

Council Tax Support Consultation Document

September 2012

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1. Introduction

- 1.1 In the Government's Spending Review, 2010, it announced a new "localised" approach to the provision of financial help to council tax payers. Council Tax Benefit, the current means of providing such help is to be abolished from April 2013 and from that date, in its place, local authorities are required to introduce schemes of their own called Council Tax Support.
- 1.2 The Government also announced funding changes to take effect when Council Tax Support is introduced. Under the current Council Tax Benefit system, the cost of providing the benefit to those who are entitled to it is paid for by the Government, although the scheme itself is administered by local authorities.
- 1.3. The Government will not, however, fund Council Tax Support in the same way. Instead, it has decided that it will provide only 90% of the funding which it currently provides for Council Tax Benefit. In other words, there will be 10% less Government funding for Council Tax Support in April 2013 than there is for Council Tax Benefit in 2012.
- 1.4 The purpose of this document is to ask your views about Birmingham City Council's approach to designing its Council Tax Support scheme and about the way in which our proposed Support Scheme will operate.
- 1.5 As you read through the document you will see that we have asked a number of questions. At the end of the document is a questionnaire which repeats the questions and provides space for you to answer them.
- 1.6 We are committed to ensuring that all our residents and interested parties have the opportunity to have their say on the changes proposed. Therefore, we will consult with you from Monday 10 September to Sunday 2 December 2012 to seek your views on the proposed new Council Tax Support Scheme.
- 1.7 At the end of this consultation, we will collate all the feedback received and publish the results. These will be available in late December 2012 on <http://www.birmingham.gov.uk/counciltaxsupport>. The results will also be considered by senior members of the Council to help them make a final decision on the new Council Tax Support Scheme.
- 1.8 This document will give you the information you need about the proposed changes and details of how you can get involved. You can complete a questionnaire online at <http://www.birmingham.gov.uk/counciltaxsupport>

If you need the questionnaire in a different format or require help with completing it please email us at CTSconsultation@birmingham.gov.uk.
- 1.9 If you would like us to send you a copy of this consultation paper and/or the questionnaire, and/or any of the other documents referred to in this paper, you can contact us by email, at CTSconsultation@birmingham.gov.uk, or by telephone, on 0121 464 5179 or you can write to us at the following address Council Tax Support Team, Revenues & Benefits, Birmingham City Council, PO Box 8267, Birmingham, B4 7XF.

2. The Council's Approach to Council Tax Support

2.1 We estimate that, if we were to provide Council Tax Support on the same basis as Council Tax Benefit was provided, then the funding gap, i.e. the amount of money that we would have to provide from Birmingham City Council's own finances, would be £10.9 million.

This requires difficult choices to be made.

2.2 We could bridge some of the gap by removing some exemptions and discounts which are currently granted in respect of second homes and empty properties. Our proposals in relation to this are contained below at section 6 (6.1-6.3). We estimate that these changes, if implemented, would realise around £4.4 million.

We could decide to provide support at the same level as Council Tax Benefit, but this would mean

- raising Council Tax in the region of 4.4%;
- reducing Council services and using the compensatory savings to fund Council Tax Support; or
- a combination of Council Tax rises and a reduction in Council services

One of the principles agreed is that the Council Tax Support scheme should be framed on the basis that it would cost no more than the funding available from Government.

2.3 We already have to plan the Council's finances on the basis that there may be a rise in Council Tax of around 1.9% and that all service areas will have to make savings this year.

2.4 We have therefore drafted a Council Tax Support Scheme on the basis that:

- we will remove the second homes and empty properties exemptions and discounts set out below at section 6 (6.1 – 6.3);
- the support provided will be kept to the funding provided by the Government and the money realised by abolishing these exemptions and discounts.

2.5 As a result, approximately £10.9 m savings need to be made for the year April 2013 to March 2014 – this is to fund the shortfall and also takes into account non-collection, caseload growth, future Council Tax increases and a discretionary fund. If we implement the removal of certain property exemptions and discounts already discussed, this will help us to achieve some of the savings we need.

