

# Supplementary Committee Agenda



## ***Finance and Performance Management Scrutiny Panel Tuesday, 20th September, 2011***

**Place:** Committee Room 1, Civic Offices, High Street, Epping

**Room:** Committee Room 1

**Time:** 7.00 pm

**Committee Secretary:** A Hendry - The Office of the Chief Executive  
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**11. GOVERNMENT CONSULTATION - LOCALISING SUPPORT FOR COUNCIL TAX IN ENGLAND (Pages 3 - 16)**

(Director of Finance and ICT) Report attached.

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## **Report to Finance & Performance Management Scrutiny Panel**



# SCRUTINY

 Epping Forest District Council

**Date of meeting: 20 September 2011**

**Portfolio: Finance and Economic Development**

**Subject: Government Consultation – Localising support for Council Tax in England**

**Responsible Officer: Janet Twinn (01992–564215).**

**Democratic Services Officer: Adrian Hendry (01992–564246)**

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### **Recommendations/Decisions Required:**

- (1) That the report on the proposed changes to Council Tax Benefit is noted; and**
- (2) That the proposed responses to the Consultation set out in Appendix 1 be agreed.**

### **Executive Summary:**

Following on from announcements made in the 2010 Spending Review, the Department for Communities and Local Government has issued a consultation paper on the proposals to replace Council Tax Benefit in England with a system of 'localised support' administered by local authorities from 2013. The consultation closes on 14 October 2011.

### **Reasons for Proposed Decision:**

### **Other Options for Action:**

The Authority could choose not to respond to the consultation document.

### **Report:**

#### **Introduction**

1. At the moment lower income households can qualify through the Council Tax Benefit system to pay either a reduced or a zero amount of Council Tax. In the 2010 Spending Review, the Government announced proposals to localise Council Tax Benefit and to reduce expenditure by 10% but at that time there were no details announced of the replacement scheme.

2. The Department for Communities and Local Government has now issued a consultation paper with more details of the plans for a system of local support for Council Tax. The paper confirms that Council Tax will not form part of the Universal Credit but will remain the responsibility of local authorities. Local authorities will be put in full charge of devising a scheme to provide support to pay the Council Tax but the paper also confirms that local authorities will

need to reduce expenditure on the replacement scheme by 10%. It is assumed that given the other existing budgetary pressures and cuts in grant funding that the Council will seek to achieve the 10% saving rather than fund the local scheme at current levels through growth in the Continuing Services Budget.

3. The Government believes that the new system will simplify the current complex system of criteria and allowances, establish stronger incentives for councils to get people back into work and save the taxpayer up to £480 million a year.

### **How the proposed new system will work**

4. A fixed amount of money will be provided to local authorities by central government to operate a scheme providing support to pay the Council Tax. This will be an amount that is 10% lower than the current expenditure on the Council Tax Benefit scheme. Each local authority will devise their own scheme with its own qualifying criteria.

5. People of pensionable age will be protected against any reduction in support and will continue to have Council Tax Benefit assessed and awarded at existing levels and under the existing rules. This means that the savings will have to be made from claimants of working age and that cuts to working age claimants will be in excess of 10%. Based on current caseload figures, the cut in assistance with the Council Tax for working age claimants in the Epping Forest District will be 20%.

6. These new schemes must be in place by April 2013 and local authorities should be able to make adjustments to their schemes each year to accommodate local change.

### **Impact on existing Council Tax Benefit caseload in Epping Forest**

7. People in receipt of Council Tax Benefit who receive either Guaranteed Pension Credit, Income Support, Job Seekers Allowance (income based) or Employment Support Allowance (income related) currently receive 100% benefit unless there are other adults in the property. These are known as 'passport benefits' and it could be considered that these people are the most vulnerable as they are living on the basic living needs allowance. Based on July 2011 caseload figures, there were 8895 Council Tax Benefit claimants which is broken down as follows:

	Caseload	Weekly average CTB	Weekly expenditure
Elderly (passport)	2858	£21.46	£61,333
Elderly (non-passport)	1582	£16.96	£26,831
Working Age (passport)	3020	£21.33	£64,417
Working Age (non-passport)	1435	£16.62	£23,850
<b>Total</b>	<b>8895</b>		<b>£176,431</b>

8. Passport cases make up 66.1% of the caseload and 71.3% of the expenditure. Elderly cases make up 49.9% of the caseload and 50% of the expenditure. If pensioners are to be protected as well as vulnerable working age claimants, the 10% cut would be restricted to 13.5% of the caseload.

