

Public Document Pack

Blackpool Council

27 November 2015

To: Councillors Blackburn, Cain, Campbell, Collett, Jackson, Jones, Kirkland, Smith, I Taylor and Mrs Wright

The above members are requested to attend the:

EXECUTIVE

Monday, 7 December 2015 at 6.00 pm
in Committee Room A, Town Hall, Blackpool

A G E N D A

1 DECLARATIONS OF INTEREST

Members are asked to declare any interests in the items under consideration and in doing so state:

- (1) the type of interest concerned; and
- (2) the nature of the interest concerned

If any member requires advice on declarations of interests, they are advised to contact the Head of Democratic Governance in advance of the meeting.

2 COUNCIL TAX REDUCTION SCHEME 2016/17 (Pages 1 - 64)

3 FINANCIAL PERFORMANCE MONITORING AS AT MONTH 7 2015/16 (Pages 65 - 68)

Venue information:

First floor meeting room (lift available), accessible toilets (ground floor), no-smoking building.

Other information:

For queries regarding this agenda please contact Lennox Beattie, Executive and Regulatory Manager, Tel: (01253) 477157, e-mail lennox.beattie@blackpool.gov.uk

Copies of agendas and minutes of Council and committee meetings are available on the Council's website at www.blackpool.gov.uk.

Report to:	EXECUTIVE
Relevant Officer:	Steve Thompson, Director of Resources
Relevant Cabinet Member:	Councillor Simon Blackburn, Leader of the Council
Date of Meeting:	7th December 2015

COUNCIL TAX REDUCTION SCHEME 2016/2017

1.0 Purpose of the report:

1.1 To seek approval for the proposals for the Council Tax Reduction Scheme 2016/17.

2.0 Recommendation(s):

2.1 To recommend to the Council to agree to continue to operate a Discretionary Discount Policy for Council Tax to be awarded in cases of exceptional hardship as set out at Section 3 of Appendix 2a.

2.2 To recommend to the Council that the reduction applied to Working Age claimants remains at 27.11% for the 2016/17 Scheme and that the main elements and method of calculating awards previously agreed by Council on 21st January 2015 will remain the same.

3.0 Reasons for recommendation(s):

3.1 To ensure a Local Council Tax Reduction Scheme is approved by 31st January 2016 avoiding the financial risks associated with the Government imposed default scheme.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

None, a Council Tax Reduction Scheme must be approved by the Council in every year.

4.0 Council Priority:

4.1 The relevant Council Priority is

“Communities: Creating stronger communities and increasing resilience”

5.0 Background Information

5.1 The Welfare Reform Act 2012 abolished Council Tax Benefits (CTB), billing authorities were required to adopt a local Council Tax Reduction Scheme (CTRS) to take effect from 1st April 2013.

5.2 In 2013/14 the Government grant for the Council Tax Reduction Scheme was equal to less than 90% of the Government’s forecast funding levels had Council Tax Benefits continued. This was expected to leave a shortfall in funding of £3.22million based on estimates of demand and assumptions regarding the basis of calculation for the central Government grant. The level of Government support was fixed and the Council adopted a self-funding Scheme under which all working age claimants had to pay at least 27.11% of their Council Tax in 2013/14. The rate has remained the case in subsequent years.

5.3 Since 2013/14, the Government funding has become part of the Local Government Finance Settlement and is no longer separately identifiable, however, overall funding has fallen further.

5.4 The Blackpool Scheme incorporates the national pensioner scheme decided by Government. This ensures that support continues at existing levels for pensioners. In Blackpool pensioners currently account for 38% of the caseload.

5.4 For working-age claims there will be a means-tested assessment, predominantly based upon the former Council Tax Benefit rules, to establish entitlement. A percentage reduction will then be applied at the end of the assessment.

5.5 Although the 2016/17 scheme will, as far as is possible, have the same design principles as that currently in operation a change to one element for 2016/17 is proposed. The Government has announced its intention to remove the family premium from housing benefit for children born after April 2016 or for new claims made after that date. The Council proposes to do the same for its Council Tax Reduction Scheme for 2016/17 to keep this element of the scheme the same as housing benefit. This change will apply to working age claimants who are not in receipt of certain benefits such as Income Support, Income Based Job Seekers Allowance or Income-Related Employment and Support Allowance.

- 5.6 At this point in time the Department for Communities and Local Government may still issue changes to the known position. Required changes will be incorporated into the final scheme presented for adoption at full Council on 20th January 2016.
- 5.7 The value of the percentage reduction must be established each year. The percentage is determined by reference to the level of Local Government Finance Settlement, caseload, growth / reduction in caseload. It is proposed that for 2016/17 the value of the percentage reduction for working age customers should remain at 27.11%.
- 5.8 The attached document at Appendix 2a also includes the Discretionary Discounts policy for those not in receipt of Council Tax Reduction and the Discretionary Discounts policy for Business Rates. It is not proposed to change either of these policies but to continue to include these in the one document for ease of use.
- 5.9 Does the information submitted include any exempt information? No

5.10 **List of Appendices:**

Appendix 2a: Proposed Council Tax and Business Rates Discretionary Discount Policy 2016/17 including the Discretionary Discount for those in receipt of Council Tax Reduction

Appendix 2b: Equality Analysis

6.0 Legal considerations:

- 6.1 A resolution by the full Council to adopt a Council Tax Reduction Scheme is required by 31st January 2016. The Scheme will take effect from 1st April 2016.
- 6.2 The Council Tax and Business Rates Discretionary Discount Policy has been updated and is attached at Appendix 2a.

7.0 Human Resources considerations:

- 7.1 Existing staffing resources within the Benefits service are used to administer the Council Tax Reduction Scheme. However, it is apparent that there has been a considerable increase in face-to-face and telephone contact, particularly when Council Tax bills are issued. The administrative and legal processes required to collect and recover substantial numbers of small amounts place an additional burden on available resources.

8.0 Equalities considerations:

8.1 The Equality Analysis that has previously been carried out for the scheme has been revisited and updated. This aims to mitigate the impact on protected groups and includes the continued availability of a discretionary hardship fund which has been made available through the adoption of a Discretionary Discount Policy. As part of their consideration of the scheme for 2016/17. Members must read the updated Equality Analysis which is attached at Appendix 2b.

9.0 Financial considerations:

9.1 For 2016/17 it is proposed that the percentage reduction made at the end of the assessment for working age claimants shall be 27.11%.

9.2 A review of the Scheme must be carried out annually to ensure it remains fit for purpose taking account of ongoing changes in legislation, caseload and financial requirements. The Council will be required to approve the Scheme each year.

9.3 The Welfare Reform Act 2012 provides for a major overhaul of the benefits system. The Council Tax Reduction Scheme was implemented ahead of the commencement of Universal Credit. The new scheme of Council Tax Reduction will run alongside Housing Benefit during the transition to Universal Credit. Housing Benefit administration will then gradually diminish. Wider changes to existing benefits during the next few years will mean customers on benefits will have less money available to pay their Council Tax liability. Whilst there is still an ambition to achieve full collection, this is likely to take longer.

10.0 Risk management considerations:

10.1 As part of the overall project management leading to the 2013/14 Scheme, a risk workshop identified a number of risks. Actions required to mitigate those risks have been identified and implemented where possible.

10.2 Council Tax collection costs have risen as approximately 15,000 households in Blackpool have to pay more Council Tax compared to the position prior to the introduction of the Council Tax Reduction Scheme. Some previously received full Council Tax Benefits and therefore were not liable for any Council Tax. Collection rates fell by approximately 2.4% at the end of 2013/14 and a further 0.7% in 2014/15 as a consequence of the Council trying to collect from low income households.

10.3 Demand on both face-to-face and telephones within the Customer Contact Centre has increased and this adversely affects the waiting times for customers and overall response times.

11.0 Ethical considerations:

11.1 None

12.0 Internal/ External Consultation undertaken:

12.1 Extensive public consultation was undertaken during 2012 to develop the 2013/14 Blackpool Scheme. The overall response concluded that, whilst most people did not agree with the changes, the options proposed by the Council were, in the main, supported.

12.2 Although the main elements and method of calculating awards will remain the same further public consultation has taken place in respect of the proposed changes to the family premium. A summary of the public consultation response is given below. The Council's response to each comment has been considered and is included within the Equality Impact Analysis which is attached at Appendix 2b.

- 13 of the 14 respondents are Blackpool Council Tax payers, 6 are currently in receipt of Council Tax Reductions.
- Of the 14 responses to the consultation, 8 strongly agree or agree with the proposal whilst 4 strongly disagree with it. 2 respondents indicated that they neither agree/ nor disagree.
- Of those who disagree with the proposal, one suggested that the Council should focus on those not paying any Council Tax, one feels the Council should review staff salaries, another proposes a 'sponsor scheme' to cover Council Tax and rent if someone becomes unemployed and one respondent indicated that there was insufficient information to agree with the proposal and that the Council should look to renegotiate commercial agreements.
- Other comments about the proposal were mixed, with some feeling it would have a negative impact on struggling families and vulnerable people whilst others accepted that difficult savings need to be made. One comment suggested that the proposal would be fairer on those with less children and again comments touched on collection of Council Tax arrears and the impact of families moving to the area who are reliant on reductions.

12.3 Consultation has also taken place with the major preceptors as required by Department for Communities and Local Government guidelines.

13.0 Background papers:

13.1 Existing Policy-
<https://www.blackpool.gov.uk/Residents/Benefits/Documents/Local-Council-Tax-Support-2015-16.pdf>

14.0 Key decision information:

14.1 Is this a key decision? Yes

14.2 If so, Forward Plan reference number: 19/2015

14.3 If a key decision, is the decision required in less than five days? No

14.4 If **yes**, please describe the reason for urgency:

15.0 Call-in information:

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

16.0 Scrutiny Committee Chairman (where appropriate):

Date informed: 27th November 2015 Date approved:

17.0 Declarations of interest (if applicable):

17.1

18.0 Executive decision:

18.1

18.2 **Date of Decision:**

19.0 **Reason(s) for decision:**

19.1 **Date Decision published:**

20.0 **Executive Members in attendance:**

20.1

21.0 **Call-in:**

21.1

22.0 **Notes:**

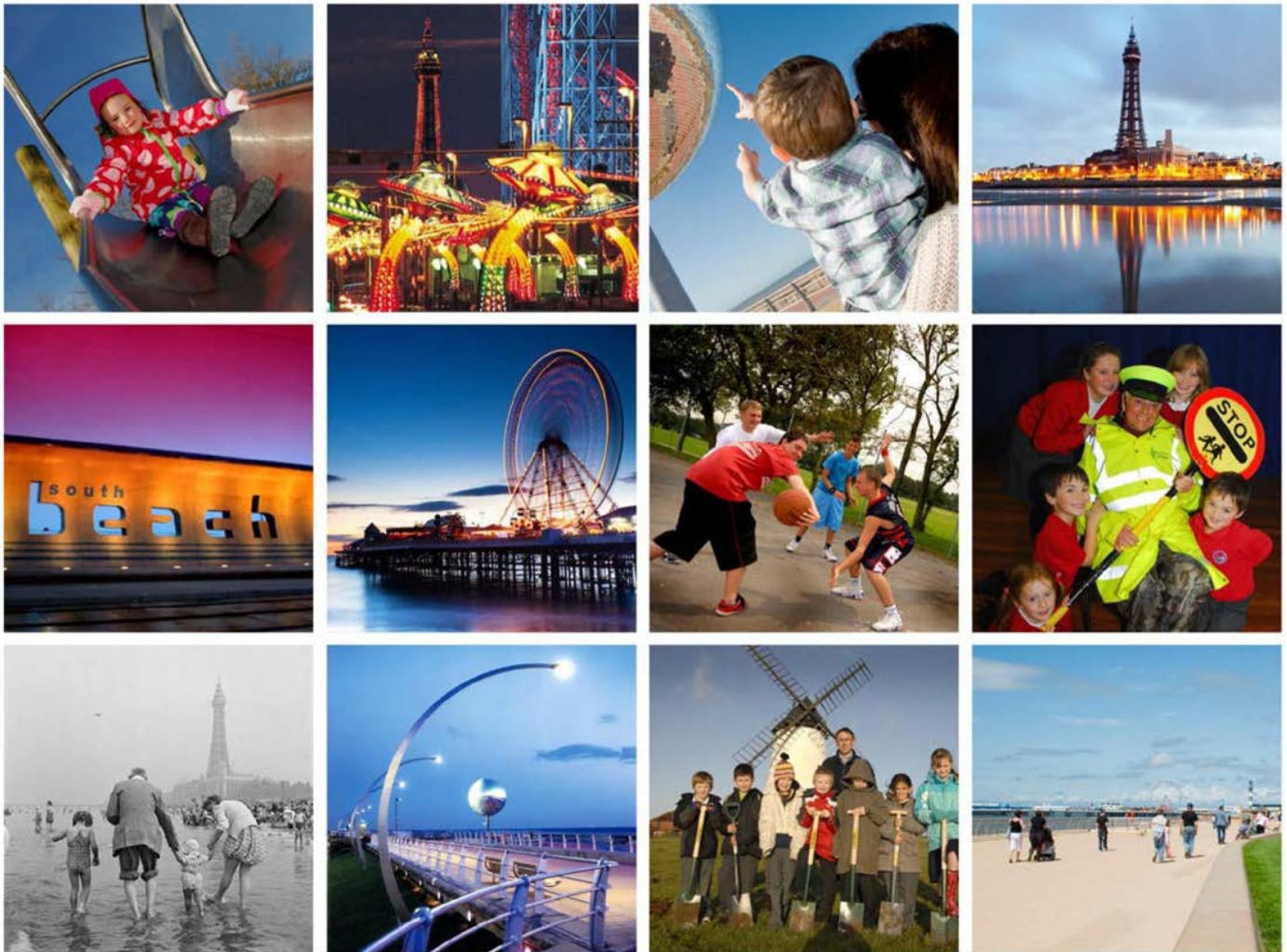
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Council Tax and Business Rates

Discretionary Discount Policy

Blackpool Council



Council Tax and Business Rates Discretionary Discount Policy

Contents

1. Introduction	04
2. Policy Objectives and Action Plan	05
3. Discretionary Discounts –Customers already in receipt of local Council Tax Reduction	08
4. Discretionary Discounts – Customers not in receipt of local Council Tax Reduction	10
5. Discretionary Discounts - Business Rates	12
6. Business Rates Retail Relief	13
7. Business Rates New Build Relief	16
8. Temporary Reoccupation Relief	17
9. Temporary Part Occupation Relief	18

Council Tax and Business Rates Discretionary Discount Policy

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Date	Version	Amended by	Description of changes
19/02/2014	1.1	Graeme Ruse	
08/10/2014	1.2	Andrew Turpin	Add Retail, New Build & Temp Reocc. Relief
19/12/2014	1.3	Andrew Turpin	Add Retail Relief
20/10/2015	1.4	Graeme Ruse	Add Part Occupation Relief

Approved By:

Name	Title	Signature	Date
Marie McRoberts	Assistant Treasurer		19/12/2014

Council Tax and Business Rates Discretionary Discount Policy

1. Introduction

Section 13A of the Local Government Finance Act 1992 (as amended) and sections 47, 48 and 49 of the Local Government Finance Act 1988 (as amended) empowers a billing authority to reduce the amount of tax payable.

Blackpool has adopted a local Council Tax Reduction Scheme from 1st April 2013, which replaced Council Tax Benefit. However it is likely that other circumstances will arise where the Council could consider a further discretionary reduction in exceptional circumstances. In addition local Businesses who are experiencing severe financial difficulties may request assistance in meeting the burden of local taxation.

Funding for such reductions must be provided by the Council. This policy sets out how the Council will use these powers and the criteria that must be satisfied.

The Council is committed to ensuring that the local taxpayers are aware of the policy and are able to quickly and easily apply for assistance.

Aims of the Discretionary Discount Policy

- Provide a mechanism for the Council to assist members of the community who are unable to meet the financial burden of local taxation
- Helping residents in receipt of Council Tax Support who are unable to increase their income
- Alleviating poverty
- Helping those who are trying to help themselves
- Supporting people who are starting work
- Supporting the most vulnerable in the local community
- Helping customers through difficult personal events
- Assisting customers in accordance with the Council's Child Poverty Strategy

Council Tax and Business Rates Discretionary Discount Policy

2. Policy Objectives and Action Plan

Objective 1: To ensure that assistance is available and accessible to members of the community most in need

- Issue regular bulletins to staff reminding them of the policy and qualifying criteria
- Regular refresher training for assessment staff to promote proactive identification of potential cases
- Provide effective overview training to non-benefits staff on the policy and qualifying criteria to promote take-up and awareness in appropriate circumstances.
- Promote access to the scheme through:
 - Leaflets and posters in areas accessed by customers.
 - Continued development of the Blackpool Council website to ensure that up to date information is provided and that relevant forms and information can be downloaded.
- Ensure third sector advice agencies are aware of the policy and qualifying criteria.
- Promoting awareness to Members
- Identifying target client groups who will be unlikely to be able increase their income. This may include :
 - Council Tax Reduction recipients in receipt of Employment Support Allowance (Support Component) and Long Term Incapacity Benefit
 - Council Tax Reduction recipients, in receipt of Carer's Premium, who are full time carers
 - Council Tax Reduction recipients with disabled children
 - Council Tax Reduction recipients with children under 5
 - Council Tax Reduction recipients who are starting employment
 - Council Tax Reduction recipients who do not have English as a first language
 - Council Tax Reduction recipients with learning difficulties
- Identify target groups from records held by other Council Services:
 - Social and Private Sector Housing Tenants with significant arrears who may qualify for a Discretionary Housing Payment (DHP).
 - Council Tax payers who have been issued with a summons.
 - Customers who are eligible for but have not claimed a disabled parking badge.

Council Tax and Business Rates Discretionary Discount Policy

- People requiring assistance from the Emergency Planning response team.
- Providing a facility to visit customers to assist them in making an application and provide supporting documents.
- Working closely with existing and new service partners and stakeholders to promote awareness of the policy.

Objective 2: To ensure discretionary discounts are only awarded when no other means of assistance is available.

- Ensure assessments of applications for local Council Tax Reduction incorporate a benefits maximization check.
- Ensure the applicant does not have income or capital which should be used to meet the liability.
- Signpost customers who do not meet the criteria to appropriate alternative advice services
- Conduct a regular review of the policy and outcomes of applications in order to review qualifying criteria and improve targeting procedures and processes.
- Provide guidance for Decision Makers which is regularly reviewed and updated.
- Implement a quality monitoring regime to ensure decisions are independent, fair and consistent.
- Ensure publicity is available to encourage customers to claim other benefits they are entitled to and where to access debt advice and money management tools.
- Ensure other sums owed to the Council (e.g. sundry debts, Housing Benefit overpayments) are reviewed and reduced repayments agreed where appropriate
- Ensure a Discretionary Housing Payment for Housing Benefit is awarded if appropriate
- Ensure recovery action is delayed where appropriate
- Awards will be tailored to match need. The period and amount of an award will be determined based upon the circumstances in each case.
- Awards will only be made for a period relating to the financial year in which the application is made.
- Awards may be reviewed at any time and may be revised, reduced or withdrawn if it is found that the circumstances of the applicant have changed and the award is no longer appropriate.

Council Tax and Business Rates Discretionary Discount Policy

Objective 3: To monitor and evaluate the administration of the policy to ensure that the service reflects the needs of the community

- Monitoring of fund spending:
 - Monthly reporting of expenditure to be provided to Divisional Management Team meetings.
 - Quarterly reporting to the Director of Resources.
 - Analysis of applications received and outcomes in order to review policy, methodology and improve targeting.
- Conduct a regular review of income and expenditure forms used.
- Conduct a regular review of the policy, criteria and guidance for decision makers.
- Review the outcome of requests for reconsideration to improve guidance and methodology.
- Conduct an annual review and analysis of applications received to identify and learn from:
 - Reasons for the award
 - Reasons for the refusal of an award
 - Origin of the application
- Invite and action feedback on processes and procedures from partners and stakeholders.

Council Tax and Business Rates Discretionary Discount Policy

3. Discretionary Discount - Customers in receipt of local Council Tax Reduction

Blackpool Council adopted a local Council Tax Reduction Scheme effective from 1st April 2013. During the development of the scheme the Councils' Equality Analysis identified that certain groups affected by the reduction in support would be unlikely to be able to increase their income. The Discretionary Discount Policy will prioritise these customers.

For an award of this type of discretionary discount to be made, the applicant must be:

- In receipt of Council Tax Reduction; and
- Have a shortfall between the level of Council Tax Reduction and their council tax liability; and
- In the opinion of the Council, be in need of further assistance with Council Tax in accordance with the qualifying criteria.

Requests for further reductions in Council Tax liability will be required in writing from the customer, their advocate / appointee or a recognised third party acting on their behalf.

Each case will be considered on 'its merits' however all of the following criteria should be met:

- There must be evidence of hardship or personal circumstance that justifies a further reduction in Council Tax liability.
- The Council must be satisfied that the customer has taken reasonable steps to resolve their situation prior to application.
- The customer does not have access to other assets that could be realised and used to pay the Council Tax.
- All other eligible discounts/reliefs have been awarded to the customer.

Responsible officer

The responsibility for making discretionary decisions will rest with the Director of Resources.

Decision making process

Stage 1: The initial request will be dealt with by a Decision Maker (Senior Benefits Assistant, Senior Benefit Specialist or Team Manager) who will consider the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: A Senior Benefits Manager will authorise the decision.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Council Tax and Business Rates Discretionary Discount Policy

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision.

Stage 1: The original decision and any additional information provided will be reviewed by a different Decision Maker who will recommend either to confirm or amend the original decision.

Stage 2: The Assistant Treasurer will consider the application for review and the recommendation and determine whether to award a discretionary discount.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination.

A discretionary reduction made under section 13A(1)(a) or (c) of the Local Government Finance Act (LGFA)1992 can be the subject of an appeal to the Valuation Tribunal under section 16 of the LGFA 1992.

Council Tax and Business Rates Discretionary Discount Policy

4. Discretionary Discounts – Customers not in receipt of local Council Tax Reduction

Requests for reductions in Council Tax liability will be required in writing from the customer, their advocate / appointee or a recognised third party acting on their behalf

Each case will be considered on 'its merits' however all of the following criteria should be met:

- There must be evidence of hardship or personal circumstance that justifies a reduction in Council Tax Liability.
- The Council must be satisfied that the customer has taken reasonable steps to resolve their situation prior to application.
- The customer does not have access to other assets that could be realised and used to pay the Council Tax.
- The customer is not entitled to an award under the local Council Tax Reduction Scheme.
- All other eligible discounts/reliefs have been awarded to the customer.

Responsible officer

The responsibility for making discretionary decisions will rest with the Director of Resources.

