



Notice of BCP Shadow Executive Committee

Date: Wednesday, 12 December 2018 at 2.00 pm

Venue: Committee Suite, Civic Centre, Poole, BH15 2RU.

Membership:

Chairman:

Cllr J Walton

Vice Chairman:

Cllr J Beesley

Cllr P Broadhead

Cllr J Challinor

Cllr B Crawford

Cllr A Filer

Cllr D A Flagg

Cllr M Greene

Cllr N Greene

Cllr M Haines

Cllr P F Jamieson

Cllr J Kelly

Cllr R Lawton

Cllr I Potter

Cllr K Rampton

Cllr M White

All Members of the Shadow Executive Committee are summoned to attend this meeting to consider the items of business set out on the agenda below.

The press and public are welcome to attend.

If you would like any further information on the items to be considered at the meeting please contact: Matt Wisdom (01202 451107) or email matthew.wisdom@bournemouth.gov.uk

Press enquiries should be directed to Ceri Tocock: Tel: 01202 795455 or email ctocock@christchurchandeastdorset.gov.uk

This Notice of Meeting and all the papers mentioned within it are available at modern.gov.bcpshadowauthority.com

JANE PORTMAN
DESIGNATED INTERIM HEAD OF PAID SERVICE

4 December 2018



Available online and
on the Mod.gov app



AGENDA

Items to be considered while the meeting is open to the public

1. Apologies

To receive any apologies for absence from Members.

2. Declarations of Interests

Councillors are required to comply with the requirements of the Localism Act 2011 regarding disclosable pecuniary interests. Declarations received will be reported at the meeting.

3. Confirmation of Record of Decisions

To confirm the record of decisions from the meeting held on 7 November 2018, available to view at the following link:-

<https://modern.gov.bcpshadowauthority.com/documents/g117/Decisions%2007th-Nov-2018%2014.00%20Executive%20Committee.pdf?T=2>

4. Public Issues

To receive any public questions or statements submitted in accordance with the Constitution. Further information on the requirements for submitting questions and statements is available to view at the following link:-

<https://bcpsshadowauthority.files.wordpress.com/2018/07/public-participation-e28093-extract-from-the-constitution.pdf>

The deadline for the submission of public questions is 10.00 am, Thursday 6 December 2018.

The deadline for the submission of a statement is 12.00 noon, Tuesday 11 December 2018.

5. Recommendations from the Overview and Scrutiny Committee

To receive any recommendations from the Shadow Overview and Scrutiny Committee.

6. Recommendations from the Joint Public Health Board

5 - 6

To receive the recommendations from the Joint Public Health Board on 19 November 2018, circulated at 6.

The background agenda and papers from the meeting of the Joint Public Health Board on 19 November 2018 are available to view at the following link:-

<https://dorset.moderngov.co.uk/ieListDocuments.aspx?CId=282&MId=1398&Ver=4>

7. Programme Update

7 - 10

See report circulated at 7.

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| <p>8. Acquisition of a Care Home</p> <p>To note the decision of Bournemouth Borough Council in respect of the acquisition of a Care Home as an on-going concern. The background report considered by a Bournemouth Borough Council Special Cabinet on 23 November 2018 is circulated at 8.</p> | <p>11 - 24</p> |
| <p>9. Consolidated Medium Term Financial Plan (MTFP) Update</p> <p>See report circulated at 9.</p> | <p>25 - 92</p> |
| <p>10. Local Council Tax Support Scheme (LCTSS) 2019/20</p> <p>See report circulated at 10.</p> | <p>93 - 218</p> |
| <p>11. Executive Committee Forward Plan</p> <p>The Committee is asked to note the latest published Forward Plan, available to view at the following link:-</p> <p>https://modern.gov.bcpshadowauthority.com/documents/1111/Printed%20plan%204%20December%202018%20-%20Forward%20Plan.pdf?T=4</p> | |
| <p>12. Any other business - not being a key decision - of which notice has been received before the meeting and by reason of special circumstances, which shall be specified in the record of decisions, the Chairman is of the opinion that the items should be considered as a matter of urgency.</p> | |

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Recommendation from Joint Public Health Board – 19 November 2018

53 The Board understood that contracts for a range of Community Health Improvement Services (CHIS) were due to expire at the end of March 2019. Given this, a series of options had been considered to determine which procurement model would best suit the needs of the CHIS in order to maximise efficiency and effectiveness of the services, with agreement of the Board being sought to progress arrangements on that basis.

The Board were informed of the background and rationale for what was being done; what options there were; the Framework Model and how this had been devised; risk and mitigation plans; budgets and timelines and what the preferred procurement option was. The Board were also being asked to agree to procure and award following successful completion of tender.

The Board acknowledged that the preferred option - Option 4: Any Qualified Provider (AQP) under an agreed framework - meant that any provider could deliver the service - provided they met specific criteria - and would be paid according to activity. This model would offer a high level of efficiency, as it was a simple process, developed as a single framework with all six lots being included, being open to any qualified provider, and placed the power in the hands of the end user to access services where they chose.

The Board recognised the need for flexibility in the delivery of these services and the choice this would give service users provided for equity, efficiency and effectiveness in meeting those needs. It would provide for a pool of assets being made available to ensure that there was the greatest opportunity for take up as necessary.

The benefits of Option 4 were readily understandable to members and, given this, they were minded to support this means of procurement, as being both sustainable and reasonable. However the new arrangements would not necessarily provide such scope for accountability as those currently did. Nevertheless, there was an expectation that there would be a good prospect of collective responsibility by potential service providers in seeing that what was being done would be for the good of their communities.

The Board were keen to see that, if at all practicable, an assessment could be made of how successful interventions and activities were in meeting the needs of individuals and in delivering what was hoped for from the Public Health agenda. Officers were satisfied that there were means by which this could be successfully demonstrated and work was progressing to ensure this could be the case.

Whilst there was no national register for the purposes of recording who had been offered interventions, what the take up rates were nor what the outcomes from this were, there appeared to be some scope for outcomes from interventions to be recorded on the Dorset Care

Bournemouth, Christchurch and Poole Shadow Authority Executive Committee – 12
December 2018
and
Shadow Dorset Council Executive Committee – 17 December 2018

record given that GP surgeries had that information available to them but there was a need for this to be securely and rationally managed. The board considered that the procurement exercise had taken into consideration all that it could and that, overall, Option 4 would provide all that was necessary in ensuring community health improvements continued to be made and that successful outcomes could be demonstrated by this means.

Resolved

1. That the preferred option - Option 4 - for procurement and award of the Framework Agreement for the provision of Community Health Improvement Services be agreed;
2. That delegated authority to the Acting Director of Public Health Dorset in consultation with the Joint Public Health Chairmen and Portfolio holders to award to appropriate providers be approved.
3. That the Framework included NHS Health Checks as per the recommendation of the September 2018 Board meeting be noted.
4. That the procurement and award through Open Tender for provision of weight management support within the community be approved.
5. That the risk and mitigating plans from cost and volume contracts be noted.
6. **That the two Unitary Council's Shadow Executive Committee's be asked to affirm the above 5 decisions.**

Reason for Decisions

To enable service continuation and transformation through procurement.



Bournemouth, Christchurch and Poole Shadow Executive Committee

7

Report Subject	BCP LGR Programme Update
Meeting date	12 th December 2018
Report Author	Julian Osgathorpe, BCP LGR Programme Director
Contributors	BCP Interim Statutory Officers BCP Programme Board
Status	Public
Classification	For information for all Members
Key Decision	No
Executive summary	This report provides an overview of activity within the BCP Programme for Local Government Reorganisation in Dorset.
Recommendations	1. Members note the progress made since the last BCP Shadow Executive Committee meeting on approved workstreams.
Reason for Recommendations	To note the progress made on the Bournemouth, Christchurch & Poole programme to prepare for local government reorganisation in Dorset and to provide assurance to Members that the Programme is progressing satisfactorily.

Background detail

1. At its first meeting the Shadow Executive Committee adopted the programme framework that had previously been approved and adopted by the BCP Joint Committee.
2. The key components of this framework are as follows:

- a. The Governance architecture comprising:
 - i. The BCP Shadow Executive Committee
 - ii. The BCP Programme Board, along with subordinate Phase 2 Delivery Boards established to oversee the specific operational areas of Adult's Services, Children's Services, Environment & Economy and Corporate & Support Services
 - iii. The Programme Director/Central Implementation Team Leader and the implementation team
 - iv. The Task & Finish Groups established under this architecture to progress specific workstreams.
 - b. The programme plan comprising three phases:
 - i. Creating the new unitary authority
 - ii. Delivering senior staffing structures and business functionality for April 2019
 - iii. Designing and building the new local authority.
 - c. The allocation of resources totalling £9,096,160 with delegation to the BCP Programme Board to approve spending from this budget.
3. The purpose of this report is to provide an overview of the activity within the programme in order to ensure oversight by the Shadow Executive Committee.

Activity Undertaken in the Last Period

4. Overall, the progress of the programme is consistent with the plan agreed by the BCP Joint Committee. Phase 2 of the programme is now into its implementation stage, with all the Delivery Boards and their Unit of Service workstreams working with the BCP PMO/Central Implementation Team and other Corporate Service colleagues in specifying and implementing solutions to ensure service continuity. While a full update on the progress made against the MTFP is included later on this Agenda, the work undertaken by the Phase 2 Delivery Boards has contributed significantly at this stage. Good progress has been made with MHCLG in progressing the consequential Orders.
5. Oversight, direction and support from elected Members is being effectively provided through a number of strategic and operational mechanisms. The Phase 2 Task & Finish Groups are working very well, and their efforts are being seen with significant progress being made in areas such as the MTFP and Budget setting, the development of the Constitution for the new authority and also the completion of the Tier 2 appointments process subject to approval by the Shadow Authority at its meeting on the 19th December. Engagement by the Shadow Executive Committee with the work of the Phase 2 Delivery Boards is facilitated by the relationships agreed at the meeting of the Shadow Executive Committee in

July 2018, while also providing an informal means of engaging and supporting the work of the Shadow Overview & Scrutiny arrangements.

Summary of finance implications

6. Resources totalling £9,096,160 have been approved to support the delivery of Phases 1 and 2 of the BCP LGR Programme. Authority to approve spend from this budget is delegated to the BCP Programme Board.
7. The programme remains within budget and the next full Budget Monitoring report will be provided in January 2019.

Summary of legal implications

10. There are no legal implications arising from this report.

Summary of human resources implications

11. There are no human resources implications arising from this report.

Summary of environmental impact

12. There are no environmental impacts arising from this report.

Summary of risk assessment

13. The risks and issues have been developed and are being regularly reviewed and managed using an established methodology and framework. At an operational level, they are reviewed and managed through the BCP Programme Board, the Phase 2 Delivery Boards/Unit of Service Workstreams along with the PMO/Central Implementation Team.
14. In the event that there is a need to escalate any risks or issues to the Shadow Executive Committee for either awareness or decision they will be fully outlined with background information, a description of available options and carry recommendations for approval. In addition, regular reviews of the Strategic Risk Register for the Programme are undertaken by the Shadow Executive Committee at its briefing meetings along with a similar arrangement in place with the Shadow Overview & Scrutiny Committee.
15. There are no risks or issues to be escalated at this stage.

Background papers

None

Appendices

None

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Cabinet

Report Subject	Acquisition of a Care Home
Meeting date	23 November 2018
Cabinet Portfolios	Councillor Blair Crawford – Adult Social Care
Corporate Lead	Sue Ross, Director
Service Director	Neil Goddard, Service Director, Community Learning & Commissioning
Status	Public
Classification	For decision
Key Decision	Yes
Impacts on Key Policy Framework	No
Report author	Sarah Longthorpe, Commercial Development Manager, ☎ 01202 451170 ✉ sarah.longthorpe@bournemouth.gov.uk Ivor Cawthorn, Head of Joint Commissioning & Partnerships, ☎ 01202 458722 ✉ ivor.cawthorn@bournemouth.gov.uk
Executive summary	<ol style="list-style-type: none"> 1. Adult Social Care continues to face many challenges in sourcing suitable accommodation and good care at an affordable price for those leaving hospital or who are otherwise in need of residential care. These challenges are shared across the whole of the care sector. As the report indicates the proposed acquisition of a care home is a direct intervention to meet present and future needs of individuals within available resources and budgetary pressures within Adult Social Care. 2. Due to the current economic conditions the external care home market in Bournemouth is finding it difficult to modernise and adapt to meet the changing needs of the population. The care homes that have been built recently have to charge higher fees than the Council is able to pay to meet their new build borrowing costs and therefore are not economically sustainable within the current Adult social care budget. The Council is therefore looking to directly participate in the market by creating or securing provision to meet identified needs. 3. This report considers the acquisition of a care home as a going concern. It is an opportunity to positively influence and stimulate the broader care market. Additionally, it will provide the Council

	<p>with a strategic solution that will secure quality provision at affordable rates to enable the council to benefit from savings and efficiencies in an area of significant budget pressure.</p> <ol style="list-style-type: none"> 4. It will also secure an on-going operational facility that can meet the needs of older people with dementia and complex needs providing the care and support they require. 5. This acquisition will involve purchasing 100% of the shares in the company that owns and operates the Care Home (TargetCo). The acquisition will be funded by prudential borrowing. 6. Upon acquisition of TargetCo, TargetCo will transfer the freehold of the Care Home to the Council at a value to be determined (subject to legal and accounting due diligence as set out below). The Council will then grant a lease to Tricuro Support Limited (TSL) (in substantively the same form as other leases granted to TSL) (the Lease) and a commissioning contract will be entered into to affect the provision of care services by TSL. Pursuant to the commissioning contract, it is anticipated that the staff currently employed by TargetCo will transfer to TSL under TUPE as well as the moveable assets and equipment needed to run the care home and potentially some supplier contracts following due diligence. The pension arrangements of the transferring staff will be treated in compliance with the applicable legislation. TSL will also provide care services to the private pay residents at the Care Home so that they will remain looked after. 7. The rent payable by TSL under the Lease will be sufficient to service the Council's borrowing from the Public Works Loan Board (PWLB). The confidential part of this report also considers options on expiry or earlier termination of the Lease. It concludes that alternative operating models would generate sufficient income to continue to service this borrowing.
<p>Recommendation</p>	<p>That Cabinet:</p> <ol style="list-style-type: none"> a) Approves the acquisition of the Care Home identified in the confidential report as an on-going concern via the purchase of TargetCo; b) Delegates authority to the Corporate Property Officer in consultation with the Monitoring Officer and Section 151 Officer to agree the final terms of the contracts, including the share purchase agreement and ancillary documents, lease and commissioning contract, and to sign-off the legal and financial due diligence; c) Approves the appointment of the Council's, Service Director Community Learning & Commissioning as Director of TargetCo, the adoption by TargetCo of revised Articles of

	<p>Association and Shareholders Agreement upon completion of the purchase of the TargetCo;</p> <p>d) Approves the transfer of the Care Home property from the TargetCo to the Council at a value to be determined subject to further legal advice;</p> <p>e) Authorises the grant of a 10-year lease to Tricuro by the Council with a mutual unconditional break at year 5;</p> <p>f) Approves the entry into a commissioning contract with TSL and Tricuro Limited to enable the continued operation of the Care Home and the associated transfer of staff from TargetCo; and</p> <p>g) Notes that this decision will have an impact on the Medium Term Financial Plan of the new Bournemouth, Christchurch & Poole Council.</p> <p>That Cabinet recommends to Council to:</p> <p>h) Amend the Capital Programme to include provision for this purchase, to be funded by prudential borrowing, on the basis set out in the confidential report.</p>
Reasons for recommendations	<p>The acquisition of a Care Home provides Adult Social Care with a strategic solution to the under provision of affordable bed spaces within the care sector in Bournemouth by guaranteeing a fixed number of bed spaces at affordable prices.</p> <p>It will secure a sustainable operational facility that can meet the future needs of older people with dementia and complex needs providing the care and support they will require.</p> <p>This Local Authority involvement in the market, alongside working with Tricuro aims to secure access to dementia care beds at local authority fee levels.</p> <p>Bournemouth has seen a rise in the development of larger care homes, (over 60 beds) which has resulted in higher levels of fees that have increased pressure on the Adult Social Care budget. Operators have to charge a higher rate to meet their increased financing costs.</p> <p>This acquisition fulfils the Adult Social Care Capital Asset Strategy objective of directly influencing provision by securing a sustainable and affordable supply that can meet the care needs of individuals.</p> <p>Whilst not being acquired as an investment opportunity, the acquisition also fulfils the strategic objectives of the Bournemouth Asset Investment strategy and assists with the management of sound finances and increases the Council asset base.</p>

Background

1. Adult Social Care continues to face many challenges in sourcing suitable accommodation and care at an affordable price for those leaving hospital or who are otherwise in need of residential care.
2. Due to the current economic conditions the external care home market in Bournemouth is finding it difficult to modernise and adapt to meet the changing needs of the population. The Council is therefore looking to directly participate in the market by investing in provision to meet identified needs. A detailed market commentary provided by Cushman & Wakefield is included in Appendix A and concludes that this area remains a needs-driven market and the demographic trends imply significant future growth in demand for variety of forms of care.
3. In Bournemouth several smaller care homes have closed over the last years, but these have been replaced by larger homes increasing the bed capacity overall rather than reducing it, and as the larger homes have a higher level of fees this adds pressure to the Adult Social Care budget.
4. The acquisition clearly contributes towards Council objectives, since it will help ensure the future provision of care home places in Bournemouth at affordable prices and will also deliver a modest financial return.
5. It is anticipated that this care home acquisition would be completed by the end of 2018, subject to due diligence.

Consultation

6. The operational delivery of the care home has been explored with the Council's LATC Social Care provider Tricuro and Tricuro has concluded that based on the running costs submitted from the TargetCo and applying its own business modelling that this is a viable operational business to run within the parameters of the current costs associated with this acquisition.
7. The Asset Investment Panel chaired by the Council's Managing Director and comprising the Leader of the Council, the Deputy Leader of the Council, the Cabinet Member for Local Government Reorganisation & Economic Growth, Section 151 Officer, Monitoring Officer, Corporate Property Officer and the Director of Housing & Communities have provided a robust scrutiny of this opportunity and fully endorse the recommendations contained within this report.
8. A Health & Adult Social Care Overview & Scrutiny Panel will be held on 21 November 2018 to consider this report and the service benefits it will deliver. Members of the Corporate Services Overview & Scrutiny Panel will also be invited to attend this meeting.

Alternative Options Considered and Rejected

9. The Council has also explored the feasibility of constructing a new care home on land that it owns elsewhere in the Borough, with a build cost estimate of between £7-8m. The purchase of an existing care home is therefore a much more cost-effective solution, providing considerable savings over the new-build option.

10. This care home is already trading well, with a 'Good' CQC rating as at July 2018. There would need to be an allowance in the business case for a new care home to build its occupancy levels and income whilst it strives to reach trading maturity.
11. Not to progress the purchase of this acquisition. The Council would be at risk of losing affordable bed space provision which would result in significant cost pressures.
12. There is currently no cap on prudential borrowing in the General Fund provided that it meets affordability criteria. Therefore, these acquisitions will not prevent further asset purchases or investment by virtue of a current borrowing cap.
13. The acquisition outlined in this report will enable the Council to develop a better balanced and more diverse asset portfolio.
14. The options for acquiring and holding the acquisition are detailed in the non-public part of this report.
15. The vendor wishes to sell the shares in the TargetCo. Therefore, it is not an option for the Council to simply purchase the freehold of the property on a going-concern basis.

Summary of Finance and Resourcing Implications:

16. The non-public part of this report considers the detailed financial and resourcing implications, which are commercially sensitive at this stage of the transaction.
17. The business case is based largely on the need to ensure future certainty over the provision of care home beds at local authority rates. It is proposed that the home will operate largely as it does at present, with a mix of local authority-funded and self-funded clients.
18. This acquisition will result in cost avoidance to the service unit of circa £400k per annum if a third party had control of provision. This is detailed further in the non-public part of this report.
19. The premise of this acquisition is that the Council will be borrowing the money at low fixed rates of interest currently available across the UK to local Authorities in order to invest in assets and service delivery.
20. The rent that comes from this asset will be used to pay the borrowing costs (interest and capital) and will benefit the Adult Social Care budget by reducing pressures.
21. In considering borrowing to fund investment, Members should be aware;
 - there are no current Government caps on General Fund Borrowing
 - that any General Fund borrowing is required to conform with the "CIPFA Prudential Code for Capital Finance in Local Authorities (2017 Edition)". This stipulates that:
 - the borrowing is used to support capital investment.
 - the borrowing is affordable over the life of the asset (period provides value to the organisation). The test of affordability being can it repay the capital

sum invested and cover the associated interest costs over the life of the asset?

- the council is required to prudentially repay the capital amount borrowed and the associated debt costs over the lifetime of the asset. In this respect an asset life of 35 years has been assumed.
 - CIPFA has recently published the revised prudential code for capital finance. This is seen as a direct response aimed at maintaining confidence in the prudential system following criticism of many Councils' commercial property activity. The revisions emphasise the prioritisation of security and liquidity over yield as well as ensuring transparency to the Council regarding strategies, risks and potential losses arising from non-treasury investments.
22. Recent concerns raised by the press and financial institutions about the property investment activities of Councils around the country has prompted the Ministry of Housing, Communities and Local Government to issue revised draft guidance on prudential borrowing. This continues to support the use of prudential borrowing in support of the local economy and service delivery the proposed opportunity entirely accords with this revised guidance.

Summary of Legal Implications

23. The Council is entering into this transaction to secure affordable and quality provision to meet present and future assessed social care residential needs of eligible individuals, which will contribute towards Council objectives. Under section 18 of the Care Act 2014, the Council has a mandatory statutory duty to provide care and support to adults who meet the eligibility criteria set out in article 2 of the Care and Support (Eligibility Criteria) Regulations 2015 (Eligibility Criteria). Under section 19(2)(a) of the Care Act 2014, the Council has a discretionary duty to provide care and support services to an adult who meets the Eligibility Criteria and is an ordinary resident of another local authority.
24. In our view, this proposal does not trigger a requirement to consult under section 3(2) Local Government Act 1999 to consult because the Council is acquiring the care home business as a going concern by purchasing 100% of the issued shares of TargetCo. It is proposed that the care home will operate largely at it does at present. Therefore, the acquisition will not entail a review of service provision to users i.e. a provision of a majority of places to the Local Authority and hence, will not trigger a best value duty to consult.
25. Under Option 1 it is proposed that the Council purchase the shares of TargetCo using prudential borrowing. Section 1 of the Local Government Act 2003 provides the Council with the powers to borrow money "for any purpose relevant to its functions under any enactment" or "for the purposes of the prudent management of its financial affairs".
26. The Council intends to enter into a transaction to purchase 100% of the issued shares of TargetCo. Section 1 of the Localism Act 2011 provides the Council with the general power of competence "to do anything that individuals generally may do".

27. The purpose of the acquisition of 100% of the issued shares of TargetCo is to secure quality affordable accommodation for adults with assessed care needs. It is contemplated that TargetCo will transfer its trading / operational assets to the Council's LATC Social Care Provider – TSL. TSL will thus be responsible for delivering care home services to individuals nominated by the Council as well as private pay residents. TSL may potentially make a surplus through the private pay market, thus generating an income stream for the Council. Section 95 of the Local Government Act 2003 provides the Council with a power "to do for a commercial purpose anything which they are authorised to do for the purpose of carrying on any of their ordinary functions", such power being exercisable through a company.
28. TargetCo is the company which owns the land and the 67-bed residential care home building. By acquisition of 100% of the issued shares of TargetCo the Council will acquire the land and buildings owned by TargetCo. The site is located directly next to an existing Council asset. In acquiring the land and buildings the Council will be increasing its land holding in this area. Section 120 of the Local Government Act 1972 gives the Council the power to "acquire by agreement any land, whether situated inside or outside [its] area" for the purposes of "any of [its] functions... or the benefit, improvement or development of their area".
29. Is it intended that upon acquisition of 100% of the issued shares of TargetCo, TargetCo will transfer the freehold of the building to the Council at a value to be determined. The determination of the value of the care home to be transferred to the Council is subject to further legal and financial advice.
30. As part of the financial due diligence the Council will need to ensure that TargetCo has sufficient distributable reserves to facilitate the transfer of the property asset to the Council to ensure the transaction is lawful.
31. The Council will then grant a lease of the building to TSL at market rent in accordance with section 123 of the Local Government Act 1972.
32. Section 18 of the Care Act 2014, places a statutory duty on the Council to provide care and support to adults with eligible care needs. The Council intends to enter into a commissioning contract with its existing LATC Social Care Provider – TSL, who will be responsible for delivering care home services. As part of this arrangement the Council intends to secure the transfer of appropriate assets and equipment, including a lease of the care home building to TSL. Section 1(1) of the Local Government (Contracts) Act 1997 provides that a "statutory provision conferring or imposing a function on the Council" also "confers power on the Council to enter into a contract with another person for the provision or making available of assets or services, or both, (whether or not together with goods) for the purposes of, or in connection with, the discharge of the function by [the Council]". The Council's substantive statutory duty under section 18 of the Care Act 2014 is supplemented by the power under section 1 (1) of the Local Government (Contracts) Act 1997.
33. The Council has subsidiary powers by virtue of section 111 of the Local Government Act 1972, by which it has "power to do anything (whether or not involving the expenditure, borrowing or lending of money or the acquisition or disposal of any property or rights) which is calculated to facilitate, or is conducive

or incidental to, the discharge of any of [its] functions". Insofar as there is a requirement for the Council to enter into any incidental or ancillary agreements to give effect to the transaction contemplated in this report, section 111 of the Local Government Act 1972 vests the Council with the requisite powers to perform such acts.

34. The proposal falls within the ambit of the broader powers the Council now has pursuant to these legislative provisions. The Council needs to be mindful of the public law duties to act for a proper purpose, its fiduciary duty to obtain value for money and to consider carefully all relevant factors, including the "CIPFA Prudential Code for Capital Finance in Local Authorities (2017 Edition)", the Ministry of Housing, Communities and Local Government's guidance document "Capital Finance: Guidance on Local Government Investments (Third Edition)", the Council policies listed below under "Background papers", the risks and the proposed methods to manage and mitigate the risks.
35. The decision will be subject to a satisfactory Report on Title and agreed contract terms and conditions, hence the requirement for the delegation contained within the recommendation.
36. The shareholders of Tricuro are currently reviewing their shareholder agreement. This acquisition may have an impact and need to be considered as part of this review.
37. The transaction involves the acquisition of land and buildings by the Council through the purchase of 100% of the issued shares of TargetCo. Land and shareholding acquisitions do not trigger a requirement to tender under the Public Contract Regulations (PCR 2015) because regulation 10(1) (a) of the PCR 2015 states that the regulations do not apply to the "acquisition or rental, by whatever financial means, of land, existing buildings or other immovable property, or which concern interests in or rights over any of them". Similarly, loans, whether or not in connection with the issue, sale, purchase or transfer of securities or other financial instruments are also exempt from the PCR 2015 under regulation 10(1) (f).
38. The Council intends to use its existing LATC social care provider – TSL for the delivery of care home services. The commissioning contract between the Council and TSL will be a "public service contract", as defined in regulation 2 of PCR 2015. The public service contract need not be competitively tendered under the PCR 2015 where there is a specific exemption. One such exemption is the joint Teckal exemption. The Council intends to enter into a commissioning contract for delivery of the care home services with TSL, which is a trading company jointly owned by Dorset, Bournemouth & Poole Councils and which therefore, meets the "joint Teckal exemption.
39. The "joint Teckal" exemption in regulation 12(4) PCR, applies where:
 - the Council exercises jointly with other contracting authorities a control over TSL which is similar to that which they exercise over their own departments;
 - more than 80% of the activities of TSL are tasks entrusted to it by the Bournemouth, Dorset and Poole Councils (or bodies controlled by them); and
 - there is no direct private capital participation in TSL. It is envisaged that TSL will be providing care services to private payers. The Council will need to

establish appropriate monitoring procedures to ensure that the income derived from such private payers does not exceed 19.99% of TSL's total income or else the Council would be in breach of the Teckal exemption.

40. The Council along with Dorset and Poole Councils will be considered to exercise joint control over TSL where the following conditions, as stipulated in regulation 12(5) PCR 2015 are met: (a) the Company's decision-making bodies are composed of representatives of all participating contracting authorities; (b) those contracting authorities are able to jointly exert decisive influence over the strategic objectives and significant decisions of TSL; and (c) TSL does not pursue any interests which are contrary to those of the controlling contracting authorities.
41. In undertaking this transaction on the basis of the facts as outlined in this report, it is our current view that the Council will not engage in unlawful state aid, which is defined in Article 107(1) of the Treaty on the Functioning of the European Union as "any aid granted by a Member State or through State resources in any form whatsoever which distorts or threatens to distort competition by favouring certain undertakings or the production of certain goods".
42. In accordance with paragraphs 3.4 to 3.10 of the "State Aid Manual (July 2015)" published by the Department for Business, Energy and Industrial Strategy, the Council will be abiding by the Market Economy Operator (MEO) principle as it will be acting in a way that a private investor would in providing loans to TSL on terms that would be acceptable to a genuine private investor who is motivated by return. Therefore, on the basis of the facts set out in the above report, the Council is not providing state aid within the meaning of Article 107(1) because the company will not be obtaining an advantage as it could get funding on the same terms from the Council as it could have obtained on the market.

Summary of Environmental Impact

43. An Environmental Impact Assessment has been completed. This shows that there are no identified impacts from the purchase of this opportunity.
44. The building has an Energy Performance Certificate, indicating a B Rating, with a score of 42. This means that the Council will be purchasing an energy-efficient property with below average energy costs and carbon emissions.

Summary of Equalities and Diversity Impact

45. An Equality Impact Needs Screening Tool has been completed and this shows that there is no direct impact in terms of equalities. Indirectly, however, it is likely to have a positive effect as operational savings and rental income will be used to repay borrowing and underpin essential services, often provided to the most vulnerable in the borough. The Council will need to consider its public sector equality duty (PSED) with regard to the workforce and residents of the care home.

Summary of Risk Assessment

46. The specific risks in relation to this service delivery opportunity are explained in the non-public part of this report.
47. This acquisition is regarded as high risk due to large sum involved and because it will be 100% debt-funded, via prudential borrowing. This increases the Council's exposure to debt, potentially affecting its overall financial standing.

Overall Council Risk

48. This additional borrowing will result in a shift in the overall gearing of the Council, i.e. the relationship between its debts and its assets. This will mean that interest payments on the total Council borrowing will comprise 2% of net budget, rising from 1%, when the impact of this purchase and other approved investment is taken into account. Whilst this is still low in comparison with many of our nearest neighbours, increased exposure to debt via prudential borrowing will more closely link the financial health of the Council to the performance of the economy, at both a national and local level.

Economic Performance Exposure

49. In considering commercial acquisitions Councils are advised to consider their overall exposure to the economy in light of reducing Government funding and increasing reliance on local sources of funding influenced by economic conditions such as;

£90.3m	Council Tax (including the local council tax support scheme)
£31.4m	Business Rates (in a 50% system)
£11.3m	Car Parking income
£10.5m	Tourism income
£2.7m	Mallard Road Retail Park
£1.7m	Commercial Green Waste Income
£0.9m	Green Waste Income

50. In essence, the market conditions which might lead to a potential void in the above investments could also impact on £148.8m of the Council's general income streams.

Council Exposure to Debt via Prudential Borrowing

51. The table below highlights the current debt servicing costs of the Council compared to its CIPFA's nearest neighbours. The Council is currently the second lowest in the group when looking at total interest costs payable on borrowing and Minimum Revenue Provision (statutory charge to pay for unfunded capital expenditure) divided by the Councils net revenue budget.
52. This analysis shows that the Council amongst its peers has managed its recent capital investment very well. It has avoided over-reliance on external borrowing by utilising internal funds, meaning its exposure to external debt is low. Clearly significant investments would alter the picture below and members need to be aware that this exposure to external debt will be fixed for many years to come.