9. The savings that Epping Forest would need to achieve are set out below using the Council Tax Benefit expenditure figures for 2011/12 as at August 2011.

Annual expenditure	£10,337,739
Less 10%	<u>£1,033,774</u>
	£9,303,965
Less pension age (no change allowed) 50% expenditure	<u>£5,168,870</u>
Remainder to be used for working age (including vulnerable)	£4,135,095

10. This equates to an average reduction of £232.00 pa for each working age claimant which includes the vulnerable who are currently living on the basic living needs allowance. If the vulnerable working age claimants were also to be excluded from the cuts, the reduction for the working age non-passported claimants would be an average of £720.00 pa.

11. These figures are assuming that there will be no increase in Council Tax and no increase in caseload. As the caseload has been steadily increasing during recent years, it is likely that the savings required will be greater than currently predicted.

### **Options for meeting the savings target**

12. It is clear that the savings will be difficult to achieve and the likelihood is that some savings will have to be made from people on the passported benefits. The Government has clearly stated that work incentives must be maintained but that will be difficult to achieve if the savings have to be made from working age people in low paid employment.

13. One approach to meet the savings target would be to reduce all payments by 20% across working age claimants. However, those currently on passported benefits do not currently pay any Council Tax so this will result in the authority collecting Council Tax from a group that are used to paying nothing. As this group do not pay anything at the moment because the income that they receive is at the minimum level that it is deemed a person requires, the collection of any sums will be difficult. This will be comparable to the Community Charge between 1990 and 1993 when local authorities had to collect 20% of the Community Charge. This scheme proved complicated to administer and difficult to collect.

14. If it is accepted that the vulnerable working age people receiving the passported benefits should be protected like pensioners, it falls upon the remainder of the working age claimants to pay significantly increased amounts of Council Tax than they currently pay. This group of people will either be working but on low earnings or they do not work but have income from sources other than the passported benefits. It is difficult to envisage how work incentives would be maintained if the total savings has to be met from this group.

15. Another approach could be to remove entitlement from certain groups such as owner occupiers or restrict entitlement to certain tenure types. Such a policy would be controversial and would necessarily affect claimants with children or disabilities. A preferred approach therefore may be to remove Council Tax support from working age people who are not disabled and do not have dependant children. However, a single unemployed person without children or disabilities currently receives £67.50 a week to live on and forcing them to pay Council Tax could reduce their income to just over £53.50 per week. Not only would this reduce their income to below the accepted minimum income levels but collection of Council Tax would be extremely difficult.

16. The Department for Work and Pensions (DWP) lobbied for a Council Tax element to be included in the Universal Credit, in the same way that a Housing element is to be paid. The Government rejected this and have made it clear that the Council Tax support should be the responsibility of local authorities. However, were the Council Tax to be paid within the Universal

Credit, the DWP would not know exactly how much Council Tax people were liable to pay and therefore people may receive a weekly amount different to their liability. The biggest problem however would be that the Universal Credit will be paid directly to claimants and not credited directly to their Council Tax account. This will lead to collection difficulties as people not used to paying anything will have to pay 100% of their liability.

17. A final option is to lobby the government as the envisaged cuts are unacceptable and that the proposed scheme needs to be altered. The consultation paper makes no mention of localising the current scheme of disregards and discounts but these could be incorporated into the scheme. Significant savings could be achieved by abolishing automatic discounts for particular categories and incorporating all support into one comprehensive means tested scheme. Savings could therefore be achieved from people more able to pay rather than just the most vulnerable in society.

### **Risks of localising support for Council Tax**

18. There will be a 10% funding cut. Based on our current Council Tax Benefit expenditure this is estimated to be in the region of £1.033m. This will undoubtedly have a major impact on our current collection rate and there will be increased costs to recover monies from people who have not had to pay Council Tax before.

19. Council Tax Benefit is currently based on actual eligibility and there are no budget constraints placed on people who are eligible under the national scheme. An increase in either the Council Tax liability or an increase in the number of people claiming support for their Council Tax, will result in an increase in administration costs and increased expenditure beyond the budget allocated to the authority.

