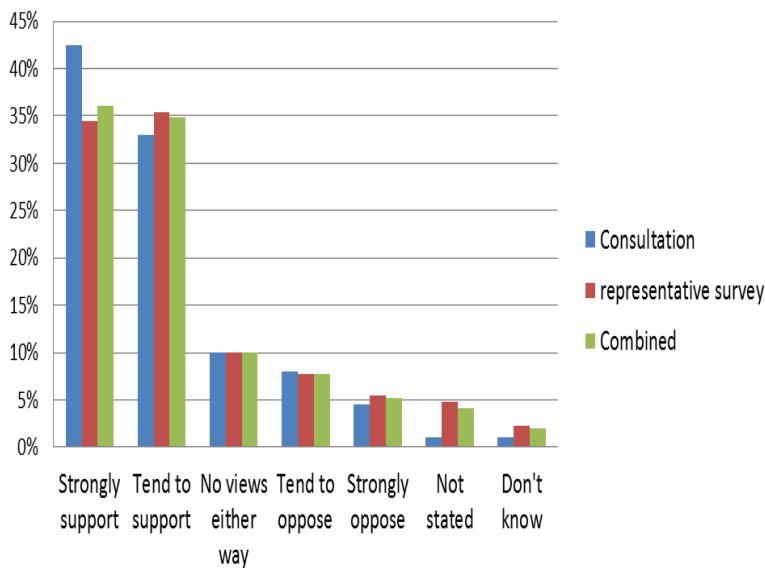


Overall results

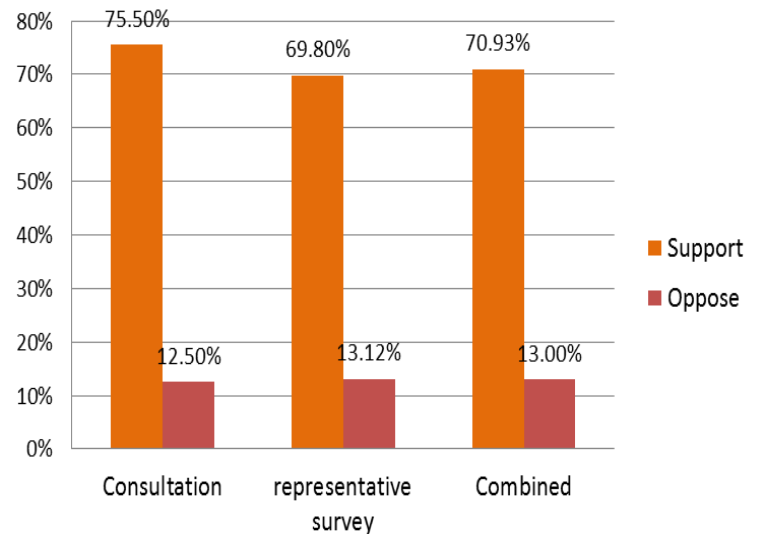


support vs opposition

Increase the child care disregards by 10%



overall results



support vs opposition

The results from other dialogue methods

There is strong support to include these work incentives, although there was some criticism that whilst we are proposing to introduce two additional work incentives, we are at the same time increasing the income taper and implementing a £5 minimum threshold (under Proposal 1) which may both act as disincentives to work. See Trafford Labour Group Response (appendix 2C).

Question 6: 'To what extent do you support or oppose Trafford Council giving some protection from the reduction in council Tax Support to each of the groups below?'

A summary of the results

Residents were provided with a list of groups which could be considered 'vulnerable residents' and asked whether or not they thought the Council should provide them with protection from the reductions in Council Tax Support under the proposed schemes.