	Interest Payable	Minimum Revenue Provision	Total	Net Revenue Expenditure	% of Revenue Expenditure
	£'000	£'000	£'000	£'000	%
North Somerset UA	7,302	8,376	15,678	153,182	10%
Plymouth UA	9,583	6,500	16,083	184,429	9%
Torbay UA	6,334	3,065	9,399	109,222	9%
Poole UA	0	2,699	2,699	105,753	3%
Bournemouth UA	1,221	3,716	4,937	124,159	4%
Brighton & Hove UA	3,632	7,915	11,547	217,693	5%
Southend-on-Sea UA	11,491	9,132	20,623	135,759	15%
Isle of Wight UA	8,873	864	9,737	126,334	8%
Blackpool UA	4,895	6,854	11,749	131,336	9%
York UA	11,917	7,275	19,192	120,539	16%
Woking	23,159	2,791	25,950	11,773	220%
Warrington	17,601	-547	17,054	131,406	13%

**The data for the other authorities is based on the 2017/18 budget as this is currently the most up to date available data.*

53. [Woking Borough Council is included within the analysis to show an extreme example of another authority where it is known that the authority carries out borrowing to support investments in commercial property and other areas. Woking has a very diverse portfolio of investments and is one of only two authorities which holds an external credit rating. Their position is well established and most of their borrowing has been carried out as onward lending to their companies within the Thamewey group, whose activities include property development and various Energy solutions. At the end of March 2018 Woking's total long term loans outstanding was £736.6m.
54. It should be noted that this analysis only shows one side of the coin in terms of the cost exposure. The investments being undertaken will also provide income which will improve the authority's net budget position.

Legislative Risk

55. The Government retains the power to "cap" any local authority undertaking what they regard as risky borrowing. Any such cap could impact on other programmes and ambitions of the Council. In addition, CIPFA has started a review of the prudential code in response to concerns expressed by some commentators regarding increasing property investment activity by Councils.

Background papers

Capital Strategy and Corporate Asset Management Plan 2018 – 2021

<http://www.room151.co.uk/wp-content/uploads/2018/03/Bournemouth2018TMSpage105.pdf>, in particular pages 5 to 11 of the PDF.

The Capital Strategy and Corporate Asset Management Plan 2018 - 2021

<https://www.bournemouth.gov.uk/councildemocratic/AboutYourCouncil/PlansandPerformance/CapitalStrategyandCorporateAssetManagementPlan.aspx>

Medium Term Financial Plan (MTFP) 2018/19 – 2020/21 and Budget 2018/19 report to Cabinet on 7 February 2018

<https://www.bournemouth.gov.uk/councildemocratic/CouncilMeetings/CommitteeMeetings/Cabinet/2018/02/07/Agenda/agenda-and-reports-special.pdf>

<https://www.bournemouth.gov.uk/councildemocratic/CouncilMeetings/CommitteeMeetings/Cabinet/2018/02/07/Cabinet07-Feb-2018.aspx> , pages 39-180, in particular pages 40 and 42–46.

Equalities Impact Needs Assessment -

<https://www.bournemouth.gov.uk/councildemocratic/AboutYourCouncil/AboutYourCouncilDocs/cscamp/eina-for-cscamp-2018-2021.pdf> , in particular page 4

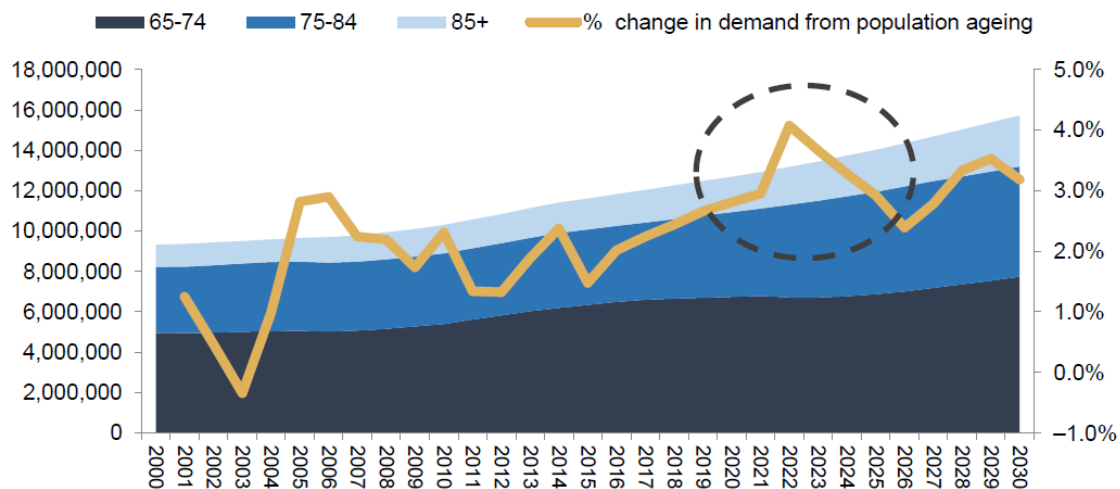
An Environmental Impact Needs Assessment and Risk Assessment have been completed. Both assessments are available upon request by contacting the report author.

Appendix A

Market Commentary - Source: Cushman & Wakefield

Background

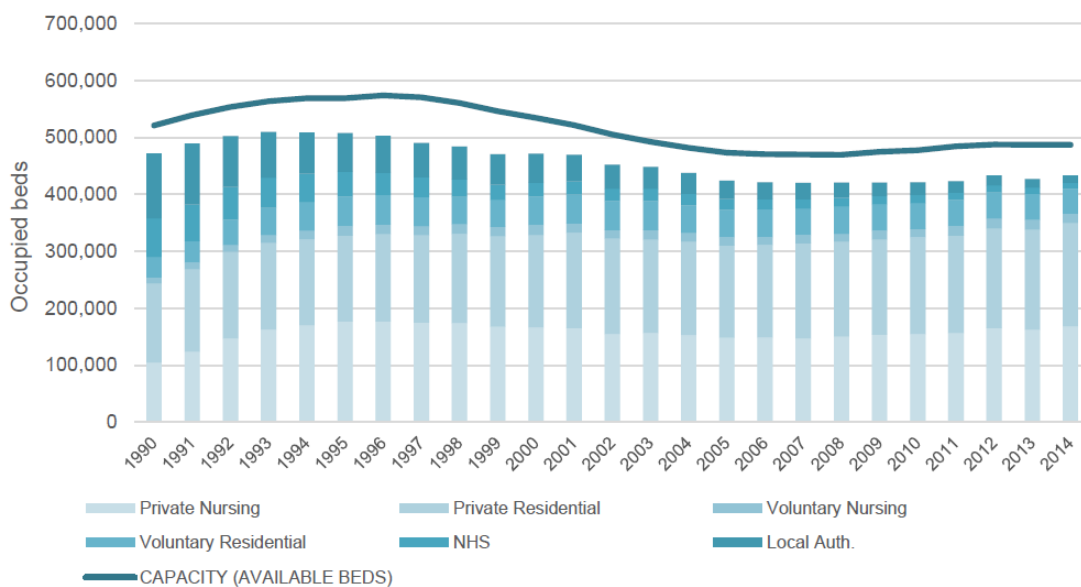
- There are currently approximately 18,000 care homes across the UK.
- The provision of residential care in the UK has effectively been privatised since the 1980s and 1990s, driven by the much lower cost of independent sector homes compared with the public sector. This in turn is mainly due to the lower costs of labour in the independent sector.
- The sector has started to grow again, driven by population ageing, as local authorities have found it increasingly challenging to divert older people with high care needs to non-residential settings. Many experts project that capacity and demand in the care home sector for older people will now continue to grow for several decades, despite major technological changes such as a cure for Alzheimer’s disease.
- According to Laing & Buisson (May 2017), the amount of over 85s in the UK is projected to increase fivefold from 1.6m in 2017 (2.3% of the population) to 7.4m in 2086 (8.7% of the population), with a spike in demand around 2022.



Source: LaingBuisson

The independent sector has grown significantly over the last 25 years with voluntary and public sector providers reducing in number as seen in the graph below, local authorities however remain the largest single source of funding for older people in private residential settings, financially supporting 49% of all residents.

Around a quarter of these however receive top ups from families and friends enabling them to upgrade their accommodation above the standard provision from the council. With the projected rise in demand for residential care provision (the over 85 population is set to quadruple by 2070), the heavily debated issue of social care funding will need to be addressed if access to funded care is to remain the same.



In recent years, the emphasis on quality properties and profitability has led to a wider polarisation between compliant homes and older stock, which is increasingly reflected in market attraction and prices paid. This has been exacerbated by:

Pressure on local authority fees with some areas focussing on the self-pay market where fees have risen in line with inflation and the less affluent areas where residents are socially funded and fees have not risen with inflation.

A focus on economies of scale has seen average registrations in the private market compared to 3 decades ago increasing from 24 to 51 places by 2014 for care homes with nursing and from 15 to 28 places for care homes. The increase has been mainly driven by corporate providers who consider care homes with 60 beds or more as being the most economic and by the exit of smaller operators with care homes of 20 beds or fewer which have far lesser appeals to acquirers

Not only has the size of homes increased, but also there have been higher numbers of care homes being registered for nursing care rising from 54.6% of new beds in 2011 to 73.7% of new beds in 2014, which is likely reflective of the increasing dependency levels of people moving into care homes, but perhaps also reflective of how operators of larger homes includes in part, perhaps not wholly, a nursing provision, thus skewing the numbers

Finally, the increased market expectations in terms of product cannot be ignored and is more pronounced now than ever with a move towards all single bedrooms, larger bedrooms and a and greater provision of en-suite facilities.

Additional Trends

At the lower end of the quality spectrum, the care home sector is more affected by lower fees and historically low rates of fee increases due to pressures on public funding generally, plus increases in staff costs from the introduction of the National Living Wage.

The confluence of events on businesses more exposed to the publicly funded market makes the current operating environment more difficult than the private pay, high quality market. There is a growing consensus, however, that with a fall in the supply of registered beds in this segment of the market, the pendulum may be swinging back towards the operator. This is being manifested by some more encouraging fee rises this year in contrast to several recent years.

Conclusions

Overall, despite some of the challenges in the industry, this sector boasts several very positive fundamentals. This remains a needs-driven market and the demographic trends imply significant future growth in demand for a variety of forms of care.



Bournemouth, Christchurch and Poole Shadow Executive

9

Report Subject	Consolidated Medium Term Financial Plan (MTFP) Update
Meeting date	12 December 2018
Report author	Adam Richens Interim Chief Financial Officer BCP Shadow Authority ☎01202 451137 Bournemouth ☎01202 633183 Poole ✉ a.richens@poole.gov.uk
Contributors	Ian Milner, Strategic Director Christchurch Borough Council Dan Povey, Finance Manager Christchurch Borough Council
Status	Public
Classification	For decision
Executive summary	<p>This report details the good progress made in the development of the Medium Term Financial Plan (MTFP) and a robust balanced budget for 2019/20. The report highlights;</p> <ul style="list-style-type: none"> • The latest Consolidated MTFP position. • Details of the key assumptions being applied to the budget and MTFP process. • An overview of the impact on Local Government of the Chancellors 2018 Budget made on Monday 29 October 2018. • Details of the latest position in respect of the process of harmonising Council Tax in the new Council. • The ongoing work in reviewing both the earmarked and unearmarked reserves of the predecessor councils which may be made available to the new authority. • Draft of the Treasury Management Strategy documents to be applied to the new authority.

Recommendations	<p>The Executive Committee is requested to;</p> <ol style="list-style-type: none"> 1. Note the good progress that has been made in developing a robust and lawful budget for 2019/20. 2. Note the implications of the Chancellors 2018 Budget Statement. 3. Note the latest position in respect of the process for the harmonisation of Council Tax. 4. Endorse the ongoing work in reviewing earmarked and unearmarked revenue reserves of the predecessor councils. 5. Endorse the work done in establishing a draft of the Treasury Management Strategy.
Reasons for recommendations	<p>To provide the Shadow Executive with the latest high level overview of the medium term financial plan position for the new Bournemouth, Christchurch and Poole Unitary Authority.</p>

Medium Term Financial Plan (MTFP)

1. The MTFP is designed to provide sound financial management and control arrangements which will be integral to the delivery of good governance for the council. Such arrangements will help in supporting service delivery, accountable decision making and safeguarding stewardship whilst optimising the use of available resources.
2. This report should be seen in the context of a rolling, evolving process structured to enable the proactive management and prioritisation of the new Council's resources.
3. At the meetings of the BCP Joint Committee on the 15 December 2017, 20 March 2018, 23 May 2018 and the BCP Shadow Executive on 24 July 2018 and 17 October 2018 high level consolidated Medium Term Financial Plan (MTFP) information has been presented which has been drawn together from both the published plans of each of the four relevant sovereign councils and the work to date to deliver a balanced, robust and sustainable budget for 2019/20.
4. To support its development the Shadow Executive have previously endorsed the following high level budget cycle for the BCP Unitary Authority;

Stage One: April to June

- High level budget planning process as set out in the Consolidated MTFP Update report to the May 2018 BCP Joint Committee including the Financial Strategy.
- Top down baselining and disaggregation of Dorset County Councils 2018/19 Budget to establish costs and income relevant to the community and residents of Christchurch.

Stage Two: June to September

- Initial detailed service based budget process led by the Phase 2 Delivery Boards.
- Establish and implement cash limits and savings targets. These were issued in July.

- Outline savings and efficiency plans as per the Financial Strategy. Within this there was an emphasis on efficiencies / reductions in the number of employed staff through economies of scale.

Stage Three: October to December

- Refinement stage including Member consideration of budget saving options.
- Consideration of public consultation, options and proposals.

Stage Four: January to February

- Finalise the 2019/20 Budget.

- As part of the Stage Three process Delivery Boards, in liaison with their nominated Shadow Executive Members, have been undertaking work to determine the efficiencies that could contribute to their established savings targets. The main area has consistently been focused on the reduction of the consolidated staff base of the new council. Such opportunities are mainly from a combination of avoiding duplication in the cost of management, through economies of scale in service delivery, and particularly in front line services own, back office and support functions.
- Figure 1 below presents the latest consolidated MTFP position as articulated through those previous reports and as updated from the October position.

Figure 1: BCP Unitary Council – Consolidated MTFP Position – December 2018

	2019/20 £000's	2020/21 £000's	Total £000's
Annual funding gap before savings	14,130	12,124	26,254
Already assumed savings	(3,379)	(657)	(4,036)
Net approved funding gaps	10,751	11,467	22,218
Consistent 2.99% C Tax increase	(1,728)		(1,728)
Sub Total	9,023	11,467	20,490
Council Tax Foregone <i>(assumes a six year harmonisation model)</i>	1,503	1,061	2,564
Sub Total	10,526	12,528	23,054
Provision for emerging cost pressures, changes in demand etc.	3,474		3,474
Funding Gap (BCP JC 23/5/18)	14,000	12,528	26,528
Financial Strategy savings (Part 1)	(1,034)		(1,034)
Funding Gap (BCP SE 24/7/18)	12,966	12,528	25,494
Financial Strategy savings (Part 2)	(1,782)	198	(1,584)
Funding Gap (BCP SE 17/10/18)	11,184	12,726	23,910
Financial Strategy savings (Part 3)	(11,184)	1,590	(9,594)
Funding Gap (BCP SE 12/12/18)	0	14,316	14,316

7. Financial Strategy savings (Part1) reflects the items referred to in the report to the Shadow Executive on the 24 July 2018 including savings from democratic representation, reduced external audit costs, and savings from common financial policies.
8. Financial Strategy savings (Part 2) generally relates to the provisional outcome of the disaggregation of the 2018/19 revenue budget of Dorset County Council and from establishing consistent funding assumptions.
9. Financial Strategy savings (Part 3) reflects the progress made by each of the four Delivery Boards (Adults, Children, Place and Corporate) towards their established savings targets and from the ongoing review of income generated from council tax, business rates and specific grant income. Although the position in figure 1 is presented as balanced there continues to be movement in the position as the council looks to achieve something not previously attempted in drawing together two upper tier unitary councils with a district council and part of a county council.
10. The intention is that through the application of the approved Financial Strategy, and working within the process and timetable set out in the budget cycle highlighted above, Members and Officers will now bring forward the final proposals to enable not just a balanced budget, but a robust budget for delivering the services of the new council and its priorities for 2019/20.
11. **Appendix A** provides details of the key assumptions currently being made and those which underpin the development of both the 2019/20 Budget and MTFP. At this stage there remain a number of risks associated with the formation of the first budget for the new authority. A key assumption will be each of the delivery boards achieving the parameters of their individual financial strategies upon which the budget for 2019/20 is currently based.
12. The next key milestone will be the provisional 2019/20 Local Government Finance Settlement and confirmation that government have apportioned funding currently made available to Dorset County Council in accordance with the assumptions made locally as part of the disaggregation process. The position as set out in Figure 1 makes no provision for a base revenue budget contingency and in line with the process uses the resources set aside as part of the finance strategy to cover cost pressures. Careful consideration will now need to be given to the level of any contingency that should be included in a robust first budget for the new authority.
13. It should also be highlighted that work continues with the BCP Shadow Schools Forum to ensure a balanced budget for the Dedicated Schools Grant (DSG) can be established. Their work programme is particularly focused on addressing the financial challenge associated with the high needs element of the budget.
14. The intention is that the February 2019 Budget report will extend the timeframe of the MTFP from two to four years.

Chancellors 2018 Budget Statement

15. On **29 October 2018**, the Chancellor, Philip Hammond, introduced his Budget 2018 to the House of Commons in which he promised that the era of austerity is finally coming to an end but that fiscal discipline will remain. He also signalled that his March 2019 Budget statement might need to be upgraded to a full Budget depending on the progress made around the United Kingdoms exit of the European Union.
16. In respect of Local Government the Budget Statement made two significant statements. The first was in respect of a number of spending pledges which evident that the Government has listened to some of the requests for additional funding for under pressure local services. The second was in regards to the control totals for the next spending review period which is assumed will cover the four year period 2020/21 to 2023/24.
17. Taking the last of these first, in June 2018 the Government set out plans to invest an extra £80bn over five years or up to £20.5bn per annum in the National Health Service (NHS). Budget 2018 did not include any detailed evidence of exactly how this commitment will be financed but it did show total government spending for the period 2020/21 to 2023/24 split between the NHS and all other departments. This indicates that resources across the rest of government departments will increase in cash terms by 8.4% over the period 2019/20 to 2023/24 which is roughly in line the increases in the Consumer Price Index (CPI) for the period set by the Office Budget Responsibility (OBR). This suggests that outside of the NHS, all other departments combined will not see any real terms increase in their funding with some doing better and some worse than this averaged position. This accords with our current financial planning assumption of a cash freeze for local government over the Spending Review 2019 (SR19) period with business rates resources increasing by CPI.
18. As stated the Chancellor also announced a number of additional public spending measures relating to 2018/19 and 2019/20. These included;
 - Confirmation that the **£240m** of additional Winter Pressures funding announced in October for 2018/19 will also be provided for 2019/20. It should be highlighted that the local Clinical Commission Group (CCG) will have expectations as to how these resources, which are estimated at £1.7m per annum for BCP, will be applied.
 - A further **£410m** of funding in 2019/20 for adults and children's social care with the Budget stating that where necessary, local councils should use this funding to ensure adult social care pressures do not create additional demand on the NHS. Local councils can also use it to improve their social care offer for older people, people with disabilities and children.
 - An additional **£55m** for the Disabled Facilities Grant in 2018/19 to provide home aids and adaptations for disabled children and adults on low incomes.
 - **£420m** to local authorities in 2018/19 to tackle potholes, repair damaged roads and invest in keeping bridges open.

Generally Local Authorities will have to wait until around the 6 December 2018, which is when we are being promised the provisional 2019/20 Local Government Settlement, for confirmation of individual allocations. That said the allocations from the £420m for local transport in 2018/19 where announced on the 13 November 2018 with Bournemouth receiving £644,000, Poole £709,000 and Dorset County Council £6,165,000.

19. In addition the Budget 2018 also;

- Confirmed that the Housing Revenue Account debt cap that controls local authority borrowing for house building was abolished from 29 October 2018.
- Provided support to the business rates system through reducing bills by one-third for retail properties with a rateable value below £51,000 for two years from April 2019. Local authorities will be fully compensated for the loss of income as a result of the business rates changes.
- Created a £675m Future High Streets Fund to support areas fund plans to redevelop their high streets and town centres. This will be invested in town centre infrastructure, including increased access to the high street and supporting redevelopment and densification around the high street. Although spread across the whole period to 2023/24, 90% of this funding will be made available after 2021/22.
- Set out that from April 2019 the National Living Wage will increase from £7.83 an hour to £8.21.

Council Tax Harmonisation

20. The BCP Authorities approach to council tax harmonisation has been developed through reports to, and the resolutions of, the Joint Committee and Shadow Executive in October, November and December 2017 as well as January, March, April and November 2018.

21. This culminated in the agreement of the Shadow Executive in November 2018 to write to Rishi Sunak (Minister for Local Government) in support of his endorsement of local preference as the fundamental determinate of the strategy provided a fully harmonised council tax is set by the start of the eighth (2026/27) at the latest. The Secretary of State will set out of the Government's final parameters as part of the Finance Order which was due to be laid by the end of November 2018.

22. The Shadow Executive local preference can be cited as follows;

- a) That no Borough's council tax levels will rise at a rate exceeding the Government's referendum limits; and
- b) That the absolute level of council tax levied in Christchurch in respect of the unitary authority is frozen and or reduced until the new harmonised rate is applied.

23. In support of this preference the Councils Medium Term Financial Plan (MTFP) currently makes provision for the financial implications of council tax forgone resulting from the application of the following assumed parameters;

- i. Adjustments to the Band D council tax rates of the three predecessor councils will be made to reflect the creation of two new Town Councils in Christchurch and the transfer of the mayoral function to Chartered Trustees in both Bournemouth and Poole and to the new Christchurch Town Council in Christchurch.
- ii. The Governments referendum limit will be 2.99% in 2019/20 and 1.99% annually thereafter.
- iii. Poole's Council Tax (*as adjusted for i.*) will rise in line with the Government's referendum limit.

- iv. Christchurch's Council Tax (*as adjusted for i.*) will be frozen until the Poole's Council Tax catches up.
 - v. Bournemouth's Council Tax (*as adjusted for i.*) will increase by slightly less than the annual referendum limit to ensure it catches up with Christchurch's level of tax in the same year as Poole's.
 - vi. Any increases in the Government referendum limit, higher than those currently assumed, will reduce the period of harmonisation.
24. As part of the Parliamentary Orders Update report to the BCP Shadow Executive on the 7 November 2018 an appendix was included that provided details of the council tax harmonisation strategy based on the provisional estimates available at that time. **Appendix B** provides an update of the strategy. The changes generally reflect the following two key matters;
- Clarification from the Ministry of Housing, Communities and Local Government (MHCLG) that the Chartered Trustees in Bournemouth and Poole will not actually issue a precept until the 2020/21 financial year. In respect of the position for 2019/20 the new Unitary Council will need to include in its council tax requirement an **Anticipated Amount** which the trustees will then request is made available to them. This will mean that the adjustment to the current Bournemouth and Poole Band D charges will now be factored into the model in 2020/21.
 - The work by the Christchurch Council Task and Finish Group charged with providing proposals around the two new Town Councils in Christchurch (*Highcliffe & Walkford Neighbourhood Council and Christchurch Town Council*). Christchurch Council will be asked to make a final decision at its meeting on the 4 December 2018. Up until that point the information in Appendix B should be regarded as provisional.
25. It will be a matter for the Shadow Authority as part of its February 2019 budget report to determine its final council tax for 2019/20 within the these parameters.

Reserves

26. In developing a financial strategy to support the delivery of a balanced budget for 2019/20, the interim s151 Officer to the BCP Shadow Authority has been undertaking a review of reserves. The purpose of this review is to determine the extent to which reserve resources might be best applied to;
- a) Transition, transformation and one-off costs associated with creating the new council.
 - b) Specific challenges faced by the new Council in creating a new single tier local government entity. An example of this is around the legacy deficits on the High Needs element of its Dedicated Schools Grant.
 - c) Supplementing amounts currently available for Welfare Reform and as a Hardship Fund.
27. The proposal is to categorise earmarked reserves into ten broad headings.
- Financial resilience reserves
 - Transition and transformation reserves
 - Asset investment strategy, rent, risk and repairs reserve
 - Insurance reserve

- Reserves held in partnership for external organisations
- Reserves required by statute or legislation
- Planning related reserves
- Government grants held in reserves
- Maintenance reserves
- ICT development and improvement reserves
- Reserves held to support corporate priorities and service improvements

From the work undertaken to date it can be established that further work will be required to ensure consistency in reporting of the reserves inherited from predecessor councils between these categories. Work will also now be undertaken to ensure that certain items are consistently recorded between reserves and other balance sheet headings such as provisions.

28. As part of the approved BCP financial strategy the principle, at least in the first year of the new Council, is to maintain the absolute value of the unearmarked reserves passed across from Bournemouth, Christchurch and Poole councils to help mitigate operational risk. This continues to the financial planning assumption being applied.
29. At this stage no assumption is being made in regards to the value of the reserves that will be transferred from Dorset County Council (DCC). Agreement on the complete set of principles to be applied to the disaggregation of the 31 March 2019 balance sheet of DCC remains to be reached. However in regards to reserves the following *draft* principles are currently being applied;
- The General Balances and the General Earmarked reserves of DCC will be apportioned between the two unitary councils based on population which for the avoidance of doubt will be 11.7% share to the BCP Unitary.
 - DCC project/building/trusts/bequests earmarked reserves will be apportioned to the new unitary council that they can specifically be identified with.
 - Separate arrangements will be made in respect of the Private Finance Initiative and the Insurance earmarked reserves.
30. Ongoing analysis of unearmarked and earmarked reserves will provide a clear audit trail to the resources made available to the new authority and provide assurance in respect of a fair and reasonable apportionment of the reserves of DCC.

Draft Treasury Management Strategy

31. All Councils are required to have a Treasury Management Strategy. This would normally be a matter for consideration by its Audit Committee however in this regard it has been developed by the Finance Task and Finish Group. This includes the details of the underlying policies and practices and its prudential indicators.
32. **Appendix C** attached presents the draft of the Treasury Management Strategy and the Treasury Management Policy and Practices. These documents reflect;

- revisions that local authorities are required to make for 2019/20 due to revisions of MHCLG Investment Guidance, MHCLG Minimum Revenue Provision (MRP) guidance, CIPFA Prudential Code, and the CIPFA Treasury Management code.
- the position from the combination of Bournemouth, Christchurch and Poole's information together. Work remains ongoing in respect of the principles to be applied to the 31 March 2019 disaggregation of the balance sheet of Dorset County Council.

The final version will be included in the February 2019 Budget report for approval by the Shadow Authority.

Schedule of key financial decisions made by the sovereign councils

33. The Chief Financial Officers of each of the sovereign Councils has a key role in ensuring the Shadow Authority are made aware of any significant financial matters which will impact on the future resilience and sustainability of the proposed new Unitary Authority.
34. A four part protocol is now in operation which requires;
- 1) The Chief Financial Officer of each sovereign Council to ensure the relevant service Portfolio Holders and the Resources Portfolio Holders for each of the sovereign councils are made aware of any proposals before they are presented to the relevant decisions making body for approval.
 - 2) That each Consolidated MTFP Update report to the BCP Shadow Executive includes a schedule of the key financial decisions made since the previous such report.
 - 3) That any key financial decision which is a Cabinet decision of the each sovereign Council's will need to include a section in the report on consultation with the Shadow Executive. The expectation is the report author will consult with the relevant members of the Shadow Executive and detail who they consulted with and their response.
 - 4) That any report which is a Council decision of each of the sovereign Councils, and also contains a key financial decision, will be presented by the report author to the Shadow Executive for their formal consideration as part of the consultation process. The sovereign council will therefore be able to reflect on the feedback from the Shadow Executive when they consider their decision.
35. The Consolidated MTFP Update report to the BCP Shadow Executive on the 17 October 2018 presented the key decisions that had taken place since the 24 July 2018. **Appendix D** sets out the key financial decisions since the October Shadow Executive meeting.

Previous Reports

36. Previous Consolidated MTFP Update Reports to this Shadow Executive have provided information on;
- Financial Strategy.
 - Budget Timetable.
 - Aggregate Budget Information.
 - Fair Funding Review.

- 75% Business Rates Retention Model.
- Negative Revenue Support Grant (RSG).
- Response submitted to the Ministry of Housing, Communities and Local Government to the technical consultation on the 2019/20 Local Government Finance Settlement.
- Details of the CIPFA financial resilience index.
- Capital Programme, the Capital Financing Requirement and External Loans.
- Reserves.
- Consolidated Housing Revenue Account.
- Key financial decisions made by each of the four sovereign councils.

Consultation

37. In isolation, the matters raised in this report do not require any formal consultation. The necessary additional resources, savings and efficiencies required to balance the budget over the next four years will each need to be reviewed to determine the extent to which they may require consultation. Consideration will also need to be given to the relevant period, stakeholder groups and method of consultation.

Summary of finance and resourcing implications

38. As set out in the report.

Summary of legal implications

39. It is the responsibility of Members of the Shadow Authority to ensure the Council sets a balanced budget for the forthcoming year. In setting such a budget Members and Officers of the authority have a legal requirement to ensure it is balanced in a manner which reflects the needs of both *current* and *future* taxpayers in discharging these responsibilities. In essence this is a direct reference to ensure that the authority sets a financially sustainable budget which is mindful of the long term consequences of any short term decisions.

Summary of human resources implications

40. There are no direct human resource implications of this report. However, the MTFP and Budget will have a direct impact on the level of services delivered by the Council, the mechanisms by which those services are delivered and the associated staffing establishment.

Summary of environmental impact

41. None specifically related to this report.

Summary of equalities and diversity impact

42. A full Equalities Impact and Needs Assessment (EINA) will be undertaken as part of the final February report to Members as part of the annual budget process to identify the overall equality impacts in respect of the nine protected characteristics:
- a) age;
 - b) disability;
 - c) gender reassignment;
 - d) marriage / civil partnership;
 - e) pregnancy/maternity;
 - f) race;
 - g) religion & belief;
 - h) sex;
 - i) sexual orientation.
43. Officers are required to identify any EINA implications of any specific priorities or savings which they bring forward as part of their budget proposals which are then used to inform the Council's final Budget decisions.

Summary of risk assessment

44. A key thread of the Future Dorset submission was the opportunity to best protect public services as the government continues to reduce the funding it provides to local councils.
45. A separate report on this agenda addresses the key programme risks.

Background papers

46. Previous Consolidated Medium Term Financial Plan reports to this Joint Committee can be found at <https://bcpsshadowauthority.wordpress.com/meetings/>
- 15 December 2017
 - 20 March 2018
 - 23 May 2018
 - 24 July 2018
 - 17 October 2018

Appendices

47. Appendix A Budget and MTFP Key assumptions
- Appendix B Council tax harmonisation – latest provisional model
- Appendix C Treasury management strategy documentation
- Appendix D Key financial decisions since the 17 October 2018 Shadow Executive

MEDIUM TERM FINANCIAL PLAN 2019 to 2023

ASSUMPTIONS AND PRINCIPLES

The Medium Term Financial Plan (MTFP) as set out in the December 2018 Consolidate MTFP Update report to the Shadow Executive is based on the following assumptions;

Government funding

The MTFP is currently drafted in line with the final year of the four year Local Government Financial Settlement announced in 2016/17. This highlights that the new Council will lose a further £6.2m per annum in core Government funding from 2019/20 onwards.

Government have commenced work on their 2019 Spending Review (SR2019) which will outline the resources they intend to make available to Local Government from 2020/21 onwards. At this stage there has been no formal announcement on the exact period to be covered or the timeline for departmental submissions. The indications via the Chancellors 2018 Budget are that it will cover the four year period 2020/21 to 2023/24. It should though be stressed it could just cover a one year period due to uncertainty associated with the United Kingdoms decision to withdraw from the European Union.