The Decision Maker (Revenues Team Manager) will liaise with the applicant in each case to request sufficient information in order that a decision can be made.

Decision making process

Stage 1: The initial request will be dealt with by a Decision Maker (Revenues Team Manager) who will consider the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: A Senior Revenues Manager will authorise the decision.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision.

Stage 1: The original decision and any additional information provided will be reviewed by a different Decision Maker who will recommend either to confirm or amend the original decision.

Stage 2: The Assistant Treasurer will consider the application for review and the recommendation and determine whether to award a discretionary discount.

Council Tax and Business Rates Discretionary Discount Policy

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination.

A discretionary reduction made under section 13A(1)(a) or (c) of the Local Government Finance Act (LGFA) 1992 can be the subject of an appeal to the Valuation Tribunal under section 16 of the LGFA 1992.

Council Tax and Business Rates Discretionary Discount Policy

5. Discretionary Discounts - Business Rates

Requests for reductions in Business Rates will be required in writing from the ratepayer or a recognised third party acting on their behalf

Each case will be considered on its merits however all of the following criteria should be met:

- It must be in the interest of the Council and community for the local authority to grant a reduction.
- All other eligible discounts/reliefs have been awarded to the ratepayer.

Responsible officer

The responsibility for making discretionary decisions will rest with the Director of Resources.

A Revenues Team Manager will liaise with the applicant in each case to request sufficient information in order that a decision can be made.

Decision making process

Stage 1: The Decision Maker (Principal Income and Recovery Manager or Revenues and Benefits Service Manager) will make a recommendation to the Director of Resources, considering the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: The Director of Resources will consider the application and the recommendation to determine whether to award a discretionary discount.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision if there is new information available on which to reconsider the original decision.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination.

Council Tax and Business Rates Discretionary Discount Policy

6. Business Rates Retail Relief

Eligible retail properties description

Relief of up to £1,000 may be provided to occupied retail properties, with a rateable value of £50,000 or less, in the financial year 2014/15. For 2015/16 relief of up to £1,500 may be granted subject to local discretion.

To qualify for the relief the retail property should be wholly or mainly being used as a shop, restaurant, cafe or drinking establishment. In a similar way to other reliefs (such as charity relief), this is a test on use rather than occupation. Therefore, retail properties which are occupied but not wholly or mainly used for the qualifying purpose will not qualify for the relief.

The Council will consider each award based on individual merits and will refuse the award where it is considered that the business/retail property is not supporting the Council's wider objectives or it is determined to be having a detrimental impact on neighbourhoods or communities.

Relief will only be allowed where the award complies with European Union State Aid law.

The Council reserves the right to withdraw any award where it becomes evident that the property is not being used for a qualifying purpose.

For the purposes of this relief the Council considers shops, restaurants, cafes and drinking establishments to mean:

Retail properties that are being used for the sale of goods to visiting members of the public:

Shops (such as: florist, bakers, butchers, grocers, greengrocers, jewellers, stationers, off licence, chemists, newsagents, hardware stores, supermarkets, etc.)

Charity shops

Opticians

Post offices

Furnishing shops/ display rooms (such as: carpet shops, double glazing)

Car/ caravan show rooms

Second hand car lots

Markets

Petrol stations

Garden centres

Art galleries (where art is for sale/hire)

Council Tax and Business Rates Discretionary Discount Policy

Retail properties that are being used for the provision of the following services to visiting members of the public:

Hair and beauty services (such as: hair dressers, nail bars, beauty salons, tanning shops, etc.)
Shoe repairs/ key cutting
Travel agents
Ticket offices e.g. for theatre
Dry cleaners
Launderettes
PC/ TV/ domestic appliance repair
Funeral directors
Photo processing
DVD/ video rentals
Tool hire
Car hire

Retail properties that are being used for the sale of food and/ or drink to visiting members of the public:

Restaurants
Takeaways
Sandwich shops
Coffee shops
Pubs
Bars

Ineligible retail properties descriptions

The list below sets out the types of uses that the Council does not consider to be retail use for the purpose of this relief.

(A) Retail properties that are being used for the provision of the following services to visiting members of the public:

Financial services (e.g. banks, building societies, cash points, bureau de change, payday lenders, betting shops, pawn brokers)
Other services (e.g. estate agents, letting agents, employment agencies)
Medical services (e.g. vets, dentists, doctors, osteopaths, chiropractors)
Professional services (e.g. solicitors, accountants, insurance agents/ financial advisers, tutors)
Post office sorting office

(B) Retail properties that are not reasonably accessible to visiting members of the public

(C) Retail properties that do not support the Council's wider objectives or could have a detrimental impact on neighbourhoods and communities

Council Tax and Business Rates Discretionary Discount Policy

Responsible officer

The responsibility for making discretionary relief decisions will rest with the Director of Resources, who will discharge this responsibility by the following process:

Decision making process

Stage 1: The initial request will be dealt with by a Team Manager who will consider the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: The Revenues and Benefits Service Manager/Principal Income and Recovery Manager will authorise the decision.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision. The process will be as follows:

Stage 1: The original decision and any additional information provided will be reviewed by a different Manager who will recommend either to confirm or amend the original decision.

Stage 2: The Assistant Treasurer Revenues, Benefits and Customer First will consider the application for review and the recommendation and determine whether to award discretionary retail relief.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination. Following the re-determination of a request for a discretionary award there is no further right of appeal.

Council Tax and Business Rates Discretionary Discount Policy

7. Business Rates New Build Empty Property Relief

All newly built commercial property completed between 1 October 2013 and 30 September 2016 are exempt from empty property rates for the first 18 months, up to the state aids limits. Guidance from DCLG will be considered in relation to properties that have been subject to splits, mergers or other changes.

Responsible officer

The responsibility for making discretionary relief decisions will rest with the Director of Resources, who will discharge this responsibility by the following process:

Decision making process

Stage 1: The initial request will be dealt with by a Team Manager who will consider the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: The Revenues and Benefits Service Manager/Principal Income and Recovery Manager will authorise the decision.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision. The process will be as follows:

Stage 1: The original decision and any additional information provided will be reviewed by a different Manager who will recommend either to confirm or amend the original decision.

Stage 2: The Assistant Treasurer Revenues, Benefits and Customer First will consider the application for review and the recommendation and determine whether to award new build occupation relief.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination. Following the re-determination of a request for a discretionary award there is no further right of appeal.

Council Tax and Business Rates Discretionary Discount Policy

8. Temporary Reoccupation Relief

New occupants of previously empty retail premises will receive 50% discount from business rates. The discount will last for 18 months. The relief will be available to businesses moving in to properties between 1 April 2014 and 31 March 2016.

There are no restrictions based on the type, or the size, of the business which takes the property on – i.e. it is not be required to be a retail business. Guidance from DCLG will be considered in relation to properties that have been subject to splits, mergers or other changes.

Responsible officer

The responsibility for making discretionary relief decisions will rest with the Director of Resources, who will discharge this responsibility by the following process:

Decision making process

Stage 1: The initial request will be dealt with by a Team Manager who will consider the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: The Revenues and Benefits Service Manager/Principal Income and Recovery Manager will authorise the decision.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision. The process will be as follows:

Stage 1: The original decision and any additional information provided will be reviewed by a different Manager who will recommend either to confirm or amend the original decision.

Stage 2: The Assistant Treasurer Revenues, Benefits and Customer First will consider the application for review and the recommendation and determine whether to award temporary reoccupation relief.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination. Following the re-determination of a request for a discretionary award there is no further right of appeal.

Council Tax and Business Rates Discretionary Discount Policy

9. Temporary Part Occupation Relief

The Ratepayer is liable for the full non-domestic rate whether a property is wholly occupied or only partly occupied. Under s44A of the Local Government Finance Act 1988, where a property is partly occupied for a short time the Council has discretion to request that the Valuation Office apportion the rateable value of a property between the occupied and unoccupied parts; thereby reducing the amount payable.

Applications must be made in writing and supported by: -

- Detailed maps which outline the whole property and indicate the partly occupied section.
- Details of the planned period of time for the part occupation.
- Details of future intentions.
- Details of the cause for the part occupation.

A site visit will normally be undertaken.

Where necessary the ratepayer may be required to provide additional information to support their application.

Responsible officer

The responsibility for making discretionary decisions will rest with the Director of Resources.

A Revenues Team Manager will liaise with the applicant in each case to request sufficient information in order that a decision can be made.

Decision making process

Stage 1: The Decision Maker (Principal Income and Recovery Manager or Revenues and Benefits Service Manager) will make a recommendation to the Director of Resources, considering the application against the criteria set out in this policy, based upon the information provided by the applicant and known to the Council.

Stage 2: The Director of Resources will consider the application and the recommendation to determine whether to award a discretionary discount.

Notification of decision

The Council will notify the applicant of its decision within 28 days of receiving sufficient information to make a decision.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination. Following the re-determination of a request for a discretionary award there is no further right of appeal.

Council Tax and Business Rates Discretionary Discount Policy

Review of decision/re-determination requests

The Council will accept an applicant's written request for a redetermination of its decision if there is new information available on which to reconsider the original decision.

Notification of review/re-determination decision

The Council will notify an applicant of its decision within 28 days of receiving a request for a re-determination.

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Equality Analysis (EA) (formally Equality Impact Assessment) Record Form 2016/17

Department: Revenues, Benefits and Customer Services

Team or Service Area Leading Assessment: Council Tax Project Team

Title of Policy/ Service or Function: Working Age Council Tax Reduction Scheme Equality Assessment

Lead Officer: Marie McRoberts

STEP 1 - IDENTIFYING THE PURPOSE OR AIMS

1. What type of policy, service or function is this?

New/ proposed policy

2. What is the aim and purpose of the policy, service or function?

From April 2013, as part of the government's Welfare Reform agenda, Council Tax Benefit was abolished and replaced with a locally determined Council Tax Reduction (CTR) Scheme. Pensioners continue to be protected at their existing levels of benefit under a national scheme whilst new schemes will be set up for Working Age customers at a Local Authority level. Under this system, it is billing authorities who will decide who is eligible to get support and the support will be awarded by way of a Section 13A Council Tax discount. The grant provided by the Government continues to be reduced; Local Authorities will therefore have to manage the reduction in funding in developing local Council Tax Reduction Schemes and will have to ensure that their scheme also covers the impact of any future increase in Council Tax Support recipients.

Blackpool Council will need to operate under three major constraints:

1. The cut in funding (which may in practice be higher if demand for support increases in the future).
2. The desire to protect vulnerable groups and the exhortation to do this by the Government (as set out in "Localising Support for Council Tax: Vulnerable people – key local authority duties" published by the Department of Communities and Local Government in May 2012).
3. The desire to incentivise work and not contradict the incentives to work in the forthcoming Universal Credit (as set out in "Localising Support for Council Tax: Taking work incentives into account" published by the Department of Communities and Local Government in May 2012).

The Government has stated (in the above document on vulnerable people) that they do not intend to prescribe the protection that local authorities should provide for vulnerable groups other than pensioners. Rather the guidance reminds local authorities to have due regard to how their local scheme may impact on people based on the following:

- Age

- Disability
- Sex and sexual orientation
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief

The above guidance refers to specific legislation that local authorities should have due regard to when designing their local scheme. This includes:

- The Equality Act 2010 (particularly the Public Sector Equality Duty)
- The Child Poverty Act 2010 (duty to mitigate the effects of child poverty)
- The Housing Act 1996 (duty to prevent homelessness)

In addition, it advises that local authorities consider the impact under The Armed Forces covenant published in May 2011.