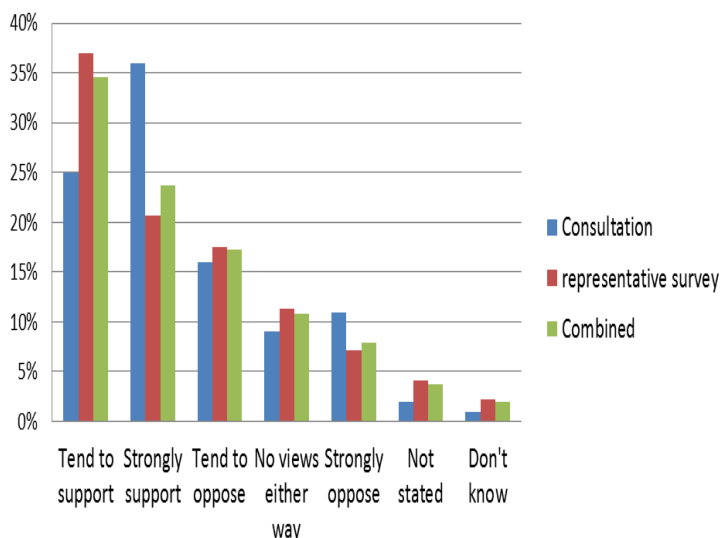
Two in three Trafford residents (67% from the representative survey and 72% from consultation survey) support protecting those receiving the middle or higher rate of Disability Living Allowance from reductions in Council Tax Support. Half of residents (53% from the representative survey & 58% from the consultation survey) think that these protections should be extended to include residents who receive *any* level of Disability Living Allowance.

Around six in ten (58% from the representative survey and 63% from the consultation survey) think these protections should be given to either families with children under 5 who receive benefits or single parent households with children under 5 who receive benefits (60% from the representative survey and 62% from the consultation survey).

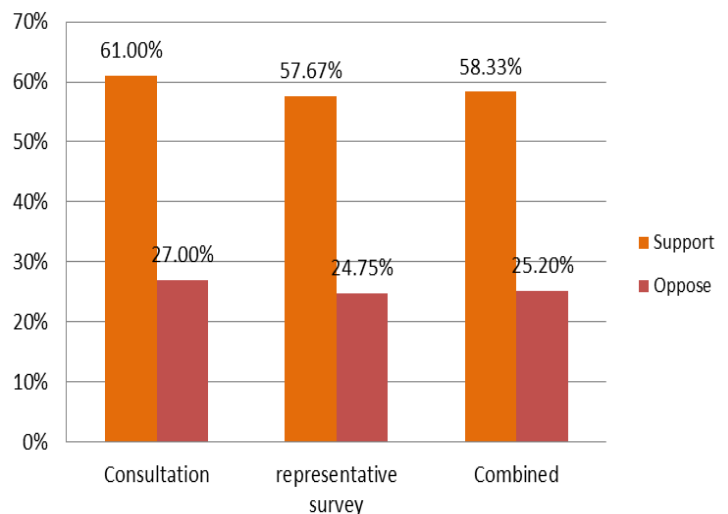
CTB recipients are more likely to think that people receiving any rate of Disability Living Allowance should be given protection by the Council from the reductions in Council Tax Support.

Support for protecting those with children under 5 who receive benefits is higher among those who oppose Child Benefit (for both surveys) being treated as income: 76% of representative survey respondents support the protection of *families* with children under 5 (vs. 58% overall) and 75% support the protection of *single parent households* with children under 5 (vs. 60% overall).

The results from the surveys Protect families with children under 5

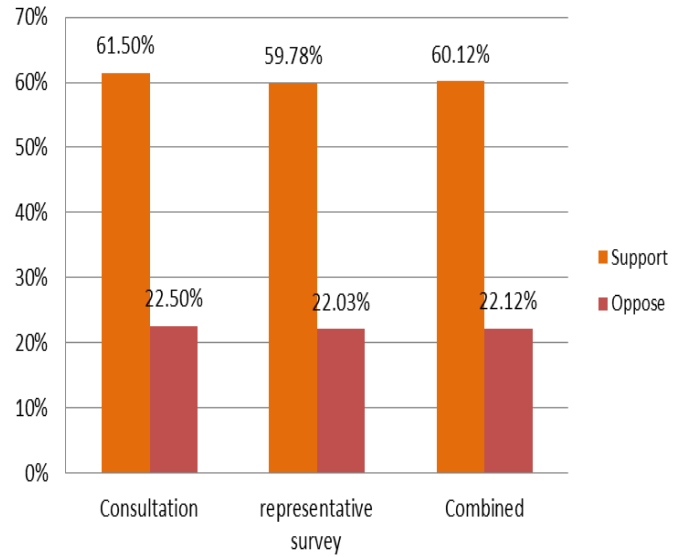
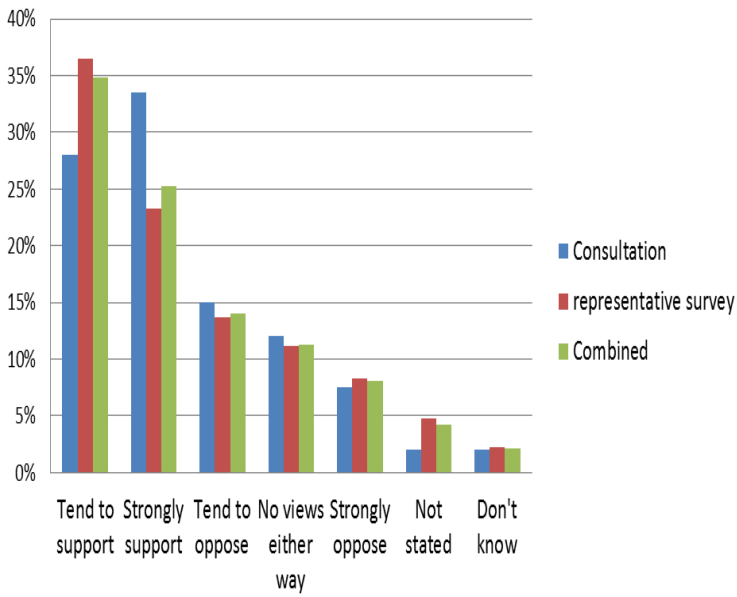