What is known about the next Spending Review is that it is due to be supported by the outcome of a Fair Funding Review and a move to 75% Business Rates Retention. The key points associated with the proposed 75% Business Rates Retention model include;

- It will be **fiscally neutral** at a national level.
- It will continue to be underpinned by the **principle of redistribution of resources** based on need.
- The Government will incorporate additional funding responsibilities including the Public Health Grant and where relevant any residual Revenue Support Grant (RSG).
- It will be subject to suitable transitional measures.

At its crudest the Fair Funding Review is exploring the relationship between three core issues, the volume of services needed, the cost of those services and the ability to raise income locally. The assumption had previously always been that core government grant funding was designed to fill the gap between these three issues.

Any redistribution of funding for local government will inevitably create winners and losers. The concern for BCP will be that historically such redistributions have not favoured south coast or Dorset authorities.

Within the detail of the Chancellors Budget 2018 he set out total government spending for the period 2020/21 to 2023/24 split between the NHS and all other departments. This indicates that resources across the rest of government Departments will increase in cash terms by 8.4% over the period 2019/20 to 2023/24 which is roughly in line the increases in the Consumer Price Index (CPI) for the period set by the Office Budget Responsibility (OBR). This suggests that outside of the NHS, all other Departments combined will not see any real terms increase in their funding with some doing better and some worse than this averaged position. This position accords with our current financial planning assumption of a cash freeze for local government over the Spending Review 2019 (SR19) period.

One caveat with this is that as a matter of prudence and due to the uncertainty associated with the approach for drawing up the baseline funding position for the new council, no provision has been made for the potentially positive impact associated with the Government's proposal to remove negative Revenue Support Grant (RSG) in 2019/20 which would potentially reduce the value of the Government funding reductions by £3m. The removal of negative RSG in 2019/20 was the suggested approach the Government outlined in their July 2018 Technical Consultation on the 2019/20 Local Government Finance Settlement. Government lobbying around negative RSG was a key category within the BCP financial strategy agreed in May 2018 by the BCP Joint Committee. It was also a matter that members of the BCP Financial Strategy & Council Tax Harmonisation Task and Finished Group raised with each of the five local MPs in early July.

It is important to recognise that if we were to receive some relief from the impact of negative RSG it most likely only likely to be temporary with its impact playing out as part of the 2019 Spending Review.

The Institute for Government (IfG) have stated that they expect the 2019 Spending Review, other than for the National Health Service, to be another lean one for public services. Given the ongoing demand particularly on Adult, Children's and Housing services, and the Government funding reductions already faced by councils since 2010 the prediction is it will be more difficult than the previous two.

Council Tax

The assumption is that the Council will move towards the harmonisation of Council Tax in line with the local preference developed by the Shadow Executive namely;

- 1) Adjustments to the current Band D council tax rates of the three predecessor councils will be made to reflect the creation of two new Town Councils in Christchurch and the transfer of the mayoral function to Chartered Trustees in both Bournemouth and Poole and to the new Christchurch Town Council in Christchurch.
- 2) The Government's referendum limit will be 2.99% in 2019/20 and 1.99% annually thereafter.
- 3) Poole's Council Tax (*as adjusted for 1*) will rise in line with the Government's referendum limit.
- 4) Christchurch's Council Tax (*as adjusted for 1*) will be frozen until the Poole's Council Tax catches up.
- 5) Bournemouth's Council Tax (*as adjusted for 1*) will increase by slightly less than the annual referendum limit to ensure it catches up with Christchurch's level of tax in the same year as Poole's.
- 6) Any increases in the Government referendum limit, higher than those currently assumed, will reduce the period of harmonisation.

In line with (3) above the assumption is that the lowest level of Council Tax, which is within Poole, will increase by 2.99%. For future years the current planning assumption is 1.99%.

Normally a local authority would determine its consolidated Council Tax taxbase, the number of Band D properties, as part of an annual report to Council in December/January each year. The intention is that the new BCP will need to maintain a separate taxbase for each area (Bournemouth, Christchurch and Poole) until the point of harmonisation.

Business Rates

The assumption is that the Council will continue to deliver amounts in excess of those assumed by the Government as part of the Council's baseline finance settlement from the Government. These amounts have though been reducing more towards the baseline based on actual performance over recent years.

In line with the detail of the Spending Review 2019 (SR19) announced by the Chancellor in his October 2018 Budget our current financial planning assumption is for business rates resources to increase by Consumer Price Index (CPI).

This position will be kept under review in light of the announcement move to a 75% Retained Business Rates model from 2020/21.

New Homes Bonus (NHB)

In establishing a consistent financial policy it is proposed to budget for New Homes Bonus to support the revenue base budget in 2019/20. NHB is an unringfenced grant paid by Central Government to Councils for increasing the number of homes and the number of long term empty properties bought back into use in their area. The bonus was previously paid for six years at a rate equivalent to the extra Council Tax revenue a property will raise. In line with the 2017/18 local government finance settlement the bonus has been reduced to five years from 2017/18 and four years from 2018/19 onwards. A restriction is now applied which means the Council will not receive any bonus on the first 0.4% of any housing growth.

The 2018/19 allocation across Bournemouth, Christchurch and Poole is £4.3m in New Homes Bonus. The budget proposed for 2019/20 assumes that the NHB will be reduced to £3.2m.

It should be highlighted no allowance has been made for the potential increase in the annual baseline below which no NHB is paid. The July 2018 Technical Consultation on the 2019/20 Local Government Finance Settlement indicated that this baseline, sometimes referred to as the “deadweight”, will need to be increase in 2019/20 due to affordability.

Current indications are that 2019/20 will be the final year NHB is paid as Government look to explore how to incentivise housing growth as part of the next spending review. It is though assumed that the replacement will provide resources equivalent to legacy payments already anticipated under the current system.

Adult Social Care investment

Additional £16.4m investment in Adult Social Care over the next 2 years being a combination of;

- a) demographic growth in demand for care packages including those to support the urgent and emergency care system as well as prevent delayed discharges from hospital.
- b) assumptions around specific inflationary pressures within the care market which have increased the cost of care between 6% to 10% in recent years.
- c) Impact of the new National Living Wage which will increase from £7.83 an hour to £8.21 per hour from 1 April 2019 (4.9%).

It has also been assumed that the funding being made available to BCP in 2019/20 under the Improved Better Care Fund and the additional Social Care Funding announced in the October 2018 Budget will continue to be received in absolute annual terms for the period of the next spending review. It is hoped that the anticipated Green Paper on social care funding will provide sustainable funding for this service moving forward.

Pay award

In September 2017 the Government announced its intention to move away from the 1% per annum public sector pay award policy but with a clear indication that any actual increases above this level are unlikely to be funded nationally. Negotiations via the National Employers for Local Government Services set 2% flat rate increase in both 2018/19 and 2019/20. However, increases in the lower spinal column points to reflect the National Living Wage increase the local government pay bill by 2.7% in 2018/19 and 2.8% in 2019/20.

Within the proposed budget provision has been made for the 2% baseline increase, with further provision in certain services where they have a significant staff base on the lower spinal column points. Services will be expected to manage the impact of any incremental drift in their pay base.

Inflationary costs

Inflation is only provided for in service budgets where it can be demonstrated that it will be needed due to either market or contract conditions. Inflation as at October 2018 was 2.4% as measured by the Consumer Price Index (CPI).

Council Tax Modelling - BCP Council - Netted down for Band D Chartered Trustees amount

	CTax 2018/19 £	Increase 19/20 %	CTax 2019/20 £	CTax 2020/21 £	CTax 2021/22 £	CTax 2022/23 £	CTax 2023/24 £	CTax 2024/25 £	CTax 2025/26 £
Christchurch Borough Council	£200.82		£191.96	£191.96	£191.96	£191.96	£191.96	£191.96	£213.84
Dorset County Council	£1,406.34		£1,406.34	£1,406.34	£1,406.34	£1,406.34	£1,406.34	£1,406.34	£1,406.34
Christchurch Total	£1,607.16		£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,620.18
Adjustment for Christchurch Town and Highcliffe & Walkford*	-£8.86								
Christchurch Calculated ANA	£1,598.30	0.00%	£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,598.30	£1,620.18
Christchurch Town Council Precept inc Mayoralty*	£9.69	-	£27.92	£28.48	£29.04	£29.62	£30.21	£30.81	£31.42
Burton Parish*	£13.08	1.99%	£13.34	£13.61	£13.88	£14.15	£14.43	£14.72	£15.01
Hurn Parish*	£27.93	1.99%	£28.49	£29.05	£29.63	£30.22	£30.82	£31.44	£32.06
Highcliffe and Walkford (New)*	£9.89	-	£29.22	£29.80	£30.39	£31.00	£31.61	£32.24	£32.89
Bournemouth	£1,438.92		£1,473.40	£1,497.03	£1,518.73	£1,543.31	£1,568.39	£1,593.96	£1,620.18
Adjustment for Bournemouth Chartered Trustee*	£0.00			-£2.40					
Bournemouth Total	£1,438.92	2.40%	£1,473.40	£1,494.63	£1,518.73	£1,543.31	£1,568.39	£1,593.96	£1,620.18
Bournemouth Chartered Trustee (New)*	£0.00	-	£0.00	£2.40	£2.45	£2.50	£2.55	£2.60	£2.65
Holdenhurst Parish*	£0.00	-	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00	£0.00
Poole	£1,399.68		£1,441.53	£1,470.22	£1,497.21	£1,527.05	£1,557.48	£1,588.52	£1,620.18
Adjustment for Poole Chartered Trustee*	£0.00			-£2.26					
Poole Total	£1,399.68	2.99%	£1,441.53	£1,467.95	£1,497.21	£1,527.05	£1,557.48	£1,588.52	£1,620.18
Poole Chartered Trustee (New)*	£0.00	-	£0.00	£2.26	£2.31	£2.36	£2.40	£2.45	£2.50
Dorset Police and Crime Commissioner*	£206.58	1.99%	£210.69	£214.88	£219.16	£223.52	£227.97	£232.51	£237.13
Dorset and Wiltshire Fire and Rescue Authority*	£72.70	1.99%	£74.15	£75.62	£77.13	£78.66	£80.23	£81.82	£83.45

*1.99% applied to all preceptors in future years

*Figures are purely notional for modelling purposes

Bournemouth, Christchurch and Poole Council (BCP)

Treasury Management Strategy Statement 2019/20

Introduction

Local Government Reorganisation in Dorset

- 1 Dorset's existing nine councils will be replaced with two new unitary councils from April 2019, with Bournemouth Borough Council, the Borough of Poole and Christchurch Borough Council forming one unitary council, and the six other councils forming the other.
- 2 It will therefore be necessary to 'disaggregate' existing investments and borrowings attributable to Christchurch Borough Council from the County Council's assets and liabilities. The process for doing this is being developed and agreed during 2018/19, in common with other services and activities of the County Council provided to Christchurch Borough Council.

Background

- 3 The Council defines its treasury management activities as: "The management of the local authority's investments and cash flows, its banking, money market and capital market transactions; the effective control of the risks associated with those activities; and the pursuit of optimum performance consistent with those risks." Part of the treasury management operation is to ensure that the cash flow is adequately planned, with cash being available when it is needed. Surplus monies are invested in low risk counterparties or instruments commensurate with the Council's low risk appetite, providing adequate liquidity initially before considering investment return.
- 4 The second main function of the treasury management service is the funding of the Council's capital plans. These capital plans provide a guide to the borrowing need of the Council, essentially the longer term cash flow planning to ensure that the Council can meet its capital spending obligations. This management of longer term cash may involve arranging long or short term loans, or using longer term cash flow surpluses. On occasion any debt previously drawn may be restructured to meet Council risk or cost objectives.
- 5 Revised reporting is required for the 2019/20 reporting cycle due to revisions of the MHCLG Investment Guidance, the MHCLG Minimum Revenue Provision (MRP) Guidance, the CIPFA Prudential Code and the CIPFA Treasury Management Code. The primary reporting changes include the introduction of a capital strategy, to provide a longer-term focus to the capital plans, and greater reporting requirements surrounding any commercial activity undertaken under the Localism Act 2011. The capital strategy is being reported separately.

Reporting Requirements

- 6 **Capital Strategy** - The CIPFA revised 2017 Prudential and Treasury Management Codes require, for 2019-20, all local authorities to prepare an additional report, a capital strategy report, which will provide the following:
 - a high-level long term overview of how capital expenditure, capital financing and treasury management activity contribute to the provision of services

- an overview of how the associated risk is managed
- the implications for future financial sustainability

The aim of this capital strategy is to ensure that all elected members on the full council fully understand the overall long-term policy objectives and resulting capital strategy requirements, governance procedures and risk appetite.

This capital strategy is reported separately from the Treasury Management Strategy Statement; non-treasury investments will be reported through the former. This ensures the separation of the core treasury function under security, liquidity and yield principles, and the policy and commercialism investments usually driven by expenditure on an asset.

- 7 The Council is required to receive and approve, as a minimum, three main reports each year, which incorporate a variety of policies, estimates and actuals.
- 8 **Prudential and treasury indicators and treasury strategy** - The first, and most important report covers:
 - a The capital plans (including prudential indicators);
 - b A minimum revenue provision (MRP) policy (how residual capital expenditure is charged to revenue over time);
 - c The treasury management strategy (how the investments and borrowings are to be organised) including treasury indicators; and
 - d An investment strategy (the parameters on how investments are to be managed).
- 9 **Quarterly treasury management report** – This will update members with the progress of the capital position, amending prudential indicators if necessary, and whether any policies require revision. The reports will be presented to a yet to be formed committee for the BCP authority.
- 10 **An annual treasury management report** – This provides details of a selection of actual prudential and treasury indicators and actual treasury operations compared to the estimates within the strategy.
- 11 The above reports are required to be adequately scrutinised before being recommended to the Council. This role is undertaken by the yet to be formed committee for the BCP authority.

Treasury Management Strategy for 2019/20

- 12 The strategy for 2019/20 covers two main areas:

Capital issues

- the capital plans and the prudential indicators;
- the minimum revenue provision (MRP) policy.

Treasury management issues

- the current treasury position;
- treasury indicators which limit the treasury risk and activities of the Council;
- prospects for interest rates;
- the borrowing strategy;

- policy on borrowing in advance of need;
 - debt rescheduling;
 - the investment strategy;
 - creditworthiness policy; and
 - policy on use of external service providers.
- 13 These elements cover the requirements of the Local Government Act 2003, the CIPFA Prudential Code, MHCLG MRP Guidance, the CIPFA Treasury Management Code and MHCLG Investment Guidance.

Training

- 14 The CIPFA Code requires the responsible officer to ensure that members with responsibility for treasury management receive adequate training in treasury management. This especially applies to members responsible for scrutiny. Training will be organised alongside the Council's Treasury Management advisors and will be organised for members for the formation of the Bournemouth, Christchurch and Poole Authority in 2019/20.
- 15 The training needs of treasury management officers are periodically reviewed.

Treasury management consultants

- 16 Currently Bournemouth uses Link Asset Services and Christchurch and Poole use Arlingclose as its external treasury management advisors. The Finance team for Bournemouth and Poole and Christchurch are currently undertaking a tender to ensure one supplier is in place by the 1st April 2019.
- 17 The Council recognises that responsibility for treasury management decisions remains with the organisation at all times and will ensure that undue reliance is not placed upon our external service providers.
- 18 It also recognises that there is value in employing external providers of treasury management services in order to acquire access to specialist skills and resources. The Council will ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review.

The Capital Prudential Indicators 2019/20 – 2020/21

- 19 The Council's capital expenditure plans have a key influence over the treasury management activity. The capital expenditure plans are reflected in the prudential indicators, which are designed to assist members' in considering the impact and risk of this Council's capital expenditure plans. As the BCP authority is yet to be established the capital plans are limited to 2 years. These will be extended and represented once the BCP authority has established itself.

Capital expenditure

- 20 This prudential indicator is a summary of the Council's capital expenditure plans, both those agreed previously, and those forming part of this budget cycle. Members are asked to approve the capital expenditure forecasts:

Capital expenditure	2018/19 Estimate £'000	2019/20 Estimate £'000	2020/21 Estimate £'000
General Fund	112,749	46,963	13,250
Commercial activities/ non-financial investments	145,296	60,000	-
HRA	35,073	26,462	16,067
Total	293,118	133,425	29,317

* Commercial activities / non-financial investments relate to areas such as capital expenditure on investment properties, loans to third parties etc.

21 The tables below summarise the above capital expenditure plans and how these plans are being financed by capital or revenue resources. Any shortfall of resources results in a funding borrowing need.

General Fund and Commercial Activity Capital Expenditure

Capital expenditure	2018/19 Estimate £'000	2019/20 Estimate £'000	2020/21 Estimate £'000
General Fund Total	258,045	106,963	13,250
Financed by:			
Capital receipts	5,571	1,512	997
Capital grants & Contributions	47,962	21,642	7,765
Other Contributions	7,168	1,265	2,048
Reserve Contributions	10,821	6,893	1,050
Internal Borrowing	41,227	15,651	1,390
External Borrowing	-	-	-
Total financing for the year	112,749	46,963	13,250

HRA Capital Expenditure

Capital expenditure	2018/19 Estimate £'000	2019/20 Estimate £'000	2020/21 Estimate £'000
HRA Total	35,073	26,462	16,067
Financed by:			
Capital receipts	5,919	2,283	176
Major Repairs Allowance	28,830	24,179	7,791
Other Contributions	60	-	-
Internal Borrowing	264	-	-
External Borrowing	-	-	8,100
Total financing for the year	35,073	26,462	16,067

The Council's borrowing need (the Capital Financing Requirement)

- 22 The second prudential indicator is the Council's Capital Financing Requirement (CFR). The CFR is simply the total historic outstanding capital expenditure which has not yet been paid for from either revenue or capital resources. It is essentially a measure of the Council's underlying borrowing need. Any capital expenditure above, which has not immediately been paid for, will increase the CFR.
- 23 The CFR does not increase indefinitely, as the minimum revenue provision (MRP) is a statutory annual revenue charge which broadly reduces the borrowing need in line with each assets life, and so charges the economic consumption of capital assets as they are used.
- 24 The CFR includes any other long term liabilities (e.g. PFI schemes, finance leases). Whilst these increase the CFR, and therefore the Council's borrowing requirement, these types of scheme include a borrowing facility and so the Council is not required to separately borrow for these schemes.
- 25 The Council is asked to approve the CFR projections overleaf:

	2018/19 Estimate £'000	2019/20 Estimate £'000	2020/21 Estimate £'000
Capital Financing Requirement			
CFR – General Fund	289,220	297,018	304,816
CFR – HRA	144,995	144,995	153,095
Total CFR	434,215	442,013	457,911
Movement in CFR	33,698	7,798	1,637
Movement in CFR represented by			
Net movement in borrowing for the year (above)	41,491	15,651	9,490
Less MRP/VRP and other financing movements	(7,793)	(7,853)	(7,853)
Movement in CFR	33,698	7,798	1,637

- 26 A key aspect of the regulatory and professional guidance is that elected members are aware of the size and scope of any commercial activity in relation to the authority's overall financial position. The capital expenditure figures and the details above demonstrate the scope of this activity and, by approving these figures, consider the scale proportionate to the Authority's remaining activity.

Minimum Revenue Provision (MRP) policy statement

- 27 The Council is required to make a Minimum Revenue Provision (MRP). It is a statutory requirement to make a charge to the Council's General Fund to make provision for the repayment of the Council's past capital debt and other credit liabilities.
- 28 MHCLG regulations have been issued which require the full Council to approve an MRP Statement in advance of each year. A variety of options are provided to councils, so long as there is a prudent provision. The Council is recommended to approve the following MRP Statement.
- 29 For capital expenditure incurred before 1 April 2008 or which in the future will be Supported Capital Expenditure, the MRP policy will be either:
- **Existing practice** - MRP will follow the existing practice outlined in former CLG regulations (option 1);
 - **Based on CFR** – MRP will be based on the CFR (option 2);
- 30 These options provide for an approximate 4% reduction in the borrowing need (CFR) each year.
- 31 From 1 April 2008 for all unsupported borrowing (including PFI and finance leases) the MRP policy will be either:
- **Asset life method** – MRP will be based on the estimated life of the assets, in accordance with the regulations (this option must be applied for any expenditure capitalised under a Capitalisation Direction) (option 3);
 - **Depreciation method** – MRP will follow standard depreciation accounting procedures (option 4);

- 32 The type of approach intended by the MRP guidance is clearly to enable local circumstances and discretion to play a part, as the guidance in general contains a set of recommendations rather than representing a prescriptive process. The guidance makes it clear that councils can follow an alternative approach, provided they still make a prudent provision.
- 33 It was agreed by members of previous Councils that the following MRP policy was applied from 2016/17 onwards:
- In respect of all supported borrowing, capital expenditure incurred prior to 2016/17 (excluding assets acquired under PFI or finance lease arrangements) MRP will be provided at a rate of 2% on a straight line basis to ensure the balance is fully cleared over the period in line with the useful life of the assets the debt services.
 - In respect of all unsupported borrowing, capital expenditure incurred prior to 2016/17 (excluding assets acquired under PFI or finance lease arrangements) the Council will apply the Asset life method as used in previous years and will apply an average life of 25 years for the unsupported borrowing requirement to be repaid over based on historical schemes that have required and applied unsupported borrowing.
 - MRP charges from 1 April 2004 to 31 March 2016 exceeded what prudence required during the period under this revised policy. There will be a realignment of MRP charged to the revenue account in 2016/17 and subsequent years to recognise this excess sum. Total MRP after applying realignment will not be less than zero in any financial year.
 - In respect of capital expenditure incurred in 2016/17 and subsequent financial years MRP will be provided at a rate of 4% on the written down balance.
- 34 In 2017/18 a proposed change was made that the 4% write down method will be used for all assets except for significant individual schemes exceeding £10m (such as asset investments) for which the specific asset life will be used for MRP purposes.
- 35 There is no requirement on the HRA to make a minimum revenue provision but there is a requirement for a charge for depreciation to be made (although there are transitional arrangements in place).
- 36 Repayments included in annual PFI or finance leases are applied as MRP.

MRP Overpayments

- 37 A change introduced by the revised MHCLG MRP Guidance was the allowance that any charges made over the statutory minimum revenue provision (MRP), voluntary revenue provision or overpayments, can, if needed, be reclaimed in later years if deemed necessary or prudent. In order for these sums to be reclaimed for use in the budget, this policy must disclose the cumulative overpayment made each year. Up until the 31 March 2019 the total VRP overpayments were £3.5m.

Borrowing

- 38 The treasury management function ensures that the Council's cash is organised in accordance with the relevant professional codes, so that sufficient cash is available to meet this service activity. This will involve both the organisation of the

cash flow and, where capital plans require, the organisation of appropriate borrowing facilities. The strategy covers the relevant treasury / prudential indicators, the current and projected debt positions and the annual investment strategy.

Current portfolio position

39 The overall Treasury Management portfolio as at 31 March 2018 and for the position as at 31 October 2018 are shown below for both borrowing and investments.

	Actual 31/03/2018 £'000	Actual 31/03/2018 %	Current 31/10/2018 £'000	Current 31/10/2018 %
Treasury investments				
Money Market Funds	2,150	3%	2,000	2%
Bank Deposits	7,500	11%	13,100	16%
Local Authorities	23,000	33%	17,500	21%
Call Account	4,097	6%	11,960	15%
Debt Management Office	11,850	17%	12,850	16%
Cash Plus and Short Bond Funds	20,400	30%	25,000	30%
Total Treasury Investments	68,997	100%	82,410	100%
Treasury External Borrowing				
PWLB	153,187	62%	153,187	64%
Local Authorities	73,200	29%	64,600	27%
Private Sector	19,214	8%	18,863	8%
Salix	3,541	1%	2,695	1%
Total External Borrowing	249,142	100%	239,345	100%
Net treasury investment / (borrowing)	(180,145)		(156,935)	

40 It should be noted that Bournemouth Borough Council has secured £49m forward borrowing loan which will be issued in May 2021. There will be a need to refinance the current £49m local authority loans which will be redeemed in September 2019.

41 The Council's forward projections for borrowing are summarised below. The table shows the actual external debt (the treasury management operations), against the underlying capital borrowing need (the Capital Financing Requirement - CFR), highlighting any over or under borrowing.

	2018/19 Estimate £'000	2019/20 Estimate £'000	2020/21 Estimate £'000
External Debt			
Debt at 1 April	249,142	249,142	200,142
Expected change in Debt	0	(49,000)	49,000
Actual gross debt at 31 March	249,142	200,142	249,142
The Capital Financing Requirement	493,147	560,351	557,222
Under / (over) borrowing	244,005	360,209	308,080

42 Within the prudential indicators there are a number of key indicators to ensure that the Council operates its activities within well defined limits. One of these is that the Council needs to ensure that its gross debt does not, except in the short term, exceed

the total of the CFR in the preceding year plus the estimates of any additional CFR for 2018/19 and the following two financial years. This allows some flexibility for limited early borrowing for future years, but ensures that borrowing is not undertaken for revenue purposes.

- 43 The previous Council have complied with their prudential indicator in the current year and the new authority does not envisage difficulties for the future. This view takes into account current commitments, existing plans, and the proposals in this budget report.

Treasury Indicators: limits to borrowing activity

- 44 **The operational boundary.** This is the limit beyond which external debt is not normally expected to exceed. In most cases, this would be a similar figure to the CFR, but may be lower or higher depending on the levels of actual debt.
- 45 **The authorised limit for external debt.** A further key prudential indicator represents a control on the maximum level of borrowing. This represents a limit beyond which external debt is prohibited, and this limit needs to be set or revised by the full Council. It reflects the level of external debt which, while not desired, could be afforded in the short term, but is not sustainable in the longer term.
- a This is the statutory limit determined under section 3 (1) of the Local Government Act 2003. The Government retains an option to control either the total of all Councils' plans, or those of a specific Council, although this power has not yet been exercised.
- b The Council is asked to approve the following authorised limit:

	2018/19 Estimate £m	2019/20 Estimate £m	2020/21 Estimate £m
Operational boundary	411	460	510
Authorised limit	459	510	560

- 46 It should be noted that the Operation boundary and Authorised limit have been set to allow sufficient headroom should any future Asset Investments be approved.

Maturity structure of borrowing

- 47 Maturity structure of borrowing. These gross limits are set to reduce the Council's exposure to large fixed rate sums falling due for refinancing, and are required for upper and lower limits.
- 48

Maturity structure of fixed interest rate borrowing 2019/20		
	Lower	Upper
Under 12 months	0%	40%
12 months to 2 years	0%	50%
2 years to 5 years	0%	80%
5 years to 10 years	0%	80%
10 years and above	50%	100%

Maturity structure of variable interest rate borrowing 2019/20		
	Lower	Upper
Under 12 months	0%	100%
12 months to 2 years	0%	100%
2 years to 5 years	0%	100%
5 years to 10 years	0%	25%
10 years and above	0%	25%

Prospects for interest rates

- 49 Link Asset Services as part of their service is to assist the Council to formulate a view on interest rates. The following table gives their view on the base rate and PWLB borrowing costs.

Link Asset Services Interest Rate View														
	Dec-18	Mar-19	Jun-19	Sep-19	Dec-19	Mar-20	Jun-20	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22
Bank Rate View	0.75%	0.75%	1.00%	1.00%	1.00%	1.00%	1.25%	1.25%	1.50%	1.50%	1.50%	1.75%	1.75%	2.00%
3 Month LIBID	0.80%	0.80%	0.90%	1.10%	1.10%	1.20%	1.40%	1.50%	1.60%	1.60%	1.70%	1.80%	1.90%	2.00%
6 Month LIBID	0.90%	0.90%	1.00%	1.20%	1.20%	1.30%	1.50%	1.60%	1.70%	1.70%	1.80%	1.90%	2.00%	2.10%
12 Month LIBID	1.00%	1.00%	1.10%	1.30%	1.30%	1.40%	1.60%	1.70%	1.80%	1.80%	1.90%	2.00%	2.10%	2.20%
5yr PWLB Rate	2.00%	2.10%	2.20%	2.20%	2.30%	2.30%	2.40%	2.50%	2.50%	2.60%	2.60%	2.70%	2.70%	2.80%
10yr PWLB Rate	2.50%	2.50%	2.60%	2.70%	2.70%	2.80%	2.90%	2.90%	3.00%	3.10%	3.10%	3.20%	3.20%	3.20%
25yr PWLB Rate	2.90%	3.00%	3.00%	3.10%	3.20%	3.20%	3.30%	3.40%	3.50%	3.50%	3.60%	3.60%	3.60%	3.70%
50yr PWLB Rate	2.70%	2.80%	2.80%	2.90%	3.00%	3.00%	3.10%	3.20%	3.30%	3.30%	3.40%	3.40%	3.40%	3.50%

- 50 The flow of generally positive economic statistics after the quarter ended 30 June meant that it came as no surprise that the Monetary Policy Committee (MPC) came to a decision on 2 August to make the first increase in Bank Rate above 0.5% since the financial crash, from 0.5% to 0.75%. However, the MPC emphasised again, that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, than before the crash; indeed they gave a figure for this of around 2.5% in ten years' time but they declined to give a medium term forecast. It is unlikely that the MPC will increase Bank Rate in February 2019, ahead of the deadline in March for the UK exit of the European Union. Similarly, the MPC is more likely to wait until August 2019, than May 2019, before the next increase, to be followed by further increases of 0.25% in May and November 2020 to reach 1.5%. However, the cautious pace of even these limited increases is dependent on a reasonably orderly Brexit process.

Borrowing strategy

- 51 The Council is currently maintaining an under-borrowed position. This means that the capital borrowing need (the Capital Financing Requirement), has not been fully funded with loan debt as cash supporting the Council's reserves, balances and cash flow have been used as a temporary measure. This strategy is prudent as investment returns are low and counterparty risk is still an issue that need to be considered.
- 52 The Chief Financial Officer has the delegated responsibility to arrange such loans

as are legally permitted to meet the Council's borrowing requirement and to arrange terms of all loans to the Council including amounts, periods and rates of interest.

- 53 Against this background and the risks within the economic forecast, caution will be adopted with the 2019/20 treasury operations. The Chief Financial Officer will monitor interest rates in financial markets and adopt a pragmatic approach to changing circumstances:
- a If it was felt that there was a significant risk of a sharp FALL in long and short term rates (e.g. due to a marked increase of risks around relapse into recession or of risks of deflation), then long term borrowings will be postponed, and potential rescheduling from fixed rate funding into short term borrowing will be considered.
 - b If it was felt that there was a significant risk of a much sharper RISE in long and short term rates than that currently forecast, perhaps arising from an acceleration in the rate of increase in central rates in the USA and UK, an increase in world economic activity or a sudden increase in inflation risks, then the portfolio position will be re-appraised. Most likely, fixed rate funding will be drawn whilst interest rates are lower than they are projected to be in the next few years.
 - c Any decisions will be reported to the yet to be Audit and Governance committee for the BCP authority at the next available opportunity.

Policy on borrowing in advance of need

- 54 The Council will not borrow more than or in advance of its needs purely in order to profit from the investment of the extra sums borrowed. Any decision to borrow in advance will be within forward approved Capital Financing Requirement estimates, and will be considered carefully to ensure that value for money can be demonstrated and that the Council can ensure the security of such funds.
- 55 Risks associated with any borrowing in advance of activity will be subject to prior appraisal and subsequent reporting through the mid-year or annual reporting mechanism.

Debt rescheduling

- 56 As short term borrowing rates will be considerably cheaper than longer term fixed interest rates, there may be potential opportunities to generate savings by switching from long term debt to short term debt. However, these savings will need to be considered in the light of the current treasury position and the size of the cost of debt repayment (premiums incurred).
- 57 The reasons for any rescheduling to take place will include:
- a The generation of cash savings and / or discounted cash flow savings;
 - b Helping to fulfil the treasury strategy;
 - c Enhance the balance of the portfolio (amend the maturity profile and/or the balance of volatility).
- 58 Consideration will also be given to identify if there is any residual potential for making savings by running down investment balances to repay debt prematurely as short term rates on investments are likely to be lower than rates paid on current debt.

59 All debt rescheduling will be reported to the Audit and Governance committee for the BCP authority at the earliest meeting following its action.