The local scheme will set out:

- the classes of person who are entitled to a reduction
- the reductions which are to apply to those classes
- the procedure by which a person may apply for a reduction.

The timetable for development of the original 2013/14 Equality Analysis is shown below and this document is reviewed and updated annually to consider the impact of the Scheme and any changes to it.

Action	Timescale
Set up Working Group	May 2012
Assign Officers to EA	May 2012
Develop first draft of the proposed schemes	Jun 2012 -Jul 2012
Start Equality Analysis based on proposed scheme	Jul 2012 – Oct 2012
Consultation with Affected Groups/Stakeholders	Aug 12 – Oct 2012
Post Consultation Review of EA taking consultation into account	Oct 2012 – Nov 2012
Develop EA Action Plan to mitigate impact of the changes	Oct 2012
Review EA with Equalities team	Oct 2012
Send EA with Council Report to decide the scheme	Nov 2012
Ensure Monitoring arrangements are in place	Dec 2012 – Jun 2013
Consultation exercise on removal of the family premium in CTRS claims	Sep 2015 – Oct 2015
Post Consultation Review of EA taking consultation into account	Oct 2015 – Nov 2015
Develop EA Action Plan to mitigate impact of the changes	Oct 2015 – Nov 2015
Send EA with Council Report to decide the scheme	Nov 2015

3. Please outline any proposals being considered.

1. Continue with the existing 2015/16 scheme, ensuring the scheme is cost neutral to the Council with continued reduced support for working age claimants of 27.11%.
2. Mirror the proposed changes to the Housing Benefit scheme with effect from April 2016 whereby no family premium (an extra needs allowance) will be awarded for new CTR claims or existing claims where there are new births.

4. What outcomes do we want to achieve?

A new framework to provide Council Tax support with the following objectives:

- Introduce a scheme similar to the current national scheme in terms of eligibility criteria to determine who will receive support.
- Introduce a scheme to support work incentives and in particular, avoid disincentives to move into work.
- Introduce a scheme which achieves the required savings and allows room for future take-up of the discount.
- Introduce a scheme which is cost effective to administer.
- Introduce a scheme where the impact can be assessed and future adjustments can be made.

5. Who is the policy, service or function intended to help/ benefit?

Each billing authority in England must design a scheme specifying the reductions which are to apply to amounts of council tax support payable in respect of dwellings situated in its area by:

- Persons of working age whom the authority considers to be in financial need; or
- Persons of working age in classes consisting of persons whom the authority considers to be, in general, in financial need

The scheme is to be developed to take into account cuts in funding from Central Government.

6. Who are the main stakeholders/ customers/ communities of interest?

The main stakeholders are:

- The Preceptors e.g. Lancashire Fire & Rescue Service, Lancashire Police Authority
- Any resident who is liable to pay Council Tax
- Any current Working Age Council Tax Benefit customers
- A range of 3rd party organisations providing support and advice to a wide range of customers

7. Does the policy, service or function have any existing aims in relation to Equality/ Diversity or community cohesion?

The main scheme will continue with the aims as set out in previous year Equality Analysis but will also consider the impact on protected groups of the proposed changes to the removal of the family premium in CTR calculations with effect from April 2016.

STEP 2 - CONSIDERING EXISTING INFORMATION AND WHAT THIS TELLS YOU

8. Please summarise the main data/ research and performance management information in the box below.

Data/ information

The main performance information to assist in the design of the Council Tax Reduction scheme will be databases and statistics held for the following purposes:

- Billing and Recovery of Council Tax
- Awarding Council Tax Reduction
- Census data including index of deprivation
- Benefits caseload data to establish trends
- Information held by the Office of National Statistics

Research or comparative information

Local authorities have clearly defined responsibilities in relation to, and awareness of, the most vulnerable groups and individuals other than pensioners in their areas. This includes responsibilities under:

- The **Child Poverty Act 2010**, which imposes a duty on local authorities to have regard to and address child poverty and their partners, to reduce and mitigate the effects of child poverty in their local areas.
- The **Disabled Persons Act 1986**, and **Chronically Sick and Disabled Persons Act 1970**, which include a range of duties relating to the welfare needs of disabled people.
- The **Housing Act 1996**, which gives local authorities a duty to prevent homelessness with special regard to vulnerable groups.

Local evidence:

Population

Blackpool has a resident population of 140,500, some 28,500 (20.3%) of which are aged over 60. 64,000 households. It is a dense urban area with high levels of deprivation, unemployment, and poor health in the resident population.

Deprivation

Blackpool ranks as the most deprived local authority in England in terms of average deprivation scores. It has 94 LSOAs of which 35 (38%) rank in the most deprived nationally. Blackpool has no areas in the least deprived 20% nationally. Health deprivation is much higher than average and over half of areas are in the most deprived 10% for Health nationally.

Housing

The number of households in Blackpool was just over 64,000, with a high percentage of private rented dwellings, and slightly lower owner occupation:

- 62% - owner occupied (England: 63%)

- 26% - privately rented (England: 17%)
- 11% - social rented (England: 18%)
-

Household Composition

The households in Blackpool have a slightly higher proportion of lone parent families and lone adults (both over 65 and under 65) than England.

Household types:

- 15% - lone adults over 65 years (England: 12%)
- 23% - lone adults under 65 years (England: 18%)
- 13% - lone parent families (England: 11%)
- 8% - single families with all adults over 65 (England: 8%)
- 35% - single families cohabiting/married with all adults under 65 (England: 43%)

Disability

11,870 (12.8%) of working age residents claim employment support allowance/incapacity benefit and a further 1,480 claim disability living allowance (1.7%). The ESA proportion is nearly double that for England as a whole.

Child Poverty

28.1% of children in Blackpool live in low income families, around 8,730 children in total.

Pension Credit

Blackpool has 6,740 claimants in receipt of Pension Credit Guarantee Credit only, or both Guarantee Credit and Savings Credit, equivalent to 81% of claimants (Nationally 80%)

Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only is much lower at 1540 claimants compared, equivalent to 19% of claimants (Nationally 20%)

As a proportion of the population, 29% of the 65+ age group claim pension credit, much higher than England at 19%.

Blackpool Child Poverty Needs Assessment

The child poverty framework 2011-2014 set out a series of potential indicators on poverty and surrounding issues. Information below presents a summary of all available indicators and some additional context.

The local area child poverty measure is the Children in Low-Income Families Local Measure produced by HMRC and is "children living in families in receipt of out-of-work benefits or in receipt of tax credits with a reported income which is less than 60per cent of national median income."

Data is released annually but covers a time period 2 years prior to that date e.g. the most recent data is for 2013. The reason for this delay is that the measure is based on actual reported family income rather than surveys or estimates and is available down to small areas including wards.

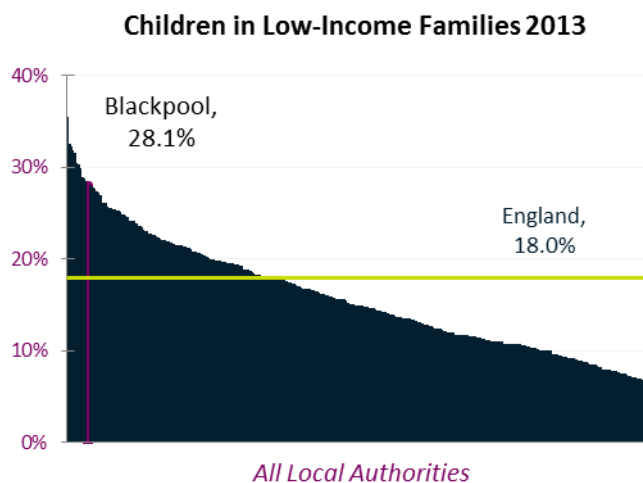
2013 Position

The chart right, shows the % of children in low income families in 2013, compared to all authorities in England and to the English average. It highlights

- **8,730 children** in Blackpool live in low income families
- This accounts for **28.1% of all children**
- Blackpool ranks **12th highest in England**.

Changes since 2011

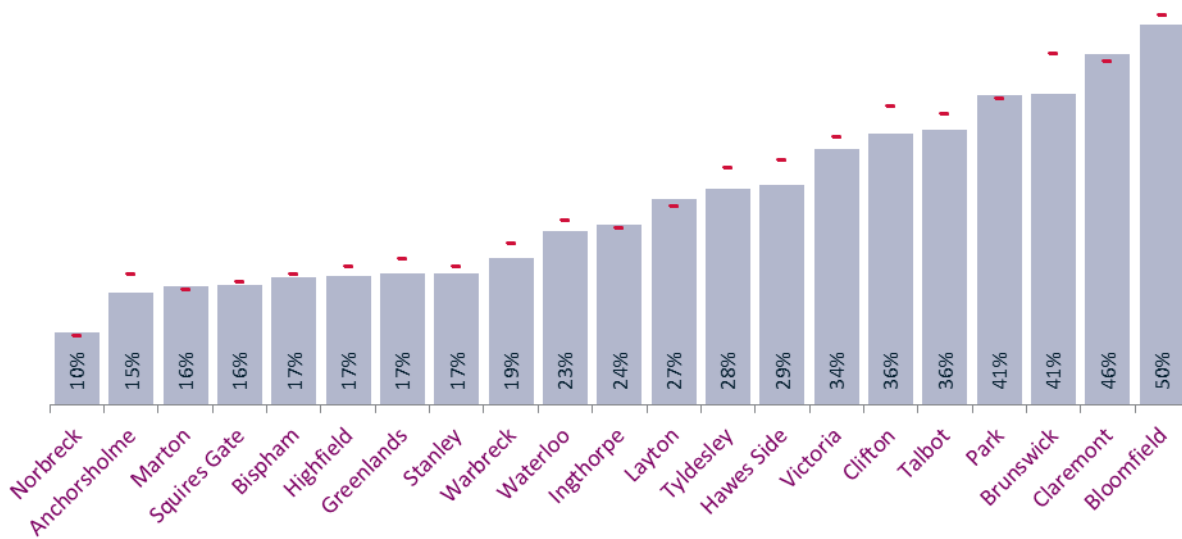
- Overall, in percentage terms Blackpool has seen a small reduction in the proportion of children in poverty between 2012 and 2013. Reducing from 9,145 (29.3%) in 2012 to 8,730 (28.1%) in 2013. This ends a trend of decline from 2008-2011.
- Despite this improvement, Blackpool ranked more poorly nationally. From 21st highest in 2011 to 14th in 2012 and most recently 12th highest in 2013. This is because while Blackpool rates have reduced by -1.1%pp the average reduction across all Local Authorities is slightly better and other areas improved at a faster rate.
- A further factor is that in 2012 the income distribution changed nationally with generally lower incomes. The low income threshold, which is 60 per cent of the median income, fell from £218 in 2011 to £204 in 2012. Other measures of welfare reform were also introduced. This might mean families previously considered to have poor incomes are no longer counted, but their circumstance may remain the same.



