

Cabinet  
Council

5 January 2016  
12 January 2016

**Name of Cabinet Member:**

Cabinet Member for Strategic Finance and Resources – Councillor Gannon

**Director Approving Submission of the report:**

Executive Director of Resources

**Ward(s) affected:**

City-wide

**Title:**

Revision of the Local Council Tax Support Scheme

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**Is this a key decision?**

Yes – the proposals within the report have financial implications in excess of £1m and are likely to impact residents across the whole of the City.

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**Executive Summary:**

Council Tax Support (CTS) is a means tested discount to help low income households with the cost of council tax payments. The Council awarded over £27.6 million in council tax support in 2014/15 to approximately 33,500 households in the City.

Since the Government announced that Council Tax Benefit (CTB) was to be localised from April 2013 every council has had the responsibility for designing its own scheme of support. In localising support, the Department for Communities and Local Government (DCLG) also cut funding by 10 per cent in 2013/14. The funding received from the Government is no longer separately identified, making it very difficult to quantify exactly the level of additional cost to the Council now. However, if the amount included notionally for CTS within the Council's overall Government funding has reduced in line with headline funding cuts this would mean that the amount of local CTS funding will fall to below £22 million for 2015/16. Hence, the existing scheme is already costing the Council up to £5 million per annum more than the level of government resource that has been allocated to fund the responsibility.

The Council faces significant funding pressures for 2016/17 and beyond. Although the Pre-Budget Report approved by Cabinet contains proposals that will move the Council towards a balanced Budget in 2016/17, large shortfalls exist in the budget for later years. Given this level of

funding pressure, the 2015/16 Budget Report included a £3 million saving target for CTS from 2016/17. This formed part of the Council's 2015/16 budget consultation process.

On 11 August 2015, Cabinet agreed that a consultation should be undertaken to consider proposals for a new Council Tax Support scheme. This report outlines the outcome of that consultation and the equality and consultation analysis. The report makes recommendations for the introduction of a new Council Tax Support Scheme.

### **Recommendations:**

Cabinet is requested to recommend that Council:

- 1) Consider the outcomes of the consultation responses, resulting equality impacts and other information in this report, then make a decision on the proposed new Council Tax Support (CTS) Scheme
- 2) Approve the proposed Council Tax Support scheme as set out in appendix 1 and delegate authority to the Director of Resources to make final detailed changes to the Scheme and to implement the scheme from 1 April 2016.

Council is requested to:

- 1) Consider the outcomes of the consultation responses, resulting equality impacts and other information in this report, then make a decision on the proposed new Council Tax Support Scheme
- 2) Approve the proposed Council Tax Support scheme as set out in appendix 4 and delegate authority to the Director of Finance and Legal Services to make final detailed changes to the Scheme and to implement the scheme from 1 April 2016.

### **List of Appendices included:**

1. Consultation analysis report
2. Equalities and Consultation Analysis
3. Section 13a (1) (c) Policy
4. Proposed scheme

### **Background papers:**

None

### **Other useful papers:**

*Localising support for council tax in England* consultation – Department for Communities and Local Government

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

Local Government Finance Act 2012

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

Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012

<http://www.legislation.gov.uk/ukxi/2012/2885/contents/made>

New Policy Institute – national review of all council tax support schemes

<http://counciltaxsupport.org/>

**Has it or will it be considered by Scrutiny?**

Yes – Corporate Services Scrutiny Board (1) considered the proposals as part of the consultation on 11 November 2015.