- 2.6 Finding these savings is a huge task and Birmingham City Council is doing all it can to address the financial challenge that has been placed on all local authorities in England. We want to ensure that:
- Those in the greatest need of support are fully protected
 - The impact of the savings is minimised on those people who can least afford it
 - The cost of the new scheme does not exceed our Government funding together with resources realised from the proposed removal of exemptions and discounts, if those proposals are implemented.
- 2.7 Due to the level of savings we need to make, some working-age people who currently receive Council Tax Benefit will have to pay something towards their Council Tax bill. Pensioners will be unaffected as the Government has prescribed that they must continue to receive support on the same basis as the means tested Council Tax Benefit
- 2.8 In addition to pensioners, the Council’s proposed Support Scheme will protect claimants whose households include a dependant child under the age of six, and claimants who, or whose partners, receive a disability premium, disabled child premium or war pension. Their support will continue to be based on 100% of the amount of council tax they are liable to pay (this is explained in more detail further on).
- 2.9 Alternatives have been considered to the scheme proposed and these are explained further below.

QUESTION 1

(a) Do you agree that it is the right approach for the Council to keep the cost of its Council Tax Support scheme within the level of Government funding and any savings realised from the removal of certain Council Tax property exemptions and discounts?

Yes No Don't Know

(b) If you disagree, and you think the Council should make an additional contribution from its own finances to the Council Tax Support Scheme, how do you think this should be funded? In particular, should the Council increase Council Tax, or cut other Council services, or both.

Council Tax increase Cut other Council services Both

3. The Council's Proposed Support Scheme

Who will be affected?

- 3.1. Pensioners are protected from any changes and will continue to receive support on the same basis as the means tested Council Tax Benefit. Currently there are 54,019 people of pensionable age receiving this benefit in Birmingham. 72% of them receive full awards mainly as a result of receiving guaranteed pension credit. So if you were born before 06th October 1951 on 01 April 2013 there will be no change for you.
- 3.2. However, anyone of working-age is likely to be affected if they are not, and their partner is not, disabled, responsible for a disabled child, in receipt of a war pension or if they do not have dependant children under 6. On current figures, there are 82,699 people in the city of working age receiving Council Tax Benefit. Of these, 19% receive less than full benefit, largely due to earned income.

What are the changes to Council Tax Benefit?

- 3.3. Under the Government's planned welfare reforms, from April 2013 Council Tax Benefit will be abolished and each Council in England must develop a Council Tax Support Scheme. This is a new way of providing support to people who have difficulties in paying their Council Tax. At the same time, the Government will be taking away 10% of our budget which currently funds Council Tax Benefit.
- 3.4. The Government has produced a draft 'default' Support Scheme which councils, may adopt if they want to, and which will be imposed upon any council that has not adopted a Council Tax Support Scheme by 31 January 2013. The Government's default scheme is available for download from <http://www.communities.gov.uk/publications/localgovernment/draftdefaultschemeregs>
- 3.5. The Government is also making it compulsory for councils to include certain provisions in any Support Scheme that they adopt. The Council will have no choice about whether or not to include these provisions.
 - There will be no change to the amount of help pensioners currently receive. People who have reached the age for state pension credit will be assessed under a national scheme which is decided by the Government.
 - Other provisions which must be included relate to the way in which the new Support is administered.

Because we have no choice, and have to include these compulsory provisions, we are not consulting you about them.

- 3.6 The Government has also outlined some principles which it expects all new schemes to embrace:
- The impact on the most vulnerable should be considered when councils design their new schemes.
 - The new scheme should encourage people to work and in particular should not discourage people from working.

Other than these requirements and principles, however, the new schemes will be designed to meet the needs of the local area and local authorities are allowed to decide the rules for their own Council Tax Support Schemes. This means that different councils will introduce different schemes.

- 3.7 The Government has set out these changes in the Local Government Finance Bill, which is currently going through Parliament. If, as expected, this planned legislation is passed, Birmingham City Council will be expected to have a Support Scheme in place by 31 January 2013, ready for the new financial year which starts on 01 April 2013. This means that if we are to listen to your views, we must start consulting on our proposals now.

4. Birmingham City Council's Draft Scheme

- 4.1 Our draft Council Tax Support Scheme is based on the principles that, with some exceptions, people of working age must pay something towards their council tax bill, whilst the impact should be minimised for those who cannot reasonably be expected to find work.. It proceeds on the basis that it should not cost more than the funding available from Government and from the removal of certain property exemptions and discounts (above, section 2.6).
- 4.2 We have decided that we should therefore not adopt the Government's default Scheme but should use it as a starting point, making the changes to it which we think will produce a fair Support Scheme based on these principles.
- 4.3 These principles are now explained in greater detail.
- 4.4 **Principle 1: People of working-age (unless specified) should pay something**

At present claimants in receipt of Income Support, Income Based Job Seekers Allowance, and Income Based Employment Support Allowance and other claimants not receiving these benefits but with an income below the required level for their basic living needs, generally receive 100% Council Tax Benefit and therefore pay no Council Tax.