Ward Distribution

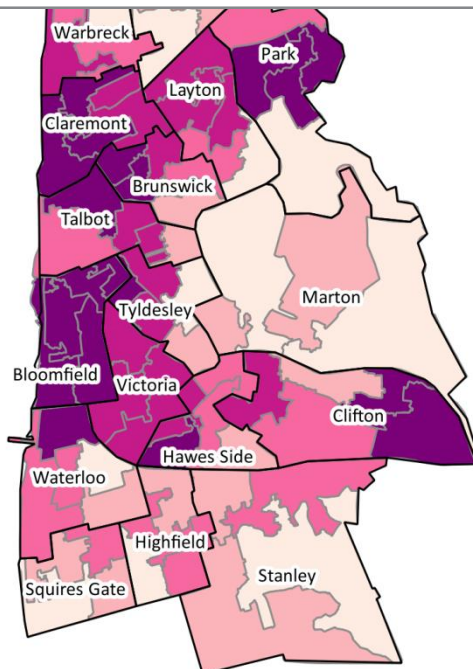
- **All wards** have some children living in poverty.
- **Bloomfield, Claremont, Brunswick, and Park** wards each have more than 40% of children in poverty.
- Bloomfield ward ranks as the 4th highest level of poverty in England

Children in low income families by ward 2013



Family demographics

- 83% of children in poverty live in **families claiming Income Support or Job Seekers Allowance**
- 65% of children in poverty live in **lone parent families**
- 26% are young children aged 0-4, **52% are school aged 5-15**, and 22% are dependents aged 16-19
- 56% live in 1-2 child families, 44% live in families with 3 or more children
- In total there are around **4,700 families with low incomes** in Blackpool.



Data Source: HMRC, 2015

Detailed map of Child Poverty

The map above shows the distribution of children in low income households in Blackpool for small areas.

- The largest percentages of children in low income households are in the central areas of Blackpool.
- Bloomfield, Brunswick, Claremont, Park and Clifton have several pockets of children in poverty above 42% of all children in those areas.

The map of poverty shares many similarities with maps for:

- Child Protection Plans
- Indices of Deprivation 2010
- Free School Meals Recipients
- Out-of-work Benefit claimants

The Blackpool Child Poverty Needs Assessment also highlighted potential links (not cause and effect) between child poverty and:

- Employment
- Education & Skills
- Health outcomes
- Areas with higher Crime levels
- Areas with high Fuel poverty
- Teenage pregnancy

National Data

As Council Tax Reduction is a locally administered scheme, no national statistics are collated so reference must be made to old Council Tax Benefit statistics.

According to the Single Housing Benefit Extract, as at January 2011 there were 3.1 million Council Tax Benefit claimants under 65 in the United Kingdom.

According to the Family Resources 2009/10 Survey data, of these:

- 48% of households have at least 1 adult or child who is disabled
- 18% of households have at least 1 adult with caring responsibilities
- 17% of households have at least 1 adult requiring informal care

Information from administrative sources can also provide more limited information on carers and disabled people and shows the number of Council Tax Benefit claimants who are carers or households in receipt of a disability premium and not pass ported onto full Council Tax Benefit. At January 2011:

- 34,790 non-passported under 65 Council Tax Benefit claimants were carers
- 219,580 non-passported under 65 Council Tax Benefit claimants were in receipt of a disability premium

Since some of the passported claimants are also likely to be carers or receiving a disability premium this underestimates the total number that could be affected.

9. What are the impacts or effects for Key Protected Characteristics?

Age

Older People of pension age

Potential Impact

The Department for Communities and Local Government has stated that pensioners must receive

the same level of support under the new scheme as they currently receive under the current Council Tax Benefit scheme. They will therefore be treated more favourably than other groups under the proposed changes.

In Blackpool we currently have 22036 Council Tax Reduction recipients of who 6902 are single and of pension age. In addition we have 2050 couples over 60 in receipt of Council Tax benefit. Of those 69 have child dependents.

Eligible 'pensioners' can be divided into the three groups below:

PASSPORTED CLAIMANTS

Those in receipt of Pension Credit Guarantee Credit

Pension Credit 'Guarantee Credit' acts as a passport to maximum Council Tax Benefit support. Pensioners apply to the Pension Service and if successful are prompted to apply for Council Tax Benefit. The Pension Service can take the claim on behalf of the local authority and will send an assessment direct to the relevant local authority.

MEANS-TESTED CLAIMANTS

Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only

Pension Credit applicants may be awarded 'Savings Credit' only. This group are also prompted to apply for Council Tax Benefit, and if they do the Pension Service will send appropriate data to the relevant local authority that complete the means-testing applying nationally set rules.

Other means-tested claimants

Customers can also apply directly. Claimants who have attained the qualifying age for State Pension Credit are means-tested by the Local Authority on application, to determine eligibility for support. The exact amount of support needed will depend on a range of factors, such as age, income, capital, the personal circumstances of the individual and the Council Tax band their home falls into.

We currently do not have data that would allow us to break the Blackpool figures down into the categories above.

People of Working Age (over 25)

Potential Impact

People under pension age will be treated less favourably under the new support scheme than pensioners. In addition it is possible that some people in this group will be affected more because of the greater difficulties they may face in finding paid employment e.g. over the age of 55.

People of Working Age (under 25)

Potential Impact

Under the current Council Tax Benefit scheme the system of applicable amounts differentiate

between those under and over 25. Claimants who are under 25 have a lower applicable amount and are treated as having lower living costs than those aged 25 and over. In addition, young single people may be more at risk of becoming homeless and/or there will be pressure on these people to return or remain in the family home.

Current Welfare Reforms in Housing Benefit will affect the same group of Working Age customers.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not impact Working Age customers adversely when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

Disability

Potential Impact

The definition of disability used is based on entitlement to certain state benefits or to entitlement to a Council Tax disabled band reduction. This can reflect the circumstances of any member of the claimant's household.

The relevant benefits/additions to benefit include:

- Disability Living Allowance
- Employment Support Allowance
- Personal Independence Payments
- Universal Credit
- Disability Premium
- Severe Disability Premium
- Enhanced Disability Premium
- Disabled Child Premium
- Disabled Earnings Disregard
- Carers Allowance
- War Disablement Pension
- War Widows Pension
- Council Tax Disability Reduction

It is possible that some people in this group will be affected less favourably because of the greater difficulties they may face in coping with the changes, for example by finding paid employment. This may result from their reduced capacity to work due to the nature of their disability and/or discrimination based on the perceptions of employers or the fact that the place of work has not been adapted to meet the needs of disabled people.

Other welfare reforms may further impact on some members of this group and also some of the services that members of this group receive are being reduced under austerity measures.

It should also be noted that in some cases (depending on the nature of the disability) there may be potential communication issues where information available in standard formats is not the best method of communicating with benefit recipients. This may cause greater difficulty in understanding their changed liability, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily with all the associated problems this can cause.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not adversely impact on disabled customers when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

Some individuals in this group who also receive Social Care support from Blackpool Council may be able to have the extra Council Tax they pay deducted from their income for charging purposes (unless they pay the full cost because they have capital over the current threshold). It is acknowledged that this will not help disabled people who do not receive chargeable support from Blackpool Council. However, the most severely disabled are likely to receive this support. Extensive consultation was carried out prior to the introduction of the 2013/14 scheme with specific disabled stakeholder groups i.e. the Disability Partnership Forum, the Learning Disabilities Self Advocacy Forum and the Disability First open day in order to make them aware of the changes, help them to understand the potential impact and to discuss any support mechanisms that can be built in for affected groups. As the main basis of the 2016/17 scheme is the same as 2015/16 scheme, no further specific consultation has been carried out with these groups.

It is recognised that the level of a customer's disability could mean they are more disadvantaged over another disabled customer. There may be the opportunity for a less disabled person to increase their income in order to pay for the increase in Council Tax whereas this may not be an option for a more severely disabled person. Because of this issue, the action plan will contain potential areas that could be considered to mitigate the impact of the scheme.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact.

Example 1

Single person aged 45, unable to work because of his disabilities; lives alone in a Housing Association flat costing £100 per week and with Council Tax of £17 per week (Band B property in Blackpool with the 25% Single Person Discount); no savings.

Current weekly income

£157.35	Employment Support Allowance (Income-related)
£51.85	DLA (middle rate care component)
£54.05	DLA (higher rate mobility component)
£100.00	Housing Benefit so has no rent to pay**
£17.00	Council Tax Benefit so has no Council Tax to pay

Impact of proposed changes

A 20% reduction in Council Tax Support would mean he would have to pay **£3.40** per week towards his Council Tax rather than nothing as at present.

A 25% reduction in Council Tax Support would mean he would have to pay **£4.25** per week towards his Council Tax rather than nothing as at present.

Example 2

Couple with no children, both disabled, she works for 25 hours per week at the minimum wage, he doesn't work. Living in a 2 bedroom rented property costing £150 per week and with Council Tax of £29.14 per week (Band D property in Blackpool); no savings.

Current weekly income

- £105.05 His Employment Support Allowance (contributory) Support Group**
- £51.85 His DLA (middle rate care component)
- £20.55 His DLA (lower rate mobility component)
- £20.55 Her DLA (lower rate care component)
- £151.29 Her net income from wages
- £70.32 Her Working Tax Credit
- £62.35 Housing Benefit so has to pay £87.65 towards the rent.
- £3.03 Council Tax Benefit so has to pay £26.11 per week towards the Council Tax.

Impact of proposed changes

A 20% reduction in Council Tax Support would mean they would have to pay an extra **£0.61** per week towards their Council Tax, i.e. £26.72 per week in total.

A 25% reduction in Council Tax Support would mean they would have to pay an extra **£0.76** per week towards their Council Tax, i.e. £26.87 per week in total.

The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).

Gender Reassignment**Potential Impact**

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of their gender identity. No information is collected on the gender reassignment status of CTB claimants. However, it is acknowledged that transgender people experience higher levels of disadvantage and social/financial exclusion and therefore may face greater difficulties in responding to the changes, for example by finding work. We will further review this after the consultation period.

Marriage and Civil Partnership**Potential Impact**

The latest figures show that there are 5,064 couples in receipt of Council Tax Reduction. Of these: 2,098 (41%) had child dependents, and 2,966 (59%) had no child dependents.

There are 3,014 couples in receipt of Council Tax Reduction who are of working age, with 2,029 (67%) had child dependents and 985 (33%) had no child dependents.

The main scheme will have an impact on working age families/couples whether they are living together/married or in civil partnerships but will not treat marriage or civil partnership any differently. Married couple and civil partnerships are recognised equally in the current Council Tax Reduction system as are people living together as if they are in such legal partnerships.

Families with a large number of children are more likely to live in a bigger property and therefore one with a higher Council Tax Band. Our proposed scheme would ensure that these customers would not be disadvantaged over smaller families as the Council Tax Support would be based on the actual Council Tax band for the property and the percentage reduction would be the same across all groups of claimants.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not adversely impact on this protected group when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact.

Example 1

Couple in their 40s with 2 children (aged 9 and 13); man works 40 hours per week at the minimum wage with a net income after tax and national insurance of £214. Living in a 3 bedroom rented property costing £170 per week and with Council Tax of £29.14 per week (Band D property in Blackpool); no savings.

Current weekly income

£214.00 Net earnings

£ 40.57 Working Tax Credit

£113.68 Child Tax Credit

£33.70 Child Benefit

£116.49 Housing Benefit so has to pay £53.51 towards the rent.

£12.54 Council Tax Benefit so has to pay £16.60 per week towards the Council Tax.

Impact of proposed changes

A 20% reduction in Council Tax Support would mean they would have to pay an extra £2.51 per

week towards their Council Tax, i.e. £19.11 per week in total.

A 25% reduction in Council Tax Support would mean they would have to pay an extra £3.14 per week towards their Council Tax, i.e. £19.74 per week in total.

Example 2

Couple in their late 20s with 2 children (aged 3 and 6); man works 37 hours per week at the minimum wage with a net income after tax and national insurance of £201.62. Living in a 2 bedroom rented property costing £150 per week and with Council Tax of £25.90 per week (Band C property in Blackpool); no savings.

