

Appendix A: Responses to consultation on proposed changes to West Suffolk Local Council Tax Reduction Scheme 2022-23

	Question	Consultees' responses	West Suffolk Council response
1	<p>Proposal 1. Do you agree with the proposal to lower the 'capital threshold' for Local Council Tax Reduction from £16,000 to £10,000, and remove the requirement to pay a tariff on savings over £6,000.</p>	<p>Agree – 2, Don't know – 1, Disagree – 1</p> <p>The respondent who disagreed said:</p> <p>"This is not a high savings figure and the removal of the tariff will create a 'Cliff edge' approach"</p>	<p>This change is specifically intended to help simplify the scheme, improve the customer experience, reduce the need for reporting changes to capital of £250 or more and the burden of evidence provision. It also ensures we target help to those most in need as those with less capital will receive increased awards and those who no longer qualify will have more than £10,000 capital. As with all means tested schemes there is a level where customers' savings or income results preclude assistance. If customers savings decrease below this level £10,000 a customer may make a further claim for LCTRS assistance.</p>
2	<p>Proposal 2. Do you agree with the proposal to set a fixed deduction for customers with non-dependent adult friends or family members in the same household?</p>	<p>Agree – 2, Disagree – 1, Disagree strongly – 1</p> <p>The respondents who disagreed said:</p> <p>"This is an increase for most claimants as far as we can see"</p> <p>"From the wider document it suggests those on basic uc are not counted as passported benefits as you cant tell if they are on basic UC or have some work. This will penalise increasing numbers of</p>	<p>The proposed change would mean that around 109 customers will gain from the change (2% of claimants) and 126 will experience reductions (2.27%)</p> <p>The proposal is to retain a nil deduction for non-dependents in receipt of passported benefits (or UC with no earnings) but introduces a fixed rate deduction of £7.40 for other non-dependents.</p> <p>We would also retain the existing protections for customers in receipt of disability benefits meaning they would be exempt from any</p>

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		<p>uc claimants on exactly the same income as JSA claimants etc and the amounts are very hard to find each week for under 25s in particular who have very low UC. I understood those with PIP living or DLA care are exempt from non-dep deductions not just those with an SDP. SDP's are very rare as the presence of a non-dep normally leads to the removal of non-existence of a severe disability premium, is this the correct eligibility clause"</p>	<p>deductions (regardless of their non-dependent's circumstances):</p> <p>Deductions are not made if a claimant or their partner:</p> <ul style="list-style-type: none"> • is receiving attendance allowance • is registered as blind • is receiving <u>Disability Living Allowance</u> (the care component) • is receiving the <u>Personal Independence Payment</u> (the daily living component)
3-4	<p>Based on data about average deductions for current claimants, the council is proposing a fixed rate deduction of £7.40 for claimants whose benefits are not 'passported'. Do you agree that this is the right amount?</p>	<p>Yes – 2. No – 2</p> <p>The two respondents who answered No said that the amount was too high and commented as follows:</p> <p>"Current amount is lower"</p> <p>"it is a lot to find on those of very basic income, UC jobseekers under 25 if not passported often have income of under £50 per week once deductions and advances are taken off and to find £7.40 for their parents council tax is a lot and unfair in relation to those passported"</p>	<p>The nil deduction will apply to those on passported benefits including those on UC with no earnings</p>
5	<p>Proposal 3. Do you agree with the proposal to simplify the application process for</p>	<p>Agree – 1, Don't know – 1, Disagree – 1, Strongly disagree – 1</p>	<p>We are not placing any additional pressure on DWP – we already receive data for new UC claimants directly from DWP and treat</p>

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<p>LCTRS by requiring all customers to apply to the Department for Work and Pensions (DWP) rather than direct to the local authority. Whereas previously, customers submitted separate claims for LCTRS, the proposals would mean customers would in-future only need to apply for benefits through DWP, who will automatically notify ARP if someone is eligible for the LCTRS.</p>	<p>The two respondents who disagreed said:</p> <p>“No this is not a function DWP. Responsibility LCTRS should sit with those that are charging and assessing it. DWP is too anonymous and queries re eligibility will be difficult to address. Seems too much being off loaded to DWP. Generally those that are vulnerable in some way are entitled to LCTRS and this will be yet another way for them blinded and blocked with bureaucracy”</p> <p>“I am concerned that lots of people miss out on ctr eligibility under the present system if they do not initially qualify for ctr under uc and they do not reclaim if income drops further. . People claim UC too early or before their maternity pay drops or a baby is born or have one off double wages or bonuses that nil q them for ctr and expect uc to adjust ctr the next month which it doesnt. Also this approach may lead to people claiming uc unnecessarily as many changes do not need to lead to UC and anyone can make a new claim for ctr. CTR applications should be freely available and methods of declaring changes of circumstance. Also will this work also for pensioners who are not on pension credit. If not , will there be two confusing systems for claiming ctr”</p>	<p>this as a new claim in its own right (removing the need for a duplicate claim through the local authority). This change is to help reduce the number of duplicate claims still received.</p> <p>This change will mean that we only accept new claims through the ARP website from those in receipt of legacy benefits or war pensions. Anyone else will be signposted to claim UC in the first instance or advised that they do not need to complete a form if they have claimed UC already and are waiting its outcome. The numbers ARP will be signposting are minimal with modelling showing we would only signpost around four customers each quarter and three of these would have qualified for UC so we would be helping not maximise their income.</p> <p>Anyone already in receipt of UC or who has previously made an unsuccessful claim for UC will be able to make a quick and easy re-claim through a short declaration form on the ARP website.</p> <p>There will be a fallback option where in exceptional circumstances, a customer could still apply direct to ARP.</p> <p>We will still provide customer assistance with eligibility questions.</p>

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6	Proposal 4. Do you agree with the proposal to increase the threshold for income changes that affect Local Council Tax Reduction from £65 to £100?	<p>Agree – 3, Disagree – 1</p> <p>“My main query is not with the increase but it does need to be heavily publicised that you can ask for discretion if wages drop in the other direction”</p>	
7	Anything else about the proposals.	<p>We feel claims should last for two months of nil award as ending after one takes no account of error or blips in income.</p> <p>I would be mindful of using current data only as increasing numbers will go to UC over time. Also i believe their is reduced take-up of low level ctr entitlements in the current system and these changes will bring about even fewer claims. Nil entitlement claims for ctr need to be kept open at least two months in case someone has simply had two 4 weeks payslips in a month or has claimed too early</p>	<p>We will have a simple online declaration that a customer can complete if they have a change in their UC which may mean they become entitled to the Local Council Tax Reduction Scheme, to enable us to review their entitlement without the need for a full fresh claim.</p>