Municipal Bond Agency

60 It is likely that the Municipal Bond Agency, currently in the process of being set up, will be offering loans to local authorities in the near future. It is also hoped that the borrowing rates will be lower than those offered by the Public Works Loan Board (PWLB). This Authority intends to make use of this new source of borrowing as and when appropriate.

Annual Investment Strategy

Investment Policy

61 The MHCLG and CIPFA have extended the meaning of ‘investments’ to include both financial and non-financial investments. This report deals solely with financial investments, (as managed by the treasury management team). Non-financial investments, essentially the purchase of income yielding assets, are covered in the Capital Strategy, (a separate report).

62 The Council’s investment policy has regard to the following: -

- MHCLG’s Guidance on Local Government Investments (“the Guidance”)
- CIPFA Treasury Management in Public Services Code of Practice and Cross Sectoral Guidance Notes 2017 (“the Code”)
- CIPFA Treasury Management Guidance Notes 2018

The Council’s investment priorities will be security first, portfolio liquidity second and then yield, (return).

63 In accordance with the above guidance from the MHCLG and CIPFA, and in order to minimise the risk to investments, the Council applies minimum acceptable credit criteria in order to generate a list of highly creditworthy counterparties which also enables diversification and thus avoidance of concentration risk. The key ratings used to monitor counterparties are the Short Term and Long Term ratings.

64 Ratings will not be the sole determinant of the quality of an institution; it is important to continually assess and monitor the financial sector on both a micro and macro basis and in relation to the economic and political environments in which institutions operate. The assessment will also take account of information that reflects the opinion of the markets. To this end the Council will engage with its advisors to maintain a monitor on market pricing such as “credit default swaps” and overlay that information on top of the credit ratings.

65 Other information sources used will include the financial press, share price and other such information pertaining to the banking sector in order to establish the most robust scrutiny process on the suitability of potential investment counterparties.

Creditworthiness policy

66 The primary principle governing the Council’s investment criteria is the security of its investments, although the yield or return on the investment is also a key consideration. After this main principle, the Council will ensure that:

- a It maintains a policy covering both the categories of investment types it will invest in, criteria for choosing investment counterparties with adequate

security, and monitoring their security. This is set out in the specified and non-specified investment sections below; and

- b It has sufficient liquidity in its investments. For this purpose it will set out procedures for determining the maximum periods for which funds may prudently be committed. These procedures also apply to the Council's prudential indicators covering the maximum principal sums invested.
- 67 The Chief Financial Officer will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to which types of investment instruments that can be used as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.
- 68 Credit rating information is supplied by Link Asset (Services) Ltd, our treasury consultants, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance, a negative rating watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.
- 69 The criteria for providing a pool of high quality investment counterparties (both specified and non-specified investments) is:

Sovereign Ratings

- AAA (non UK)

(Rating Description: AAA = Prime Rating, AA+, AA, AA- = High Grade Rating)

Appendix 2 sets out the current list of countries that the Council can invest funds with.

The UK sovereign rating is currently AA. To ensure that the Treasury Function has capacity to operate effectively no specific minimum UK sovereign rating has been set out.

Selection Criteria

- 70 Banks 1 - the Council will use UK and non UK banks which have, as a minimum at least one of, the following Fitch, Moody's and Standard & Poors credit ratings (where rated):

	Fitch	Moody's	Standard & Poors
Short Term	F1	P1	A-1
Long Term	A-	A3	A-

- 71 Investments will include term deposits, call accounts, notice accounts and Certificate of Deposits.

- a Banks 2 – Part nationalised UK bank – Royal Bank of Scotland. This bank can be included provided it continues to be part nationalised or it meets the ratings in Banks 1 above.
- b Banks 3 – The Council’s own banker (HSBC) for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time.
- c Bank subsidiary and treasury operation - The Council will use these where the parent bank has provided an appropriate guarantee or has the necessary ratings outlined above.
- d Building societies. The Council will use societies which meet the ratings for Banks 1 outlined above.
- e Market Funds (MMFs) Constant net asset value (CNAV)
- f Money Market Funds (MMFs) Low-Volatility asset value (LNVAV)
- g Money Market Funds (MMFs) Variable net asset value (VNAV)
- h Ultra-Short Dated Bond Funds with a credit rating of at least 1.25
- i Ultra-Short Dated Bond Funds with a credit rating of at least 1.50
- j Cash Plus Funds
- k UK Government (including gilts, Treasury Bills and the Debt Management Account Deposit Facility (DMADF))
- l Local authorities, Parish Councils, BCP Council Companies (Subsidiaries) and Partnerships.
- m Pooled Funds

Maximum Time and Monetary Limits applying to Investments

72 The maximum amount that can be invested in any one institution at the time of the investment (including call accounts) as a percentage of the total investment portfolio has been reviewed and rationalised. All AA- and above rated institutions have a maximum limit of 25%, all A+, A or A- rated institutions have a maximum limit of 20%. For practical reasons where the average investment balance falls below £10m it may become necessary to increase the percentage limit to 33% at the time of investment (this only applies to call accounts and money market funds).

73 The maximum time and monetary limits for institutions on the Council’s Counterparty List are as follows (these will cover both Specified and Non-Specified Investments):

	Long Term Rating	Money Limit	Time Limit
Banks 1 higher quality	AA-	25%	2 years
Banks 1 medium quality	A	20%	1 year
Banks 1 lower quality	A-	20%	6 months

Banks 2 category – part-nationalised			
Lloyds / Bank of Scotland	N/A	20%	2 years
RBS / Nat West			2 years
Banks 3 category – Council’s banker HSBC	AA-	25%	3 months
DMADF/Treasury Bills	AAA	25%	6 months
Local Authorities	N/A	20%	5 years
Money Market Funds CNAV	AAA	25%	Instant access
Money Market Funds LVNAV	AAA	25%	Instant access
Money Market Funds VNAV	AAA	25%	Instant access
Ultra-Short Dated Bond Funds	N/A	25%	Instant access
Cash Plus Funds	AAA	25%	12 to 18 months
UK Gilts	UK Sovereign Rate	25%	5 years

Use of additional information other than credit ratings

74 Additional requirements under the Code require the Council to supplement credit rating information. Whilst the above criteria relies primarily on the application of credit ratings to provide a pool of appropriate counterparties for officers to use, additional operational market information will be applied before making any specific investment decision from the agreed pool of counterparties. This additional market information will be applied to compare the relative security of differing investment counterparties.

Investment strategy

In-house funds

75 Investments will be made with reference to the core balance and cash flow requirements and the outlook for short-term interest rates (i.e. rates for investments up to 12 months).

Investment returns expectations

76 Bank Rate is forecast to increase steadily but slowly over the next few years to reach 2.00% by quarter 1 2022. Bank Rate forecasts for financial year ends (March) are:

- a 2018/19 0.75%
- b 2019/20 1.00%
- c 2020/21 1.50%
- d 2021/22 2.00%

77 The overall balance of risks to economic growth in the UK is probably neutral. The balance of risks to increases in Bank Rate and shorter term PWLB rates, are probably also even and are dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

78 **Investment treasury limit** – The maximum period for investments will be 5 years.

Appendices

Appendix 1 - Economic Background and interest rate forecasts

Appendix 2 - Approved Countries for investments

Appendix 3 - Treasury Management Policy, Practices and Schedules

Appendix 1: Economic Background (provided by Link Asset Services Ltd)

GLOBAL OUTLOOK. World growth has been doing reasonably well, aided by strong growth in the US. However, US growth is likely to fall back in 2019 and, together with weakening economic activity in China, overall world growth is likely to weaken.

Inflation has been weak during 2018 but, at long last, unemployment falling to remarkably low levels in the US and UK has led to a marked acceleration of wage inflation which is likely to prompt central banks into a series of increases in central rates. The EU is probably about a year behind in a similar progression.

KEY RISKS - central bank monetary policy measures

Looking back on nearly ten years since the financial crash of 2008 when liquidity suddenly dried up in financial markets, it can be assessed that central banks' monetary policy measures to counter the sharp world recession were successful. The key monetary policy measures they used were a combination of lowering central interest rates and flooding financial markets with liquidity, particularly through unconventional means such as quantitative easing (QE), where central banks bought large amounts of central government debt and smaller sums of other debt.

The key issue now is that that period of stimulating economic recovery and warding off the threat of deflation, is coming towards its close. A new period has already started in the US, and more recently in the UK, of reversing those measures i.e. by raising central rates and, (for the US), reducing central banks' holdings of government and other debt. These measures are now required in order to stop the trend of a reduction in spare capacity in the economy, and of unemployment falling to such low levels that the re-emergence of inflation is viewed as a major risk. It is, therefore, crucial that central banks get their timing right and do not cause shocks to market expectations that could destabilise financial markets. In particular, a key risk is that because QE-driven purchases of bonds drove up the price of government debt, and therefore caused a sharp drop in income yields, this also encouraged investors into a search for yield and into investing in riskier assets such as equities. Consequently, prices in both bond and equity markets rose to historically high valuation levels simultaneously. This now means that both asset categories are vulnerable to a sharp downward correction. It is important, therefore, that central banks only gradually unwind their holdings of bonds in order to prevent destabilising the financial markets. It is also likely that the timeframe for central banks unwinding their holdings of QE debt purchases will be over several years. They need to balance their timing to neither squash economic recovery, by taking too rapid and too strong action, or, conversely, let inflation run away by taking action that was too slow and/or too weak. **The potential for central banks to get this timing and strength of action wrong are now key risks.**

The world economy also needs to adjust to a sharp change in **liquidity creation** over the last five years where the US has moved from boosting liquidity by QE purchases, to reducing its holdings of debt. In addition, the European Central Bank has cut back its QE purchases substantially and is likely to end them completely by the end of 2018.

UK. The flow of positive economic statistics since the end of the first quarter this year has shown that pessimism was overdone about the poor growth in quarter 1 when adverse weather caused a temporary downward blip. Quarter 1 at 0.1% growth in GDP was followed by a return to 0.4% in quarter 2; quarter 3 is expected to be robust at around +0.6% but quarter 4 is expected to weaken from that level.

At their November meeting, the MPC repeated their well-worn phrase that future Bank Rate increases would be gradual and would rise to a much lower equilibrium rate, (where monetary policy is neither expansionary or contractionary), than before the crash; indeed they gave a figure for this of around 2.5% in ten years time but declined to give a medium term forecast.

However, with so much uncertainty around Brexit, they warned that the next move could be up or down, even if there was a disorderly Brexit. While it would be expected that Bank Rate could be cut if there was a significant fall in GDP growth as a result of a disorderly Brexit, so as to provide a stimulus to growth, they warned they could also raise Bank Rate in the same scenario if there was a boost to inflation from a devaluation of sterling, increases in import prices and more expensive goods produced in the UK replacing cheaper goods previously imported, and so on. In addition, the Chancellor has held back some spare capacity to provide a further fiscal stimulus if needed.

It is unlikely that the MPC would increase Bank Rate in February 2019, ahead of the deadline in March for Brexit. Getting parliamentary approval for a Brexit agreement on both sides of the Channel will take well into spring next year. However, in view of the hawkish stance of the MPC at their November meeting, the next increase in Bank Rate is now forecast to be in May 2019. The following increases are then forecast to be in February and November 2020 before ending up at 2.0% in February 2022.

Inflation. The Consumer Price Index (CPI) measure of inflation fell from 2.7% to 2.4% in September. In the November Bank of England quarterly inflation report, inflation was forecast to still be marginally above its 2% inflation target two years ahead, (at about 2.1%), given a scenario of minimal increases in Bank Rate. This inflation forecast is likely to be amended upwards due to the Bank's inflation report being produced prior to the Chancellor's announcement of a significant fiscal stimulus in the Budget; this is likely to add 0.3% to GDP growth at a time when there is little spare capacity left in the economy, particularly of labour.

As for the **labour market**, unemployment has continued at a 43 year low of 4% on the Independent Labour Organisation measure. A combination of job vacancies hitting an all-time high in July, together with negligible growth in total employment numbers, indicates that employers are now having major difficulties filling job vacancies with suitable staff. It was therefore unsurprising that wage inflation picked up to 3.1%, (3 month average regular pay, excluding bonuses). This meant that in real terms, (i.e. wage rates less CPI inflation), earnings are currently growing by about 0.7%, the highest level since 2009. This increase in household spending power is likely to feed through into providing some support to the overall rate of economic growth in the coming months. This tends to confirm that the MPC was right to start on a cautious increase in Bank Rate in August as it views wage inflation in excess of 3% as increasing inflationary pressures within the UK economy.

In the **political arena**, there is a risk that the current Conservative minority government may be unable to muster a majority in the Commons over Brexit. However, our central position is that Prime Minister May's government will endure, despite various setbacks, along the route to reaching an orderly Brexit in March 2019. If, however, the UK faces a general election in the next 12 months, this could result in a potential loosening of monetary and fiscal policy and therefore medium to longer dated gilt yields could rise on the expectation of a weak pound and concerns around inflation picking up.

USA. President Trump's massive easing of fiscal policy is fuelling a, (temporary), boost in consumption which has generated an upturn in the rate of strong growth which rose from 2.2%, (annualised rate), in quarter 1 to 4.2% in quarter 2 and 3.5%, (3.0% y/y), in quarter 3, but also an upturn in inflationary pressures. In particular, wage rates were increasing at 3.1% y/y in October and heading higher due to unemployment falling to a 49 year low of 3.7%. With CPI inflation over the target rate of 2% and on a rising trend towards 3%, the Fed increased rates another 0.25% in September to between 2.00% and 2.25%, this being the fourth increase in 2018. They also indicated that they expected to increase rates four more times by the end of 2019. The dilemma, however, is what to do when the temporary boost to consumption wanes, particularly as the recent imposition of tariffs on a number of countries' exports to the US, (China in particular), could see a switch to US production of some of those goods, but at higher prices. Such a scenario would invariably make any easing of monetary policy harder for the

Fed in the second half of 2019. However, a combination of an expected four increases in rates of 0.25% by the end of 2019, together with a waning of the boost to economic growth from the fiscal stimulus in 2018, could combine to depress growth below its potential rate, i.e. monetary policy may prove to be too aggressive and lead to the Fed having to start on cutting rates. The Fed has also been unwinding its previous quantitative easing purchases of debt by gradually increasing the amount of monthly maturing debt that it has not been reinvesting.

The tariff war between the US and China has been generating a lot of heat during 2018, but it is not expected that the current level of actual action would have much in the way of a significant effect on US or world growth. However, there is a risk of escalation. The results of the mid-term elections are not expected to have a material effect on the economy.

Eurozone. Growth was 0.4% in quarters 1 and 2 but fell back to 0.2% in quarter 3, though this is probably just a temporary dip. In particular, data from Germany has been mixed and it could be negatively impacted by US tariffs on a significant part of manufacturing exports e.g. cars. For that reason, although growth is still expected to be in the region of nearly 2% for 2018, the horizon is less clear than it seemed just a short while ago. Having halved its quantitative easing purchases of debt in October 2018 to €15bn per month, the European Central Bank has indicated it is likely to end all further purchases in December 2018. Inflationary pressures are starting to build gently so it is expected that the ECB will start to increase rates towards the end of 2019.

INTEREST RATE FORECASTS

The interest rate forecasts provided by Link Asset Services are predicated on an assumption of an agreement being reached on Brexit between the UK and the EU. In the event of an orderly non-agreement exit, it is likely that the Bank of England would take action to cut Bank Rate from 0.75% in order to help economic growth deal with the adverse effects of this situation. This is also likely to cause short to medium term gilt yields to fall. If there was a disorderly Brexit, then any cut in Bank Rate would be likely to last for a longer period and also depress short and medium gilt yields correspondingly. It is also possible that the government could act to protect economic growth by implementing fiscal stimulus.

The balance of risks to the UK

- The overall balance of risks to economic growth in the UK is probably neutral.
- The balance of risks to increases in Bank Rate and shorter term PwLB rates, are probably also even and are broadly dependent on how strong GDP growth turns out, how slowly inflation pressures subside, and how quickly the Brexit negotiations move forward positively.

One risk that is both an upside and downside risk, is that all central banks are now working in very different economic conditions than before the 2008 financial crash as there has been a major increase in consumer and other debt due to the exceptionally low levels of borrowing rates that have prevailed for ten years since 2008. This means that the neutral rate of interest in an economy, (i.e. the rate that is neither expansionary nor deflationary), is difficult to determine definitively in this new environment, although central banks have made statements that they expect it to be much lower than before 2008. Central banks could therefore either over or under do increases in central interest rates.

Appendix 2: Approved countries for investments

AA

- United Kingdom

AAA

- Australia
- Canada
- Denmark
- Germany
- Luxembourg
- Netherlands
- Norway
- Singapore
- Sweden
- Switzerland

Bournemouth, Christchurch and Poole Council

Treasury Management Policy, Practices and Schedules

Treasury Management Practices and Schedules

The Treasury Management Practices (TMPs) and Schedules set out the manner in which the Council will seek to achieve its Treasury Management Policies and objectives and how it will manage and control those activities.

TMP 1 – Treasury Risk Management

TMP 2 – Best Value and Performance Measurement

TMP 3 – Decision-Making and Analysis

TMP 4 - Approved Instruments, Methods and Techniques

TMP 5 - Organisation, Clarity and Segregation of Responsibilities, and Dealing Arrangements

TMP 6 - Reporting Requirements and Management Information Arrangements

TMP 7 - Budgeting, Accounting and Audit Arrangements

TMP 8 - Cash and Cash Flow Management

TMP 9 - Money Laundering

TMP 10 - Staff Training and Qualifications

TMP 11 - Use of External Service Providers

TMP 12 - Corporate Governance

TMP1 Treasury Risk Management

- 1 The S151 Officer will design, implement and monitor all arrangements for the identification, management and control of treasury management risk, will report at least annually on the adequacy/suitability thereof, and will report, as a matter of urgency, the circumstances of any actual or likely difficulty in achieving the organisation's objectives in this respect, all in accordance with the procedures set out in TMP6 Reporting Requirements and Management Information Arrangements. In respect of each of the following risks, the arrangements which seek to ensure compliance with these objectives are set out in the schedule to this document.

Credit and Counterparty Risk Management

Credit and counter-party risk is the risk of failure by a counterparty to meet its contractual obligations to the organisation under an investment, borrowing, capital project or partnership financing, particularly as a result of the counterparty's diminished creditworthiness, and the resulting detrimental effect on the organisation's capital or current (revenue) resources.

- 2 The Council regards a key objective of its treasury management activities to be the security of the principal sums it invests. Accordingly, we will ensure that the counterparty list and limits reflect a prudent attitude towards organisations with which funds may be deposited, and will limit the investment activities to the instruments, methods and techniques referred to in TMP4 Approved Instruments, Methods and Techniques and listed in the schedule to this document. The Council also recognises the need to have, and will therefore maintain, a formal counterparty policy in respect of those organisations from which it may borrow, or with whom it may enter into other financing arrangements.
- 3 The S151 Officer will maintain a counterparty list in compliance with the following criteria and will revise the criteria and submit them to Council for approval as necessary. These criteria are separate to which types of investment instruments that can be used as it provides an overall pool of counterparties considered high quality which the Council may use, rather than defining what types of investment instruments are to be used.
- 4 The minimum rating criteria uses method of selecting counterparties and applying limits. The Council will use UK and non-UK banks which have, as a minimum at least one of, the following Fitch, Moody's and Standard and Poor's credit ratings. Credit rating information is supplied by Link Asset Services, our treasury consultants, on all active counterparties that comply with the criteria below. Any counterparty failing to meet the criteria would be omitted from the counterparty (dealing) list. Any rating changes, rating watches (notification of a likely change), rating outlooks (notification of a possible longer term change) are provided to officers almost immediately after they occur and this information is considered before dealing. For instance, a negative rating watch applying to a counterparty at the minimum Council criteria will be suspended from use, with all others being reviewed in light of market conditions.
- 5 The criteria for providing a pool of high quality investment counterparties (both specified and non-specified investments) is:

Sovereign Ratings

- AA (UK)
- AAA (non UK)

(Rating Description – AAA = Prime Rating, AA+, AA, AA- = High Grade Rating)

Selection Criteria

- Banks 1 - the Council will use UK and non UK banks which have, as a minimum at least one of, the following Fitch, Moody's and Standard and Poors credit ratings (where rated):

	Fitch	Moody's	Standard & Poors
Short Term	F1	P1	A-1
Long Term	A-	A3	A-

Investments will include term deposits, call accounts, notice accounts and CD's.

- a Banks 2 – Part nationalised UK bank – Royal Bank of Scotland. This bank can be included provided it continues to be part nationalised or it meets the ratings in Banks 1 above.
- b Banks 3 – The Council's own banker for transactional purposes if the bank falls below the above criteria, although in this case balances will be minimised in both monetary size and time.
- c Bank subsidiary and treasury operation - The Council will use these where the parent bank has provided an appropriate guarantee or has the necessary ratings outlined above.
- d Building societies. The Council will use societies which meet the ratings for Banks 1 outlined above.
- e Market Funds (MMFs) CNAV
- f Money Market Funds (MMFs) LNAV
- g Money Market Funds (MMFs) VNAV
- h Ultra-Short Dated Bond Funds with a credit rating of at least 1.25
- i Ultra-Short Dated Bond Funds with a credit rating of at least 1.50
- j Cash Plus Funds
- k UK Government (including gilts, Treasury Bills and the Debt Management Account Deposit Facility (DMADF))
- l Local authorities, Parish Councils, BCP Council Companies (Subsidiaries) and Partnerships.
- m Pooled Funds

Maximum Time and Monetary Limits applying to Investments

- 6 The maximum that can be invested in any one institution at the time of the investment (including call accounts) as a percentage of the total investment portfolio has been reviewed and rationalised. All AA- and above rated institutions have a maximum limit of 25%, all A+, A or A- rated institutions have a maximum limit of 20%. For practical reasons where average investment balance falls below £10m it may become necessary to increase the percentage limit to 33% at the time of investment (this only applies to call accounts).
- 7 The maximum time and monetary limits for institutions on the Council's Counterparty List are as follows (these will cover both Specified and Non-Specified Investments):

	Long Term Rating	Money Limit	Time Limit
Banks 1 category	AA-	25%	2 years
Banks 1 category	A	20%	1 year
Banks 1 category	A-	20%	6 months
Banks 2 category – part-nationalised Lloyds / Bank of Scotland RBS / Nat West	N/A	20%	1 year 2 years
Banks 3 category – Council's banker	AA-	25%	3 months
DMADF/Treasury Bills	AAA	25%	6 months
Local Authorities	N/A	20%	5 years
Money Market Funds CNAV	AAA	25%	Instant access
Money Market Funds LVNAV	AAA	25%	Instant access
Money Market Funds VNAV	AAA	25%	Instant Access

Ultra-Short Dated Bond Funds	N/A	25%	Instant access
Cash Plus Funds	AAA	25%	12/18 months
UK Gilts	UK Sovereign Rate	25%	5 years

Approved methodology for changing limits and adding/removing counterparties

- 8 Credit ratings for individual counterparties can change at any time. The S151 Officer is responsible for applying the stated credit rating criteria outlined above for selecting approved counterparties, and will add or delete counterparties as appropriate to / from the approved counterparty list when there is a change in the credit ratings of individual counterparties or in banking structures e.g. on mergers or takeovers.
- 9 The S151 Officer will also adjust lending limits and periods when there is a change in the credit ratings of individual counterparties or in banking structures e.g. on mergers or takeovers in accordance with the criteria outlined above.

Liquidity Risk Management

- 10 This is the risk that cash will not be available when it is needed, that ineffective management of liquidity creates additional unbudgeted costs, and that the Council's business/service objectives will be thereby compromised.
- 11 The Council will ensure it has adequate though not excessive cash resources, borrowing arrangements, overdraft or standby facilities to enable it at all times to have the level of funds available to it which are necessary for the achievement of its business/service objectives.
- 12 The Council will only borrow in advance of need where there is a clear business case for doing so and will only do so for the current capital programme or to finance future debt maturities.

Cash flow and cash balances

- 13 The Council will aim for effective cash flow forecasting and monitoring of cash balances and will maintain a rolling 12 month cash flow forecast.

The Treasury Management function shall seek to optimise the balance held in the Council's main bank accounts at the close of each working day in order to minimise the amount of bank overdraft interest payable or maximise the amount of interest that can be earned.

In order to achieve the maximum return from investments, a daily cash balance of +/- £50,000 is the normal objective for the Council's bank account. Note - it may not always be possible or practical to achieve this target for various reasons, such as, late or fluctuating receipts after the treasury management activities for the day have been completed.

Short term investments

- 14 Funds are held in overnight accounts, call accounts or money market funds specifically in order to deal with day to day cash flow fluctuations.

Temporary borrowing

- 15 Temporary borrowing up to 364 days through the money market is available should there be a cash flow deficit at any point during the year.

At no time will the outstanding total of temporary and long-term borrowing together with any bank overdraft exceed the Prudential Indicator for the Authorised Borrowing Limit agreed by the Council before the start of each financial year.

Bank Overdraft and standby facilities

- 16 The Council has an authorised overdraft limit with its bankers of up to £100k at an agreed rate of 2.39% over base rate.

Interest Rate Risk Management

- 17 The risk that fluctuations in the levels of interest rates create an unexpected or unbudgeted burden on the Council's finances, against which the Council has failed to protect itself adequately.
- 18 The Council will manage its exposure to fluctuations in interest rates with a view to containing its net interest costs, or securing its interest revenues, in accordance with the amounts provided in its budgetary arrangements as amended in accordance with TMP6 Reporting Requirements and Management Information Arrangements.
- 19 It will achieve these objectives by the prudent use of its approved financing and investment instruments, methods and techniques, primarily to create stability and certainty of costs and revenues, but at the same time retaining a sufficient degree of flexibility to take advantage of unexpected, potentially advantageous changes in the level or structure of interest rates. The above are subject at all times to the consideration and, if required, approval of any policy or budgetary implications.
- 20 The Council's Policy will limit its exposure to interest rate changes by allowing a maximum of 4% of borrowing to be at variable interest and a maximum of 100% to be at fixed rate. In addition, a maximum of 50% of investments can be made at variable interest and a maximum of 100% to be at fixed rate.
- 21 Interest rates will be monitored by the Assistant Chief Financial Officer and information about possible changes in interest rates gathered from market sources.

Policies concerning other instruments for interest rate management.

- 22 Forward dealing - Will only be undertaken where the date of commencement is 3 months (or less) for an investment from the date that funds will be transferred, in order to minimise risk due to uncertainties in the cash flow projections. The maximum length of time permissible for all investments will be 5 years.

Exchange Rate Risk Management

- 23 The risk that fluctuations in foreign exchange rates create an unexpected or unbudgeted burden on the organisation's finances, against which the organisation has failed to protect itself adequately.

Approved criteria for managing changes in exchange rate levels

- i) As a result of the nature of the Council's business, it may have an exposure to exchange rate risk from time to time. This will mainly arise from the receipt of income or the incurring of expenditure in a currency other than sterling. The Council will adopt a full hedging strategy to control and add certainty to the sterling value of these transactions. This will mean that the Council will eliminate all foreign exchange exposures as soon as they are identified.
- ii) Where there is a contractual obligation to receive income or make a payment in a currency other than sterling at a date in the future, forward foreign exchange transactions will be considered, with professional advice, to comply with this full cover hedging policy. Unexpected receipt of foreign currency income will be converted to sterling at the earliest opportunity unless the Council has a contractual obligation to make a payment in the same currency at a date in the future. In this instance, the currency will be held on deposit to meet this expenditure commitment.

Refinancing Risk Management

- 24 The risk that maturing borrowings, capital, project or partnership financings cannot be refinanced on terms that reflect the provisions made by the organisation for those refinancing, both capital and current (revenue), and/or that the terms are inconsistent with prevailing market conditions at the time.
- 25 The Council will ensure that its borrowing, private financing and partnership arrangements are negotiated, structured and documented, and the maturity profile of the monies so raised are managed, with a view to obtaining offer terms for renewal or refinancing, if required, which are competitive and as favourable to the Council as can reasonably be achieved in the light of market conditions prevailing at the time.
- 26 It will actively manage its relationships with its counterparties in these transactions in such a manner as to secure this objective, and will avoid over-reliance on any one source of funding if this might jeopardise achievement of the above.

Projected capital investment requirements

- 27 3 year projections are in place for capital expenditure and its financing or funding. Financing will be from capital receipts, reserves, any grants or contributions awarded and revenue. Funding will be from internal or external borrowing, as decided.

As required by the Prudential Code, the Council will undertake Options Appraisals to evaluate the best capital expenditure financing route.

The Council's projected long-term borrowing requirement will be linked to the projected Capital Financing Requirement.

Debt profiling, policies and practices

- 28 Any longer term borrowing will be undertaken in accordance with the Prudential Code and will comply with the Council's Prudential Indicators and the Treasury Management Strategy.

The Council will maintain through its various treasury spreadsheets reliable records of the terms and maturities of its borrowings, capital, project and partnership funding and, where appropriate, plan and successfully negotiate terms for its refinancing.

Where the lender to the Council is a commercial body the Council will aim for diversification in order to spread risk and avoid over-reliance on a small number of counterparties.

Policy concerning limits on revenue consequences of capital financings

- 29 The revenue consequences of financing the capital programme are included in cash flow models, annual revenue estimates and medium term forecasts.

Legal and Regulatory Risk Management

- 30 The risk that the organisation itself, or an organisation with which it is dealing in its treasury management activities, fails to act in accordance with its legal powers or regulatory requirements, and that the organisation suffers losses accordingly.
- 31 The Council will ensure that all of its treasury management activities comply with its statutory powers and regulatory requirements. It will demonstrate such compliance, if required to do so, to all parties with whom it deals in treasury activities. In framing its credit and counterparty policy under TMP1 Treasury Risk Management, it will ensure that there is evidence of counterparties' powers, authority and compliance in respect of the transactions they may effect with the Council, particularly with regard to duty of care and fees charged.
- 32 The Council recognises that future legislative or regulatory changes may impact on its treasury management activities and, so far as it is reasonably able to do so, will seek to minimise the risk of these impacting adversely on the Council.
- 33 The Council operates its Treasury Management Practices in accordance with the provisions of the Local Government and Housing Act 1989 and the CIPFA Treasury Code of Practice. The Council's powers are documented in the Treasury Management Policy statement, the Treasury Management Practices and the Schedules.
- 34 Counterparties are included on the lending list where they fully comply with the Credit Rating requirements from Fitch, S&P and Moody's or where they meet the specified exceptional criteria.
- 35 The S151 Officer will review the Legal and Regulatory framework in order to assess the impact of any changes on the Council.

Procedures for evidencing the Council's powers/ authorities to counterparties

- 36 The Council's Financial Regulations contain evidence of the power/ authority to act as required by S151 of the Local Government Act 1972, under the general direction of the Council and Cabinet.

The Council will confirm, if requested to do so by counterparties, the powers and authorities under which the Council effects transactions with them.

Where required, the Council will also establish the powers of those with whom they enter into transactions, including any compliance requirements in respect of a duty of care and best practice.

Required information from counterparties concerning their powers/ authorities

- 37 Lending shall only be made to institutions on the Council's authorised lending list.

The Council will only undertake borrowing from approved sources such as the Public Works Loans Board (PWLB), organisations such as the European Investment Bank and from commercial banks who are on the Council's list of authorised institutions, thereby minimising legal and regulatory risk. The list of approved sources of borrowing is contained in TMP 4.

Political Risk Management

- 38 Political risk is managed by:

- i) Adoption of the CIPFA Treasury Management Code of Practice;
- ii) Adherence to Corporate Governance (TMP 12 – Corporate Governance);
- iii) Adherence to the Statement of Professional Practice by the S151 Officer;
- iv) The roles of the Council and Cabinet.