Overall results



support vs opposition

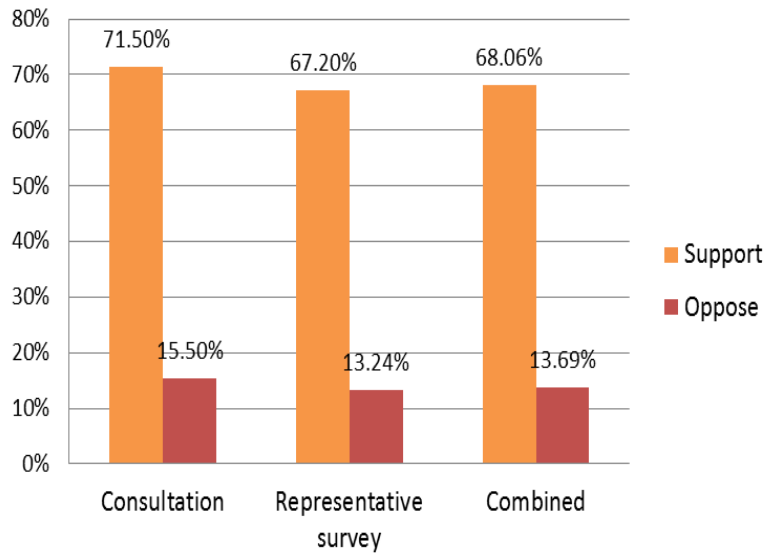
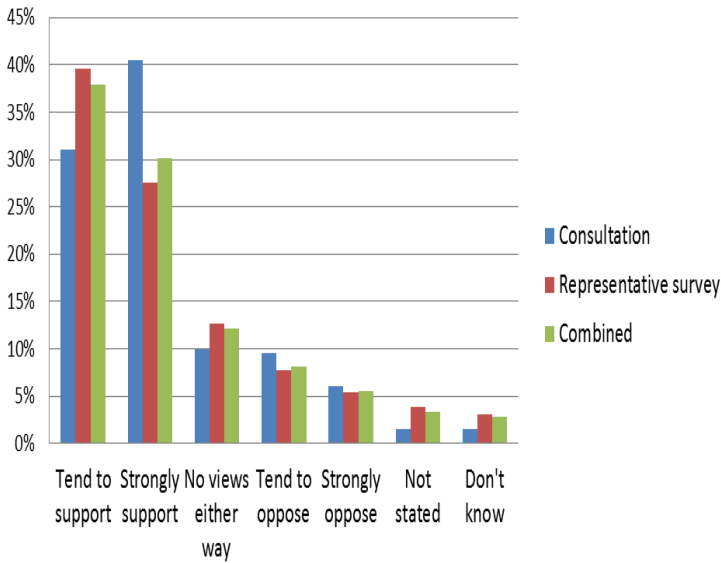
Protect single parents with children under 5