**Has it, or will it be considered by any other Council Committee, Advisory Panel or other body?**

No

**Will this report go to Council?**

Yes



## **Report title:**

Revision of the Local Council Tax Support Scheme

### **1. Context (or background)**

- 1.1 Council Tax Support (CTS) is a means tested discount to help low income households with the cost of Council Tax payments. The existing CTS scheme in Coventry broadly mirrors the Council Tax Benefit (CTB) scheme, previously administered under the framework from the Department for Work and Pensions (DWP).
- 1.2 Since the Government announced that CTB was to be localised from April 2013 every council has had the responsibility for designing its own scheme of support. In localising support, the DCLG also cut funding by 10 per cent in 2013/14. Notwithstanding this reduction in funding, the Council initially made the decision to implement a new Council Tax Support scheme which effectively mirrored the previous CTB scheme meaning no change in the level of financial assistance received by recipients. Due to the 10 per cent reduction in funding from central government, this meant that the Council had to find approximately £3 million of additional resources to maintain the equivalent level of support under the CTS scheme.
- 1.3 The Council awarded over £27.6 million in council tax support in 2014/15 to approximately 33,500 households in the City. This has steadily reduced from a level of around £29.3 million two years ago.
- 1.4 The funding received from Government to provide CTS schemes is no longer separately identified making it very difficult to quantify exactly the level of cost to the Council now. However, if the amount included notionally for (CTS) within the Council's overall Government funding has reduced in line with headline funding cuts this would mean that the amount of local CTS funding has fallen below £22m for 2015/16. Hence, the existing scheme is now costing the Council up to £5 million per annum more than the level of funding notionally allocated by government to meet this responsibility. This additional cost will rise even more if government funding continues to fall faster than the cost of the CTS scheme.
- 1.5 The Council faces significant funding pressures for 2016/17 and beyond. Although the Pre-Budget Report approved by Cabinet contains proposals that will move the Council towards a balanced Budget in 2016/17, large shortfalls exist in the budget for later years. Given these medium term funding pressures, the 2015/16 Budget Report included a £3 million saving target for CTS from 2016/17. This formed part of the Council's 2015/16 budget consultation process. Reducing the CTS scheme is only one of a number of difficult and challenging decisions that the Council will need to take as it reduces and redesigns services to ensure that the Council maintains a sustainable financial position in the wake of unprecedented reductions in funding. Additional cuts to services in other areas (to make up the £3 million savings) would cause significant impacts across the Council when all service areas are looking at ways of reducing cost.
- 1.6 In proposing to now revise its CTS scheme, the Council will be following the majority of English councils who have now similarly reduced the levels of discounts offered under local schemes than were funded under CTB. In 2015/16 only 42 out of 326 councils have protected all recipients from a cut in support. On average, councils in England have cut scheme discounts compared with levels of benefits previously provided, by 20per cent.

- 1.7 The rules governing support for pensioners, who comprise approximately 39 per cent of the caseload in Coventry, will continue to be prescribed nationally. People of pension age do not receive any reduction in entitlement (compared to the previous CTB scheme) under a local scheme. Pension age is defined as the age at which an individual can qualify for state pension credit (the pensionable age for a woman). This means that pensioners will not be impacted by any proposals to revise the local CTS scheme although this inevitably has the impact of loading the weight of a cut onto people of working age.
- 1.8 There are approximately 20,135 households in Coventry with working age recipients of CTS. Approximately 16,000 of this number do not currently pay any council tax as they receive maximum benefit.
- 1.9 The Local Government Finance Act 1992 (as substituted by the 2012 Act) places a statutory duty upon Local Authorities to design and implement local schemes of support for council tax and for those schemes to be agreed by 31 January in the financial year prior to that in which the changes are intended to be implemented.
- 1.10 In designing local schemes, councils are reminded of their responsibilities in relation to vulnerable groups and individuals. The Equalities Consultation Assessment (ECA) attached as Appendix 2, considers these issues. In addition to vulnerable groups, councils are also encouraged to consider work incentives when designing local support schemes.

## **2. Options considered and recommended proposal**

- 2.1 Officers have considered various models for revising CTS conscious of the impact this may have on vulnerable groups and also conscious of the need to consider the impact on incentives to work. Some of this work has been informed by the experiences of other Local Authorities who have revised their schemes previously.
- 2.2 It is also recognised that to begin collecting relatively small amounts of tax (particularly from those people who are not used to paying Council Tax) will be challenging and potentially costly. Many of the same people will also be affected by other welfare reforms.
- 2.3 The consultation analysis is contained within the appendices to this report along with the accompanying Equality and Consultation Analysis. Cabinet and Council members must read these documents in their entirety. The summaries below do not provide a comprehensive treatment of all the issues raised during the consultation but highlight those considered most significant.
- 2.4 Following the conclusion of the consultation the comments received in respect of each proposal were collated and analysed. The overall impact of the proposed changes was considered. This analysis was then used to form a view on whether the existing proposal should proceed as described, be varied in the light of the consultation feedback and impacts or withdrawn. The following options are the main ones that have been considered.