Current weekly income

£201.62 Net earnings

£ 47.76 Working Tax Credit

£113.68 Child Tax Credit

£ 33.70 Child Benefit

£ 99.88 Housing Benefit so has to pay £50.12 towards the rent.

£ 10.58 Council Tax Benefit so has to pay £15.32 per week towards the Council Tax.

Impact of proposed changes

A 20% reduction in Council Tax Support would mean they would have to pay an extra £2.17 per week towards their Council Tax, i.e. £17.49 per week in total

A 25% reduction in Council Tax Support would mean they would have to pay an extra £2.65 per week towards their Council Tax, i.e. £17.97 per week in total

The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).

Pregnancy and Maternity

The proposed main scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of whether they are pregnant/recently given birth or not.

Whilst at this moment we consider that this impact is unlikely to be disproportionately greater on households where a member is pregnant or recently given birth, we acknowledge that they may face greater difficulties in responding to the changes, for example by finding work.

In addition, women on maternity leave may find that they now have to pay an increased amount of Council Tax Support on a reduced income with little prospect of increasing their income in the short term.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council

Tax Reduction or existing claims where a child is born will not adversely impact on customers who are pregnant or on maternity leave when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

Race

Potential Impact

The proposed main scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of race or ethnicity. We do not have any data regarding the ethnicity of Council Tax benefit recipients in Blackpool. However, national data shows that 90% of households receiving Council Tax Benefit are white, and 10% are ethnic minorities. This compares to a total population of 91% white and 9% ethnic minorities.

At the moment we consider that the impact is unlikely to be disproportionately greater on households of different ethnicity within the working age group. There will be no difference in the way ethnic groups are treated under any new Council Tax Reduction scheme. However, some ethnic groups experience different levels of disadvantage and therefore they may find it more difficult to cope with the changes. This may be because they face unofficial discrimination in the job market and possibly because of access to skills including language skills are limited in some cases.

There may also be potential communication issues where English is not the benefit recipient's first language and where documents printed in Standard English is not the optimum method of communicating.

Claimants whose first language is not English may have greater difficulty in understanding their changed level of Support, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily leading to the associated problems this can cause.

A road show was held for the 2012/13 consultation with the Blackpool Equality Forum to further highlight the potential impact of this change and further work could be carried out to contact groups who have traditionally failed to engage with the community to make them aware of the changes e.g. Polish and Chinese communities and Romanians.

Contact could be made specifically with the following groups if required:

Blackpool Polish Community Association
c/o Council for Voluntary Services
Abingdon Street
Blackpool

Blackpool Chinese Community Association
64 Cookson Street

Blackpool

Bcca.vicechairman@googlemail.com

African Caribbean Friends & Relatives Association

Romanies via the Council's Diversity Learning Manager

This targeted approach could be face to face, by telephone or by utilising translation services, if appropriate.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council Tax Reduction or existing claims where a child is born will not adversely impact on customers on the grounds of race when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

Religion and Belief

Potential Impact

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of religion or belief. We do not have any data regarding the religion or beliefs Council Tax benefit recipients in Blackpool. We do not envisage this impact to be greater for people with particular religions or beliefs. However, this will be reconsidered if evidence in the consultation suggests otherwise.

Sex

Potential Impact

The latest figures show that in Blackpool there are 16,972 single people in receipt of Council Tax Reduction. Of these: 10,338 (61%) are female, and 6,634 (39%) are male.

Of the 10,338 female recipients, 3,661 (36%) are lone parents and of the 6,634 male recipients, 307 (5%) are lone parents.

On the face of it we will continue to treat both men and women equally in the proposed Council Tax Reduction scheme from 1st April 2016. However, given the higher number of female recipients (61% in Blackpool), changes to the current Council Tax Reduction scheme will impact on more women than men. National data does confirm that more women than men experience financial deprivation. In addition, because many more female claimants will be lone parents, they may be treated less favourably indirectly because lone parents may face greater difficulties in responding to the changes, including by finding work.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council

Tax Reduction or existing claims where a child is born will not adversely impact on customers on the grounds of sex when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact in individual cases on the change in benefits. The financial impact in each case will be the same regardless of the gender of the individual.

Example 1

Single person aged 28, not working and claiming Income-based Jobseekers Allowance (JSA). Living in a 1 bedroom rented flat costing £80 per week and with Council Tax of £17 per week (Band B property in Blackpool with the 25% Single Person Discount); no savings.

Current weekly income

£71.00 JSA

£65.00 Housing Benefit so has £15 to pay towards their rent**

£17.00 Council Tax Benefit so has no Council Tax to pay.

Impact of proposed changes

A 20% reduction in Council Tax Support would mean they would have to pay **£3.40** per week towards his Council Tax rather than nothing as at present.

A 25% reduction in Council Tax Support would mean they would have to pay **£4.25** per week towards his Council Tax rather than nothing as at present.

**As s/he is a single claimant under 35, the maximum he can claim for Housing Benefit is restricted to the shared accommodation rate which in Blackpool is £58.50 per week.

Example 2

Lone parent with 1 child aged 3, not working and claiming Income Support. Living in a 2 bedroom rented property costing £110 per week and with Council Tax of £19.43 per week (Band C property in Blackpool with the 25% Single Person Discount)* no savings.

Current weekly income

£71.00 Income Support

£62.00 Child Tax Credit

£20.30 Child Benefit

£110.00 Housing Benefit so have no rent to pay

£19.43 Council Tax Benefit so have no Council Tax to pay.

Impact of proposed changes

A 20% reduction in Council Tax Benefit would mean that they would have to pay **£3.89** per week towards their Council Tax rather than nothing as at present.

A 25% reduction in Council Tax Benefit would mean that they would have to pay **£4.86** per week towards their Council Tax rather than nothing as at present.

The Single Person Discount of 25% is applied when there is only one adult living in the property; it is not means-tested

The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).

Sexual Orientation

Potential Impact

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of their sexual orientation. We have no data on the sexual orientation of Council Tax Reduction claimants locally and at this moment we consider that the impact is unlikely to be disproportionately greater on recipients with different sexual orientations. However, national data demonstrates that some Lesbian, Gay or Bisexual people experience higher levels of disadvantage and financial exclusion than other groups and therefore may face greater difficulties in responding to the changes, for example by finding work. There will also be specific consultation with the Blackpool, Wyre and Fylde LGBT Forum.

Other Relevant Groups

Potential Impact

Carers

The proposed scheme will have a negative impact on those carers of working age who are in receipt of Council Tax Benefit. Whilst this impact will also be experienced by others of working age also, it is acknowledged that some carers, especially full time carers, may be affected more because of the greater difficulties they may face in responding to the changes, for example by finding work.

Troubled Family Programme

The 'Troubled Families' programme is a national program where families with specific circumstances are provided intensive support and advice. Further consideration of targeted communication to the Troubled Families service will be undertaken following consultation.

Child Poverty

The impact of the proposed scheme on the Council's Child Poverty Strategy has been considered and it is believed that by continuing to disregard Child Benefit and Child Maintenance consideration of this area has been sufficiently taken into account.

Homelessness

The impact of the proposed scheme on the Council's Homelessness Strategy has been considered and by continuing to work with financial inclusion officers within the Council and Housing Options Support workers, sufficient promotion of how the scheme will work will be available. Targeted communication to other Council Services to promote the final scheme will also be undertaken and will form part of the Council's EA action plan.

Armed Forces Covenant

The impact of the proposed scheme on the Armed Forces has been considered and it is believed that by continuing to disregard War Disablement Pension, War Widow's Pension and War Widower's Pension consideration of this area has been sufficiently taken into account.

Note 1

Other relevant benefit changes that apply from April 2016

The changes to the Council Tax Reduction scheme will come in from April 2016. At the same time other proposed changes to the benefit and tax systems will continue to affect people in receipt of/potentially eligible for Council Tax Reduction. The other changes include the following:

1. *A reduction in the total benefit cap for people of working age. The cap is £257 for single people and £384 for couples and lone parents. The cap will not be applied to households eligible for Working Tax Credit (i.e. working over 16 hours per week) or who get certain disability benefits or War Widows/Widowers Pension.*
2. *Working age benefit rates (Tax Credits, applicable amounts) will be frozen for four years.*
3. *Tax Credit awards are to be reduced.*
5. *Income Tax changes – from April 2013 the under-65 tax free allowance will be increased from April 2013 to £9,205*

10. What do you know about how the proposals could affect community cohesion?

- There may be an effect on community cohesion as pensioners are not being affected by the new Local Council Tax Reduction scheme and will continue to receive their current levels of support whilst Working Age customers will have reduced levels of help. Whilst we recognise the inequalities of the two schemes (Working Age and Elderly), we are unable to do anything about them but will monitor the impact of the scheme between age groups during consultation to ensure any comments are recorded.
- If any other protections are made within the working age group, some groups may feel they

are “shouldering the burden” of the scheme more than others.

- There may be an increase in transience, as people move to more affordable accommodation in order to be able to afford to pay for their increased contribution to Council Tax.
- There could be an increase in the number of people leaving Blackpool to move to a neighbouring authority with a more generous Council Tax Reduction scheme.

STEP 3 - ANALYSING THE IMPACT

13. Is there any evidence of higher or lower take-up by any group or community, and if so, how is this explained?

- There was traditionally a lower take up of Council Tax Benefit from pensioners, however, as pensioner support will be delivered through a national framework of criteria & allowances and will be a discount rather than a benefit, take up is likely to increase.
- Within some other community groups there is traditionally a low take up because individuals either do not need support or do not like to claim benefit. To mitigate this, there will be a programme of marketing and communication which will include liaison to target hard to reach groups. Within Blackpool these groups are seen to be:
 - Polish Community
 - Chinese Community
 - African Caribbean Friends & Relatives Association
 - Romanies

14. Do any rules or requirements prevent any groups or communities from using or accessing the service?

There will be an initial eligibility criteria for the new Blackpool Council Tax Support scheme (in line with the existing Council Tax Benefit scheme), which will exclude the following:

- Any person who is not a Council Tax payer as they do not need to pay Council Tax
- Anyone who is not able to claim state benefits in accordance with the Central Government regulations in the Local Government Finance Bill
- If the property is a second home

Once the eligibility criteria have been established, there will be a means tested assessment of entitlement to Council Tax Support, which could mean that some people are not entitled but this is the case now also.

Other exclusions may apply, depending on the results of consultation e.g. if the final scheme includes no Council Tax Support for customers with non dependents.

15. Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people?

Access

The new scheme will offer the same level of access to the service as there is within the current system of Council Tax Reduction, as follows:

- Face to face access
- Telephone access
- Online access
- Home visit if required

Policy

Disabled people may not be exempt for the purposes of calculating Council Tax Reduction. The rationale behind this is:

- The new scheme will support people on a low income and is likely to be means tested. Disabled people receive additional income for disabilities and Blackpool's preferred option allows for the continued disregard of disability incomes in the calculation.
- Disability relief, which is a reduction in the amount of Council Tax payable, applies where adaptations have been made to a property to accommodate a disabled person. Exempting disability benefits in the calculation of Council Tax Support would put those people at a financial advantage
- The new Council Tax Support Scheme must cost 10% less than the current system of Council Tax Benefit. The 10% saving would be unachievable if disabled applicants were disregarded.
- Disability Benefits are disregarded in DWP assessment therefore issues of vulnerability have been addressed prior to our calculation

However, we recognise that even within the category of disability, some people will be more affected than others in that they will be unlikely to be able to increase their income and therefore policies need to be established to mitigate the impact of the scheme.