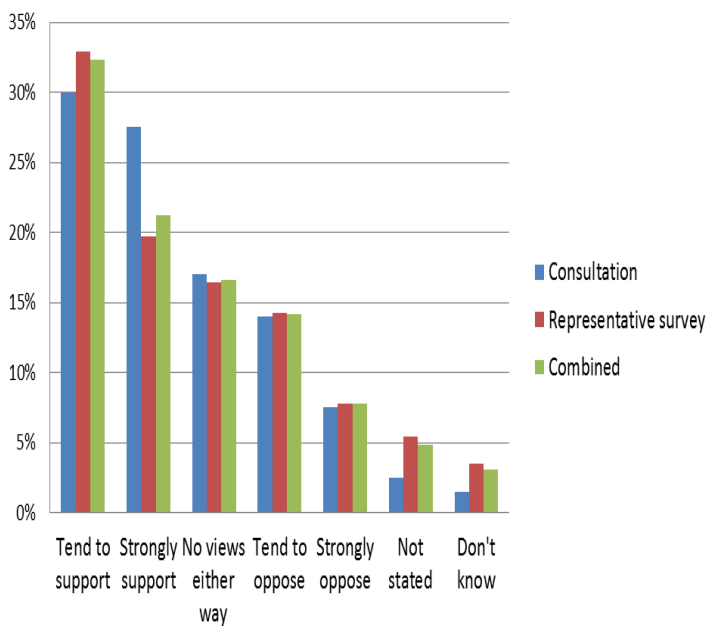
overall results

support vs opposition

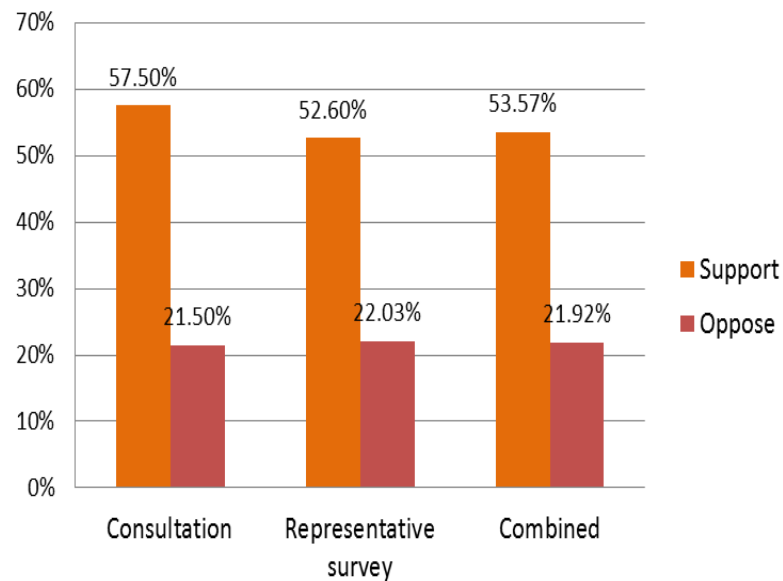
Protect claimants who receive the middle or the higher rates of DLA



Protect claimants who receive any level of DLA



overall results



support vs opposition

The results from other dialogue methods

The Disability and Advisory Group and Trafford Deaf Partnership were particularly interested in the proposals for protecting people on the middle or higher rate of Disability Living Allowance, but believed that these protections did not go far enough. I.E the group felt that this protection should be extended to include those receiving the lower rates of Disability Living Allowance. The extra costs associated with this are approximately £35k.

The group were concerned that when Disability Living Allowance is replaced with the new Personal Independence Payments (PIP) from April 2013 onwards, many people currently receiving DLA will either move to a lower rate or not be entitled at all. Therefore, protecting all rates of DLA will help disabled people in future when the new PIP is phased in.

The group also mentioned including some transitional protection for residents who qualified for protection under DLA, but would not qualify under PIP. A 6 and 12 month period were suggested.

Question 7: 'Are there any other groups who you feel should receive some protection from the changes in the way Council Tax Support will work in the future in Trafford?'