### **Option 1 – no change**

- 2.5 Officers have considered the option of the Council not changing the current scheme. This would add significant additional funding pressures for the 2016/17 budget and beyond. Assuming all savings are delivered in 2015/16, there is still a £13.1 million shortfall in the budget. The Council has already implemented a large number of proposals to make cuts

across a wide range of services and will need to continue to do this as part of its on-going and future Budget Setting.

- 2.6 There have been tight Government imposed limits on the amount that the Council has been able to raise through Council Tax and the Council has approved rises very near to the maximum allowed in the last two years. It is not viable for the Council to use reserves to fund Council Tax Support costs because reserves represent a one-off resource and all the Council's reserve balances, other than a small contingency equal to 2 per cent of net budget, are already earmarked for existing purposes. Neither is it possible to fund Council Tax Support costs from the sale of City Council assets because CT Support represent on-going revenue costs and asset sales generates one-off capital receipts which cannot be used for such purposes.
- 2.7 Given this combination of circumstances, the 2015/16 Budget Report included a £3 million saving target for CTS from 2016/17 onwards which formed part of the Council's 2015/16 budget consultation process.

### **Option 2 – exclusion of vulnerable groups**

- 2.8 Officers have also considered whether a scheme should exclude certain (potentially) more vulnerable groups, for example, the disabled. Clearly by excluding one part of the working age population, the burden of additional cost (council tax liability) increases for all other low income households. For example, to raise £2.4 million by making a straight cut across all working age people would result in a 15 per cent reduction in CTS. If disabled people, for example, are excluded from the calculation the reduction rises to 20 per cent for everyone else on low income.

### **Option 3 – increased taper**

- 2.9 Some Local Authorities have sought to revise schemes in part based on household income. An approach to doing this would be to increase the taper which is applied to excess income. At present, the Government prescribes notional income levels which individuals and families are deemed to require in order to meet basic needs. If household income is below this prescribed amount then maximum benefit is payable. Any income above the notional amount is known as excess income and benefit entitlement is reduced by a percentage of the excess income amount. Under the current CTS scheme this taper amount is set at 20 per cent (20 pence for each additional pound of excess income). Under a local scheme the Council could increase this rate to generate additional income.
- 2.10 The taper rate for housing benefit is 65 per cent and the taper rate for universal credit is expected to be 65 per cent. If council tax support was based on a taper rate of 40 per cent it is estimated that this would reduce expenditure by approximately £990,000 per annum. The balance of £1.31 million would need to be found by applying a 10 per cent 'minimum contribution' from all working age people.
- 2.11 The benefits of this approach are that reductions are targeted at households with higher incomes rather than a blanket percentage reduction. In the vast majority of working cases the customer will already be making some level of contribution towards their council tax bill. The obvious disadvantage of this approach would be the potential impact on work incentives. An increased taper rate would result in benefit being withdrawn more quickly when a person starts work or earns more – and they would also be 'hit' by the overall 10 per cent reduction.

- 2.12 It is estimated that the taper reduction would affect approximately 3,800 customers. All working age people (around 20,100 – including those affected by the taper reduction) would also be subject to the minimum contribution (10 per cent) in order to raise the balance of the required £2.4 million.
- 2.13 This option is certainly feasible notwithstanding the potential impact on incentives to work given that some excess income earned will be reduced through a lower level of Council Tax discount.

#### **Option 4 – minimum contribution**

- 2.14 A minimum contribution approach would be to pass on a 15 per cent reduction in support for all working age people. This approach would apply a blanket reduction regardless of individual circumstances or the type or level of income of the customer. The advantage of this approach would be to disperse the cut across the widest possible section of customers to minimise the average impact. The average weekly award of £20.09 (in a Band A property) would reduce by £3.01 to £17.08, leaving the Council to collect the annual balance of around £156.52 from each of these households (around £2.4 million additional charges if applied equally to all working age residents).
- 2.15 The table below provides an indication of the approximate contribution people will have to make, according to their council tax property band. Single households, which constitute around 75 per cent of working age households in receipt of CTS, will receive a 25 per cent discount on these figures:

<b>Council Tax 2016</b>	<b>15% (weekly payment)</b>	<b>Annual additional payment</b>
A £1044.89	£3.01	£156.73
B £1219.04	£3.52	£182.85
C £1393.20	£4.01	£208.98
D £1567.34	£4.52	£235.04
E £1915.64	£5.53	£287.35
F £2263.94	£6.53	£339.56
G £2612.25	£7.53	£391.56

- 2.16 This approach spreads the burden of the cut most widely; this is the recommended option for revising the scheme.