Claimants with an income above the required level for their basic living needs, do not receive full Council Tax Benefit. The level of Council Tax Benefit that may be awarded is assessed upon the level of an individual's excess income. Any Council Tax Benefit awarded reduces the amount of Council Tax the individual must pay.

Birmingham City Council proposes that all working age claimants (unless specified) will have their claim for Council Tax Support assessed on 76% of the amount of Council Tax they are liable to pay instead of 100%. This means that the maximum support payable to working-age people, unless they fall within one of the excepted classes, will be 76% of their Council Tax bill. Most working age people can therefore expect to pay at least 24% of their Council Tax under the proposed new scheme. You may have more to pay, depending upon your individual financial circumstances.

4.5 **Principle 2: Those people in the greatest need of support should be fully protected**

Claimants will be protected from the 24% minimum contribution if

- they or their partner are entitled to a disability premium or disabled child premium, or
- they or their partner receives war disablement pension, war widow's pension, or war widower's pension
- they or their partner has a dependant child under 6 years of age

4.6 The equal opportunities research which we have conducted supports the conclusion that these classes of claimant should receive the most protection. We believe that people with disabilities are likely to need more support than most people. The people who will be protected are those in receipt of a disability premium or disabled child premium. This includes people who are registered blind, have been off sick for 52 weeks or more or are getting benefits such as Disability Living Allowance, Attendance Allowance, Severe Disablement Allowance, long term Incapacity Benefit etc.

4.7 We also recognise that childcare provision and costs can act as a deterrent to securing suitable employment and so we want to support families with pre-school children and also provide a year's support after children have started school to aid the parent's transition back to work.

4.8 This means that if you or your partner is disabled, have a disabled child, are in receipt of a war pension or have dependant children under 6, your claim for Council Tax Support will continue be assessed on 100% of the amount of Council Tax you are liable to pay. You may still have to pay something dependant upon your individual financial circumstances.

4.9 **Principle 3: Council Tax Support should only be paid from the date they are claimed**

At present, if a person has a good reason for not making a Council Tax Benefit claim earlier, we can backdate their award for up to a period of six months. Under the new Scheme, we propose to only allow a backdate of Council Tax Support of 1 month prior to the date it is claimed if good cause is shown. This reduces administration costs and saves in the region of £400,000. In the current draft of the Government's proposed new Universal Credit rules, on which the Government is currently consulting, it is proposed that backdating will also be limited to 1 month.

4.10 Principle 4: Costs will not exceed DCLG funding combined with technical reforms

The funding we receive to provide Council Tax Support will come from the Department for Communities & Local Government (DCLG) and we have already explained that this funding is being cut by 10%. The cost of our proposed new scheme should not exceed the DCLG funding combined with funds realised from removing certain Council Tax property exemptions and discounts.

4.11 The key features of the proposed new Scheme

The key features of the Council’s proposed scheme are therefore that:

- people of working-age (unless specified below) will have their Council Tax Support assessment based on 76% of their council tax liability,
- people with disabilities should be protected from this requirement;
- people with dependant children under 6 should be protected,
- people in receipt of a war pension should also be protected,
- the backdating of claims should be limited to 1 month.

5. Hardship Fund

5.1 The Council is considering the creation of a discretionary Hardship Fund to support people suffering genuine hardship, whether or not they fall into one of the protected categories. This reflects our aim to support the most vulnerable in our society.

QUESTION 2

Question 1 asked you about our proposal to limit the cost of the scheme to the funding available (including removing certain Council Tax exemptions and discounts). This question is about the other principles on which the Council’s proposed scheme is based.

(a) Do you think that the Council has based its proposed Scheme on the right principles? If not, what other principles should have been used as well or instead?

Yes No Don’t Know

(b) In particular, do you agree or disagree:

(i) that most people of working age should be expected to pay something towards their Council Tax?

Agree Disagree Don’t Know

(ii) If so, do you think that the 76% liability cap is at the right level or is too high or too low?