A summary of the results

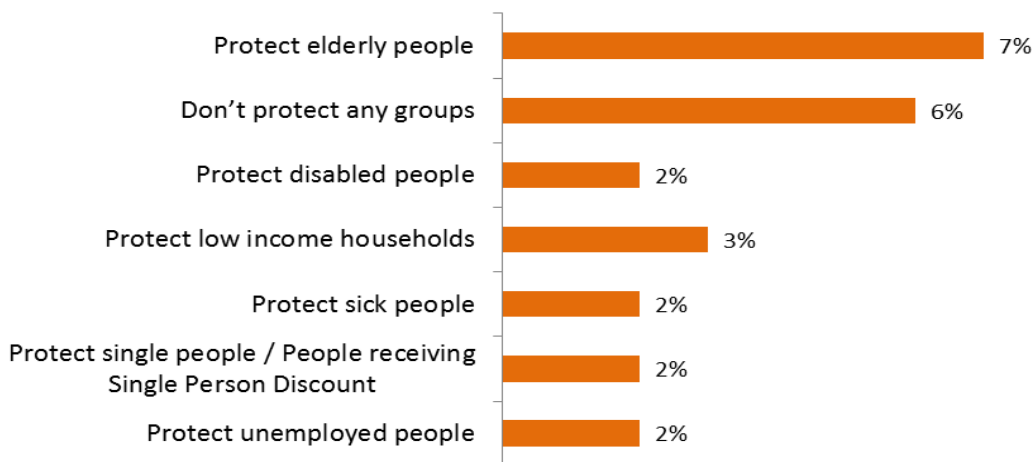
Residents were also given the opportunity to suggest any other groups which they felt needed to be protected from the reductions in Council Tax Support.

- Overall, 6% claimed they did not think anybody should receive protection from the reductions. However, the groups most likely to be spontaneously mentioned by 2% or more are:

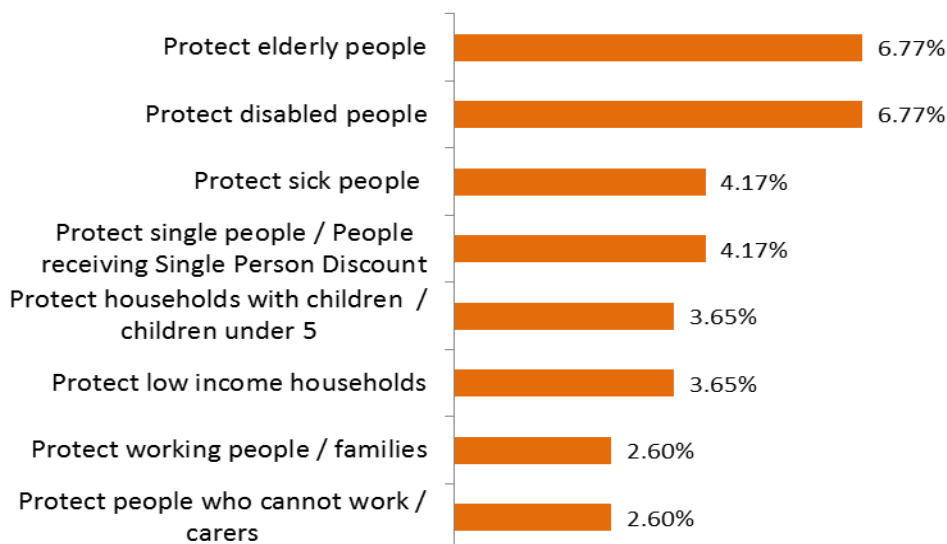
- CTB recipients are more likely to mention that a variety of vulnerable groups need to be protected; for example, almost one in ten (9%) comment on the need to protect people receiving benefits such as Job Seekers Allowance or Disability Living Allowance compared with 1% of empty/unfurnished/second home owners and less than 0.5% of General Council Tax payers.
- There are no significant differences between those who support Proposal 1 and those who support Proposal 2 in terms of defining additional vulnerable groups to be protected from reductions in Council Tax Support.

The results from the surveys

Representative Survey free text responses



Consultation free text responses



The results from other dialogue methods

The general consensus from the Welfare Reform Steering Group was that single people should receive some form of protection as they are the hardest hit by the other welfare reforms.