Details of relevant Statutes and regulations

- 39 The treasury management activities of the Council shall comply fully with legal statute and the regulations of the Council. These are as follows:

- i) CIPFA's Treasury Management Code of Practice and guidance notes;
- ii) CIPFA Guide for Chief Financial Officers on Treasury Management in Local Authorities;
- iii) CIPFA Prudential Code for Capital Finance in Local Authorities and subsequent amendments;
- iv) CIPFA Standard of Professional Practice on Treasury Management
- v) The Local Government Act 2003;
- vi) The Local Authorities (Capital Finance and Accounting) (England) Regulations 2003 SI 2003 No 3146, and subsequent amendments;
- vii) Pensions, England and Wales - The Local Government Pension Scheme (Management and Investment of Funds) Regulations 2009 – SI 2009 No 3093;

- viii) MHCLG Guidance on Minimum Revenue Provision (MRP);
- ix) MHCLG Revised Guidance on Investments Feb 2017
- x) The MHCLG's Guidance on Local Government Investments in England issued March 2004 and subsequent amendments ;
- xi) The Local Authorities (Contracting out of Investment Functions) Order 1996 SI 1996 No 1883;
- xii) LAAP Bulletins;
- xiii) Code of Practice on Local Authority Accounting in the United Kingdom based on International Financial Reporting Standards (from 2010/11 onwards);
- xiv) Accounts and Audit Regulations 2003, as amended together with CLG's Guidance;
- xv) The Non Investment Products Code (formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets;
- xvi) Council's Constitution including:
 - Standing Orders relating to Contracts;
 - Financial Regulations;
 - Scheme of Delegation.
- xvii) CLG's Self-Financing Policy Documentation and subsequent amendments.

Fraud, Error and Corruption, and Contingency Management

- 40 The risk that an organisation fails to identify the circumstances in which it may be exposed to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings, and fails to employ suitable systems and procedures and maintain effective contingency management arrangements to these ends. It includes the area of risk commonly referred to as operational risk.
- 41 The Council will ensure that it has identified the circumstances which may expose it to the risk of loss through fraud, error, corruption or other eventualities in its treasury management dealings. Accordingly, it will employ suitable systems and procedures, and will maintain effective contingency management arrangements, to these ends.
- 42 In order to mitigate these risks, it is a system requirement that two officers need to be involved in order to facilitate a CHAPS payment via internet banking. The first officer will set up the payment details and the second officer will verify the details and authorise payment. Payment is only to be made on appropriately authorised documentation.
- 43 For payments to investment counterparties and other regular payments (e.g. Inland Revenue, Pensions) the payee name and bank details will be set up as named beneficiaries within the system.

Details of systems and procedures to be followed, including internet services

- 44 The S151 Officer will ensure that all Treasury Management Procedures are fully documented and approved and that they contain adequate levels of internal control. All computer systems or electronic forms of recording or transmitting data will have adequate security and back up provisions.
- 45 The S151 Officer will ensure that the Treasury Management function is subject to regular internal audit, the intention being that this will generally take place once each year with sufficient programmed days to cover all aspects of its activity.

Emergency and contingency planning arrangements

- 46 In the event of treasury management software being unavailable, due to power failure or problems with the system, arrangements for the day-to-day treasury function will be undertaken direct with the Council's bank.

Insurance cover details

- 47 The Treasury Management function is covered under the Council's Fidelity Guarantee Policy.

Market risk management

- 48 The Council will seek to ensure that its stated Treasury Management Policies and objectives will not be compromised by adverse market fluctuations in the value of the principal sums it invests, and will accordingly seek to protect itself from the effects of such fluctuations.

Details of approved procedures and limits for controlling exposure to investments whose capital value may fluctuate (GILTS, CDS, etc.)

If the Council makes use of fund managers they may deal in GILTS, Certificates of deposit etc. on behalf of the Council. The limit for these will be the value of the fund, held by the external body at the time. The fund will be able to be liquidated within 7 days.

TMP2 Best Value and Performance Measurement

- 49 The Council is committed to the pursuit of value for money in its treasury management activities, and to the use of performance methodology in support of that aim, within the framework set out in its Treasury Management Strategy Statement.
- 50 Accordingly, the Treasury Management function will be the subject of ongoing analysis of the value it adds in support of the Council's stated business or service objectives. It will be the subject of regular examination of alternative methods of service delivery, of the availability of fiscal or other grant or subsidy incentives, and of the scope for other potential improvements. The performance of the Treasury Management function will be measured using the criteria set out in this section.

Methodology to be applied for evaluating the impact of Treasury Management decisions

- 51 All treasury management decisions will be recorded by the Treasury Accountant. A monthly report will be produced and any significant decisions notified to the S151 Officer on the monthly report. Rates quoted for investments and borrowing will be recorded and monitored against benchmarks, any benchmarking reports will consider risk as well as the rate of return. Market trends will be compared to expectations. Investments or borrowing which takes place with a maturity of over one month, evidence should be kept to demonstrate that the most favourable interest rate has been achieved.

Policy concerning methods for Testing Value for Money in Treasury Management

Frequency and processes for review

- 52 The Treasury Management function will be included within the Core Service Transformation review of Strategic Finance.

Banking services

- 53 Banking services will be retendered or renegotiated periodically in line with accepted procurement practice to ensure that the level of prices reflect efficiency savings achieved by the supplier and current pricing trends.

Money-broking services

- 54 The Council will use money broking services in order to make deposits or to borrow, and will establish charges for all services prior to using them. The Council will also deal direct with counterparties that appear on the lending lists where it can be shown that the rates achievable by dealing direct are higher than those that could have been achieved by dealing through money-brokers.

An approved list of brokers will be established which takes account of both prices and quality of services. Note that fees are only due when the authority chooses to borrow using money brokers.

Consultants'/advisers' services

- 55 The Council may appoint professional treasury management advisers as and when it is deemed necessary to do so. The performance of these advisors will be monitored on an ongoing basis and be the subject of a tendering process.

Where treasury management advisers are appointed they will be expected to:

- i) Provide creditworthiness advice and updates on credit developments;
- ii) Provide rating watch information and highlight any impact on the Council's lending list;
- iii) Review all treasury management reports and check compliance with the Treasury Management Code of Practice, the Prudential Code and Best Practice;
- iv) Provide suitable economic information including interest rate forecasts;
- v) Offer suitable training and seminars to support for Members and officers;

- vi) Provide technical advice help and support as required.

External Fund Managers

- 56 The Council may appoint full-time cash/external investment fund managers and will comply with the Local Authorities (Contracting Out of Investment Functions) Order 1996 [SI 1996 No 1883].

The fund Manager will undertake all activity in accordance with the provisions set out in this document.

The delegation of investment management to external managers will entail the following:

- i) Agreement of a formal contractual agreement and documentation;
- ii) Agreement on terms for early termination of the contract;
- iii) Setting of a benchmark of [7 day LIBID] and a performance target of exceeding the benchmark;
- iv) Setting of investment counterparty constraints;
- v) Quarterly reporting of performance;
- vi) At least annual meetings with investment managers;
- vii) Setting of other constraints/parameters/conditions.

The Council's treasury management advisors will assist in monitoring the performance of the fund managers.

Methods to be employed for measuring the performance of the Council's Treasury Management activities

- 57 Performance will be measured against the benchmark figures agreed. Performance will also be monitored by comparing expected levels of interest to the interest budgets set in the Budget setting process.

Benchmarks and calculation methodology:

a Debt management

- Average rate on all external debt
- Average rate on external debt borrowed in previous financial year
- Average rate on internal borrowing
- Average period to maturity of external debt
- Average period to maturity of new loans in previous year

b Investment

The performance of investment earnings will be measured against the following benchmarks:

- i) In house investments - 7 Day LIBID
- ii) Cash fund manager - 7 Day LIBID

It is recognised that these benchmarks must be assessed in the overall context of security and liquidity being more important than yield.

TMP3 Decision-Making and Analysis

- 58 The Council will maintain full records of its treasury management decisions, and of the processes and practices applied in reaching those decisions, both for the purposes of learning from the past, and for demonstrating that reasonable steps were taken to ensure that all issues relevant to those decisions were taken into account at the time. The issues to be addressed and processes and practices to be pursued in reaching decisions are detailed below.
- 59 Whilst the Council will take advice from external consultants as and when required it is recognised that the final decision for all treasury management activity lies with the Council.

Funding, Borrowing, Lending, and new instruments / techniques

Records to be kept

- 60 Details of all rates achieved on new investments and borrowing will be kept by the S151 Officer, along with rates requested from other sources that were rejected. This is to show that the S151 Officer consulted different areas of the market place to support the decision made. All documentation to support investment / borrowing decisions will be available for inspection by internal audit.

Processes to be pursued

- 61 When investment decisions are to be made, the Treasury Accountant with responsibility for treasury management will seek rates from at least two brokers or counterparties that deal direct, and a comparison will be made with indicative rates quoted by brokers on the day. These rates, together with the reason for the chosen rate (not always the highest rate quoted), will be recorded on the deal ticket or electronically and will be made available for inspection. Since the start of the credit crisis and the nominal rates achieved on investments the Treasury Management function have concentrated their efforts firmly on capital protection and risk management. In practice the Council has a very restricted lending list and there is often little or no choice where to place investments.

Borrowing decisions will be made by the S151 Officer in the light of the Council's medium term budgetary requirement. The interest rate type, period of the loan and reason for the need to borrow will be recorded by the Group Accountant with responsibility for treasury management.

Issues to be addressed

- 62 In respect of every decision made the Council will:
- a Above all be clear about the nature and extent of the risks to which the Council may become exposed;
 - b Be certain about the legality of the decision reached and the nature of the transaction, and that all approvals to proceed have been obtained;
 - c Be content that the documentation is adequate both to deliver the Council's objectives and protect its interests, and to deliver good housekeeping;

- d Ensure that third parties are judged satisfactory in the context of the Council's creditworthiness policies, and that limits have not been exceeded;
 - e Be content that the terms of any transactions have been fully checked against the market, and have been found to be competitive.
- 63 In respect of borrowing and other funding decisions, the Council will:
- a Evaluate the economic and market factors that might influence the manner and timing of any decision to fund;
 - b Consider the merits and demerits of alternative forms of funding, including funding from revenue, leasing and private partnerships;
 - c Consider the ongoing revenue liabilities created, and the implications for the Council's future plans and budgets.
- 64 In respect of investment decisions, the Council will:
- a Consider the optimum period, in the light of cash flow availability and prevailing market conditions;
 - b Consider the alternative investment products and techniques available, especially the implications of using any which may expose the Council to changes in the value of its capital.

TMP4 Approved Instruments, Methods and Techniques

- 65 The Council will undertake its treasury management activities by employing only those instruments, methods and techniques detailed below and within the limits and parameters defined in TMP1 Risk Management.
- 66 Where the Council intends to use derivative instruments for the management of risks, these will be limited to those set out in its Treasury Management Strategy. The Council will seek proper advice and will consider that advice when entering into arrangements to use such products to ensure that it fully understands those products.

Approved activities of the Treasury Management function

- a Borrowing
- b Lending
- c Debt repayment and rescheduling
- d Consideration, approval and use of new financial instruments and treasury management techniques
- e Managing the underlying risk associated with the Council's capital financing and surplus funds activities
- f Managing cash flow
- g Banking activities
- h Leasing
- i The use of external fund managers

Approved instruments for investment

- 67 In accordance with The Local Authorities (Capital Finance) (Approved Investments) Regulations 1990 and subsequent amendments, the instruments approved for investment and commonly used by local authorities are:
- a UK Government (including gilts, Treasury Bills and Debt Management Account Deposit Facility)
 - b Deposits with banks, building societies or local authorities (and certain other bodies) for up to five years;
 - c Certificates of deposits with banks or building societies for up to five years;
 - d Corporate bonds and bonds issued by Multilateral Development Banks;
 - e Euro-sterling issues by certain Supra-national bodies listed on the London and Dublin Stock Exchanges;
 - f Money Market Funds;
 - g Pooled funds, i.e. collective investment schemes as defined in SI 2004 No 534.

Approved techniques

- a Forward dealing up to five years
- b Callable deposits up to five years

Approved methods and sources of raising Capital Finance

- 68 Finance will only be raised in accordance with the Local Government and Housing Act, 1989, and within this limit the Council has a number of approved methods and sources of raising capital finance. These are:

On Balance Sheet	Fixed	Variable
PWLB	●	●
Local Authorities and Other Public Bodies	●	●
Private Sector Organisations	●	●
Overdraft		●
Internal (capital receipts & revenue balances)	●	●
Municipal Bond Agency	●	●
Leasing (finance leases)	●	●
Deferred Purchase	●	●

Other Methods of Financing

Government and EU Capital Grants
Lottery monies
PFI

- 69 These forms of funding will be considered based on the prevailing economic climate, regulations and local considerations. The S151 Officer has delegated powers through this Policy and the Strategy to take the most appropriate form of borrowing from the approved sources.

Investment Limits

Deposits (including Money Market Funds)	LIMIT Unlimited
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Borrowing Limits

On Balance Sheet

PWLB	100%
Private Sector Organisations	100%
Municipal Bond Agency	20%
Local Authorities and Other Public Bodies	100%
Overdraft	£500k
Internal (capital receipts & revenue balances)	100%

TMP5 Organisation, Clarity and Segregation of Responsibilities, and Dealing Arrangements

- 70 The Council considers it essential, for the purposes of the effective control and monitoring of its treasury management activities, and for the reduction of the risk of fraud or error, and for the pursuit of optimum performance, that these activities are structured and managed in a fully integrated manner, and that there is at all times a clarity of treasury management responsibilities.
- 71 The principles on which this will be based is a clear distinction between those charged with setting Treasury Management Policies and those charged with implementing and controlling these policies, particularly with regard to the execution and transmission of funds, the recording and administering of treasury management decisions, and the audit and review of the Treasury Management function.
- 72 If and when the Council intends, as a result of lack of resources or other circumstances, to depart from these principles, the responsible officer will ensure that the reasons are properly reported in accordance with TMP6 Reporting Requirements and Management Information Arrangements, and the implications properly considered and evaluated.
- 73 The S151 Officer will ensure that there are clear written statements of the responsibilities for each post engaged in treasury management, and the arrangement for absence cover. The present arrangements are detailed in the schedule in this section.
- 74 The S151 Officer will ensure there is proper documentation for all deals and transactions, and that procedures exist for the effective transmission of funds. The present arrangements are detailed in this section.
- 75 The delegations to the S151 Officer in respect of treasury management are set out in this section. The S151 Officer will fulfil all such responsibilities in accordance with the Council's policy statement and TMPs and, if a CIPFA member, the Standard of Professional Practice on Treasury Management.

76 Limits to responsibilities/discretion at Committee/Executive levels

Full Council

- receiving and reviewing the annual Treasury Management Strategy Statement and a report on Treasury Management Policy, Practices and Schedules;
- budget consideration and approval;
- receiving a summary annual report on performance during the previous financial year.

Cabinet

- receiving and reviewing the annual Treasury Management Strategy Statement and a report on Treasury Management Policy, Practices and Schedules;
- budget consideration and approval;
- receiving a summary annual report on performance during the previous financial year;
- approval of investments where minimum lending criteria are not met.

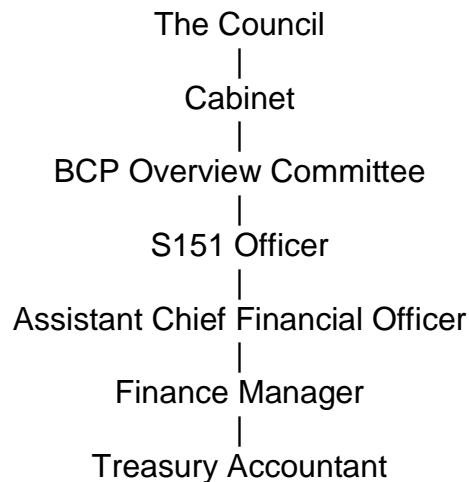
BCP Committee

- approval of amendments to the Council's adopted clauses, Treasury Management Strategy Statement and Treasury Management Policies, Practices and Schedules;
- performance monitoring;
- receiving and reviewing external audit reports and acting on recommendations;
- approving the selection of external fund managers and agreeing terms of appointment;
- receiving a detailed annual report;
- scrutinise the Treasury Management Strategy Statement and Treasury Management Policies, Practices and Schedules;
- receive reports of any non-compliance with the Council Treasury Management Strategy Statement and Treasury Management Policies, Practices and Schedules.

77 Principles and practices concerning segregation of duties

The S151 Officer will ensure that there is proper segregation of duties in place for Treasury Management.

78 Treasury Management organisation chart



79 Statement of Duties/Responsibilities of each Treasury Post

a S151 Officer

i) The S151 Officer will:

- execute and administer treasury management decisions in accordance with the Treasury Management Strategy and the Treasury Management Policies, Practices and Schedules;
- recommend all arrangements for the identification, management and control of all treasury management risk and report on such;
- design, recommend and implement the annual Treasury Management Strategy and Treasury Management Policies, Practices and Schedules for approval, reviewing and monitoring compliance;
- adhere and monitor performance against the approved prudential indicators;
- construct the Council's lending list and formulating suitable criteria for assessing and monitoring the credit risk of investment counterparties;
- submit regular treasury management policy reports;
- submit budgets and budget variations;
- ensure that all Treasury Management Policies, Practices and Schedules are fully documented and approved, and contain adequate levels of internal control;
- receive and review management information reports;
- review the performance of the Treasury Management function and promote value for money reviews;
- ensure the adequacy of treasury management resources and skills, and the effective division of responsibilities within the Treasury Management function;
- ensure all Members and treasury management staff receive training to ensure all responsibilities are carried out appropriately;

- recommend investments where the minimum lending criteria are not met;
 - ensure the adequacy of internal audit, and liaising with external audit;
 - ensure that the most appropriate form of borrowing is taken from the approved sources;
 - review the legal and regulatory framework in order to assess the impact of any changes on the Council;
 - monitor the Governance arrangements of the treasury management function;
 - recommend the appointment of external service providers.
- ii) The S151 Officer has delegated powers through this policy to take the most appropriate form of borrowing from the approved sources, and to take the most appropriate form of investments in approved instruments.
- iii) Only officers approved by the S151 Officer or the Assistant Chief Finance Officer will conduct dealing transactions.
- iv) The S151 Officer will ensure that the Policy is adhered to, and if not will bring the matter to the attention of elected Members as soon as possible.
- v) Prior to entering into any capital financing, lending or investment transaction, it is the responsibility of the S151 Officer to be satisfied, by reference to the Monitoring Officer, the Council's legal department and external advisors as appropriate, that the proposed transaction does not breach any statute, external regulation or the Council's financial Regulations.
- vi) It is also the responsibility of the S151 Officer to ensure that the Council complies with the requirements of The Non Investment Products Code (formerly known as The London Code of Conduct) for principals and broking firms in the wholesale markets.
- b** Assistant Chief Financial Officer / Finance Manager
- i) The responsibilities of these posts will be:
- planning, organising, directing and monitoring the Treasury Management function;
 - ensuring compliance with the policy, practices and schedules;
 - regularly reporting to the S151 Officer regarding performance of the function;
 - ensuring the treasury management function is adequately covered during normal business hours;
 - monitoring market conditions and interest rates and advising the S151 Officer regarding its impact on the Council's strategy.
- c** Finance Manager / Treasury Accountant
- i) The responsibilities of this post will be:
- execution of transactions;
 - adherence to agreed policies and practices on a day-to-day basis;
 - maintaining relationships with third parties and external service providers;

- supervising treasury management staff;
 - monitoring performance on a day-to-day basis;
 - submitting management information reports to the Assistant Chief Finance Officer;
 - preparation of cash flow statements;
 - recording all treasury management decisions;
 - maintain the counterparty list in line with the approvals made;
 - identifying and recommending opportunities for improved practices.
- d Treasury Accountant
- carry out day to day banking activities ensuring the treasury function meets its objectives
 - recording all treasury management decisions;
 - maintain the counterparty list in line with the approvals made;
 - preparation of cash flow statements;
- e Head of the Paid Service
- i) The responsibilities of this post will be:
- ensuring that the system is specified and implemented;
 - ensuring that the S151 Officer reports regularly to the Council, Cabinet and BCP Committee on treasury management policy, activity and performance as appropriate.
- f Monitoring Officer
- i) The responsibilities of this post will be:
- ensuring compliance by the S151 Officer with the Treasury Management Strategy Statement and Treasury Management Policies, Practices and Schedules and that they comply with the law;
 - being satisfied that any proposal to vary treasury management policy or practice complies with law or any code of practice;
 - giving advice to the S151 Officer when advice is sought.
- g Internal Audit
- i) The responsibilities of Internal Audit will be:
- reviewing compliance with approved policy and procedures;
 - reviewing division of duties and operational practice;
 - assessing value for money from treasury management activities;
 - undertaking audits to provide assurance over the probity of the Treasury Management function.

Absence cover arrangements

- 80 The Finance Manager with responsibility for the treasury function will ensure that the Treasury Management function is adequately covered during normal business hours.

Dealing limits

- 81 The Finance Manager with responsibility for treasury management is permitted to place deals in accordance with the Counterparty Lists and Limits and approved Treasury Management Practices.

List of approved brokers

- Tradition Brokers
 - Sterling International Brokers division of BGC Brokers LP
 - Martin Brokers division of BGC Brokers LP
 - Tullett Prebon (Europe) Limited
- 82 Treasury management staff are also authorised to deal direct with any of the counterparties on the approved lending list, where it can be shown that better rates of interest can be achieved than would otherwise be available through Brokers.

Policy on Brokers' services

- 83 The Authority aims to achieve a spread of brokers, together with the use of direct dealing counterparties in order to secure suitable deals.

Policy on taping of conversations

- 84 The Authority does not currently tape telephone calls made to brokers. It is understood that the broker firms used do tape all telephone conversations and deals are always confirmed by fax by the broker and the body receiving or paying over the money, these documents will be retained.

Direct dealing practices

- 85 The Authority aims to achieve a spread of counterparties in order to secure suitable deals.

Settlement Transmission Procedures

- 86 On maturity of an investment or loan the broker / counterparty involved will always be contacted by the treasury management staff to confirm what the Authority's intentions are with regard to the maturity and whether it is to be repaid.

Documentation requirements

- 87 Copies of all correspondence with brokers will be kept and made available for inspection.

Arrangements Concerning the Management of Third-Party Funds

- 88 The Council holds a number of trust funds. The cash in respect of these funds is held in the Council's bank account but transactions are separately coded. Interest is given on credit balances at the average rate for internal balances for the year.

TMP6 Reporting Requirements and Management Information Arrangements

- 89 The Council will ensure that regular reports are prepared and considered on the implementation of its Treasury Management Policies; on the effects of decisions taken and the transactions executed in pursuit of those policies; on the implications of changes, particularly budgetary, resulting from regulatory, economic, market or other factors affecting its treasury management activities; and on the performance of the Treasury Management function.

Annual Programme of reporting

- 90 As a minimum, the Council will receive:
- a An annual report on the strategy and plan to be pursued in the coming year;
 - b A summary annual report on the performance of the Treasury Management function.
- 91 It is recognised that BCP Committee are responsible for ensuring effective scrutiny of the Treasury Management Strategy Statement and activities and as such they will receive:
- a A copy of the annual report on the strategy and plan to be pursued in the coming year together with the treasury management prudential indicators;
 - b A full annual report on the performance of the Treasury Management function, on the effects of the decisions taken and the transactions executed in the year to date, and on any circumstances of non-compliance with the Council's Treasury Management Strategy Statement and TMPs.
 - c Quarterly Monitoring Reports

Annual Treasury Management Strategy Statement

- 92 The Treasury Management Strategy Statement sets out the specific expected treasury management activities for the forthcoming financial year. This Strategy will be submitted to Cabinet and Full Council for approval before the commencement of each financial year.
- 93 The formulation of the Treasury Management Strategy Statement involves determining the appropriate borrowing and investment decisions in the light of the anticipated movement in both fixed and shorter-term variable interest rates. For instance, the Council may decide to postpone borrowing if fixed interest rates are expected to fall, or borrow early if fixed interest rates are expected to rise.
- 94 The Treasury Management Strategy Statement is concerned with the following elements:
- a The prospects for interest rates;
 - b The limits placed by the Council on treasury activities;
 - c The expected borrowing strategy;
 - d The expected temporary investment strategy (including the appointment of fund managers);
 - e Other issues.

Policy on Interest Rate Exposure

- 95 As required by section 45 of the Local Government and Housing Act, 1989, the Council must approve before the beginning of each financial year the following treasury management limits:
- a The overall borrowing limit;
 - b The amount of the overall borrowing limit which may be outstanding by way of short-term borrowing;
 - c The maximum proportion of interest on borrowing which is subject to variable rate interest.
- 96 The S151 Officer is responsible for incorporating these limits into the Treasury Management Strategy Statement, and for ensuring compliance with the limits. Should it prove necessary to amend these limits, the S151 Officer shall submit the changes for approval to Cabinet before submission to the Full Council for approval.

Annual Report on Treasury Management activity

- 97 A summary annual report will be presented to Cabinet and Full Council at the earliest practicable meeting after the end of the financial year, but in any case by the end of September. A full annual report will be presented to BCP Committee. This report will include the following:
- a A comprehensive picture for the financial year of all Treasury Management Policy, Practices and Schedules, plans, activities and results;
 - b Transactions executed and their revenue (current) effects;
 - c Report on risk implications of decisions taken and transactions executed;
 - d Monitoring of compliance with approved policy, practices and statutory / regulatory requirements;
 - e Monitoring of compliance with powers delegated to officers;
 - f Degree of compliance with the original strategy and explanation of deviations;
 - g Explanation of future impact of decisions taken by the Council;
 - h Measurements of performance;
 - i Report on compliance with CIPFA Code recommendations.

Management Information Reports

- 98 Management information reports will be prepared every month by the Treasury Accountant and will be presented to the following officers:
- a Finance Manager;
 - b Assistant Chief Financial Officer;
 - c S151 Officer;
- 99 These reports will contain the following information:
- a Summary of the Authority's financial position for the current year and previous financial years;
 - b Details of all current investments / loans;

- c Details of the Interest Budget and Interest Projections;
- d All notes relevant to the Treasury Management function, including where applicable the reasons behind and the impact of any decisions made.

Periodic Monitoring Committee Reports

- 100 Interim reports will be prepared where significant matters arise that need to be reported to a BCP Committee.

TMP7 Budgeting, Accounting and Audit Arrangements

- 101 The responsible officer will prepare, and the Council will approve and, if necessary, from time to time amend, an annual budget for treasury management, which will bring together all of the costs involved in running the Treasury Management function, together with associated income. The matter to be included in the budget will at minimum be those required by statute or regulation, together with such information as will demonstrate compliance with TMP1 Risk Management, TMP2 Best Value and Performance Measurement, and TMP4 Approved Instruments, Methods and Techniques. The S151 Officer will exercise effective controls over this budget, and will report upon and recommend any changes required in accordance with TMP6 Reporting Requirements and Management Information Arrangements.
- 102 The Council will account for its treasury management activities, for decisions made and transactions executed, in accordance with appropriate accounting practices and standards, and with statutory and regulatory requirements in force for the time being.
- 103 The Council will ensure that its auditors, and those charged with regulatory review, have access to all information and papers supporting the activities of the Treasury Management function as are necessary for the proper fulfilment of their roles, and that such information and papers demonstrate compliance with external and internal policies and approved practices.

Statutory/Regulatory Requirements

- 104 The treasury management budget and interest budget will be set as part of the Council's main budget setting process as required by the Council. Treasury Management is subject to an annual audit by Internal Auditors and is also audited by External Audit as part of the main financial audit.

TMP8 Cash and Cash Flow Management

- 105 Unless statutory or regulatory requirements demand otherwise, all monies in the hands of the Council will be under the control of the S151 Officer, and will be aggregated for cash flow and investment management purposes. Cash flow projections will be prepared on a regular and timely basis, and the S151 Officer will ensure that these are adequate for the purposes of monitoring compliance as per paragraphs 11-13 Liquidity Risk Management. The present arrangements for preparing cash flow projections, and their form, are set out below.

Arrangements for preparing/submitting Cash Flow Statements

- 106 The Finance Manager with responsibility for treasury management will prepare a rolling cash flow forecast which will cover at least 12 months, based on information gathered from within the Council. This cash flow forecast will be continually updated as new information is received. The cash flow forecast will contain information for every day of the year for all bank accounts.

Listing of sources of information

- 107 Information will be provided to the Treasury Management function by other members of Financial Services and the Council in general.

Bank Statements procedures

- 108 Bank statements are received daily and retained. Summary bank statements are also available in electronic format through the use of treasury management software.

TMP9 Money Laundering

Proceeds of Crime Act 2002

- 109 The Proceeds of Crime Act (POCA) 2002 consolidated, updated and reformed criminal law in the UK in relation to money laundering. The principal offences relating to money laundering are:
- a Concealing, disguising, converting, transferring or removing criminal property from England and Wales, from Scotland or from Northern Ireland;
 - b Being concerned in an arrangement which a person knows or suspects facilitates the acquisition, retention use or control of criminal property;
 - c Acquiring, using or possessing criminal property.
- 110 Other offences include failure to disclose money laundering offences, tipping off a suspect either directly or indirectly, and doing something that might prejudice an investigation.
- 111 Organisations pursuing relevant businesses were required to appoint a nominated officer and implement internal reporting procedures; train relevant staff in the subject; establish internal procedures with respect to money laundering; obtain, verify and maintain evidence and records of the identity of new clients and transactions undertaken and report their suspicions.

The Money Laundering Regulations 2007

- 112 In December 2007, the UK Government published the Money Laundering Regulations 2007, which replaced the 2003 Regulations.
- 113 CIPFA believes that public sector organisations should “embrace the underlying principles behind the money laundering legislation and regulations and put in place anti money laundering policies, procedures and reporting arrangements appropriate and proportionate to their activities”.
- 114 Principle: The Council is alert to the possibility that it may become the subject of an attempt to involve it in a transaction involving the laundering of money. Accordingly, it will maintain procedures for verifying and recording the identity of

counterparties and reporting suspicions, and will ensure that staff involved in this are properly trained.

Procedures for establishing identity / authenticity of lenders

115 The Council does not accept loans from individuals. All loans are obtained from the PWLB, Local Authorities or Other Public Bodies or from authorised institutions under the Banking Act 1987: (the names of these institutions appeared on the Bank of England quarterly list of authorised institutions until 1 December 2001 when the Financial Services Authority (FSA) took over the responsibility for maintaining a register of authorised institutions. This register can be accessed through their website on www.fsa.gov.uk).

Methodology for identifying sources of deposit

116 These will be arranged through authorised money brokers or by direct dealing.

TMP10 Staff Training and Qualifications

Details of approved training

- 117 The Council recognises the importance of ensuring that all staff involved in the Treasury Management function are fully equipped to undertake the duties and responsibilities allocated to them. It will therefore seek to appoint individuals who are both capable and experienced and will provide training for staff to enable them to acquire and maintain an appropriate level of expertise, knowledge and skills. The S151 Officer will recommend and implement the necessary arrangements.
- 118 The S151 Officer will ensure that Council Members tasked with treasury management responsibilities, including those responsible for scrutiny, have access to training relevant to their needs and responsibilities.
- 119 Those charged with governance recognise their individual responsibility to ensure that they have the necessary skills to complete their role effectively.
- 120 The treasury management staff have attended training courses provided both by the Council's advisors and other organisations. The Group Accountant with responsibility for treasury management will ensure that a proactive approach is taken to continually keeping abreast of changes within the treasury management field.

Approved Qualifications for Treasury Staff

- S151 Officer ACCA
 - Assistant Chief Financial Officer CPFA
 - Finance Manager - Technical CPFA
 - Treasury Accountant AAT
- 121 The S151 Officer can determine that an approved qualification is not required if the member of staff has appropriate expertise and knowledge to carry out the responsibilities outlined in the Treasury Management Policy, Practices and Schedules.

Statement of Professional Practice (SOPP)

122 Where the S151 Officer is a member of CIPFA, there is a professional need for the CFO to be seen to be committed to professional responsibilities through both personal compliance and by ensuring that relevant staff are appropriately trained.

Other staff involved in treasury management activities that are CCAB members must also comply with the SOPP.

Member training

123 Council Members tasked with treasury management responsibilities should be trained in the areas of their responsibility.