Correct level Too high Too low

(iii) that some categories of people should still be protected and their claim assessed upon 100% of their Council Tax liability?

Agree Disagree Don't Know

(iv) that the Council has chosen the right categories to receive protection?

Agree Disagree Don't Know

(v) If not, who should be protected?

(vi) that backdating of Council Tax Support claims should be limited to one month?

Agree Disagree Don't Know

(vii) If not, what is the correct length of time for backdating Council Tax Support claims?

1 month 2 months 3 months or more

QUESTION 3

Do you think that the Council should set up a discretionary hardship fund?

Yes No Don't Know

QUESTION 4

If you are a Council Tax benefit claimant, what impact will our proposals have on you? How could we avoid or lessen any negative impacts?

6. Removal of Certain Discounts/Exemptions

- 6.1 We have explained above that we are proposing to remove certain council tax exemptions and discounts as will be permitted by the current Local Government Finance Bill when it becomes law.
- 6.2 The specific exemptions and discounts to be removed are as set out below. The discounts will be set at zero in the following categories:
- Class A – Empty property requiring structural repair (currently 100% exemption for 12 months)
 - Class C – Empty and unfurnished property (currently 100% exemption for 6 months)
 - Long term empty property (currently 10% discount)
 - Second Homes (currently 10% discount).
- 6.3 In the case of long term empty properties which have been empty for more than 2 years, we propose not only to remove the current discount but to impose a Council Tax charge of up to 150%. This will help bring much needed properties back into use, and will also help us fund our proposed Support scheme.

QUESTION 5

a) Do you agree with our proposals to remove these discounts?

Yes No Don't Know

b) Do you agree with our proposals to charge up to 150% of the normal Council Tax for long term empty properties?

Yes No Don't Know

7. Administration

- 7.1 It is proposed that the administration of the Scheme will be:
- in accordance with the compulsory provisions imposed by the Government and
 - based on the principles of the Government's draft 'default' Support Scheme.
- 7.2 Like the Council's proposed Support scheme, the Government's default scheme is still in draft and has not been finished yet. If you would like to see a copy of the default scheme in its current form, it is available on the Council's website at the link given at the bottom of this document or on the DCLG website at:

<http://www.communities.gov.uk/publications/localgovernment/draftdefaultscemeregs>

- 7.3 The Council always aims to simplify administration where possible, and we intend to look critically at the Government’s default scheme to see if there are areas where we can make the process of applying for, and providing, Council Tax Support more straightforward and simpler to administer. The areas for simplification which the council is considering include such as whether copy documents rather than originals can be accepted as proofs for the purposes of a claim etc.
- 7.4 Where the Council’s scheme differs from the default scheme so as to achieve simpler administration, we will make sure that the rights of claimants are not adversely affected in any way.
- 7.5 We cannot give full details of our proposals in this regard at this stage, because the default scheme is not in its final form and we are still considering whether any, and if so, what aspects of the administration of our proposed scheme can be simplified. If possible, we will give further details during the consultation process.

QUESTION 6

Do you agree with our view that the administration of the Council’s scheme should be simplified where possible, without affecting claimants’ rights?

Yes No Don’t Know

8. Alternatives to the Proposed Scheme

- 8.1 Consideration has been given to whether the Council can or should make up (either in whole or part) from its own finances, the gap in funding so as to be able to provide Council Tax Support at existing Council Tax Benefit levels, or at a higher level than our proposals currently provide for.
- 8.2 Having considered the implications, the Council is not minded to increase Council Tax or reduce Council services in order to fund Council Tax Support, given that the Council’s budget is already under severe pressure.

QUESTION 7

Is there anything else you would like to say about our proposals, including any alternatives to our draft Scheme?

9. We need your views

9.1 Due to the tight deadlines and Birmingham City Council's commitment to a full and detailed consultation process, we are consulting before final Government legislation has been passed. We are seeking your views based on the current draft legislation although there may be some changes, including a change to the start date of the scheme. If the legislation changes, we will keep you informed and will still take account of your views on any future schemes.

9.2 In particular, we would like to hear your views on:

- The principles upon which we have based the new Draft Scheme
- The details of the Draft Scheme
- The impact of the Draft Scheme
- Ways of lessening the negative impacts

9.3 As the Scheme affects Birmingham City Council's local approach to support for Council Tax, we are keen to receive views from all residents regardless of whether they currently claim benefit or not and any other interested parties. Your answers will be treated confidentially and you are not required to give your name.