Imagine, Act and Succeed (Supports people with learning difficulties)

The organisation identified the need to protect People in receipt of Severe Disability Allowance or incapacity benefit

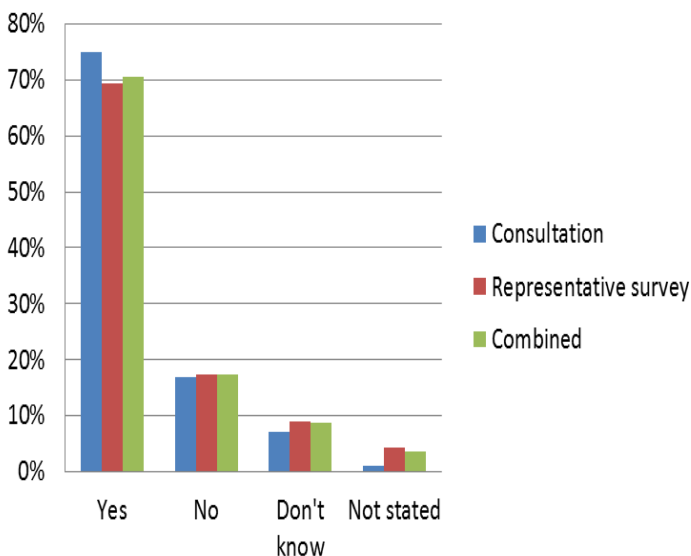
Question 8: 'Do you think the Council should set up a discretionary fund to help with the change from Council Tax Benefit to Council Tax Support?'

A summary of the results

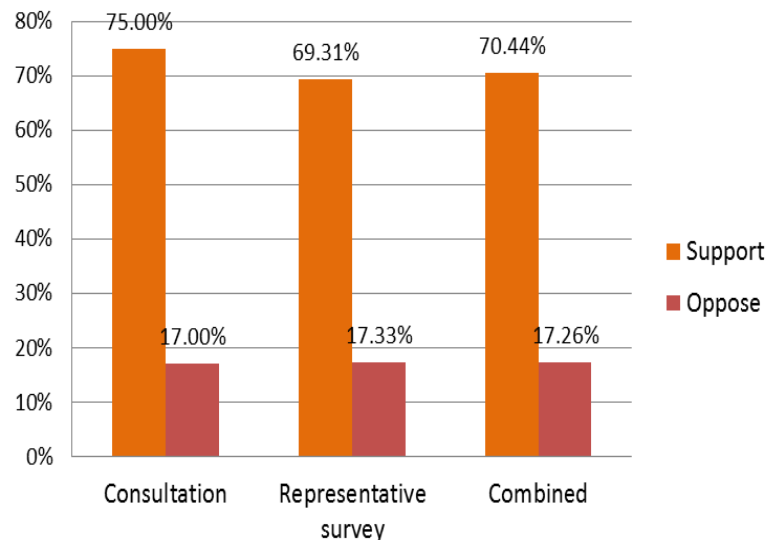
- Residents were asked if they would support the idea of setting up a discretionary fund to allow those who experience severe financial difficulties to apply for additional temporary financial help towards their Council Tax bill on a case by case basis.
- Seven in ten Trafford residents (69%) responding to the representative survey and 75% of residents responding to the Consultation support the idea of establishing a discretionary fund.

The results from the surveys

Should the Council set up a discretionary fund?



overall results



support vs opposition

Free text quote:

For: *“A discretionary fund would allow each case to be assessed on its own merits and help given for a set period where it is especially needed.”*

Against: *“There should only be a need for the discretionary fund if the measures introduced are too much of a burden on the poorest. It would be better to spend time making sure this doesn't happen.”*

The results from other dialogue methods

All groups supported the idea of setting up a discretionary fund to help deal with individual residents on a case by case basis. Many thought that this would give the council extra flexibility to deal with any initial ‘teething problems and act as a safeguard to residents who do not fall within one of the two protected group categories.

At the neighbourhood forums some concern was raised around the administration cost of such a scheme. This was also raised in some of the community meetings. However, as the fund will sit alongside an already established discretionary fund for Housing Benefit, then the administration costs will be minimal.

Further consultation has taken place with Citizens Advice Trafford who believe a discretionary fund should be prioritised, but not necessarily restricted to those residents who have been directly affected by the Council Tax Support scheme changes. This should encompass residents who no longer qualify for any benefit as a result of the changes.

It's also important to point out that a discretionary fund for the current Council Tax Benefit scheme already exists, through the discretionary Housing payment scheme.