Those charged with governance must recognise their individual responsibility and ensure that they have the necessary skills to complete their role effectively.

TMP11 Use of External Service Providers

124 The Council recognises that responsibility for treasury management decisions remains with the authority at all times.

It recognises the potential value of employing external providers of treasury management services, in order to acquire access to specialist skills and resources. When it employs such service providers, it will ensure it does so for reasons which will have been submitted to a full evaluation of the costs and benefits. It will also ensure that the terms of their appointment and the methods by which their value will be assessed are properly agreed and documented, and subjected to regular review. It will ensure, where feasible and necessary, that a spread of service providers is used, to avoid over reliance on one or a small number of companies. Where services are subject to formal tender or re-tender arrangements, legislative requirements will always be observed. The monitoring of such arrangements rests with the Service Director, Strategic Finance.

125 The terms of appointment of all consultants are assessed and properly agreed and documented.

Details of Contracts with Service Providers, including Bankers, Brokers, Consultants, Advisers

- a Banking services
- b Name of main supplier of service - HSBC
- c Contract commenced 1 April 2019
- d Money-broking services - No contract exists
- e Cash/fund management services – No contract exists
- f Consultants'/advisers' services
- g Name of supplier of service – currently under tender
- h Software suppliers – No contract exists
- i Credit rating agencies
- j The Council will make use of any information supplied by Moody's, Standard and Poor's and Fitch

- k Procedures and frequency for tendering services
- l This will be in accordance with the Council's Standing Orders.

TMP12 Corporate Governance

- 126 The Council is committed to the pursuit of proper corporate governance throughout its businesses and services, and to establishing the principles and practices by which this can be achieved. Accordingly, the Treasury Management function and its activities will be undertaken with openness and transparency, honesty, integrity and accountability.
- 127 The Council has adopted and has implemented the key recommendations of the Treasury Management Code of Practice as updated. This, together with the other arrangements detailed below, are considered vital to the achievement of proper corporate governance in treasury management, and the S151 Officer will monitor and, if and when necessary, report upon the effectiveness of these arrangements.

Stewardship responsibilities

- 128 The S151 Officer ensures that systems exist to deliver proper financial administration and control and maintaining a framework for overseeing and reviewing the Treasury Management function.

List of documents to be made available for public inspection

- 129 The following documents are freely available for public inspection:
- Annual Statement of Accounts;
 - Budget Book;
 - Medium Term Financial Plan (including Capital);
 - Treasury Management Policy, Practices and Schedules;
 - Treasury Management Strategy;
 - Budget monitoring reports;
 - Annual Treasury Report;

BCP Unitary Authority

Schedule of key financial decisions made by the four sovereign councils

Period: This paper covers all activity from the date of the last Consolidated Medium Term Financial Plan (MTFP) Update report to the BCP Shadow Executive which was the 17 October 2018.

Value: A key financial decision is for the purposes of this exercise defined as one in which the total value of expenditure/income is an amount of £500k or more. Areas covered include purchase, disposal and transfer of assets, new contracts with significant on-going financial commitments (but not routine items like care packages), new capital schemes and the use of reserves above those already approved.

Items the BCP Shadow Executive have already been consulted upon

BCP Shadow Executive 7 November 2018

Ref	Description	Decision Maker	Date	Detail	Financial Implications
A	Hillbourne Masterplan	Poole Cabinet	30 Oct 2018	Delivery of a purpose built two forms of entry primary school on the current site. Surplus land released to deliver housing.	Funded from a combination of the capital receipts generated by the housing development, Section 106 and CIL income, a previous revenue contribution to capital and supported borrowing. Subject to a Section 77 application to the Secretary of State for Education for consent to dispose of surplus school playing field land.
		Poole Council	13 Nov 2018		

Ref	Description	Decision Maker	Date	Detail	Financial Implications
B	Herbert Avenue Temporary Accommodation	Poole Cabinet Poole Council	30 Oct 2018 13 Nov 2018	24 Unit Temporary Accommodation Development for use by the Council	Budgeted cost of £2.508m funded by borrowing in the Housing Revenue Account. Annual debt repayment, running costs and income will be factored into the MTFP but should enable Bed and Breakfast cost avoidance.
C	Allocation of Basic Needs Grant for Secondary Schools Expansion Projects	Bournemouth Cabinet Bournemouth Council	7 Nov 2018 4 Dec 2018	Expansion of four secondary schools to gain five extra forms of entry at this level to support the required demand.	Allocation of £1.4m of Government Education Basic Needs Grant.
D	Local Transport Plan (LTP) Capital Programme 2018/19	Bournemouth Cabinet Bournemouth Council	7 Nov 2018 4 Dec 2018	Local Transport Plan investment priorities for 2018/19	Allocation of £7.154m of resources most significantly the Government LTP capital grant but also including Local Enterprise Partnership (LEP) grant funding and smaller local resources allocations to specific projects.
E	Future of the Public Health Partnership – Update and Key Issues under Local Government Reorganisation	Joint Public Health Board	24 Sept 2018	Extend the partnership for a minimum of twelve months after LGR. Approve a procurement for a new model to provide NHS Health Checks with a pan-Dorset budget of £600k per annum	Funded from within the ring fenced public health grant

F	Acquisition of a Care Home	Bournemouth Cabinet	23 Nov 2018	Acquisition of a Care Homes	Funded via prudential borrowing
		Bournemouth Council	4 Dec 2018		

General Fund

Category 1 One-off items of revenue or capital expenditure

Ref	Description	Decision Maker	Date	Detail	Financial Implications
G	Millhams Recycling Centre	Bournemouth Cabinet	7 Nov 2018	Additional £600,000 investment in the scheme to meet Environment Agency's requirements.	Funded from the Government Strategic Waste Facilities Grant

Bournemouth, Christchurch and Poole - Shadow Executive

Report Subject	Local Council Tax Support Scheme (LCTSS)
Meeting date	12 December 2018
Report author	Adam Richens Chief Financial Officer Bournemouth and Poole Councils ☎01202 451137 Bournemouth ☎01202 633183 Poole ✉ a.richens@poole.gov.uk
Contributors	Ian Milner, Strategic Director Christchurch Borough Council Dan Povey, Finance Manager Christchurch Borough Council Heather Kitching, Senior Research Officer, Bournemouth & Poole Chloe Durrant, Senior Research Officer, Bournemouth & Poole Paul Knevett, Benefit Service Manager SVPP Julie Lankshear, Benefit Service Manager Bournemouth Darren Vickers, Revenues Manager Bournemouth Alan Fletcher, Operations Manager SVPP Paul Hudson, Head of Revenues & Benefits SVPP & Bournemouth
Status	Public
Classification	For decision
Executive summary	<p>Further to a report to the BCP Joint Committee on the 24 July 2018 a consultation has been undertaken in respect of creating a consistent Local Council Tax Support Scheme (LCTSS) across the conurbation. BCP is required to put in place a consistent LCTSS within its first 24 months of operation. Establishing a common approach from day one is wholly consistent with the approved Financial Strategy for the BCP Unitary Authority.</p> <p>The proposed scheme slightly amends the current policies of Bournemouth and Poole to be in line with the latest good practice and amends the Christchurch policy to ensure conurbation wide consistency.</p> <p>The proposal ensures that every person considered vulnerable remains protected.</p>

<p>Recommendations</p>	<p>Members of the Shadow Executive are requested to note that;</p> <p>1. All the proposals put forward as part of this report have been consulted upon.</p> <p><i>Local Council Tax Support Scheme formerly Council Tax Benefit</i></p> <p>2. Under these proposals, Council Tax Support applicants or their partners in receipt of one of the following, will continue to be protected:</p> <ul style="list-style-type: none"> - Disability Premium - Enhanced Disability Premium - Severe Disability Premium - Disabled Child Premium - Carer Premium - Support component within the ESA - War Disablement Pension - War Widow Pension - War Widows Disablement Pension or - Universal Credit recipients, who are not pensioners, but the applicant or their partner is in receipt of an income or premium listed above <p>Members of the Shadow Executive are requested to approve;</p> <p>3. To establish Local Council Tax Support Scheme as set out in item 50 of this report to be implemented from 1 April 2019.</p>
<p>Reasons for recommendations</p>	<p>Council Tax operating policies and discounts should be reviewed regularly to ensure they are accurate and up to date and adhere to the latest good practice.</p> <p>The Ministry of Housing, Communities and Local Government (MHCLG) requires a council to operate a consistent Local Council Tax Support Scheme (LCTSS) policy within its boundaries. MHCLG will require this to be in place for the new council within 24 months from 1 April 2019.</p> <p>Consultation has taken place and those considered vulnerable in existing LCTSS policies to remain protected.</p>

Background detail

1. The implementation of common financial policies was adopted by the Bournemouth, Christchurch and Poole Joint Committee in May 2018 as a key element of its approved Financial Strategy for 2019/20.
2. Examples given in that document included Council Tax Discounts and the Local Council Tax Support Scheme (LCTSS).
3. The Ministry of Housing, Communities and Local Government (MHCLG) have indicated that they would expect the new Council to have aligned policies in place within 24 months of the 1 April 2019 or sooner where possible.
4. The administration of a single LCTSS operating policy will meet the expectations of MHCLG and assist in the efficiency and effectiveness of the Revenue and Benefits service.
5. The proposals set out in this report will support the delivery of the Revenue and Benefit Service efficiency savings currently assumed in the BCP Unitary Authorities budget for 2019/20 and Medium Term Financial Plan (MTFP). They will also align the scheme in areas to the award process for Housing Benefit to make it simpler for claimants to understand and officers to process.

Background to proposed Local Council Tax Support Scheme for BCP

6. From April 2013 Government devolved responsibility for Council Tax Benefit from Whitehall to 326 individual local authorities. At the same time the budget was reduced by 10%. Nationally this equated to a £414m reduction.
7. Using the reduced money available, local authorities were required to design, consult upon and implement their own local scheme to replace the previous national system. However, despite the then 10% cut in the total funding, the Government required local authorities to protect claimants of pension age (approximately 42% of the claimants). In addition, the Councils decided to protect the most vulnerable in our society.
8. Based upon the funding restriction it was acknowledged that a 20% liability would in most circumstances in Dorset achieve a “break even” position in April 2013. Dorset councils consulted on this scheme, but prior to implementation, the Government announced additional funding for 1 year where Councils limited their LCTSS to an 8.5% Scheme. Bournemouth continued with a 20% Scheme, Poole commenced with an 8.5% Scheme then moving to 14.5% and now 20%. Christchurch commenced and remained with an 8.5% Scheme.
9. Since its implementation, the resources made available by Government have been further reduced as part of the annual reductions to each Council Revenue Support Grant (RSG).
10. On 24 July 2018 the Shadow Executive approved that they should consult on a range of proposals in respect of the operation of a common Local Council Tax Support Scheme from April 2019 onwards. In supporting the proposed consultation the Shadow Executive

noted that the following groups have been and will continue to be **protected** in respect of the local scheme;

(A) Council Tax Support claimants of state pension credit age. The Government's view is that they cannot go back to work and they deserve dignity and security in retirement.

(B) The prevailing Councils have previously chosen to protect working age Council Tax Support claimants from the liability restrictions where the applicant or partner is in receipt of any of the following;

- Disability Premium
- Enhanced Disability Premium
- Severe Disability Premium
- Disabled Child Premium
- Carer Premium
- Support component within the ESA
- War Disablement Pension
- War Widow Pension
- War Widows Disablement Pension, or
- Universal Credit recipients, who are not pensioners, but the applicant or their partner is in receipt of an income or premium listed above

11. Collecting Council Tax from working age customers where their LCTSS is restricted by 20% is challenging especially where Council Tax increases exceed income rises for claimants. The collection implications will continue to be kept under constant review. It should be highlighted that the Finance Task and Finish Group looking into Council Tax Harmonisation within the BCP Unitary Council are working to a Joint Committee resolution to prioritise options which include freezes and or reductions to the absolute level of Council Tax paid by Christchurch residents.

Explanation of potential changes

12. After careful consideration of this background the Shadow Executive on the 24 July 2018 agreed to undertake a consultation on the proposed changes for their potential implementation from April 2019 onwards.

13. **Proposal A:** Everyone of working age (who is not in a protected group) would have to pay a minimum of 20% of their Council Tax bill.

14. **Proposal B:** That the family premium will not be included in the Council Tax Support applicable amount for new entitlements to Council Tax Support from 1 April 2019 or for any existing claimants who have, or become responsible for, a child (under 16) or young person (under 20) for the first time on or after 1 April 2019.

15. **Proposal C:** To limit 'backdating' from 1 April 2019 up to a maximum of one calendar month for all working age claims. A claim is 'backdated' where a request is made in writing to the Benefits Service, and the person is able to show they have continuous

good cause for their failure to make a claim at the relevant time. This means that for everyone of working age, 'backdating' would be limited to up to a maximum of one calendar month to make it consistent with the Housing Benefit rules.

16. **Proposal D:** To cap the Council Tax Support Scheme to Band C. This would mean everyone of working age who is not in a protected group, whose Council Tax charge is Band D or above, would have their eligible Council Tax charge in the assessment of Council Tax Support restricted to the Band C equivalent.
17. **Proposal E:** That where a working age customer's entitlement to Council Tax Support is less than 50p per week, the reduction would not be paid, making the entitlement "nil". It is difficult to justify the administrative cost of very small awards and mirrors the Housing Benefit rule.
18. **Proposal F:** If someone does not qualify for Council Tax Support on their own income but a non-dependant on a low income lives with them, the liable person may be able to receive Council Tax Support of up to 25% of the eligible Council Tax charge. This is known as Second Adult Rebate. This is not the same as a Single Person Discount which remains unaffected. It is proposed that the Second Adult Rebate will end on 31 March 2019 for all working age claimants, including those in protected groups. This means that all claimants of working age (including those in protected groups) would be unable to apply for or receive Second Adult Rebate from 1st April 2019.
19. **Proposal G:** Housing Benefit rules state for new claims or new dependants, no more than two children are taken into account when calculating an entitlement. It is proposed to include this rule to simplify the new scheme to align with Housing Benefit.
20. **Proposal H:** It is proposed to disregard the Bereavement Support Payment & Infected Blood Schemes financial support payments to reflect changes in the Housing Benefit rules in order to provide consistency for those working age claimants. This means for a working age claim where Bereavement Support Payment and/or Infected Blood Schemes financial support payments are received, this income would not be included in the total income used in the calculations and could potentially receive more Council Tax Support.
21. **Proposal I:** Council Tax Support is usually only granted to a claimant who lives in a property as their main home. In certain circumstances, support can continue while you are 'temporarily away from your main home'. The Government changed the Housing Benefit temporary absence rules to introduce a maximum time limit to apply to temporary absences that are outside of Great Britain. This is currently 4 weeks, reduced from 13 weeks. The proposal is to apply these same rules to the new scheme so that they mirror the Housing Benefit Rules to make the scheme consistent for claimants.
22. **Proposal J:** To be consistent with Universal Credit rules, a minimum income would apply if claimant's self-employed income is less than the National Living Wage (or the National Minimum Wage) multiplied by up to 35 hours worked per week.

If claimants already receive both Universal Credit and Council Tax Support and are self-employed they will already be subject to this rule within the calculation because of the existing requirements within the Universal Credit and Council Tax Support Legislation.

If claimants are self-employed, and their business has been running for more than 12 months, but their income from the business is low, we would use a minimum income to calculate their Council Tax Support. This is an assumed income based on what we would expect an employed person to receive in similar circumstances. It is calculated using the National Minimum Wage for the claimant's age group, multiplied by up to 35 hours per week, less notional Tax and National Insurance and half of any pension contributions.

If claimant's self-employed earnings are below the minimum income floor, we will use this calculation to work out your Council Tax Support entitlement instead of their actual earnings.

If claimants have been self-employed for less than 12 months, the minimum income floor will not apply to them. However, if after 12 months of self-employment, their income is below the minimum income floor amount, their Council Tax Support will be recalculated to reflect the minimum income floor calculation.

23. **Proposal K:** To only carry out an assessment for those claimants receiving Universal Credit (UC) either every 26 or 52 weeks to see whether any changes in Universal Credit alters their Council Tax Support entitlement.

As Universal Credit is calculated using real time information, a person's entitlement can change for each Universal Credit monthly assessment period. Currently this results in the Local Authorities Benefits Service having to review and revise a claimants' Council Tax Support entitlement monthly, if necessary. A new Council Tax bill is then issued if a change has occurred. This review can take place 12 times per financial year and takes considerable administrative time, when often the Council Tax Support changes by a small amount.

By fixing the assessment period, this will avoid monthly changes to reflect Universal Credit changes. Instead there would be a re-assessment of Council Tax Support every 26 or 52 weeks to take account of the latest Universal Credit income.

Consultation with Major Preceptors

24. As the proposal impacts on the arrangements for the recovery of the total council tax levied, the Council is required to consult the Major Preceptors (Dorset Police and the Dorset and Wiltshire Fire Authority). Therefore officers representing the Stour Valley and Poole Partnership, and Bournemouth Council wrote to the major preceptors on the principles of the draft scheme for 2019/20.
25. The Office of the Dorset Police and Crime Commissioner responded and advised that "we understand your proposals and your reasoning and have no objections to them".
26. The Finance Director (& Treasurer) of the Dorset and Wiltshire Fire Authority responded and confirmed that they are "fully supportive of the alignment and standardisation to achieve a common scheme in the interests of efficiency as effectiveness, as a Fire and Rescue Service much of the work we do specifically around vulnerable groups is in

relation to many of the groups which are protected under the scheme changes proposed, and we would continue to support that principle”.

27. Subject to the recommendation of the Shadow Executive, the major preceptors will be informed on any changes to the scheme as set out in the original consultation.

Financial Implications - Local Council Tax Support Scheme

28. The financial modelling that has been completed is based on the estimated Council Tax Support expenditure for 2018/19 without a Council Tax increase and without any uprating of "applicable amounts" and incomes etc., other than where explicitly part of the proposal. It also reflects the current profile of Christchurch claimants between those that are working age unprotected claimants, protected pensioners and those locally protected vulnerable people.

29. The modelling shows that the following amounts would be generated by a consistent LCTSS;

	Amount £
Consistent LCTSS	146,000
Total	146,000

30. The proposal would mean claimants in Bournemouth and Poole would see no change in their entitlement, but for Christchurch residents they would see an increase from 8.5% contribution to 20%. Taking account of the Council Tax charges being higher in Christchurch and the Council Tax harmonisation considerations, this scheme may in future years impact on Council Tax collection.

Publication of the 2019/20 Draft Scheme and Consultation Feedback

31. All current recipients of LCTSS and all Council Tax payers had the opportunity to share their views on the proposals. Consultation questionnaires were prepared alongside background information and a summary of the proposed changes. A letter was sent to all 14,506 working age recipients of Council Tax Support inviting them to have their say, either by completing a questionnaire online or by requesting a postal copy.
32. Phone numbers for Bournemouth Council’s Council Tax Support Team and Stour Valley Partnership were included in the letter to claimants to help those who wanted hard copies of the questionnaire, or who had general enquiries about the consultation.
33. The consultation ran for 6 weeks from Monday 3rd September to Monday 15th October 2018. The online questionnaire and background information were available on the BCP Shadow Authority’s website and supported by a helpline. The letter to claimants also invited them to use a computer in any library in Bournemouth, Christchurch and Poole, as well as at their local Council offices. Promotional material and paper versions of the consultation were also available from all libraries and customer access points.

34. The Consultation Report Summary produced by the Council's Insight Team is attached as appendix A, with the detailed consultation response being attached as Appendix B to this report.
35. In summary, the total number of responses to the consultation was 351, of which 284 were online and 67 were paper responses:

Area	Number	Response Rate
Bournemouth	197	2.3%
Christchurch	36	2.5%
Poole	107	2.4%
Other or no responses	11	-
Total for BCP Council area	351	2.4%

36. Of the 351 responses, 240 were LCTSS claimants and 100 were non-claimants. 11 responses were received which did not state whether the respondent was a claimant or non-claimant.
37. In overall summary the responses were as follows;

Proposal	Agree	Neither	Disagree
A	48%	21%	31%
B	33%	29%	38%
C	48%	17%	35%
D	47%	25%	27%
E	45%	29%	26%
F	39%	30%	31%
G	54%	18%	28%
H	46%	18%	36%
I	54%	29%	17%
J	55%	27%	18%
K	56%	23%	20%

Evaluation undertaken by officers from Revenues and Benefit Service

38. A letter was sent to all existing recipients of LCTSS for the three Councils, inviting them to review the consultation and make comment on the proposals.
39. Whilst the proposed Scheme in many areas mirrored that in place currently for Bournemouth and Poole, it is the proposal to create a "new scheme" for the BCP Council for 1 April 2019.
40. In carrying out the review it was duly noted that the main financial impact of the proposed LCTSS for BCP Council would be the changes detailed in Proposals A and D for those residents of Christchurch, as residents of Bournemouth and Poole already have claims considered under these parameters.
41. It is recognised with the existing schemes that recipients of LCTSS where there is a 20% Liability and a Band restriction in some cases have difficulty in paying their Council Tax.

It is noted that officers and support agencies proactively work with the Taxpayer in these circumstances to agree a maintainable payment arrangement.

42. Respondents to the survey detailed that they would look for support on housing options, budgeting, financial or debt advice and health advice. Officers from Revenues and Benefits work closely with housing and advice agencies to support customers and give debt advice. Where possible payment arrangements that are affordable and timely are entered into.

Traditionally the s151 Officer is given delegated power to reduce or remit Council Tax on the grounds of extreme hardship. It is accepted that it may be necessary to take a more liberal approach to the use of any hardship fund and other discretionary powers to support the scheme for BCP Council. To support this approach the review of earmarked and unearmarked reserves considered as part of the MTFP Update report presented elsewhere on this agenda looks to further increase the resources set aside as a Welfare Reform earmarked reserve / Hardship Fund for the new authority.

43. In addition, should a Council Taxpayer also be receiving Housing Benefit / Universal Credit to assist with the cost of their rent, the amount of Council Tax they have to pay will be taken into consideration when deciding the level of any Discretionary Housing Payment (DHP) to help them meet any shortfall between their Housing Benefit / Universal Credit and their contractual rent.
44. During the consultation period the Governments Budget and proposed changes to Universal Credit has given the opportunity for the Council's benefit officers to review some of the proposals where the LCTSS was to be aligned to policies to support the way in which Universal Credit was processed.

From this review it is considered that the following Proposals in the consultation be removed for the reasons detailed:

Proposal J

To be consistent with Universal Credit rules, a minimum income would apply if claimant's self-employed income is less than the National Living Wage (or the National Minimum Wage) multiplied by up to 35 hours worked per week.

Removed as in the Budget the Government extended date for Universal Claimants and the income level of National Living Wage would not be appropriately aligned.

Proposal K

Proposal K: To only carry out an assessment for those claimants receiving Universal Credit (UC) either every 26 or 52 weeks to see whether any changes in Universal Credit alters their Council Tax Support entitlement.

Removed as considered data matching with Government Agencies as currently in place continues to be effective.

Equalities Impact Needs Assessment (EINA) of LCTSS changes

45. MHCLG has undertaken a full equalities impact assessment on the principle of localising support for council tax which was previously published on their website.
46. The Local Government Association has undertaken an assessment of the cumulative impacts and mitigations of all welfare reforms which was published on their website.
47. Equalities implications were fully considered as part of the predecessor authorities' original and amended schemes.
48. The Equality Impact Assessment Template for BCP for the LCTSS is attached as Appendix C to this report.

Proposed LCTSS Scheme for BCP Council as from 1 April 2019

49. BCP is required to put in place a consistent LCTSS scheme within its first 24 months of operation. Establishing a common approach from day one is wholly consistent with the approved Financial Strategy for the BCP Unitary Authority
50. The proposed scheme detailed below slightly amends the current policies of Bournemouth and Poole to be in line with the latest good practice and amends the Christchurch policy to ensure conurbation wide consistency.

Proposed BCP Local Council Tax Support Scheme – April 2019 Key characteristics		Current Scheme		
		Bmth	CBC	Poole
A	20% minimum contribution towards Council Tax from working age claimants not in a protected group.	Y	N	Y
B	New entitlement on/after 1 April 2019 do not receive the family premium	Y	N	Y
C	Backdating up to a maximum of one calendar month	Y	N	Y
D	Scheme capped at Council Tax Band C (claimants in bands above C receive support at Council Tax Band C level) for working age claimants not in protected group	Y	N	Y
E	Minimum weekly entitlement of 50p	Y	N	Y
F	No working age Second Adult Rebate	Y	N	Y
G	To limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for new applicants/new families	N	N	N
H	Disregard the Bereavement Support and Infected Blood Schemes payments to mirror Housing Benefit rules	N	N	N
I	Mirror the Housing Benefit temporary absence rules	N	N	N

Characteristics B,C,E,G,H & I are being proposed to align the new LCTSS to the award process for Housing Benefit

51. The proposal ensures that every person considered vulnerable remains protected from characteristics A & D.

Alternative option to the proposed scheme

52. The alternative option would be to bring Bournemouth and Poole policies in line with the current arrangements in Christchurch, being an 8.5% Liability Scheme.

Although it is difficult to be absolutely certain it is estimated that such an approach would create a financial pressure of over £680,000 on the new authority.

Summary of finance and resourcing implications

53. Generally, the financing and resourcing implications are set out in the body of this report. The current MTFPs of Bournemouth, Christchurch and Poole assume £408,000 between 2019 and 2021 from efficiencies within the Revenue and Benefits service.

Summary of legal implications

54. As referenced in the body of the report.

Summary of human resources implications

55. None specifically related to this report

Summary of environmental impact

56. None specifically related to this report

Summary of risk assessment

57. This report and the actions outlined within it will form part of the mitigation strategy associated with the following risks;

- Inability to deliver Council statutory services due to insufficient funding.
- Failure to deliver consistent financial and operating policies within the New Bournemouth, Christchurch and Poole Unitary Authority.

Background papers

58. Consolidated Medium Term Financial Plan report to the BCP Joint Committee on 23 May can be found at <https://bcpjointcommittee.wordpress.com/meetings/>

59. Council Tax Discounts and the Local Council Tax Support Scheme (LCTSS) to 24 July 2018 can be found at <https://moderngov.bcpshadowauthority.com/ieListDocuments.aspx?CId=138&MId=113&Ver=4>

Appendices

- 60. Appendix A – Consultation Report Summary
- 61. Appendix B – LCTSS Consultation
- 62. Appendix C – Equality Impact Assessment

Bournemouth, Christchurch and Poole Shadow Authority Council Tax Support Consultation

Committee Report Summary

December 2018

The consultation ran for 6 weeks from Monday 3rd September to Monday 15th October 2018. A letter was sent to all 14,506 working age recipients of Council Tax Support inviting them to have their say, either by completing a questionnaire online or by requesting a postal copy. Phone numbers were included in the letter to help those who wanted paper copies of the information, or who had general enquiries about the consultation. The cost of undertaking the consultation was £12,500.

The total number of responses to the consultation was 351, of which 284 were online and 67 were paper responses. Of the 351 responses, 197 responses were from Bournemouth, 36 from Christchurch and 107 from Poole. A total of 240 of the responses were from Council Tax Support claimants.

The responses have been analysed by area (Overall, Bournemouth, Christchurch and Poole) and into 'claimants' and 'non-claimants'. 'Claimant' refers to respondents who were receiving council tax support at the time of completing the questionnaire.

The consultation report highlights significant differences by area, respondent type and equalities groups.

Respondents could provide further information to explain their answers to each of the proposals. These comments are summarised in the consultation report and included in the appendices in full.

Respondents were also asked what information or support would help them (or others affected) to manage the change. Advice on housing options (46%), budgeting, financial or debt advice (45%) and health advice (36%) are the top three types of information or support that would help respondents to manage the change.

The following tables summarise the responses to each of the proposals in terms of agreement and impact.

Table 1: Agreement with, and the impact of, each of the proposals broken down into Bournemouth, Christchurch and Poole (% respondents)

Proposal	% Agree				% Impact A Lot / A Little			
	Overall	Bournemouth	Christchurch	Poole	Overall	Bournemouth	Christchurch	Poole
A. Set the minimum contribution at 20% for working age residents not in a protected group	48%	53%	44%	39%	54%	51%	73%	56%
B. Withdraw the family premium for new working age claims and new families	33%	36%	21%	32%	31%	29%	33%	32%
C. Limit backdating to up to a maximum of one calendar month for working age claims	48%	49%	39%	52%	33%	34%	25%	37%
D. Cap scheme at Council Tax Band C for working age claimants not in a protected group	47%	51%	29%	47%	36%	38%	48%	30%
E. Minimum weekly entitlement of 50p	45%	49%	33%	45%	30%	31%	24%	27%
F. No working age Second Adult Rebate.	39%	44%	24%	38%	27%	25%	19%	29%
G. Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	54%	53%	55%	56%	21%	17%	37%	22%
H. Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants	46%	46%	37%	50%	18%	19%	13%	14%
I. Mirror the Housing Benefit 'Temporary Absence' rules	54%	58%	39%	54%	20%	22%	6%	16%
J. Introduce a self-employed minimum income floor	55%	54%	57%	57%	18%	17%	31%	15%
K. Introduce fixed period assessments	56%	56%	59%	59%	-	-	-	-
- Impact of 26 week assessments	-	-	-	-	47%	48%	64%	40%
- Impact of 52 week assessments	-	-	-	-	49%	47%	57%	46%

Table 2: Agreement with, and the impact of, each of the proposals broken by claimants and non-claimants (% respondents)

Proposal	% Agree		% Impact A Lot / A Little	
	Claimant	Non-claimant	Claimant	Non-claimant
A. Set the minimum contribution at 20% for working age residents not in a protected group	40%	40%	56%	49%
B. Withdraw the family premium for new working age claims and new families	33%	24%	29%	33%
C. Limit backdating to up to a maximum of one calendar month for working age claims	41%	68%	34%	31%
D. Cap scheme at Council Tax Band C for working age claimants not in a protected group	43%	59%	36%	35%
E. Minimum weekly entitlement of 50p	42%	52%	34%	20%
F. No working age Second Adult Rebate.	32%	57%	27%	23%
G. Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	49%	69%	19%	22%
H. Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants	43%	54%	17%	16%
I. Mirror the Housing Benefit 'Temporary Absence' rules	49%	68%	20%	16%
J. Introduce a self-employed minimum income floor	52%	62%	18%	20%
K. Introduce fixed period assessments for Universal Credit recipients f 26 or 52 weeks	51%	72%	-	-
- Impact of 26 week assessments	-	-	55%	29%
- Impact of 52 week assessments	-	-	55%	32%

Bournemouth, Christchurch and Poole Shadow Authority Council Tax Support Scheme

Consultation Report

November 2018

Insight Team
Insight, Policy & Performance | Bournemouth And Poole

Contents

1. Introduction.....	1
2. Background.....	1
3. The Proposals.....	2
4. Methodology	3
5. Promoting the consultation.....	4
6. Results.....	5
7. Summary of findings	6
Proposal A: Set the minimum contribution at 20% for working age residents not in a protected group	6
Levels of agreement with Proposal A.....	6
Impact of Proposal A.....	7
Differences in response	8
Comments on Proposal A	8
Proposal B: Withdraw the family premium for new working age claims and new families ..	9
Levels of agreement with Proposal B.....	9
Impact of Proposal B.....	10
Differences in response	11
Comments on Proposal B	11
Proposal C: Limit backdating to up to a maximum of one calendar month for working age claims.....	12
Levels of agreement with Proposal C.....	12
Impact of Proposal C	13
Differences in response	14
Comments on Proposal C	14
Proposal D: Cap scheme at Council Tax Band C for working age claimants not in a protected group	15
Levels of agreement with Proposal D.....	15
Impact of Proposal D	16
Differences in response	17
Comments on Proposal D	17
Proposal E: Minimum weekly entitlement of 50p.....	18
Levels of agreement with Proposal E.....	18
Impact of Proposal E.....	19
Differences in response	20
Comments on Proposal E	20

Proposal F: No working age Second Adult Rebate	21
Levels of agreement with Proposal F	21
Impact of Proposal F	22
Differences in response	23
Comments on Proposal F	23
Proposal G: Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	24
Levels of agreement with Proposal G.....	24
Impact of Proposal G	25
Differences in response	26
Comments on Proposal G.....	26
Proposal H: Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants.....	27
Levels of agreement with Proposal H.....	27
Impact of Proposal H	28
Differences in response	29
Comments on Proposal H.....	29
Proposal I: Mirror the Housing Benefit 'Temporary Absence' rules	30
Levels of agreement with Proposal I	30
Impact of Proposal I	31
Differences in response	32
Comments on Proposal I.....	32
Proposal J: Introduce a self-employed minimum income floor	33
Levels of agreement with Proposal J.....	33
Impact of Proposal J	34
Differences in response	35
Comments on Proposal J.....	35
Proposal K: Introduce fixed period assessments for Universal Credit recipients of 26 or 52 weeks.....	36
Levels of agreement with Proposal K.....	36
Views on the assessment period.....	37
Impact of Proposal K.....	38
Differences in response	40
Comments on Proposal K	40
Information and Support	41
Differences in response	42

8. Additional comments.....	43
Appendix 1: Summary of Responses	44
Appendix 2: Respondent Profile	46

1. Introduction

Bournemouth, Christchurch and Poole Shadow Authority undertook a consultation about its proposed Council Tax Support Scheme for the 2019/20 financial year. The results are reported in this document. A consultation document was designed with an accompanying questionnaire. The fieldwork period opened on Monday 3rd September and closed on Monday 15th October. The results will be considered by the BCP Shadow Authority at its meeting on 12 December 2018.