#### **Additional option - Second Adult Rebate**

- 2.17 A further consideration when changing the scheme is Second Adult rebate. This is complicated to administer, difficult to understand, but gives a relatively small additional saving if it is removed (for working age people) of around £43,000 per annum.
- 2.18 Second adult rebate is a rebate that customers can get on their council tax if they live with a second adult who isn't their partner. It is awarded if the customer who is the council tax payer does not qualify for main council tax support in their own right – because their income is too high, but the second adult in the property is on a low income. Second Adult



Rebate is awarded to those who either have sufficient income to pay their Council Tax bill, or where they would be better off receiving second adult rebate.

2.19 Where second adult rebate is awarded the amount of council tax a customer has to pay is reduced by a certain amount. (25%, 15%, 7.5%) The amount it's reduced by will depend on the income of the adult who is living there. To calculate entitlement to second adult rebate, the local authority will work out how much income the second adult has. The less income a second adult has, the higher the rebate will be.

- Excluding Second Adult Rebate does not take support away from the poorest. In the main, Second Adult Rebate supports those who have already been deemed to have enough income / capital of their own to pay their bill.
- Those who would have qualified for main Council Tax Support, but would be better off receiving second adult rebate will still be able to claim Council Tax Support under the new scheme. Their entitlement will be assessed in line with everybody else.

### **3. Results of consultation undertaken and mitigations**

3.1 The Council is required to undertake consultation in the following order:

- consult any major precepting authority which has power to issue a precept to it;
- publish a draft scheme in such manner as it thinks fit;
- consult such other persons as it considers are likely to have an interest in the operation of the scheme.

3.2 In line with the statutory requirements the Council wrote to major precepting authorities (fire and police) and invited their responses on the proposed options for a local scheme; no response was received. The draft scheme was placed on the Council's website and referred to as part of the full consultation.

3.3 This formal public consultation on the proposed changes was undertaken from 17th August 2015 to 26th October 2015.

3.4 A pre-consultation engagement event was held with support agencies. They agreed to collaborate to ensure that the consultation reaches those affected. The group suggested a number of ways the Council could work with them to limit the impact of the changes.

3.5 Extensive efforts were made to promote the consultation. Individual letters, outlining the proposed changes and guidance on how to take part in the consultation were sent 20,331 working age people who are currently receiving help through the Council Tax Support Scheme. The consultation was advertised on the Council website, through social media, in the local press and through posters and leaflets distributed in the City.

3.6 Pop up shops were arranged at nine locations around the City to enable members of the public to discuss the proposals and complete the consultation survey. In addition two stakeholder events were held for partners from advice and support agencies so that their views and thoughts could be recorded and included as part of the consultation process.

3.7 A total of 422 surveys were submitted. The majority of respondents who completed the survey (402 individuals, 96 per cent) said they were responding as residents of Coventry. The remaining 20 respondents either did not live in Coventry, or were responding as an organisation. Responses received on behalf of organisations included Citizens Advice

Bureau, Coventry Jesus Centre, WM Housing, and the Coventry Independent Advice Service. Analysis of around 420 responses to the consultation shows (of those who answered the relevant question) that:

- 74% (280) respondents live in a household that receives partial or full CTS award;
- 25% (92) respondents are from a household that pays full council tax;
- 28% (118) respondents considered themselves disabled; and

3.8 There was a range of views about what the impact of the preferred option of a 15 per cent minimum payment would be:

- Looking at all respondents, 83% of comments about what impacts a 15% minimum payment have mentioned one or more negative impacts as a result of the proposal.
- The majority of comments (203) referred to increased financial hardship, which would be exacerbated by other welfare reforms. The severity of the impact ranged from not being able to afford to eat or pay bills, to having to think about working as it wasn't worth it, to having to make some changes to lifestyle.
- A number of respondents, who were not in receipt of council tax support, stated that the proposal was unfair and that that the Council would not achieve the assumed council tax collection rates.
- For those receiving Council Tax support, financial hardship was the most cited impact, followed by health impacts. A large number of respondents that currently receive support stated that it would negatively impact on their ability to carry out their caring responsibilities.