20. The timescales for implementing a local support scheme for Council Tax do not appear to be achievable. The primary legislation will not be passed until the summer of 2012 following which any scheme will need to be devised, publicised, IT systems developed and for everything to be in place before February 2013 when Council Tax annual billing takes place. An implementation date of April 2014 would be more achievable and would link better with the introduction of Universal Credit.

21. There are currently three major software suppliers of Revenues and Benefits systems. We use Capita's Academy system which has approximately 130 customers using the benefits software. In the proposals, Council Tax support for Pensioners will still be paid under a national scheme whilst local authorities will devise their own individual schemes for working age people. In the timescales given, it is not likely that Capita will be able to provide software to support the national scheme and develop 130 different variations of software for each authority. Not only will this be costly for authorities as development costs will be individual and not spread amongst other authorities, but also any changes to schemes to support local change will also be costly.

22. For many years there has been much criticism of means tested benefit schemes for being too complex. Although the various governments have always pledged to simplify the schemes they have in fact become more complex. The proposed localisation of support for working age people, together with a national scheme for pensioners, will make the support scheme even more complicated. Furthermore, with every local authority devising their own scheme there is the potential for a 'post code lottery'. The Essex Benefit Managers Group has discussed the possibility of Essex authorities working in partnership to devise local support schemes that are the same for more than one authority. However, due to different demographics within the County, it has been concluded that this will be difficult to achieve. Even if the same scheme was devised by neighbouring authorities, it would not reduce any IT development costs. There are other Essex authorities that use the Academy system but only Maldon Council uses the same operating platform. Therefore unless we devised the same

system as Maldon, the burden of the cost of IT development will have to be met solely by us.

23. There are particular issues with two-tier authorities as it is the district authority who will be taking the whole risk of the scheme.

24. Implementing a new scheme with a 10% cut will be challenging because potentially controversial decisions will need to be taken by local authorities about where reductions in entitlement are to be made.

25. For many years the government has encouraged take-up of specifically Council Tax Benefit as they believe that there are many people not claiming the benefit that they are entitled to. There is no incentive for any take-up of support for Council Tax and in fact there is reason to discourage take-up.

26. Appeals against decisions taken on Council Tax Benefit are currently heard by The Tribunal Service. It is unlikely that they will also hear appeals against any decision taken on a local support scheme and therefore an internal appeals process will have to be put into place.

27. As part of Welfare Reform, it is proposed that benefit investigation work will move to a centralised investigation service run by the DWP in April 2013. At present there is little information available about the transfer of staff to the DWP but it is expected that local authorities will no longer have benefit investigation staff. However, the DWP investigation staff will not investigate any potential abuse of a local scheme. Consideration must therefore be given as to how abuse of the local scheme will be tackled.

**Resource Implications:**

There are no resource implications for commenting on the consultation paper. However, if the Council has to implement a local scheme and seeks to do this without reducing the level of benefit the Council will take on an additional annual cost in excess of £1 million.

**Legal and Governance Implications:**

No specific implications

**Safer, Cleaner and Greener Implications:**

No specific implications

**Consultation Undertaken:**

The consultation paper has been discussed with various groups representing other Essex authorities

**Background Papers:**

Localising Support for Council Tax in England – Consultation paper published by the Department for Communities and Local Government

**Impact Assessments:**

Risk Management

The key risks associated with localising support for Council Tax are set out in detail above.

Equality and Diversity

As this is a response to a consultation an Equality Impact Assessment is not relevant. If the Council is required to implement a local scheme an Equality Impact Assessment will be completed as part of that policy setting process.

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## Response to Consultation – Localising Support for Council Tax in England