2. Background

From April 2019, there will be a new council for Bournemouth, Christchurch and Poole. This new council will replace the existing local authorities – Bournemouth Borough Council, Christchurch Borough Council and Borough of Poole. The three councils each have their own Council Tax Support Scheme, each with different characteristics/criteria. The new council needs a single Council Tax Support Scheme for the 2019/20 financial year that is affordable, consistent and fair, not only for those who receive support, but also for residents who depend on wider services.

It is proposed that the new scheme would also be aligned with changes made by the Government for the national Housing Benefit scheme. This is because most people who claim Housing Benefit also claim Council Tax Support, so aligning the schemes would make it easier for claimants to understand.

As of July 2018, there were 26,869 households in Bournemouth, Christchurch and Poole who receive some level of Council Tax Support. The Government says that we must fully protect pensioners, who make up 47% of those entitled to Council Tax Support. In addition, Bournemouth, Christchurch and Poole have protected, and will continue to protect the following groups, from making the minimum contribution to their Council Tax bills, where the applicant or partner is in receipt of:

- War disablement pension, war widows pension or war widows disablement pension
- Disability premium, enhanced disability premium or severe disability premium
- Disabled child premium
- Carer premium
- Support component within their employment and support allowance, or
- Universal Credit recipients, who are not pensioners, but the applicant or their partner is in receipt of an income or premium listed above.

3. The Proposals

The Shadow Authority consulted on eleven proposals, as shown in the table below. Each proposal was explained more fully in the consultation document. The table also compares the proposed scheme to the existing scheme in each authority area.

The Proposed 2019/20 Council Tax Support Scheme	Change to current scheme?		
	Bournemouth	Christchurch	Poole
A. Set the minimum contribution at 20% for working age residents not in a protected group	No	Yes	No
B. Withdraw the family premium for new working age claims and new families	No	Yes	No
C. Limit backdating to up to a maximum of one calendar month for working age claims	No	Yes	No
D. Cap scheme at Council Tax Band C for working age claimants not in a protected group	No	Yes	No
E. Minimum weekly entitlement of 50p	No	Yes	No
F. No working age Second Adult Rebate.	No	Yes	No
G. Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	Yes	Yes	Yes
H. Disregard Bereavement Support Payment and Infected Blood Schemes financial support claimants for all working age claimants	Yes	Yes	Yes
I. Mirror the Housing Benefit 'Temporary Absence' rules	Yes	Yes	Yes
J. Introduce a self-employed minimum income floor	Yes	Yes	Yes
K. Introduce fixed period assessments for Universal Credit recipients of 26 or 52 weeks	Yes	Yes	Yes

4. Methodology

All current recipients of Council Tax Support and Council Tax payers had the opportunity to share their views on the proposals. Consultation questionnaires were prepared alongside background information and a summary of the proposed changes.

A letter was sent to all 14,506 working age recipients of Council Tax Support inviting them to have their say, either by completing a questionnaire online at www.bcpshadowauthority.com/consultations or by requesting a postal copy. A total of 44 letters were returned to the Council by the Royal Mail as undeliverable.

Phone numbers for Bournemouth Council's Council Tax Support Team and Stour Valley Partnership were included in the letter to claimants to help those who wanted hard copies of the questionnaire, or who had general enquiries about the consultation. The two helpline numbers responded to requests for over 50 paper copies of the questionnaire and supporting information, and two requests for alternative formats (one large print and one audio version).

The consultation ran for 6 weeks from Monday 3rd September to Monday 15th October 2018. The online questionnaire and background information were available on the BCP Shadow Authority's website (www.bcpshadowauthority.com/consultations). The letter to claimants also invited them to use a computer in any library in Bournemouth, Christchurch and Poole, as well as at their local Council offices. Paper versions were also available from all libraries across Bournemouth, Christchurch and Poole and at the following customer service centres:

- St Stephen's Road, Bournemouth Town Hall
- Civic Centre, Poole
- Christchurch Council, Civic Offices, Bridge Street

5. Promoting the consultation

A letter was sent to all claimants with a link to the consultation page on the BCP Shadow Authority website (bcpsshadowauthority.com/consultations). In addition, three councils existing communications channels were used to promote the consultation to claimants and non-claimants:

The consultation was listed in all three council consultation areas and banner adverts were added to the Council Tax Support Scheme webpages on each council's website. In addition, banner adverts were shown on each council's homepage.

Posters were displayed at customer contact centres and at all libraries in Bournemouth, Christchurch and Poole, with copies of the forms and documents also available. Staff also promoted the consultation to claimants when they contacted the centre face to face or over the phone.

Social media post on Bournemouth, Christchurch and Poole Shadow Authority account which was retweeted from council accounts in September and October.

6. Results

The total number of responses to the consultation was 351, of which 284 were online and 67 were paper responses:

Area	Number	% Response Rate
Bournemouth	197	2.3%
Christchurch	36	2.5%
Poole	107	2.4%
Other or no response	11	-
Total	351	2.4%

Of the 351 responses, 240 were Council Tax Support claimants and 100 were non-claimants. Non-claimants included people who had received Council Tax Support in the past, Council Tax payers and people who work with those affected or work for community organisations. There were also 11 responses from people whose status and area is unknown.

The responses have been analysed by area (Overall, Bournemouth, Christchurch and Poole) and into 'claimants' and 'non-claimants'. 'Claimant' refers to respondents who were receiving council tax support at the time of completing the questionnaire.

Due to the relatively small sample size, care needs to be taken not to place too much emphasis on small statistical differences as there will inevitably be some degree of error in the results. Differences between overall responses and groups of respondents have been highlighted in the report where they are large enough to represent a statistically significant difference. Where no differences are stated, this means that no statistically significant differences exist or that the total number of responses from the target group was too small to draw any reliable conclusions.

Figures in this report are presented as a percentage of people who answered the question i.e. excluding 'don't know', 'does not apply' and 'no reply'. The percentages in this report will not always add up to 100% this can be because of rounding or because respondents can select more than one response to a question.

This report also summarises the nature of comments and suggestions made by respondents and the type of themes arising. The numbers of people mentioning the most prevalent themes are provided to give an indication of the magnitude of response. Importantly, however, given the nature of qualitative data, this does not provide an indication of significance or salience in relation to the question asked. Some comments were coded to more than one theme to reflect the range of issues mentioned. All comments are available in full in Appendix 3.

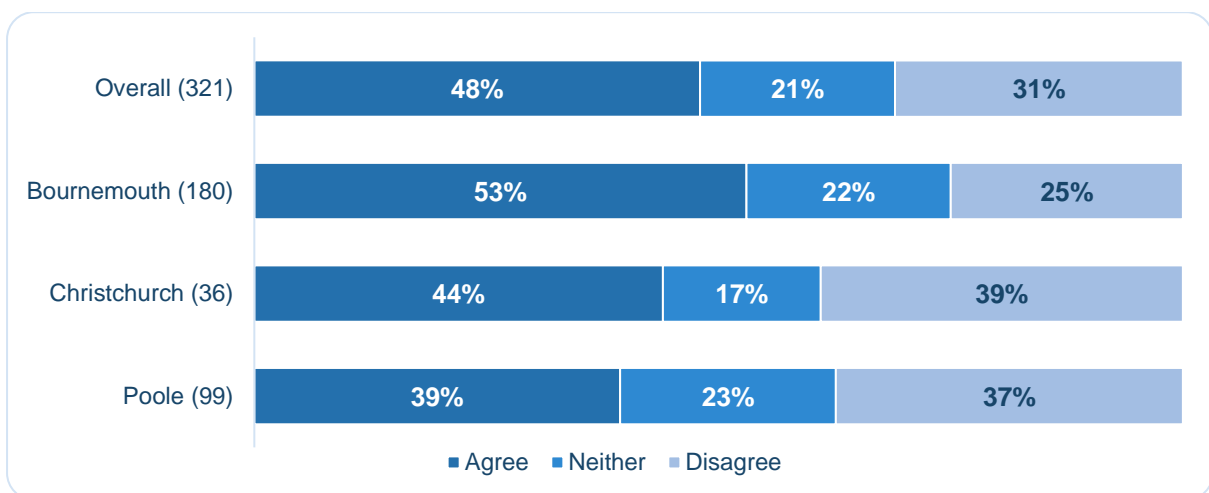
7. Summary of findings

Proposal A: Set the minimum contribution at 20% for working age residents not in a protected group

Levels of agreement with Proposal A

Almost half of respondents (48%) agreed with the proposal to set the minimum contribution at 20% for working age residents not in a protected group whilst just under one third of respondents (31%) disagreed. Respondents in Poole were significantly less likely to agree (39%) with the proposal compared to respondents in Bournemouth (53%).

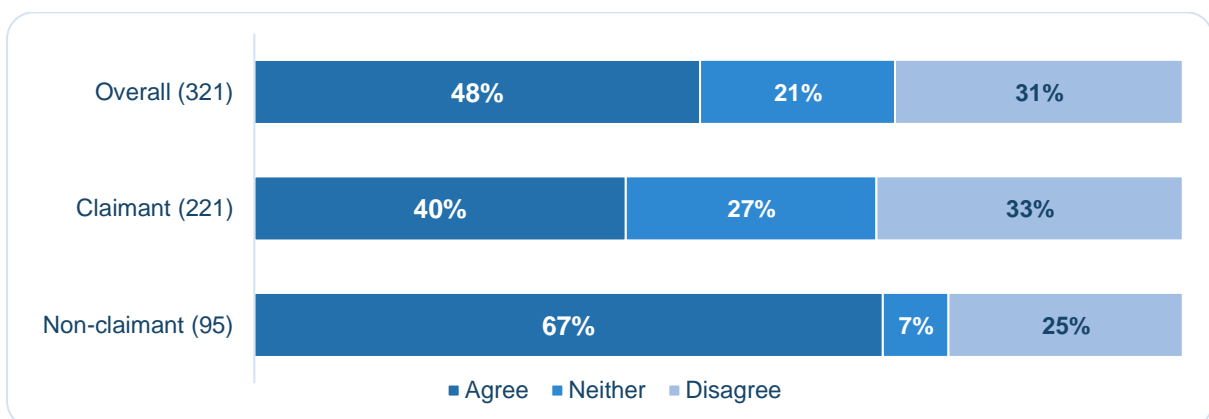
Figure 1: Levels of agreement to Proposal A by area (% respondents)



BASE: Varied as labelled

Two fifths of claimants (40%) agreed with proposal A. This compares to 67% of non-claimants agreeing with the proposal. One third of claimants (33%) disagreed with the proposal whilst one quarter (25%) of non-claimants disagreed.

Figure 2: Levels of agreement to Proposal A by respondent type (% respondents)

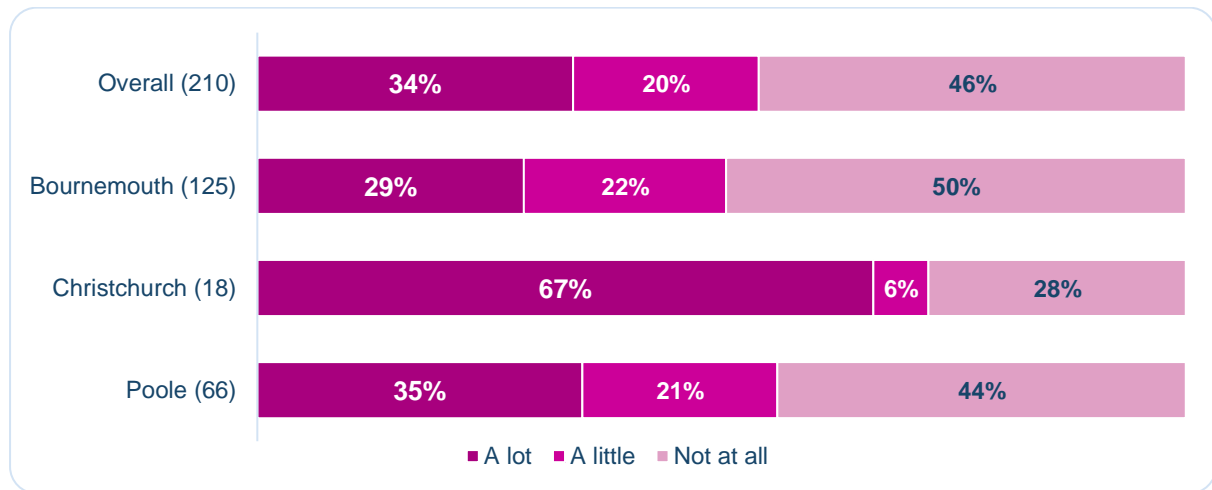


BASE: Varied as labelled

Impact of Proposal A

Just over one third of respondents (34%) thought that the proposed change would impact on them and their family a lot whilst one fifth (20%) thought it would impact on them a little. A total of 46% of respondents thought the proposed change wouldn't impact on them at all. Respondents in Christchurch (67%) were significantly more likely to think that the proposed change would impact them a lot compared to respondents in Bournemouth (29%) and Poole (35%).

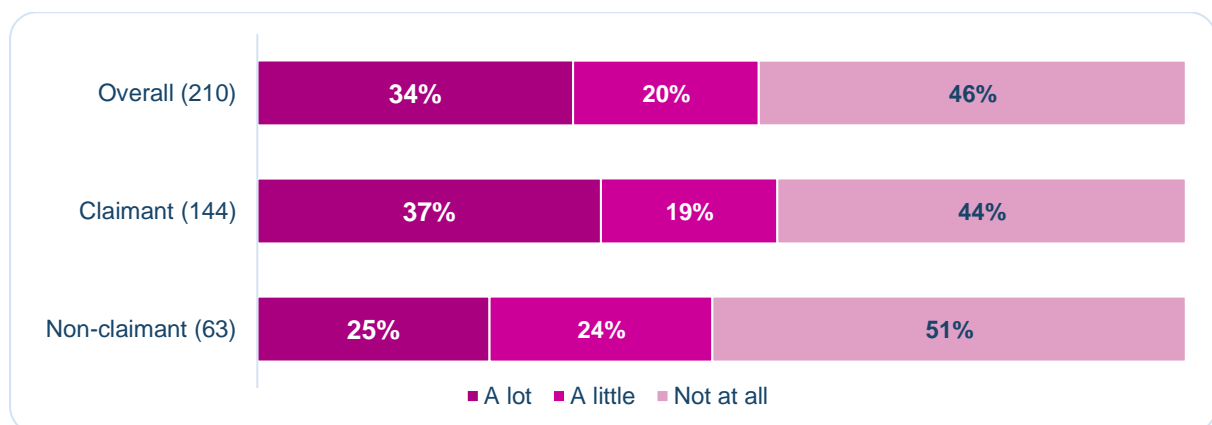
Figure 3: Levels of impact to Proposal A by area (% respondents)



BASE: Varied as labelled

Almost two fifths of claimants (37%) thought that the proposed change would impact on them and their family a lot whilst 19% thought it would impact on them a little. Over two fifths of claimants (44%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact between claimants and no-claimants.

Figure 4: Levels of impact to Proposal A respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 65 and over are significantly more likely to agree with proposal A (74%) compared to those aged 16 to 64 (47%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents with no religion are significantly more likely to agree with proposal A (36%) than Christian respondents (24%).

Respondents from other white backgrounds are significantly more likely to think that proposal A would impact them to some extent (80%) compared to white British respondents (49%).

Comments on Proposal A

Respondents were asked to provide any additional comments about proposal A. There were 91 additional comments regarding the proposal to set the minimum contribution at 20% for working age residents not in a protected group. The most common theme arising from these comments was the negative financial impact of the proposal (22 comments).

"I am already struggling as it is. Further increase in Council tax will cause a further burden." (claimant)

"Even an extra £10 would have a huge impact on my family." (claimant)

The other comments were themed as follows:

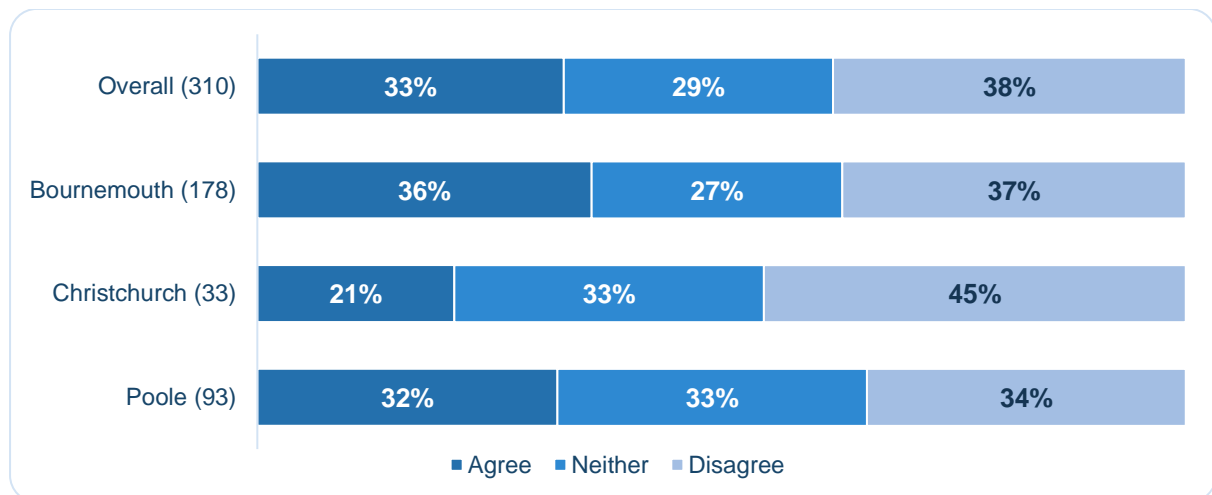
- General disagreement with the proposal / unfair proposal (13 comments)
- Not personally affected (12 comments)
- Description of personal circumstances (10 comments)
- General agreement with the proposal / fair proposal (9 comments)
- Impact is unknown (7 comments)
- Negative impact (7 comments)
- Other comments (7 comments)
- Individuals' needs should be assessed (5 comments)
- Comments on the new council (5 comments)
- Comments on the consultation (5 comments)
- Comments on Council Tax in general (3 comments)
- Comments on other proposals (1 comment)
- Positive impact (1 comment)

Proposal B: Withdraw the family premium for new working age claims and new families

Levels of agreement with Proposal B

One third of respondents (33%) agreed with the proposal to withdraw the family premium for new working age claims and new families whilst almost two fifths of respondents (38%) disagreed. There were no significant differences in agreement by area.

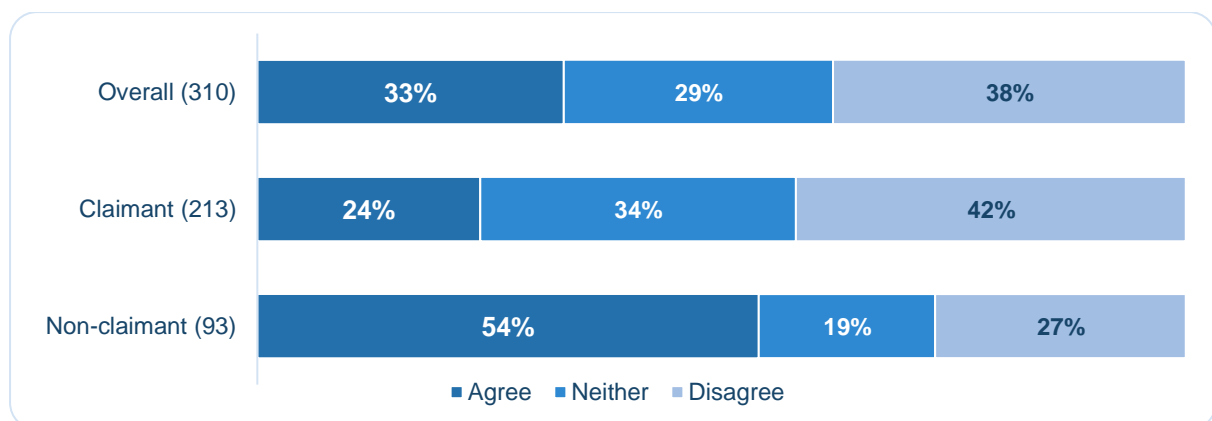
Figure 5: Levels of agreement to Proposal B by area (% respondents)



BASE: Varied as labelled

Just under one quarter of claimants (24%) agreed with proposal B. This compares to 54% of non-claimants agreeing with the proposal. Over two fifths of claimants (42%) disagreed with the proposal whilst over one quarter (27%) of non-claimants disagreed.

Figure 6: Levels of agreement to Proposal B by respondent type (% respondents)

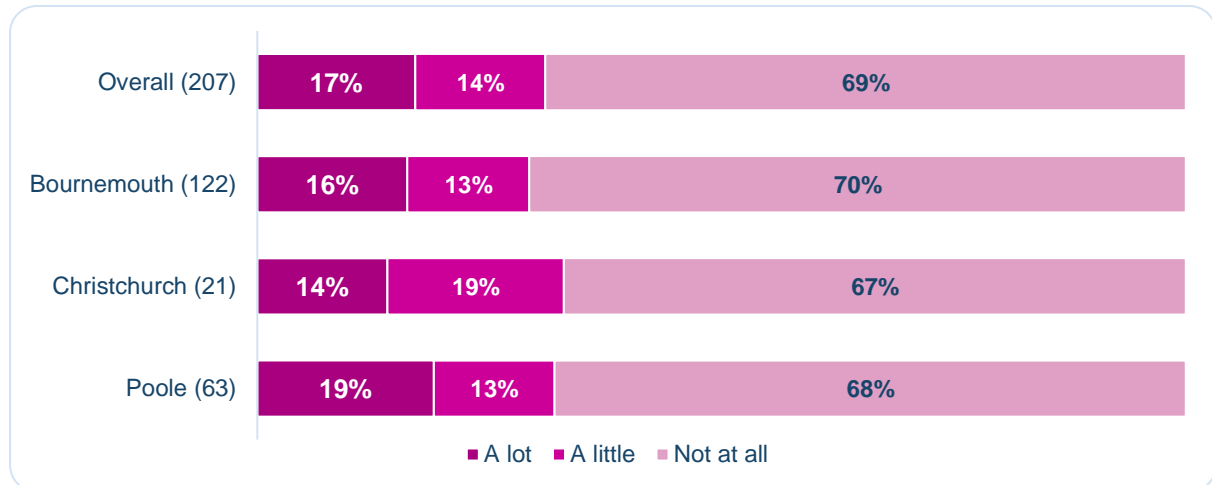


BASE: Varied as labelled

Impact of Proposal B

Less than one fifth of respondents (17%) thought that the proposed change would impact on them and their family a lot whilst 14% thought it would impact on them a little. Almost seven in ten respondents (69%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact by area.

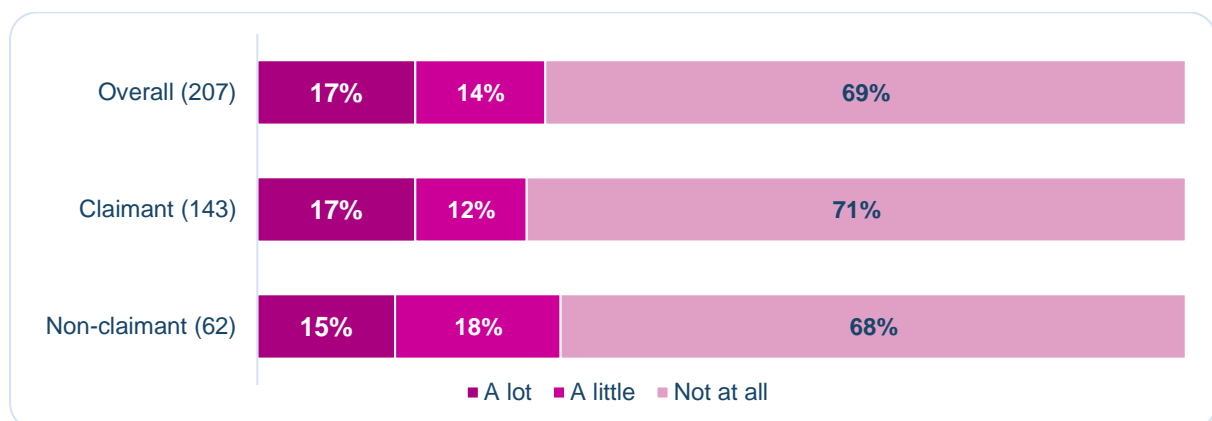
Figure 7: Levels of impact to Proposal B by area (% respondents)



BASE: Varied as labelled

Views of claimants mirrored the overall results with less than one fifth (17%) of claimants thinking that the proposed change would impact on them and their family a lot and 12% thinking it would impact on them a little. More than seven in ten claimants (71%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact between claimants and no-claimants.

Figure 8: Levels of impact to Proposal B respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 65 and over are significantly more likely to agree with proposal B (52%) compared to those aged 45 to 64 (28%). However, this is likely to be because non-working age claimants are not affected by the proposal. Respondents aged 16 to 34 are significantly more likely to think that proposal B would impact them to some extent (57%) compared to those aged 45 to 64 (26%).

Respondents from other white backgrounds are significantly more likely to agree with proposal B (55%) compared to white British respondents (31%) but are significantly more likely to think that the proposal would impact them to some extent (58% of white other respondents compared to 25% of white British respondents).

Parents are significantly more likely to disagree with proposal B (53%) compared to respondents without children (31%) and are significantly more likely to think that the proposal will impact on them a lot (26% of parents compared to 13% of those without children).

Comments on Proposal B

Respondents were asked to provide any additional comments about proposal B. There were 51 additional comments regarding the proposal to withdraw the family premium for new working age claims and new families. The most common theme arising from these comments was the negative financial impact of the proposal (14 comments).

"I would not be able to pay the full premium." (claimant)

"...Withdrawing the family premium will mean working families on low incomes are worse off yet again, increasing the number of children living in poverty in the new council area." (non-claimant)

The other comments were themed as follows:

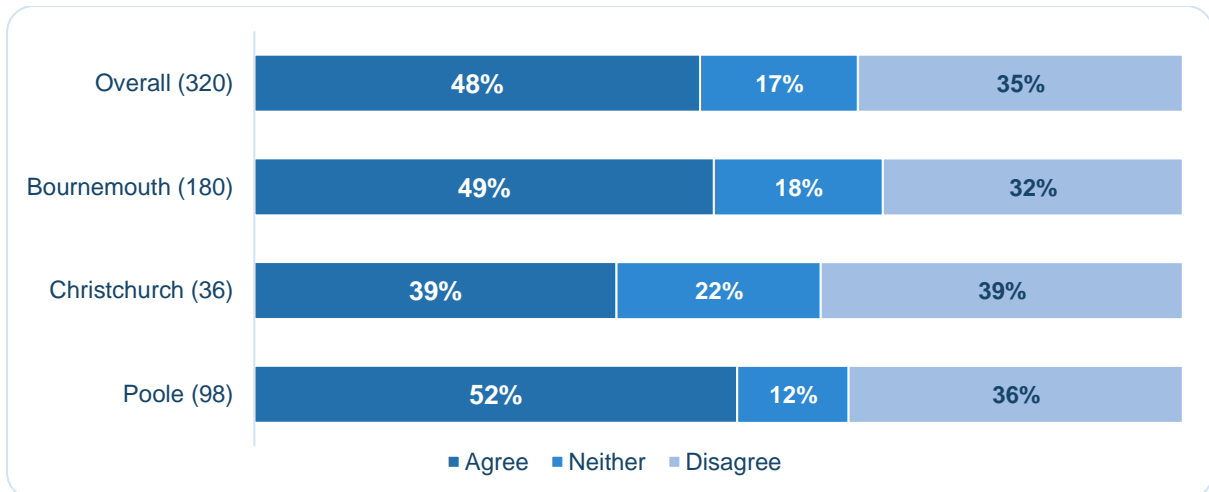
- General disagreement with the proposal / unfair proposal (12 comments)
- Discrimination between new and existing claimants (6 comments)
- Not personally affected (6 comments)
- Description of personal circumstances (5 comments)
- General agreement with the proposal / fair proposal (5 comments)
- Negative impact (5 comments)
- Other comments (4 comments)
- Individuals' needs should be assessed (4 comments)
- Comments on the consultation (2 comments)
- Impact is unknown (2 comments)
- Comments on the new council (1 comment)
- Comments on Council Tax in general (1 comment)

Proposal C: Limit backdating to up to a maximum of one calendar month for working age claims

Levels of agreement with Proposal C

Just under half of respondents (48%) agreed with the proposal to limit backdating to up to a maximum of one calendar month for working age claims whilst over one third of respondents (35%) disagreed. There were no significant differences in agreement by area.

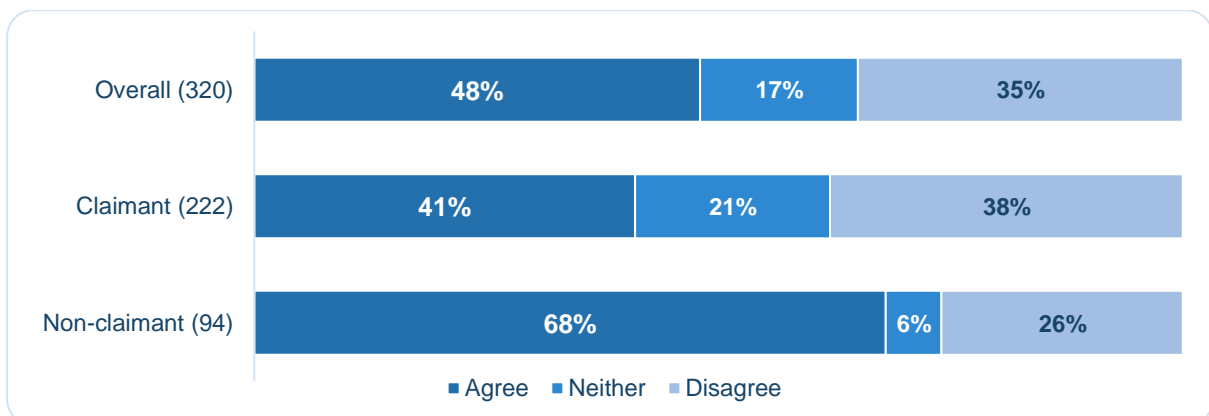
Figure 9: Levels of agreement to Proposal C by area (% respondents)



BASE: Varied as labelled

Just over two fifths of claimants (41%) agreed with proposal C. This compares to 68% of non-claimants agreeing with the proposal. Just under two fifths of claimants (38%) disagreed with the proposal whilst just over one quarter (26%) of non-claimants disagreed.