3.9 Those respondents who consider themselves to have a disability felt they would be impacted more by the proposed changes than those with no disability.

3.10 A full analysis of the consultation is included as an appendix 1. The consultation did not result in any significant or practical (because the Council needs the funding) alternatives to implementing a scheme where everyone should contribute. However there are a number of mitigations which the Council can put in place in order to support people with difficulties.

3.11 Section 13A (1) (c) of the Local Government Finance Act 1992 gives billing authorities the power to award discretionary relief in appropriate cases. The draft policy attached at appendix 3 details the circumstances in which the council would consider requests for discretionary relief. This policy would act as a safety net for people facing extreme financial hardship and could help to mitigate the most extreme impacts of any reduction in CTS. However this fund will only be used in exceptional circumstances when all other options have been exhausted. Currently the Council considers requests under section 13a as it is duty bound to do – the proposed policy is designed to provide a properly codified source of guidance for applicants and decision makers.

### **Mitigation**

3.12 The Council has documented, at appendix 3, a discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support by reducing the amount of council tax payable on a case by case basis.

3.13 The section 13a (1) (c) discretionary policy is not restricted to households receiving council tax support. The discretionary policy is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining a class of case in which liability is to be reduced.

- 3.14 The Council has Discretionary Housing Payment and Community Support Grant schemes which, whilst not used specifically to fund council tax liability, do form part of the Council's overall capacity to support those in financial hardship on a case by case basis.
- 3.15 The Council has a specific policy which outlines how to work with vulnerable debtors. The Council will be working with Enforcement Agent contractors to ensure they are sensitive to the circumstances of council tax support recipients and that where appropriate they consider more flexible re-payment arrangements for those in hardship.
- 3.16 The Council already has very strong links with a number of key partners across the City. It was clear from the consultation (especially the stakeholder groups) that the close working between the Council and partners will be even more important with a revised CTS scheme in place. There are a number of forums already in place (eg, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) and these meetings can help to provide a new focus tackling problems as they arise.
- 3.17 The Council works and will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases.

#### **4. Timetable for implementing this decision**

- 4.1 The Council's CTS scheme must be approved before the 31 January 2016. The scheme comes into force on 1 April 2016.

#### **5. Comments from Executive Director of Resources**

##### **5.1 Financial Implications**

- 5.1.1 The 2015/16 Budget Report included a saving in the cost of Coventry's Council Tax Support payments of £3 million to take effect from 2016/17. The changes to the scheme recommended in this report will deliver this saving by increasing the city's Council Tax-Base, which has the effect of increasing the amount of Council Tax that can be collected. This change to the Council Tax-Base will also deliver associated increase in income, through their precept, for the West Midlands Police (around £200,000) and the West Midlands Fire Authority (around £100,000). Taking this into account and assuming an eventual collection rate of the additional element of 90 per cent, this requires a total gross increase to the amount of collectable Council Tax of £3.7million.

- 5.1.2 Since the 2015/16 Budget was set, Council Tax Support payments have fallen by around £1.3 million. This reduces the target amount of collectable Council Tax required through changes to the CTS Scheme to £2.4 million.

- 5.1.3 If the Council chooses to reduce the level of overall Council Tax Support this will affect individual Council Tax Support recipients as described elsewhere within this report. It will also affect overall collection. Reductions in Support will mean that people who have never paid Council Tax will become liable and it is very likely that collection will prove very challenging in some instances. This impact is difficult to predict but the estimated eventual collection rate of 90 per cent referenced above, applied to the scheme changes within this report, will ensure that the Council meets its financial targets in this area.

## 5.2 Legal Implications

### 5.2.1 Before making a scheme, the authority must (in the following order)-

- (a) consult any major precepting authority which has power to issue a precept to it,
- (b) publish a draft scheme in such manner as it thinks fit, and
- (c) consult such other persons as it considers are likely to have an interest in the operation of the scheme.