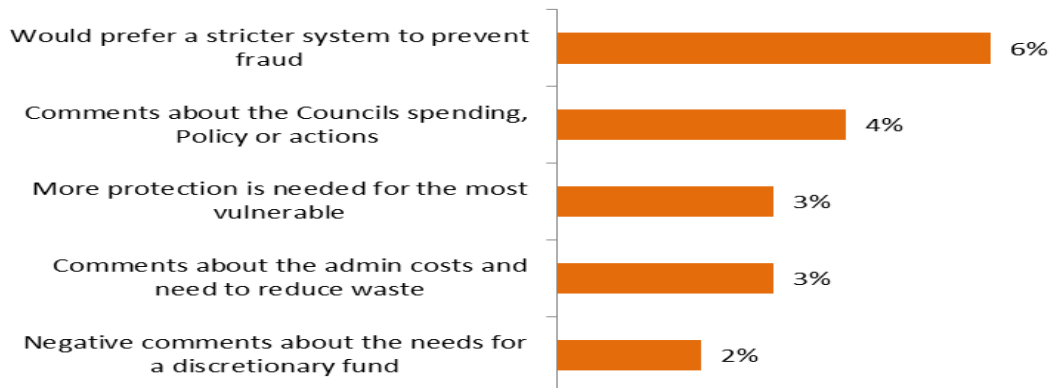
Question 9: Do you have any other comments about the proposals set out in this consultation?

A summary of the results

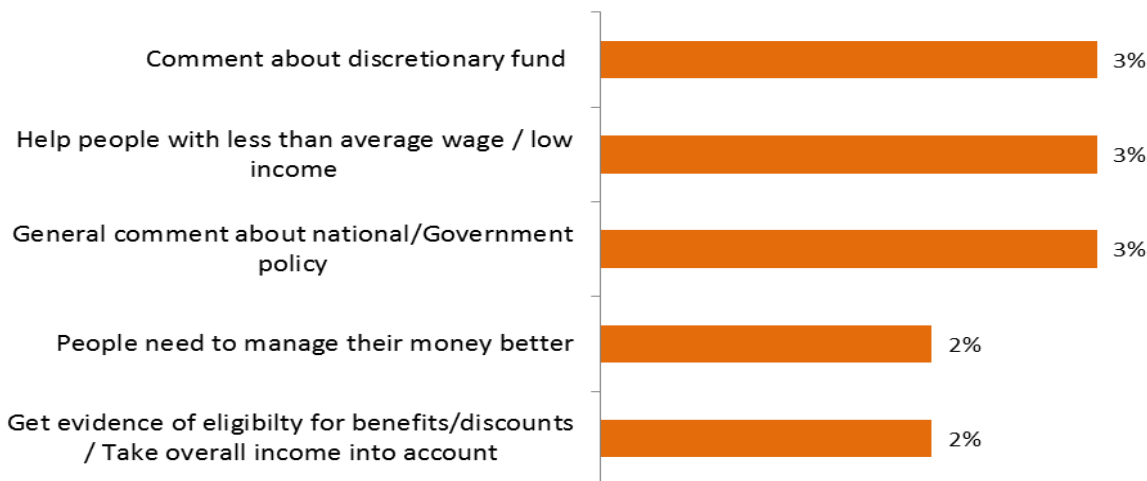
- Residents were given the opportunity to provide any other comments they had about either the representative sample survey or the public consultation process as a whole, the majority chose not to make a comment.
- The spontaneous comments that were made most regularly from the representative sample survey and mentioned by 2% or more are shown in tables 55 and 56.
- CTB recipients are more likely to mention the need to protect vulnerable groups: 8% of this group comment on the need to protect vulnerable groups.

The results from the surveys

Any other comments about this consultation (Representative survey free text responses)



Any other comments about this consultation? (consultation free text responses)



The results from other dialogue methods

- All groups expressed concern that this consultation is taking place at a time when multiple benefit changes are occurring. The Project team will analyse those customers who could be impacted from Housing Benefit and Council Tax Benefit changes.
- Concern over the complexity of the benefits system and the consultation form, with some groups expressing concern that some vulnerable residents will not understand the consultation or the changes in benefit.
- Positive feedback towards the project team and consultation was received by some residents at neighbourhood forums.
- Citizens Advice Trafford have expressed positive feedback towards the project team who have constantly included partners and stakeholders throughout the consultation period.

- Trafford Labour Group whilst they do not agree with the benefit cuts pay tribute to the work of the staff involved with this project.

Appendix 6

Due to the size of this document it will be available on the Councils website.