<b>Section 5 – Principals of the Scheme</b>	
5a: Given the Governments firm commitment to protect pensioners, is maintaining the current system of criteria and allowances the best way to deliver this guarantee of support?	
	<p>The current system of criteria and allowances is complex but maintaining the system will ensure protection for pensioners. However, although pensioners will be protected under the new scheme, it will be at the expense of working age people.</p> <p>The consultation paper makes no mention of localising the current scheme of disregards and discounts but these could be incorporated into the scheme. Significant savings could be achieved by abolishing automatic discounts for particular categories and incorporating all support into one comprehensive means tested scheme. Savings could therefore be achieved from people more able to pay rather than just the most vulnerable in society.</p>
5b: What is the best way of balancing the protection of vulnerable groups with the need for local authority flexibility?	
	<p>There is no definition of a vulnerable group but a case could be made for any number of groups to be considered vulnerable eg, people with disabilities, people with dependant children or people with the minimum income level. If both pensioners and working age people receiving the passported benefits are to be protected, the savings will have to be made from others who have a low income but are less vulnerable. There will therefore be a significant impact on employed working age people who will have to have their benefits significantly reduced in order to meet the reduction in budget. This will give local authorities no opportunity to maintain work incentives and will in turn create a disincentive to work. Although the principle of the scheme is to allow local authorities to devise their own locally deliverable schemes, the more groups that are ultimately protected will result in local authorities having less flexibility to devise a workable local scheme as it will ultimately only apply to a small number of residents.</p>
<b>Section 6 – Establishing Local Schemes</b>	
6a: What, if any additional data and expertise will local authorities require to be able to forecast demand and take-up?	
	<p>Due to the 10% budget cut, there will be a disincentive to undertake any take-up work. Any increase in caseload will result in larger cuts to existing claimants.</p>
6b: What forms of external scrutiny, other than public consultation, might be desirable?	
	<p>Local authorities will need to submit their proposed scheme to some form of public scrutiny which may result in local interest groups lobbying MP's, Members etc.</p>
6c: Should there be any minimum requirements for consultation, for example, minimum time periods?	
	<p>No comment</p>
6d: Do you agree that councils should be able to change schemes from year to year? What if any restrictions, should be placed on their freedom to do this?	
	<p>Councils should be able to modify their scheme if changes in local demographics necessitate changes to the scheme. Any changes will be expensive to implement as publicity will be required, IT software changes will need to be made and training will</p>

need to undertaken. It is therefore unlikely that Councils will make major and regular changes to their scheme. Councils will therefore be placing their own financial restriction on changes without any restrictions imposed by the Government.

6e: How can the Government ensure that work incentives are supported, and in particular, that low earning households do not face high participation tax rates?

Localising support for Council Tax whilst protecting pensioners and other vulnerable groups will not protect low earning households from increases in tax rates as it will primarily be this group that will have their Council Tax Benefit reduced. Low earning households are better protected by keeping the current national scheme whereby people who need financial support receive it without authorities having to decide who is the most needy.

### **Section 7 – Joint Working**

7a: Should billing authorities have default responsibility for defining and administering the schemes?

No comment

7b: What safeguards are needed to protect the interests of major precepting authorities in the design of the scheme, on the basis that they will be a key partner in managing financial risk?

No comment

7c: Should local precepting authorities (such as parish councils) be consulted as part of the preparation of the scheme? Should this extend to neighbouring authorities?

No comment

7d: Should it be possible for an authority (for example, a single billing authority, county council in a two-tier area) be responsible for the scheme in an area for which it is not a billing authority?

No comment

7e: Are there circumstances where Government should require an authority other than the billing authority to lead on either developing or administering a scheme?

No comment

### **Section 8 – Managing Risk**

8a: Should billing authorities normally share risks with major precepting authorities?

No comment

8b: Should other forms of risk sharing (for example between district councils) be possible?

No comment

8c: What administrative changes are required to enable risk sharing is used appropriately?

No comment
8d: What safeguards do you think are necessary to ensure that risk sharing is used appropriately?
No comment