9.4 How you can give your views

Consultation will be open for 12 weeks, from Monday 10 September until Sunday 2 December 2012 and there are a number of ways that you can get involved.

Questionnaires – You can complete a questionnaire online at:

<http://www.birmingham.gov.uk/counciltaxsupport>

Focus Groups

We will hold an invite-only focus group with People First Birmingham and the Birmingham Voluntary Services Council to ensure that users of their services are given the opportunity to have their say.

Public Meetings (please see link below for constituency map)

<http://www.birmingham.gov.uk/wards>

We will hold public meetings which are open to all to attend:

West

11.00am Saturday 15 September 2012
Perry Common Library, College Road, Birmingham B44 0HH

South

5.00pm Thursday 20 September 2012
Northfield Library, 77 Church Road, Birmingham B31 2LB

East

11.00am Saturday 29 September 2012
South Yardley Library, Yardley Road, Birmingham B25 8LT

North

6.00pm Thursday 4 October 2012
Hollyfields Centre, Woodacre Road, Erdington, Birmingham B24 0JT

Central

6.00pm Thursday 18 October 2012
Birmingham and Midland Institute, 9 Margaret Street, Birmingham B3 3BS

These venues have been chosen for their accessibility, public transport networks and convenience to areas of high concentration of Council Tax Benefit claimants. An independent facilitator will attend these meetings to ensure transparency and fairness.

- 9.5 **Direct Contact-** You can get in touch with a member of our team directly with any comments or questions at: CTSConsultation@birmingham.gov.uk

10. How the decisions will be made

- 10.1 Once the consultation is complete, all feedback will be collated and analysed. It will be presented to senior members of the Council who will use it to help shape their decisions on the new scheme for Council Tax Support. A final decision will be made in January 2013 when the report is presented to Cabinet.

- 10.2 The outcomes of this consultation will be made available publicly in January 2013 on <http://www.birmingham.gov.uk/counciltaxsupport>

11. How could the proposed scheme affect me?

Please see appendix A for details of how the draft scheme could affect your personal circumstances.

Appendix A

How could the draft scheme affect me?

Below are four examples. Details are given of how the Draft Scheme impacts financially for each type of customer.

Example 1

Mr A is 40 and wheelchair bound. He has a carer who helps him. He receives Employment and Support Allowance and the high rate care element of Disability Living Allowance.

The property he lives in is a band B for Council Tax. His weekly Council Tax charge is £14.15 per week. He currently receives £14.15 per week in Council Tax Benefit to help pay his Council Tax bill.

What the changes could mean for Mr A

Mr A's disability would put him in a protected group. He would therefore continue to receive full support with his Council Tax bill.

Example 2

Mr and Mrs B have two children aged 10 and 14. Mr B works part time at a local restaurant, while Mrs B works as a receptionist. The family also receive Working and Child Tax Credit as their wages are low.

The property they live in is a band D for Council Tax. Their weekly Council Tax charge is £24.18 per week. They currently receive £10.77 per week in Council Tax Benefit and have to pay the remaining **£13.41** towards their Council Tax bill.

What the changes could mean for Mr and Mrs B

Mr and Mrs B would receive £4.96 in Council Tax Support. They would now have to pay **£19.22 per week towards their Council Tax bill.**

Example 3

Ms C is a lone parent with a child aged 4. She currently works full time at a solicitors firm and receives Working and Child Tax Credit to help her with child care costs.

The property she lives in is a band C for Council Tax. Her weekly Council Tax charge is £21.56 per week. She currently receives £13.67 in Council Tax Benefit and has to pay the remaining **£7.89** towards her Council Tax bill.

What the changes could mean for Mrs C

As Ms C currently has a dependant child under 6, she would be protected from any changes and therefore continue to receive the same rate of support with her Council Tax bill.

Example 4

Mr and Mrs D are both out of work and currently receive Income Based Jobseekers Allowance.

The property they live in is a band D for Council Tax. Their weekly Council Tax charge is £24.18 per week. They currently receive £24.18 per week in Council Tax Benefit to help pay their Council Tax bill.