STEP 4 - DEALING WITH ADVERSE OR UNLAWFUL IMPACT

16. What can be done to improve the policy, service, function or any proposals in order to reduce or remove any adverse impact or effects identified?

See Action Plan

17. What would be needed to be able to do this? Are the resources likely to be available?

See Action Plan

18. What other support or changes would be necessary to carry out these actions?

See Action Plan

STEP 5 - CONSULTING THOSE AFFECTED FOR THEIR VIEWS

19. What feedback or responses have you received to the findings and possible courses of action? Please give details below.

2013/14 Scheme

Removal of Backdates

Comments have been received from a Councillor as follows:

“What's being proposed is that no council tax benefit claim can be backdated however good the reason is. Claimants asking for their claims to be backdated are frequently those who lack knowledge of how the system works, they are often vulnerable, some of them have experienced trauma. If this proposal is put into practice it would lead to some claimants having housing benefit claims backdated while their simultaneous council tax benefit claims are refused. This would send out a message that Blackpool Council believed in unfairness.”

Response:

11/12 numbers of people on CTB backdates (WA and Elderly): 1488

Value of backdates in CTB: £53,145 total

Maximum backdate period: 6 months WA

Average value of CTB backdate: £35.71

Genuine cases of hardship could have a Section 13A discretionary award made to cover the Council Tax.

Liaison with the Lancashire Deaf Service

“Andie Vowles, a Community Development Officer for the Lancashire Deaf Service, attended the Council Tax Support road show held at Fylde Town Hall on the 27th Sept 2012. He has been approached by numerous clients who have received a copy of the survey in the post and were struggling to understand the documentation and how it would affect them. He works and supports deaf people across the Blackpool, Fylde and Wyre area. With the help of an interpreter he asked if I could run through each of the questions on the survey in fine detail so that he could clearly understand what was being asked. Due to the complex subject matter it was necessary to run through the questions more than once and in some cases detailed examples and calculations were required in order to illustrate the outcome of an option more clearly, particularly when explaining options A and B. Andie made notes throughout and in order to clarify he had understood the options correctly and he summarised each question for me in his own words before moving on to the next. Andie felt it was vital that he felt confident that he had grasped each question sufficiently before moving on so that he could successfully cascade the information to his clients. Once we had dealt with the questions Andie asked me about the potential answers. For each question he wanted me to clarify and summarise what customers would actually be suggesting they think should happen if they were to choose either agree or disagree. This helped put the possible answers in context with each specific question and helped rule out any misinterpretation. The appointment took around two hours however by the end Andie felt he was more equipped to help his clients complete the survey and was going to be able to advise them of how each option was likely to impact them if it were to be of part of the final scheme. I gave him my name as a contact should any future issues arise and the Blackpool council tax support email box should he have any further comments he would like to make. I explained that other boroughs in the Lancashire area

that he may have contact with could quite feasibly introduce a different scheme to Blackpool and Fylde which he fully understood. He is going to work on a newsletter for his clients featuring the Council Tax Support scheme and information about the survey which will be posted on their website www.elds.org.uk."

Additional Suggestions

- Progressive council tax rates

Comment: This comment will be included in the report to be sent to Full Council for formal adoption of the scheme.

- All money coming in should be counted as income

Comment: Some income is provided for specific purposes e.g. disability income is provided to help meet the additional costs incurred by being disabled. The current Council Tax Benefit system already has a series of incomes that are disregarded in the interests of taking account of vulnerability and various statutory requirements e.g. the Armed Forces Covenant.

- Means test for people struggling to pay

Comment: The preferred option for Blackpool would ensure that the means test would continue.

- Three customers have contacted us upon receipt of the survey to highlight that they already do not have enough money to live on even before being expected to pay more Council Tax under the scheme.

Comment: All of these customers have been visited to ensure they have maximised the potential benefits they are receiving and that they are signposted for additional support or debt advice if applicable.

- Reduce the rate of Single Person Discount from 25% to 20%

Comment: Central Government have resisted Local Authority requests for the discretion to reduce the Single Person Discount. It therefore remains set by Regulations at 25% and is unable to be changed.

- Can people who claim Single Person Discount falsely be penalised. Any fine money could then be put into the fund to reduce the impact of the scheme.

Comment: There is legislation in place to issue a penalty for providing false information for Council Tax. The administration and collection costs for the penalties would mean that it is unlikely to produce a surplus that would be a useful amount.

- How are people expected to cope with the loss of money?

Comment: We will ensure that the most vulnerable people who do not have the opportunity to increase their incomes will be able to apply to the Council's Discretionary Discount Scheme and we will also ensure that Benefits maximisation is carried out.

- Is this something that just Blackpool Council is doing or are other Council's doing it?

Comment: All Council's who will not be operating the Government's default scheme i.e. where the Council will be finding the 10% cut, are consulting on their schemes. The schemes could all have different elements in them.

- How is the consultation being carried out and how will people be informed about it?

Comment: The following consultation methods have been used:

- *All Working Age recipients of Council Tax Benefit (the people who will be affected) have been sent a survey for an opportunity for them to have their say*
 - *Press release and several articles have been placed in the Gazette*
 - *Several public road show events have been held and these have been advertised in the Gazette and on the Council's website*
 - *Area forum events have been attended*
 - *Online survey on the Council's website*
 - *A number of presentations have been given to special interest groups*
 - *An article was placed in Your Blackpool to ensure all Council Tax payers had the opportunity to respond to the survey*
 - *Large print surveys are available on request*
- If people cannot access the internet, how will they be consulted and how can their input be recorded?

Comment: See above for how the Council have advertised the consultation. All consultation methods have also included a phone number should someone wish to ask for a paper copy of the survey.

- Request from the Royal British Legion (letter dated 1st Nov 2012) to disregard War Widow's Pension, War Disablement Pension and payments from the Armed Forces Compensation Scheme.

Comment: Response sent back:

Blackpool Council have always disregarded customers income in respect of War Disablement Pension and War Widows Pension. The value of a personal injury payment from the Armed Forces Compensation Scheme, or any payment of income from that trust, has also always been disregarded in full in accordance with the Housing and Council Tax Benefit Regulations 2006, unless that payment is in respect of a deceased relative.

Two elements of Blackpool Council's consultation on the proposed Council Tax Support Scheme were:

- *that an award of Support would be based on a means tested assessment broadly similar to the existing Council Tax Benefit Regulations*
- *that the income from War Disablement Pension and War Widow's Pension should continue*

to be disregarded in full.

Consultation supported both these options and will be put forward to full Council for adoption shortly. Should the scheme be approved with both these elements, the concerns raised in your letter would be addressed in full.

2014/15 Scheme

No scheme changes therefore no consultation undertaken and no comments

2015/16 Scheme

No scheme changes therefore no consultation undertaken and no comments

2016/17 Scheme

- Go after those who don't pay any council tax. Enforce it rather than putting everyone's up. Families are already struggling and this government making things worse with cuts to in work tax credits

Comment: The Council uses all available powers and resources to collect Council Tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.

- Nothing comes to mind at this present time as my children have grown up left home and have children of their own, with these changes it will make families struggle more with their finances after 2016, depending on the shortfall and their circumstances, I know the council have to make cuts, I guess this is 1 of those cut –backs

Comment: None

- I work hard on minimum wage as a single parent and I raise 2 children and am not entitled to discount other than single person supplement so why should people keep having kids therefore get further reductions

Comment: None

- Stop wasting it on daft car park schemes for a start. Cut the wages of the top 20% of council employee earners by say 3% for a 3yr period. Anyone on over £40 or £50K in Blackpool is a near millionaire and lower grades could keep their jobs and front line services for the poor and vulnerable maintained, all in it together after all. Council do a great job in general but cutting help to the poorest and most vulnerable is to be avoided at all costs, it's a hard job and just do your best, best of luck from a proud borough resident.

Comment: Priorities of the Council are determined by elected members. The Council uses all available powers and resources to collect Council tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.

It all well and good removing the family premium to increase the amount certain people will be liable for BUT you then have to collect that money, arrears in Blackpool are already far too high. The lack of action Blackpool Council takes non-payers is shameful. Not sending reminders or summonses because there's too many or you wouldn't be able to cope with the phone calls or visits is grossly unfair on the residents who do pay on time. Once someone has fallen into arrears and you've literally done nothing do you think that is going to inspire them to pay the following years liability? I would suggest that is a huge disincentive to pay up on time. Check out the level of un-summonsed debt you have!

Comment: The Council uses all available powers and resources to collect Council Tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.

- Stop taking in families from other areas unless they are working, structure a sponsor scheme, so that if unemployment happens sponsors pays council tax and rent so that a claim is unnecessary, this will free up money to renovate and improve areas within the town which are in desperate need. This could be widened to lowering business rates and allowing instalment plans for licensing for encouragement of new business ventures, as competition with lower prices from China significantly impacts business locally and slows down economic growth for the area, investment this way would encourage small businesses to employ people and further lighten the burden on the local authority. I believe investment in people born here is needed, as keep allowing families to move here while on benefit is further causing long term financial burden to the local authority

Comment:None

- There is insufficient information given in the question to form an opinion on. For example, how many individuals/families will be impacted within the Council's jurisdiction by the changes? What is the total headline saving? What is the 'real' cost of the proposed change - i.e. what additional council/gov't funded support is likely to be required as a result of current beneficiaries losing the money - e.g. will it lead to real financial hardship, will it tip the balance of whether a job is sustainable, etc. etc. In terms of other ways the council could save money, it would seem sensible for the council to re-negotiate commercial agreements, such as those with suppliers, partners or other bodies which are in receipt of council spending or subsidies to aggressively get better deals rather than automatically thinking that saving money can only easily be obtained through cuts to services or benefits.

Comment: It is impossible to determine how many families would be affected by the change as it relates to new claims for CTR or existing claims where another child is born into the household. It is

therefore impossible to determine any savings too. Customers can already apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. The Council has a robust procurement process in place award and review contracts with partners and suppliers to ensure value for money is achieved.

20. If you have not been able to carry out any consultation, please indicate below how you intend to test out your findings and recommended actions.

N/A

STEP 6 - ACTION PLANNING

Please outline your proposed action plan below.