<b>Section 9 – Administrating Local Schemes</b>
9a: In what aspects of administration would it be desirable for a consistent approach to be taken across all schemes?
<p>A consistent approach across all schemes will be taking away the principle that schemes should be devised locally. The use of National Insurance Numbers is already established as a method of checking identity and allowing data sharing and this should be retained. However, as different data is likely to be held by different authorities, the usefulness of data sharing would be limited. If a consistent approach to local schemes is desired, there should be a national scheme as at present.</p> <p>With regard to minimizing complexity for claimants who move between authorities, this will not be possible unless there is a national scheme that applies to all local authorities. Local authorities may work together to devise the same scheme in neighbouring authorities but this will be difficult as local needs vary between authorities.</p> <p>The consultation recognizes that there will be an increase in the level of Council Tax write off's where relatively small balances payable by people on low incomes become uncollectable. In Epping Forest the increase in Council Tax for working age people will be 20%, the same as the level of Community Charge that had to be collected. Experience from that scheme shows that the collection rate falls, the cost of collection rises and the level of increased write off's impacts on the Council Tax base. The burden then falls on other Council Tax payers. As different authorities may choose to write off more debts than other authorities, this creates inequality.</p>
9b: How should this consistency be achieved? Is it desirable to set this out in Regulations?
<p>With different schemes in each authority, it could end up as a postcode lottery as to whether people would qualify for help with their Council Tax. From an administration point of view, there would have to be individual bespoke IT systems etc. plus the resources required to cover appeals, fraud etc. This will inflate administration costs and offer little scope for efficiencies. If the desire is to have consistency across council schemes, this will only be achieved by Regulations and contradicts the intention to allow authorities to devise their own schemes based upon local issues. The current timescales already appear unachievable without having to create further Regulations.</p>
9c: How should local authorities be encouraged to use these approaches (run-ons, advance claims, retaining information stubs) to provide certainty for claimants?
<p>Advance claims and retaining information on previous applications reduces administration and can speed up claim processing. However, run-ons add a complication to schemes not a simplification, and payments from a limited budget may then be made to people who are able to afford the full Council Tax as they are in well paid employment.</p>
9d: Are there any other aspects of administration which could provide greater

certainty for claimants?
The greatest certainty would be provided by retaining a single national scheme.
9e: How should local authorities be encouraged to incorporate these features into the design of their schemes?
No comment
9f: Do you agree that local authorities should continue to be free to offer discretionary support for council tax, beyond the terms of the formal scheme?
If local authorities are to devise local schemes there should be no requirement for additional discretionary support.
9g: What, if any, circumstances merit transitional protection following changes to local schemes?
The various transitional protection schemes over the years have only complicated the benefit schemes for the public, the staff administering the schemes and the software suppliers. It is less complex when altering a scheme for it to be applied to everyone from a fixed date without having to apply transitional protection.
9h: Should arrangements for appeals be integrated with the new arrangements for council tax appeals?
This could be considered but appeals against billing deal with very different issues to a means tested benefit and there is concern that there may therefore be a lack of expertise.
9i: What <u>administrative</u> changes could be made to the current system of council tax support for pensioners to improve the way support is delivered (noting that factors determining the calculation of the award will be prescribed by central Government)?
No comment

### **Section 10 – Data Sharing**

10a: What would be the minimum (core) information necessary to administer a local council tax benefit scheme?
Data sharing with the DWP is already in place and this must continue. The DWP have recently invested a lot of resource when developing ATLAS so it must be assumed that the intention has always been to continue with this data sharing. The Housing Benefit Matching Service has also proven to be invaluable to local authorities and should also continue.
10b: Why would a local authority need any information beyond this “core”, and what would that be?
The DWP data will only give information on state benefits and the local schemes may not be devised solely on people being in receipt of state benefits. With the intention that local schemes should not remove incentives to work, it must be assumed that it is expected that working people will still receive support and therefore earnings evidence will still be required in addition to other types of income and capital.
10c: Other than the Department for Work and Pensions, what possible sources of information are there that local authorities could use to establish claimants’ circumstances?
Would you prefer to use raw data or data that has been interpreted in some way?

