

THURROCK DIVERSITY NETWORK LIMITED



The Beehive, West Street, Grays, Essex. RM17 6XP

The Benefits Team
Thurrock Council
Civic Offices
New Road, Grays
Essex RM17 6SL

18th October 2013

Submitted online, by email and post

Dear Sir/Madam,

**Re: Response to the Council Tax Support Scheme Consultation -
October 2013**

I am writing to you on behalf of Thurrock Diversity Network and its members.

In all its work as a co-operative, Thurrock Diversity Network aims to:

- a) Benefit disabled adult residents of Thurrock by the promotion of citizenship and the development of inclusive communities;
- b) Promote disabled people's active participation in and full integration into society;
- c) Encourage the provision of services which improve residents' conditions of life, facilitate independent living and give them choice and control over service delivery;
- d) Act as a co-ordinating body for and provide support to voluntary organisations in Thurrock that work with disabled people;
- e) Promote the advancement of understanding of human rights, equality and diversity;
- f) Work within and promote the social model of disability in all aspects of the Co-operative's activities.

In accordance with the above aims I am writing to you to respond to and provide feedback for the Council Tax Support Scheme Consultation.

Thurrock Diversity Network Limited, Registration number: 31357R.
Registered office: The Beehive, West Street, Grays, Essex. RM17 6XP.
Registered in England.

Making changes to the existing CTS Scheme

General observations relating to definitions within the scheme

It is not clear from the consultation document exactly what constitutes a “low” income or “very low” income. How does the definition align or compare with existing means-tested benefits? More detail and clarity is needed on these thresholds.

What definition does the Council use in relation to “vulnerable groups”? Are there plans to align this with adult safeguarding definitions and/or definitions of the various 9 Protected Characteristics in the Equality Act 2010?

Local Residency Requirement

We have a number of queries and alternative suggestions to the proposed Local Residency Rule:

How was the 5 year time period reached and decided upon?

The test appears also to be out of line with arrangements for all EU nationals’ in terms of the “habitual residency test” and entitlement to claim other welfare benefits, for example Job Seekers’ Allowance.

The 5 year residency rule seems to be an obstacle to social mobility, and as such should not apply in any event, as people move around the country for a variety of reasons and the rule would penalise people who move to the borough for valid reasons and make valuable economic, social and cultural contributions to Thurrock.

We suggest that eligibility for Council Tax Support should be based upon need from the start of the individual’s residency in Thurrock.

In addition, we suggest that some transfer/accumulation arrangements should be put in place in this regard, particularly if an individual or family has paid council tax, with support, in another Local Authority, they should be exempt from the Local Residency Requirement.

Vulnerable Groups and “low income”

In our view, vulnerable people should not have to pay towards their Council Tax. Many disabled people in particular, have a great deal of additional expense arising from their impairments and thus often cannot afford to pay.

We suggest that the scheme should be altered so that “vulnerable groups” and those individuals on a ‘very low’ income are exempt from paying any Council Tax.

The amount of contribution towards Council Tax for people who are in work but on a "low" income should be a fixed percentage of their wages, taking into account their individual circumstances.

Income/wage disregards?

There is a discrepancy in the consultation document and question on this issue. Does the policy relate to income or wages? Which components of Disability Living Allowance/Personal Independence Payment or other benefits (if any) are taken into account?

We suggest that the first £50 of income should be disregarded for those on a "low" income. People who are on a "very low" income should be exempt.

Pensioners.

We agree that pensioners of pension credit qualifying age should continue to be fully protected

Child related benefits

Child related benefits should continue to be disregarded when calculating Council Tax Support.

The Capital Limit

Whilst the introduction to the consultation makes reference to the £6,000 capital/savings limit, there is no question addressing the issue within the consultation itself. We suggest that the capital limit should be increased to £12,000 per household.

Thank you for considering our response and feedback in relation to this consultation.

If you have any questions or queries or would like to discuss any of the issues raised in this letter, please contact me, details can be found at the foot of this letter

Yours faithfully,

Ian Evans, LLB (Hons) LLM, PG.Dip.

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