2013/14

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
Lack of awareness of proposed scheme by protected groups	Consultation plan to include a number of groups representing people with protected characteristics	1. Set up consultation events with the following groups to ensure they have a better understanding of the scheme and it's impact on customers: <ul style="list-style-type: none"> ○ Faith Open Forum ○ Disability Partnership ○ Blackpool & Fylde LGBT Forum ○ Equalities Open Forum ○ Homelessness Group ○ Third Sector Groups 	Aug – Oct 2012	Policy / CTS Project Team	Completed

Issues/ adverse impact identified	Proposed action/objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
Disabled people categorised by being currently in receipt of Employment Support Allowance (Support Component) or Long Term Incapacity Benefit	This group of people are unlikely to be able to increase their income being too ill to work. It is therefore recognised that they will require additional support	1. Identify affected customers 2. Develop a leaflet for disabled people who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with Andy Reid to tell customers that they will be affected and what assistance we can provide e.g. debt advice, support into work programme etc 4. Monitor results of publicity and support on collection rates.	Dec 2012	CTS Project Team	Completed
			Dec 2012		Completed
			Dec 2012 Apr 2013 – Sep 2013		Completed
Disabled people in receipt of low rate Disability Living Allowance (Mobility and Care)	There is the potential for this group to be able to work, as is the Government's proposal. Provide assistance to target these people and try to support them in the move back to work	1. Identify affected customers 2. Develop a leaflet for disabled people who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with Andy Reid to tell customers that they will be affected and what assistance we can provide e.g. debt advice, support into work programme etc 4. Monitor results of publicity and support on collection rates.	Dec 2012	CTS Project Team	Completed
			Dec 2012		Completed
			Dec 2012 Apr 2013 – Sep 2013		Completed
Full time Carers	This group of people are unlikely to be able to increase their income as they are	1. Identify affected customers 2. Develop a leaflet for people who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with the carer's	Dec 2012	CTS Project Team	Completed
			Dec 2012		Completed

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
	unlikely to be able to go out to work. It is therefore recognised that they will require additional support	organisation to tell customers that they will be affected and what assistance we can provide e.g. debt advice etc 4. Monitor results of publicity and support on collection rates.	Dec 2012 Apr 2013 – Sep 2013		Completed
Take Up Campaign	There will be a number of customers who are not claiming the other Benefits they should be doing therefore a take-up campaign is proposed to help them increase their income.	1. Establish a joint campaign with Advice Link to promote the take-up of other unclaimed benefits.	Jan 2013 – Mar 2014	CTS Project Team	No specific work carried out with Advice Link but referrals to Fylde CAB for Benefits Maximisation are being made when people apply for CTRS Hardship Fund.
Benefits Maximisation	Ensure existing Benefit claimants are maximising all the benefits they should be receiving	1. Establish referral systems to ensure income maximisation e.g. to Advice Link, debt advice etc	Jan 2013 – Mar 2014	CTS Project Team	Completed, referral mechanisms in place for CTR customers who are struggling to pay
Customers with children under 5	There is the possibility that some of these customers will be unable to increase	1. Identify affected customers 2. Develop a leaflet for customers who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with to tell	Dec 2012 Dec 2012	CTS Project Team	Completed Completed

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
	their income	customers that they will be affected and what assistance we can provide e.g. debt advice etc 4. Monitor results of publicity and support on collection rates.	Dec 2012 Apr 2013 – Sep 2013		Completed Completed
Customers with disabled children	There is the possibility that some of these customers will be unable to increase their income	1. Identify affected customers 2. Develop a leaflet for customers who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with to tell customers that they will be affected and what assistance we can provide e.g. debt advice, etc 4. Monitor results of publicity and support on collection rates.	Dec 2012 Dec 2012 Dec 2012 Apr 2013 – Sep 2013	CTS Project Team	Completed Completed Completed Completed
Customers who are pregnant or are on maternity leave	There is the possibility that some of these customers will be unable to increase their income	1. Identify affected customers 2. Develop a leaflet for customers who have received a bill showing the options for help and assistance. 3. Joint marketing campaign with to tell customers that they will be affected and what assistance we can provide e.g. debt advice etc 4. Monitor results of publicity and support on collection rates.	Dec 2012 Dec 2012 Dec 2012 Apr 2013 – Sep 2013	CTS Project Team	Completed Completed Completed Completed
Customers who have learning difficulties	There is the possibility that some of these customers will be unable to increase their income	1. Establish referral systems to ensure income maximisation e.g. to Advice Link, debt advice etc	Apr 2013 – Sep 2013	CTS Project Team	Completed

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
Customers may struggle to make monthly payments of Council Tax over the usual 10 month period	Review Collection Policy to ensure more flexibility is built in for payment plans and recovery action	1. Ensure payment periods are more flexible e.g. pay weekly, over 12 months	Apr 2013	CTS Project Team	Completed
		2. Ensure debt referral scheme is in operation for Council Tax arrears	Apr 2013		Completed
		3. Ensure there is a clear distinction between those who can't pay and those who won't pay	Apr 2013		Completed
Customers may end up suffering severe financial hardship	Develop Discretionary Discount Guidance for staff and provide training to staff to identify cases where there is an issue	1. Establish if a hardship scheme can be made available	Nov/Dec 2012	CTS Project Team	Completed
		2. Establish criteria to apply to the fund for Owner Occupiers	Dec 2012		Completed
		3. Establish criteria to apply to the fund for tenants	Dec 2012		Completed
		4. Ensure debt advice and benefit maximisation is available	Apr 2013		Completed
		5. Review and possibly reduce recovery of other Council bills e.g. Sundry Debts, Housing Benefit overpayment	Apr 2013		Completed
		6. Review any cases in receipt of Social Care in order to ensure Council Tax is disregarded in the financial assessment process	Apr 2013		Completed
		7. Ensure Disabled Parking Blue Badges have been claimed	Apr 2013 – Mar 2014		Completed
		8. Ensure Advice Link Problem Noticer training is delivered to all staff	Apr 2013 – Mar 2014		Completed
		9. Ensure a DHP award cannot be made	Apr 2013 – Mar 2014		Completed

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
		10. Ensure all available help from Housing Options has been explored	Apr 2013 – Mar 2014		Completed
Some groups may still not be aware of the changes to the scheme if we have not been able to target them	Consider additional targeted publicity to certain groups	1. Identify contact points for potential groups including: Polish Community Chinese Community African Caribbean Friends & Relatives Association Romanies Visually Impaired Hearing Impaired 2. Ensure there is access to Language Line to assist customers who do not have English as a first language Discuss access to leaflets in other languages with other Local Authorities	Jan 13 – Apr 13	CTS Project Team	No contact points established but still have close working relationship with Disability First group should referrals be required

2014/15

No change to the scheme

2015/16

No change to the scheme

2016/17

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
Customers may end up suffering severe financial hardship	Review Discretionary Discount Guidance for staff and provide training to staff to identify cases where there is an issue	<ol style="list-style-type: none"> 1.Ensure the Council’s hardship scheme is still available 2.Review criteria to apply to the fund for Owner Occupiers 3. Review criteria to apply to the fund for tenants 4. Ensure debt advice and benefit maximisation is available 5.Review and possibly reduce recovery of other Council bills e.g. Sundry Debts, Housing Benefit overpayment 6.Ensure a DHP award cannot be made 7. Ensure all available help from Housing team has been explored 	<p>Jan 16</p> <p>Jan 16</p> <p>Jan 16</p> <p>Apr 16 – Mar 17</p> <p>Apr 16 – Mar 17</p> <p>Apr 16 – Mar 17</p> <p>Apr 16 – Mar 17</p>	CTS Project Team	
Monitor legislation progress in case changes to the family premium affect existing CTRS customers	If this client group are impacted by the changes, contingency plans will be required	<ol style="list-style-type: none"> 1.Review Equality Analysis in light of any legislation changes 2.Ensure the Council’s discretionary hardship fund criteria is reviewed to consider additional support for affected customers 	<p>Apr 16 – Mar 17</p> <p>Apr 16 – Mar 17</p>	CTS Project Team	

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
Take Up Campaign	There will be a number of customers who are not claiming the other Benefits they should be doing therefore a take-up campaign is proposed to help them increase their income.	1.All frontline staff are aware of the potential that customers are not claiming all the benefits they are entitled to and where to signpost customers to. 2.	Jan 2016 – Mar 2017	CTS Project Team	

STEP 7 - ARRANGEMENTS FOR MONITORING AND REVIEW

Please outline your arrangements for future monitoring and review below.

Agreed action	Monitoring arrangements	Timeframe	Responsibility	Added to Service Plan etc.
Review of scheme and it's impact	Establish baseline position for review Review impact of scheme on protected characteristic groups Review collection rates amongst affected customers Consider whether discretionary policy is sufficiently robust	Apr 2016 - Mar 2017	CTS Project Team	
Potentially propose changes to the scheme as a result of the review	Consider consultation requirements Report to Full Council to formally adopt any recommended changes to the scheme	May 2016 – Jul 2017 Nov 2017	CTS Project Team	

Page 64

Date completed:

Signed:

Name:

Position:

Report to:	EXECUTIVE
Relevant Officer:	Steve Thompson, Director of Resources
Relevant Cabinet Member:	Councillor Simon Blackburn, Leader of the Council
Date of Meeting:	7th December 2015

FINANCIAL PERFORMANCE MONITORING AS AT MONTH 7 2015/16

1.0 Purpose of the report:

1.1 The level of spending against the Council's Revenue and Capital budgets for the first 7 months to 31st October 2015.

2.0 Recommendation(s):

2.1 To note the report

2.2 To require the respective Directors and Director of Resources to continue to closely monitor and manage financial and operational performances, particularly in Children's Services, Public Health, Property Services, Concessionary Fares, Adult Services, Parking Services, Community and Environmental Services, and Places.

3.0 Reasons for recommendation(s):

3.1 To ensure financial performance against the Council's Revenue and Capital Budget is kept under review by members.

3.2a Is the recommendation contrary to a plan or strategy adopted or approved by the Council? No

3.2b Is the recommendation in accordance with the Council's approved budget? Yes

3.3 Other alternative options to be considered:

None

4.0 Council Priority:

4.1 The report is relevant to both Council Priorities:

“The economy: Maximising growth and opportunity across Blackpool”
and “Communities: Creating stronger communities and increasing resilience”

5.0 Background Information

5.1 See reports and appendices circulated to members under separate cover.

5.2 Does the information submitted include any exempt information? No

5.3 List of Appendices:

Report

Appendix 1- Revenue Summary

Appendix 2- Schedule of Service forecast overspendings

Appendix 3a- Chief Executive

Appendix 3b- Deputy Chief Executive

Appendix 3c- Governance and Regulatory Services

Appendices 3c and 3d- Ward Budgets

Appendix 3e- Resources

Appendix 3f- Places

Appendix 3g- Strategic Leisure Assets

Appendix 3h- Community and Environmental Services

Appendix 3i- Adult Services

Appendix 3j- Children’s Services

Appendix 3k- Public Health

Appendix 3l- Budgets Outside the Cash Limit

Appendix 4- Capital Monitoring

Appendix 5- Cash Flow Summary

Appendix 6- General Fund Balance Sheet Summary

All circulated to members under separate cover

6.0 Legal considerations:

6.1 None

7.0 Human Resources considerations:

7.1 See reports and appendices circulated to members under separate cover.

8.0 Equalities considerations:

8.1 An Equalities Impact Assessment was produced as a part of the budget setting process and remains relevant.

9.0 Financial considerations:

9.1 See reports and appendices circulated to members under separate cover.

10.0 Risk management considerations:

10.1 Impact of financial performance on Council balances. Financial performance against approved Revenue and Capital budgets.

11.0 Ethical considerations:

11.1 None

12.0 Internal/ External Consultation undertaken:

12.1 None

13.0 Background papers:

13.1 None

14.0 Key decision information:

14.1 Is this a key decision? No

14.2 If so, Forward Plan reference number:

14.3 If a key decision, is the decision required in less than five days? N/A

14.4 If **yes**, please describe the reason for urgency:

15.0 Call-in information:

15.1 Are there any grounds for urgency, which would cause this decision to be exempt from the call-in process? No

15.2 If **yes**, please give reason:

TO BE COMPLETED BY THE HEAD OF DEMOCRATIC GOVERNANCE

16.0 Scrutiny Committee Chairman (where appropriate):

Date informed: N/A Date approved: N/A

17.0 Declarations of interest (if applicable):

17.1

18.0 Executive decision:

18.1

18.2 Date of Decision:

19.0 Reason(s) for decision:

19.1 Date Decision published:

20.0 Executive Members in attendance:

20.1

21.0 Call-in:

21.1

22.0 Notes:

22.1