In many cases it is only the claimant who can tell authorities of their circumstances. This is likely to need a person to therefore make two applications, one to the local authority and one to the DWP for their Universal Credit claim.
10d: If the information were to be used to place the applicants into categories, how many categories should there be and what would be the defining characteristics of each?
No comment
10e: How would potentially fraudulent claims be investigated if local authorities did not have access to the raw data?
It is proposed that Benefit Investigation staff will move to the Single Fraud Investigation Service from April 2013 and therefore local authorities will no longer have the expertise. However, the Single Fraud Investigation Service are unlikely to be willing to investigate potentially fraudulent claims as there will be a different set of rules for every local authority. The responsibility must therefore lie with the local authority although the investigation expertise that has been built up over the years will have already been taken away from each authority. The existing powers of access to various sources of information would need to be maintained.
10f: What powers would local authorities need in order to be able to investigate suspected fraud in council tax support?
Local schemes would not necessarily enable local authorities to undertake any prosecution work unless the offence was serious enough that the Fraud Act could apply. A local scheme would not be backed up by legislation and therefore a prosecutable offence could not be committed. However, even if there was legislation for each individual scheme, a person could be prosecuted for an offence in one authority yet it may not be considered an offence in a neighbouring authority.
10g: In what ways could the Single Fraud Investigation Service support the work of local authorities in investigating fraud?
If local authorities could not retain their existing powers, they would need to rely on the Single Fraud Investigation Service to carry out checks and supply information. However there is a concern that requests for information for a local scheme would not be given a high priority by SFIS. In addition, as offences cannot be investigated under the Social Security legislation, it is unlikely that SFIS will supply any information to local authorities.
10h: If local authorities investigate possible fraudulent claims for council tax support, to what information, in what form would they need access?
Local authorities should be allowed to retain their existing powers and access to existing data sources such as Experian.
10i: What penalties should be imposed for fraudulent claims, should they apply nationally, and should they relate to the penalties imposed for benefit fraud?
The imposition of penalties will be reliant on legislation being in place making any abuse of the local schemes an offence. Abuse of a local scheme supporting Council Tax is still taking money from the public purse and therefore there should be a system of national penalties. Localising penalties will create a postcode lottery as to whether a person is penalised for committing fraud and will send the wrong message to the public.
10j: Should all attempts by an individual to commit fraud be taken into account in the

imposition of penalties?

More than one attempt to commit fraud shows an intent that a person will continue to make further attempts unless they are penalised. All attempts should therefore be taken into account when imposing penalties. A system of 'two strikes and you're out' could be adopted when devising local schemes.

### **Section 11 - Funding**

11a: Apart from the allocation of central government funding, should additional constraints be placed on the funding councils can devote to their schemes?

Local authorities will find it difficult to fund a local scheme for working age people within a restricted budget. If it is to be a scheme of localised support, further constraints should not be placed on authorities.

The Paper is silent on how year to year increases in the level of grant will be planned and managed and the relationship between increases in Council Tax Benefit Grant and the overall regime of Council Tax capping. It is possible that Councils will be in the strange position of having to raise Council Tax simply to raise enough additional resources to pay for Council Tax Benefit .

11b: Should the schemes be run unchanged over several years or be adjusted annually to reflect changes in need?

If it is to be a local scheme, authorities should have the ability to change their scheme based upon changes in local need. If there are increases in Council Tax without an increase in the Government funding, authorities will be forced to change their schemes.

### **Section 12 – Administrative Costs**

12a: What can be done to help local authorities minimise administration costs?

Introducing the new Council Tax Benefit system from 1<sup>st</sup> April 2013 is a challenging and probably undeliverable target. Implementing a new system to replace Council Tax Benefit will involve the procurement of new IT systems or significant adaptations to existing systems. Given the timetable for decisions, with primary legislation and secondary legislation not due until 2012, there will be insufficient time to organise and publicise the administration of the scheme as well as develop and procure new IT systems in time for an April 2013 implementation.

The development of individual IT systems for each authority whilst still retaining the existing IT systems for pensioners will significantly increase costs to local authorities. The uncertainty as to what will happen to benefit staff is also an issue to be considered. The staff at present do not know whether they will remain with local authorities or moved to the DWP for Universal Credit or to the Single Fraud Investigation Service.

12b: How could joint working be encouraged or incentivised?

No comment

### **Section 13 – Transitional & Implementation Issues**

13a: Do you agree that a one-off introduction is preferable? If not, how would you move to a new localised system while managing the funding reduction?

No comment

13b: What information would local authorities need to retain about current recipients / applicants of council tax benefit in order to determine their entitlement to council tax support?
No comment
13c: What can Government do to help local authorities in the transition?
No comment
13d: If new or amended IT systems are needed what steps could Government take to shorten the period for design and procurement?
New and amended IT systems will definitely be required but the timescales to develop and procure these is already too tight. The timetable for introduction of the replacement Council Tax Benefit scheme should be reconsidered.
13e: Should applications, if submitted prior 1 April 2012, be treated as if submitted under the new system?
If applications are accepted prior to April 2012, the data held may be incorrect and out of date if there have been un-notified changes in circumstances.
13f: How should rights accrued under the previous system be treated?
No comment

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