### 5.2.2 The duty to consult is thereby generated by statute.

### 5.2.3 Public authority decision makers are under a duty to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations between different people when carrying out their activities.

### 5.2.4 Under the Local Government Finance Act 1972 it is for full Council to take the responsibility for adopting a scheme. It is important for all councillors to read the documentation provided within the appendices to this report so each member personally can give due regard to the Public Sector Equality Duty outlined above.

## 6. Other implications

### 6.1 How will this contribute to achievement of the Council's Plan?

The council tax support scheme will continue to provide financial assistance to low income households to meet the costs of council tax payments albeit at a reduced level.

### 6.2 How is risk being managed?

A council tax support project board meets fortnightly and a project risk register has been established for council tax support. The Corporate and Directorate risk registers include a risk for welfare reform.

### 6.3 What is the impact on the organisation?

The Council is required to make any changes and agree a local scheme of support by 31 January 2016. The localisation of council tax support represents a significant financial risk to the Council in terms of both meeting the cost of the scheme but also potentially of collecting council tax from low income households which could result in increased administrative costs to the authority. Reducing the support available to low income households also has potential impacts on demand for other Council service areas.

### 6.4 Equalities / ECA

Many households currently claiming council support are experiencing negative impacts from other welfare benefit changes and from the economic recession, such as loss of employment. Equality analysis of Coventry's current CTS caseload has been undertaken, which showed that of the 22,564 (at the time of the analysis) households of working age currently claiming:

- 47 per cent (10,481) include children;
- 21 per cent (4,649) include children aged under 5 years;
- 41 per cent (7,143) are lone parent households;
- 17 per cent (2,900) are lone parent households with children aged under 5 years;

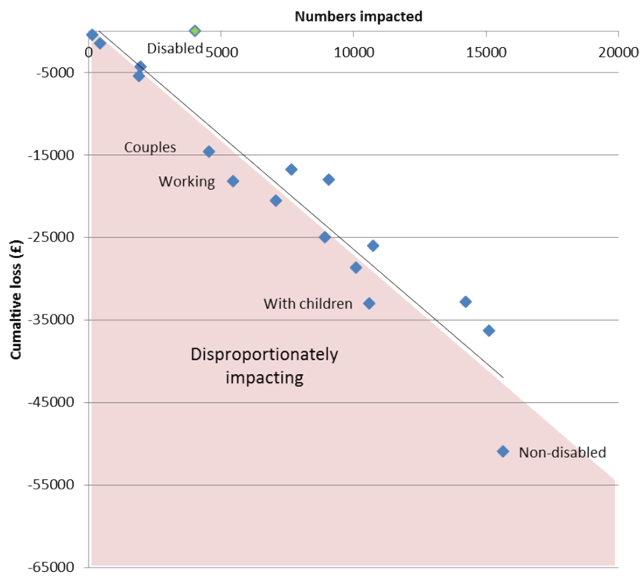
- 37 per cent (8,327) include children with parents on very low incomes (entitled to a full award)
- Ethnically diverse areas of the city are more likely to have higher levels of residents claiming CTS than other areas (ethnicity data is not collected as many people ignore this question on the claim form);
- Approximately 40 per cent (2,667) of non-passported (not in receipt of Income Support income-based job seekers allowance or income-based employment support allowance) households have a disabled household member.

The equality consultation analysis at appendix 2 found:

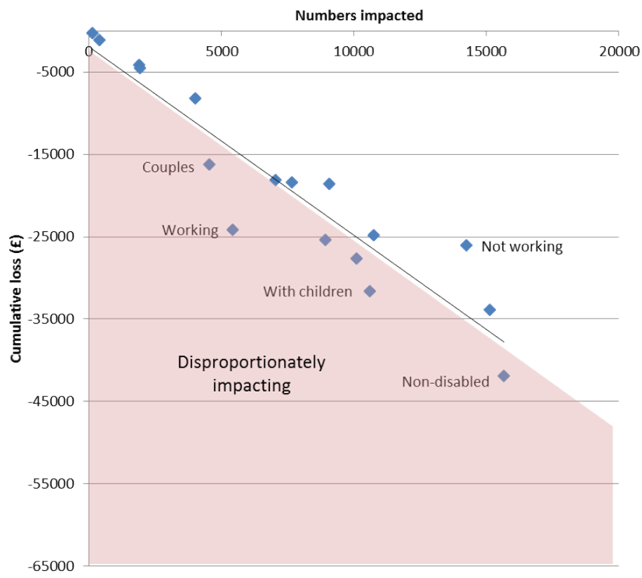
- Option 4 had a disproportionate impact on families with five or more children – this is likely to be due to larger families living in larger properties in high council tax bands;
- Option 4 would result in disabled people paying 8 pence per week more than the average - £2.69 compared to £2.61;
- Under option 4 single woman would have to pay slightly more than single men – this includes single parents and may be explained by single mothers being more likely to live in a larger property than a single male with children;
- No data was available in respect of gender reassignment, sexual orientation, looked after children, carers or religion;
- Option 4 would result in couples paying £3.20 compared with an average for single people of £2.44 per week – this may be explained by the fact a couple would be more likely to live in a higher banded property;
- No data is available in respect of race however evidence suggests that certain ethnic groups are more likely to have larger families and households and therefore may be impacted given the likelihood of occupying a larger, higher banded property;
- All three options do not substantially impact on any one ward. Option 3 would offer the most even impact across all wards but this would disproportionately impact on working people.

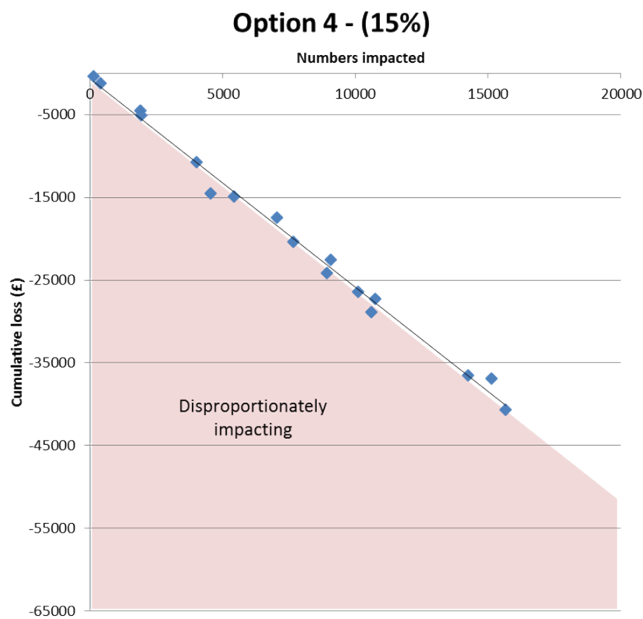
The charts below show the impact of each option on the different groups with protected characteristics. Option 4 is shown as having the most even impact with the reduction spread proportionately throughout the groups with protected characteristics.

### Option 2 - (20%, no disabled)



### Option 3 - (10% and 40% taper)





### Mitigation

The Council has documented, at appendix 3, a discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis.

The section 13a (1) (c) discretionary policy is not restricted to households receiving council tax support. The discretionary policy is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining a class of case in which liability is to be reduced.

The Council has Discretionary Housing Payment and Community Support Grant schemes which, whilst not used specifically to fund council tax liability, do form part of the Council's overall capacity to support those in financial hardship on a case by case basis.

The Council works and will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases.

The Council has a specific policy which outlines how to work with vulnerable debtors. The Council will be working with Enforcement Agent contractors to ensure they are sensitive to the circumstances of council tax support recipients and that where appropriate they consider more flexible re-payment arrangements for those in hardship.

### 6.5 Implications for (or impact on) the environment

None

### 6.6 Implications for partner organisations?

Reducing entitlement to benefit has potentially significant impacts on partner organisations, particularly for advice agencies and other third sector organisations. The Council is in regular contact with partner organisations to ensure they are kept informed of potential changes and it is expected that these organisations will respond to the public consultation on a draft scheme.

There are implications for major precepting authorities and the Council has undertaken consultation with West Midlands Police and the West Midlands Fire and Civil Defence Authority in respect of these implications.

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