What the changes could mean for Mr and Mrs D

Mr and Mrs D would now have to pay 24% of their Council Tax bill.
Mr and Mrs D would receive £18.38 in Council Tax Support. They would now have to pay **£5.80 per week towards their Council Tax bill.**

Appendix B

Glossary of Terms

Backdated Award – In some cases we have been able to pay people a period of up to six months before they made a claim. The person will have needed to have had a good reason for not making a claim sooner than they did.

Council Tax – A local tax based on the property valuation. It is used to fund public services.

Council Tax Benefit – Helps someone on a low income or no income to pay their Council Tax.

Council Tax Liability – The full amount of Council Tax that is payable before any Council Tax Benefit is deducted.

Dependant – A child (under 16) or young person up to the age of 20 who lives with the claimant and for who the claimant or their partner receives Child Benefit in respect of.

Disabled – For the purpose of Council Tax Support - People with a disability are defined for this purpose as a claimant or their partner who is entitled to the disability premium within the current Council Tax benefit system. This includes claimants or their partners who are registered blind, have been off sick for 52 weeks or more or are getting benefits such as Disability Living Allowance, Attendance Allowance, Severe Disablement Allowance, long term Incapacity Benefit etc (see http://www.direct.gov.uk/en/DisabledPeople/FinancialSupport/OtherBenefitsAndSupport/DG_068683 for further information).

This definition also includes a claimant or their partner who are entitled to the disabled child premium for a dependant child who is registered blind or is getting Disability Living Allowance.

Pensioner – We will follow the definition of a pensioner in line with the statutory guidance. On the 01 April 2013 this will be someone who was born before 06 October 1951

War Pension - For the purpose of Council Tax Support - Someone who is in receipt of war disablement pension, a war widows pension or war widower's pension.

Working Age - We will follow the definition of working age in line with the statutory guidance. On the 01 April 2013 this will be someone who was born on or after 06 October 1951

**COUNCIL TAX SUPPORT
CONSULTATION QUESTIONS**

QUESTION 1

Please refer to section 1 and 2 of the consultation document to help you answer this question.

(a) Do you agree that it is the right approach for the Council to keep the cost of its Council Tax Support scheme within the level of Government funding and any savings realised from the removal of certain Council Tax property exemptions and discounts?

Yes No Don't Know

(b) If you disagree, and you think the Council should make an additional contribution from its own finances to the Council Tax Support Scheme, how do you think this should be funded? In particular, should the Council increase Council Tax, or cut other Council services, or both.

Council Tax increase Cut other Council services Both

QUESTION 2

Please refer to sections 3, 4 and 5 of the consultation document to help you answer questions 2, 3 and 4.

Question 1 asked you about our proposal to limit the cost of the scheme to the funding available (including removing certain Council Tax exemptions and discounts). This question is about the other principles on which the Council's proposed scheme is based.

(a) Do you think that the Council has based its proposed Scheme on the right principles? If not, what other principles should have been used as well or instead?

Yes No Don't Know

(b) In particular, do you agree or disagree:

(i) that most people of working age should be expected to pay something towards their Council Tax?

Agree Disagree Don't Know

(ii) If so, do you think that the 76% liability cap is at the right level or is too high or too low?

Correct level Too high Too low

(iii) that some categories of people should still be protected and their claim assessed upon 100% of their Council Tax liability?

Agree Disagree Don't Know

(iv) that the Council has chosen the right categories to receive protection?

Agree Disagree Don't Know

(v) If not, who should be protected?

(vi) that backdating of Council Tax Support claims should be limited to one month?

Agree Disagree Don't Know

(vii) If not, what is the correct length of time for backdating Council Tax Support claims?

1 month 2 months 3 months or more

QUESTION 3

Do you think that the Council should set up a discretionary hardship fund?

Yes No Don't Know

QUESTION 4

If you are a Council Tax benefit claimant, what impact will our proposals have on you? How could we avoid or lessen any negative impacts?

QUESTION 5

Please refer to section 6 of the consultation document to help you answer this question.

a) Do you agree with our proposals to remove these discounts?

Yes No Don't Know

b) Do you agree with our proposals to charge up to 150% of the normal council tax for long term empty properties?

Yes No Don't Know

QUESTION 6

Please refer to section 7 of the consultation document to help you answer this question.

Do you agree with our view that the administration of the Council's scheme should be simplified where possible, without affecting claimants' rights?

Yes No Don't Know

QUESTION 7

Please refer to section 8 of the consultation document to help you answer this question.

Is there anything else you would like to say about our proposals, including any alternatives to our draft Scheme?