Figure 10: Levels of agreement to Proposal C by respondent type (% respondents)

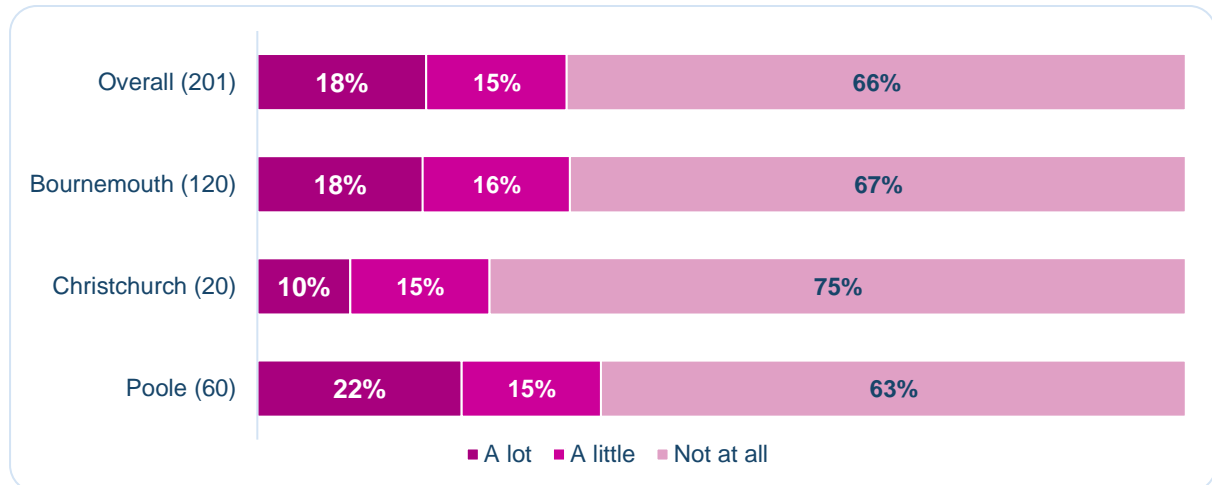


BASE: Varied as labelled

Impact of Proposal C

Just under one fifth of respondents (18%) thought that the proposed change would impact on them and their family a lot whilst 15% thought it would impact on them a little. Two thirds of respondents (66%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact by area.

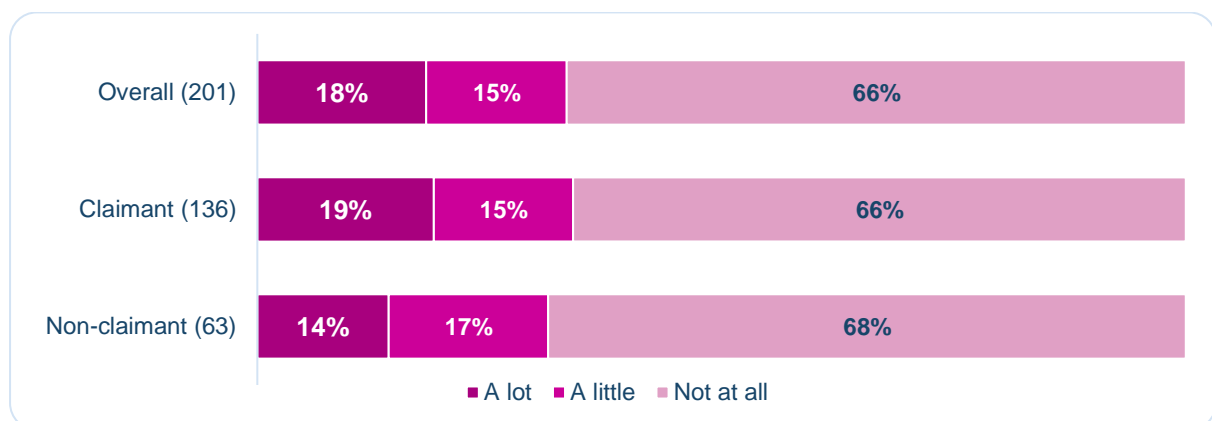
Figure 11: Levels of impact to Proposal C by area (% respondents)



BASE: Varied as labelled

Views of claimants mirrored the overall results with almost one fifth (19%) of claimants thinking that the proposed change would impact on them and their family a lot, 15% thinking it would impact on them a little and two thirds (66%) thinking the proposed change wouldn't impact on them at all. There were no significant differences in impact between claimants and non-claimants.

Figure 12: Levels of impact to Proposal C respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 65 and over are significantly more likely to agree with proposal C (76%) compared to those aged 35 to 64 (46%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents without a disability are significantly more likely to agree with proposal C (64%) compared to those with a disability (43%).

Christian respondents are significantly less likely to disagree with proposal C (27%) compared to those with no religion (40%).

Comments on Proposal C

Respondents were asked to provide any additional comments about proposal C. There were 70 additional comments regarding the proposal to limit backdating to up to a maximum of one calendar month for working age claims. The most common theme arising from these comments was around timeframes in terms of the length of time a claim can take and that it can be a slow process (19 comments).

"I found my benefits took a lot longer to sort and one type took the recommended 13 weeks."
(claimant)

"That's a bit unfair if it takes longer than a month to sort out the claim which it usually does. How are people claiming supposed to cover the rest of the backdating dates payments."
(claimant)

The other comments were themed as follows:

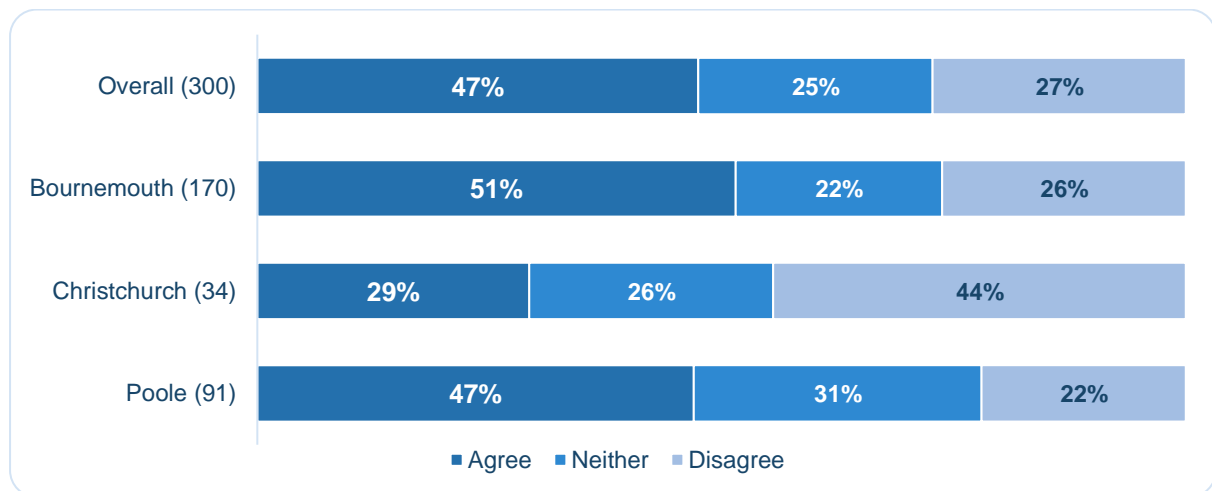
- General disagreement with the proposal / unfair proposal (17 comments)
- General agreement with the proposal / fair proposal (9 comments)
- Individuals' needs should be assessed / flexibility (9 comments)
- Negative financial impact (6 comments)
- Dependent on information available / knowledge of claimant (6 comments)
- Other comments (5 comments)
- Impact is unknown (4 comments)
- Description of personal circumstances (3 comments)
- Misinterpreting proposal (3 comments)
- Negative impact (2 comments)
- Comments on the consultation (1 comment)
- Comments on Council Tax in general (1 comment)

Proposal D: Cap scheme at Council Tax Band C for working age claimants not in a protected group

Levels of agreement with Proposal D

Just under half of respondents (47%) agreed with the proposal to cap the scheme at Council Tax Band C for working age claimants not in a protected group whilst just over one quarter of respondents (27%) disagreed. Respondents in Christchurch (29%) were significantly more likely to disagree with proposal D compared to respondents in Bournemouth (51%) and Poole (47%).

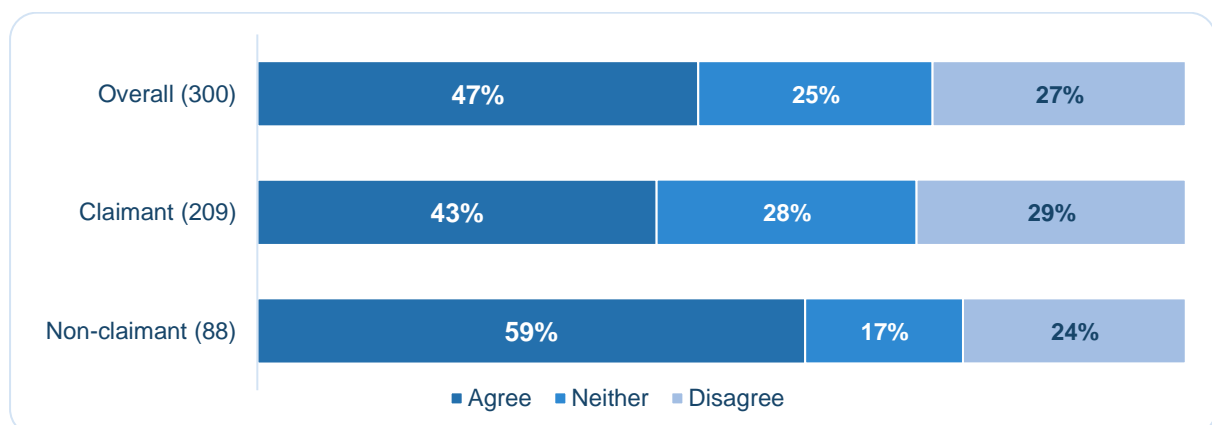
Figure 13: Levels of agreement to Proposal D by area (% respondents)



BASE: Varied as labelled

Just over two fifths of claimants (43%) agreed with proposal D. This compares to 59% of non-claimants agreeing with the proposal. Just under one in three claimants (29%) disagreed with the proposal whilst just under one quarter (24%) of non-claimants disagreed.

Figure 14: Levels of agreement to Proposal D by respondent type (% respondents)

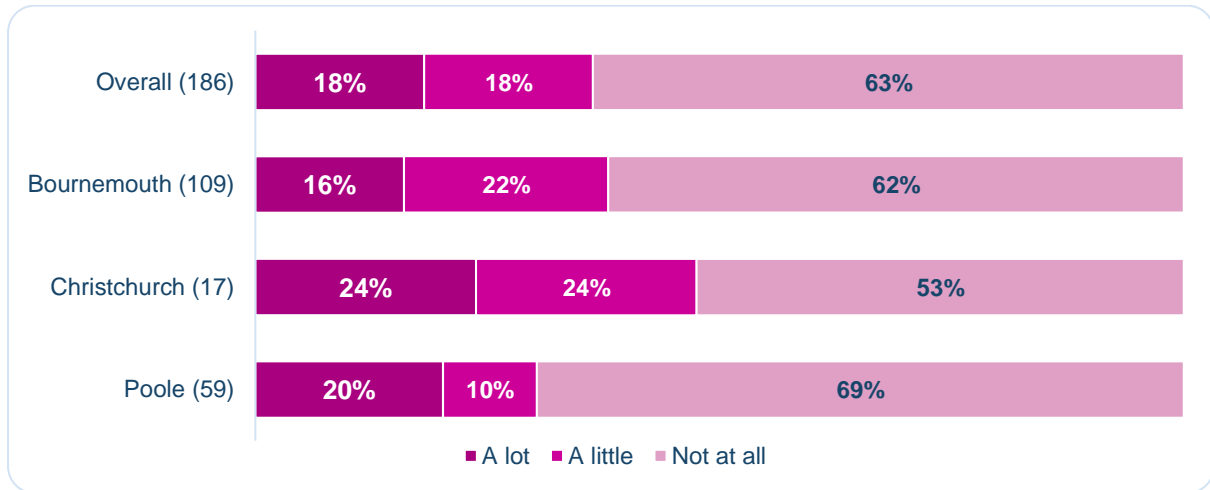


BASE: Varied as labelled

Impact of Proposal D

Just under one fifth of respondents (18%) thought that the proposed change would impact on them and their family a lot, whilst the same proportion (18%) thought it would impact on them a little. Just under two thirds of respondents (63%) thought the proposed change wouldn't impact on them at all. Respondents in Poole (10%) were significantly less likely to think the proposal would impact them a little compared to respondents in Bournemouth (22%).

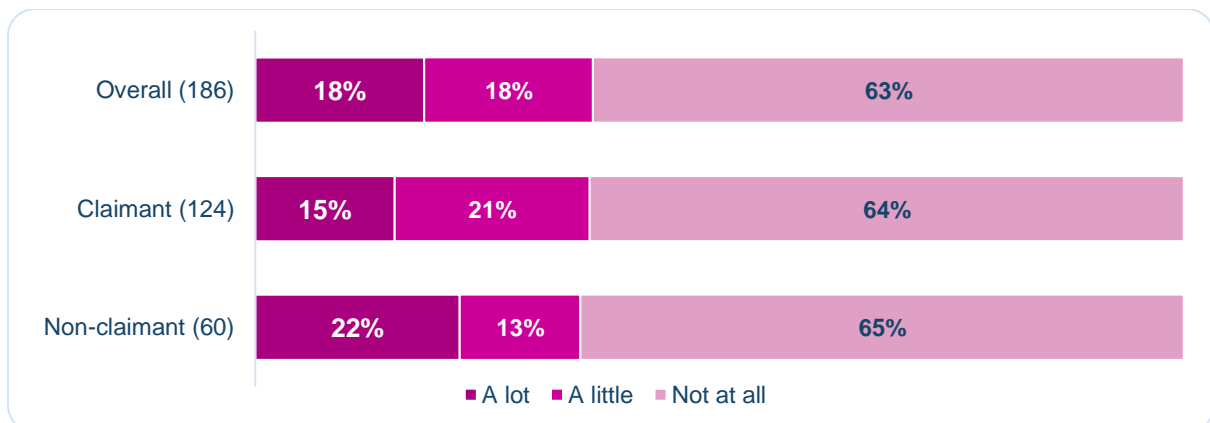
Figure 15: Levels of impact to Proposal D by area (% respondents)



BASE: Varied as labelled

Views of claimants broadly mirrored the overall results with 15% of claimants thinking that the proposed change would impact on them and their family a lot, just over one fifth (21%) thinking it would impact on them a little and just under two thirds (64%) thinking the proposed change wouldn't impact on them at all. There were no significant differences in impact between claimants and no-claimants.

Figure 16: Levels of impact to Proposal D respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 35 to 44 are significantly more likely to think that proposal D would impact them to some extent (56%) compared to respondents aged 55 to 64 (33%).

Respondents with a disability are significantly more likely to disagree with proposal D (30%) compared to those without a disability (19%).

Christian respondents are significantly more likely to agree with proposal D (55%) compared to those with no religion (43%).

Comments on Proposal D

Respondents were asked to provide any additional comments about proposal D. There were 48 additional comments regarding the proposal to cap the scheme at Council Tax Band C for working age claimants not in a protected group. The most common theme arising from these comments was general disagreement with the proposal and it being unfair (10 comments).

“Not everybody in council tax band D and above have pots of money in fact their property may be their only asset.” (claimant)

The other comments were themed as follows:

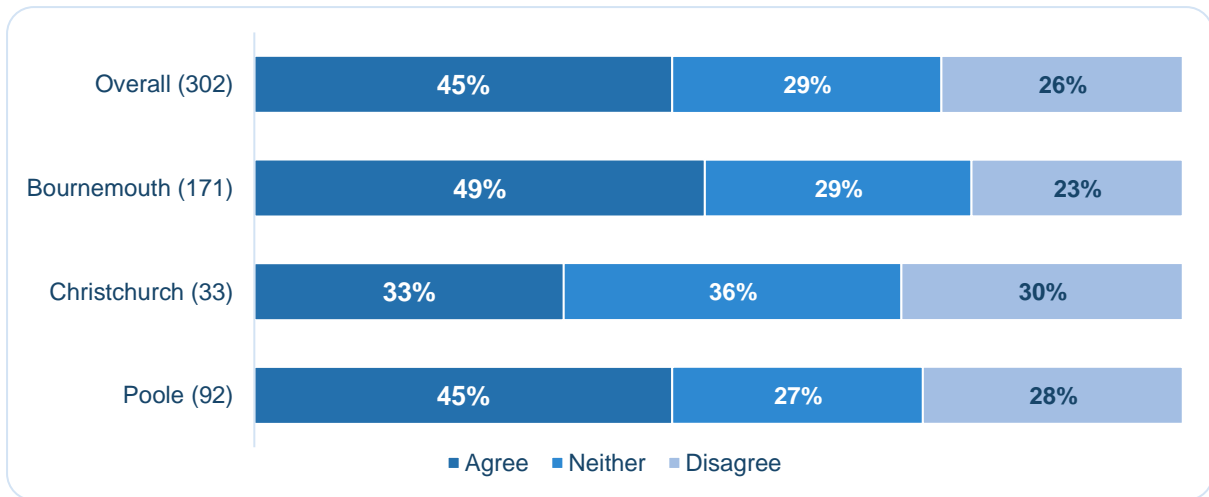
- General agreement with the proposal / fair proposal (7 comments)
- People in Band D can afford it (7 comments)
- Other comments (7 comments)
- Description of personal circumstances (5 comments)
- Negative financial impact (5 comments)
- Individuals' needs should be assessed (3 comments)
- Impact is unknown (3 comments)
- Negative impact (1 comment)
- Comments on the consultation (1 comment)
- Misinterpreting proposal (1 comment)

Proposal E: Minimum weekly entitlement of 50p

Levels of agreement with Proposal E

Overall, 45% of respondents agreed with the proposal to have a minimum weekly entitlement of 50p whilst just over one quarter of respondents (26%) disagreed. There were no significant differences in agreement by area.

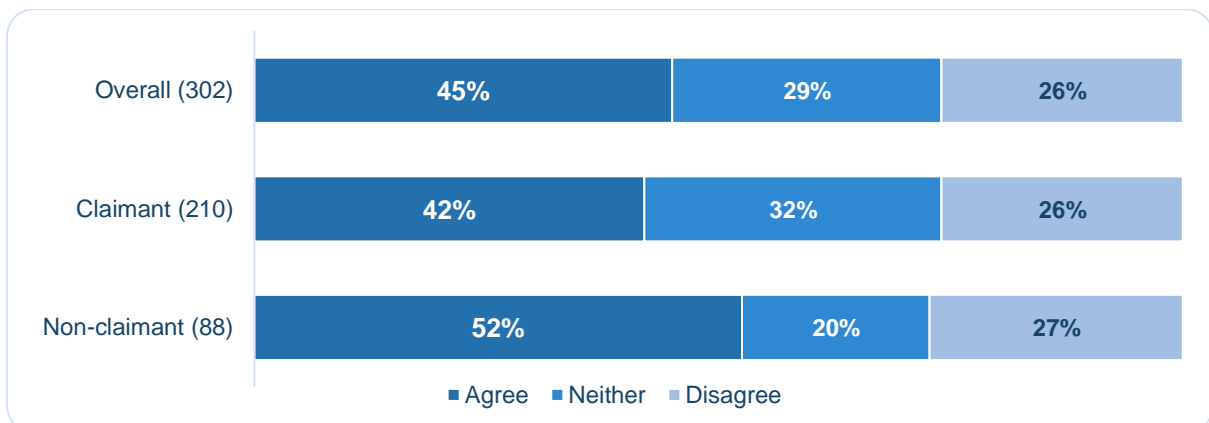
Figure 17: Levels of agreement to Proposal E by area (% respondents)



BASE: Varied as labelled

Just over two fifths of claimants (42%) agreed with proposal E. This compares to 52% of non-claimants agreeing with the proposal. Just over one quarter of claimants (26%) disagreed with the proposal which is consistent with non-claimants (27%).

Figure 18: Levels of agreement to Proposal E by respondent type (% respondents)

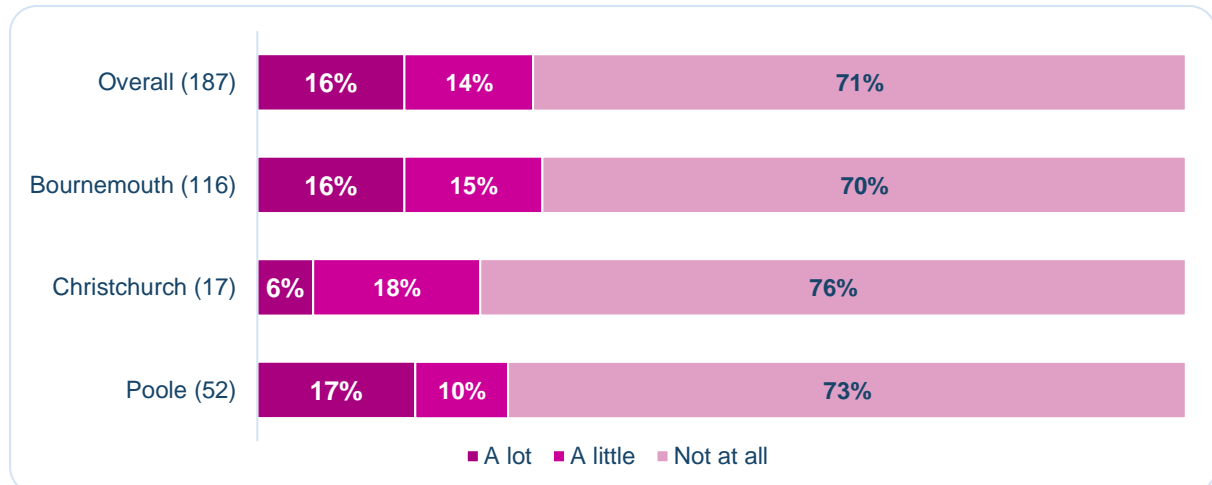


BASE: Varied as labelled

Impact of Proposal E

Overall, 16% of respondents thought that the proposed change would impact on them and their family a lot whilst 14% thought it would impact on them a little. Over seven in ten respondents (71%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact by area.

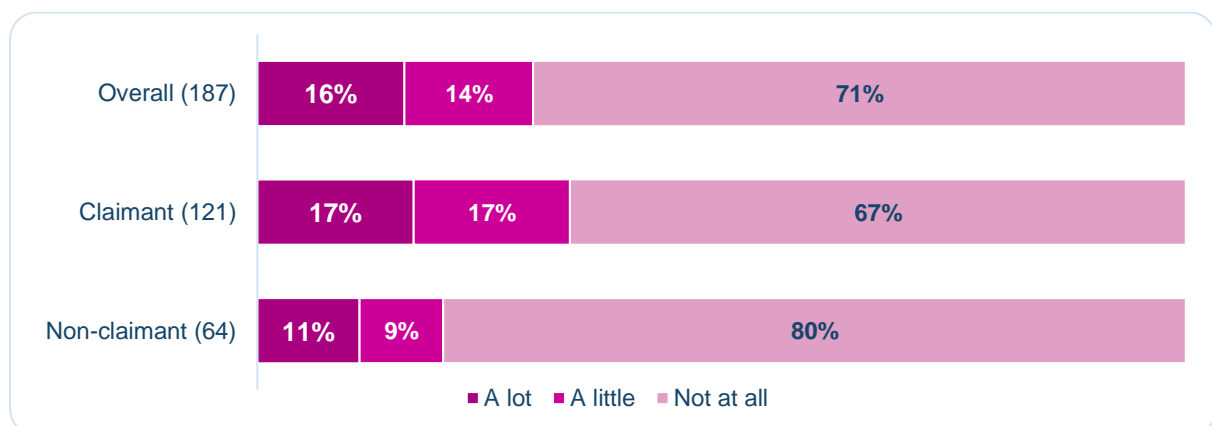
Figure 19: Levels of impact to Proposal E by area (% respondents)



BASE: Varied as labelled

Views of claimants broadly mirrored the overall results, with 17% of claimants thinking that the proposed change would impact on them and their family a lot and the same proportion (17%) thinking it would impact on them a little. Just over two thirds (67%) thought the proposed change wouldn't impact on them at all. Claimants were significantly less likely to think that the proposal wouldn't impact on them at all compared to non-claimants.

Figure 20: Levels of impact to Proposal E respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 65 and over are significantly more likely to agree with proposal E (64%) compared to those aged 16 to 34 (35%) and 55 to 64 (40%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents with a disability are significantly more likely to disagree with proposal E (29%) compared to those without a disability (19%).

Christian respondents are significantly more likely to agree with proposal E (54%) compared to those with no religion (39%).

Comments on Proposal E

Respondents were asked to provide any additional comments about proposal E. There were 42 additional comments regarding the proposal to have a minimum weekly entitlement of 50p. The most common theme arising from these comments was that 50p is not worth the administrative cost (8 comments).

“It will cost more to administer than the value of the award.” (claimant)

“Waste of office costs/postage etc.” (claimant)

The other comments were themed as follows:

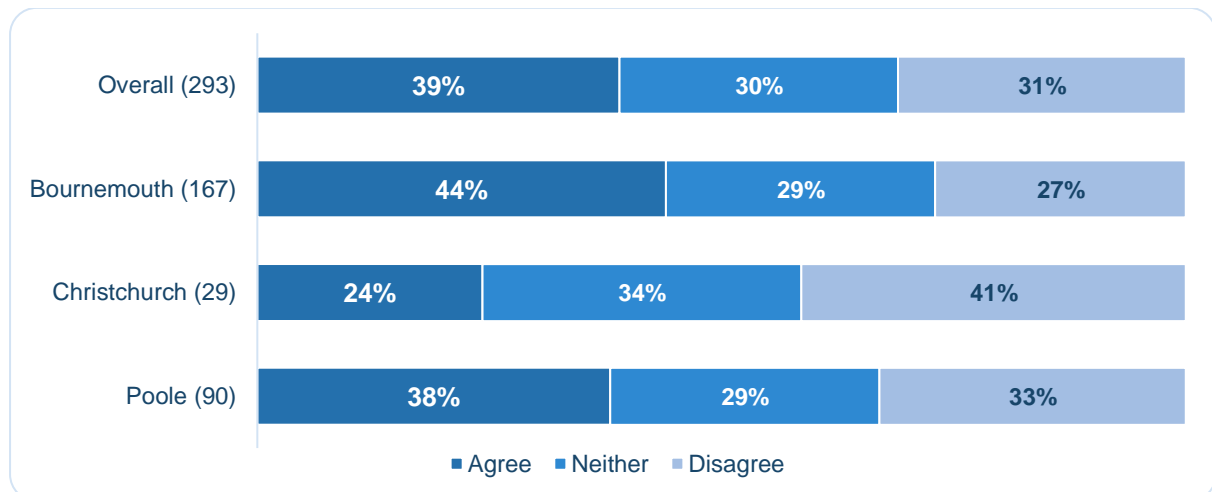
- 50p is no money at all / wouldn't impact people (6 comments)
- Other comments (5 comments)
- Minimum payment should be higher (4 comments)
- 50p is a lot of money to some people (4 comments)
- Impact is unknown (3 comments)
- General disagreement with the proposal / unfair proposal (3 comments)
- Not personally affected (3 comments)
- General agreement with the proposal / fair proposal (2 comments)
- Misinterpreting proposal (2 comments)
- Comments on the consultation (1 comment)
- Individuals' needs should be assessed (1 comment)
- Minimum payment should be lower (1 comment)

Proposal F: No working age Second Adult Rebate.

Levels of agreement with Proposal F

Just under two fifths of respondents (39%) agreed with the proposal to have no working age Second Adult Rebate whilst just under one third of respondents (31%) disagreed. Respondents in Christchurch (24%) were significantly less likely to agree with the proposal compared to respondents in Bournemouth (44%).

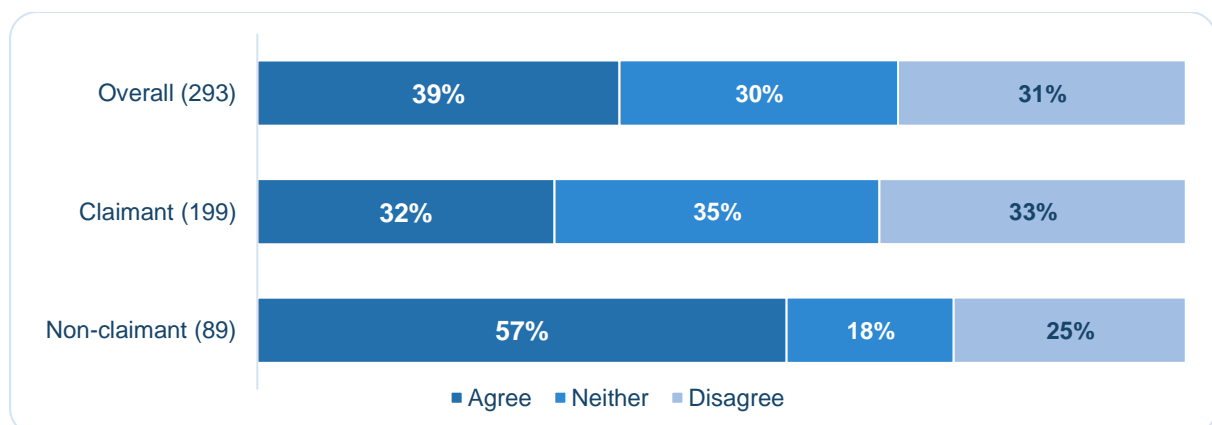
Figure 21: Levels of agreement to Proposal F by area (% respondents)



BASE: Varied as labelled

Just under one third of claimants (32%) agreed with proposal F. This compares to 57% of non-claimants agreeing with the proposal. One third of claimants (33%) disagreed with the proposal compared to one quarter of non-claimants (25%).

Figure 22: Levels of agreement to Proposal F by respondent type (% respondents)

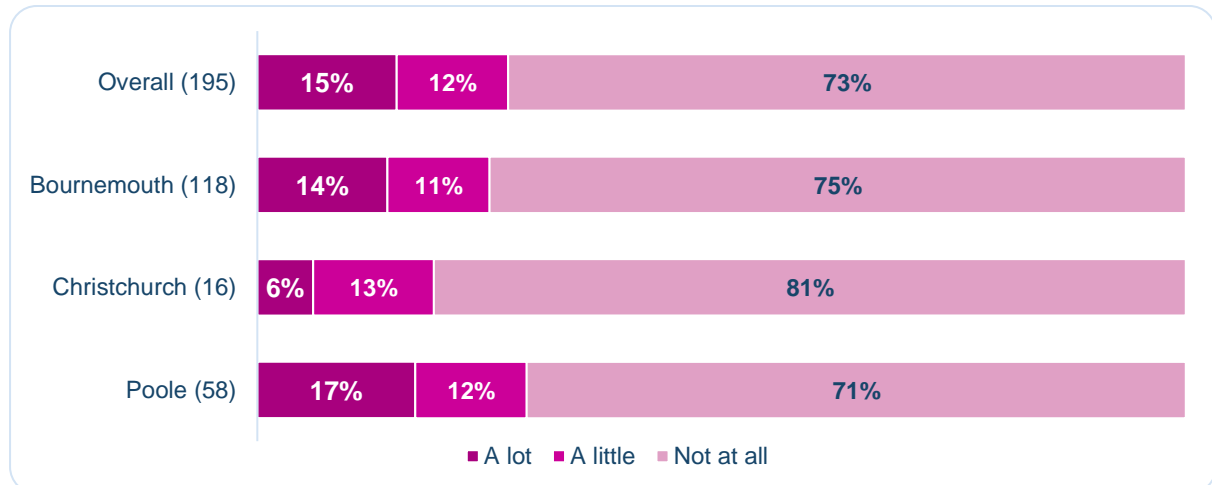


BASE: Varied as labelled

Impact of Proposal F

Overall, 15% of respondents thought that the proposed change would impact on them and their family a lot whilst 12% thought it would impact on them a little. Just under three quarters of respondents (73%) thought the proposed change wouldn't impact on them at all. There were no significant differences in impact by area.

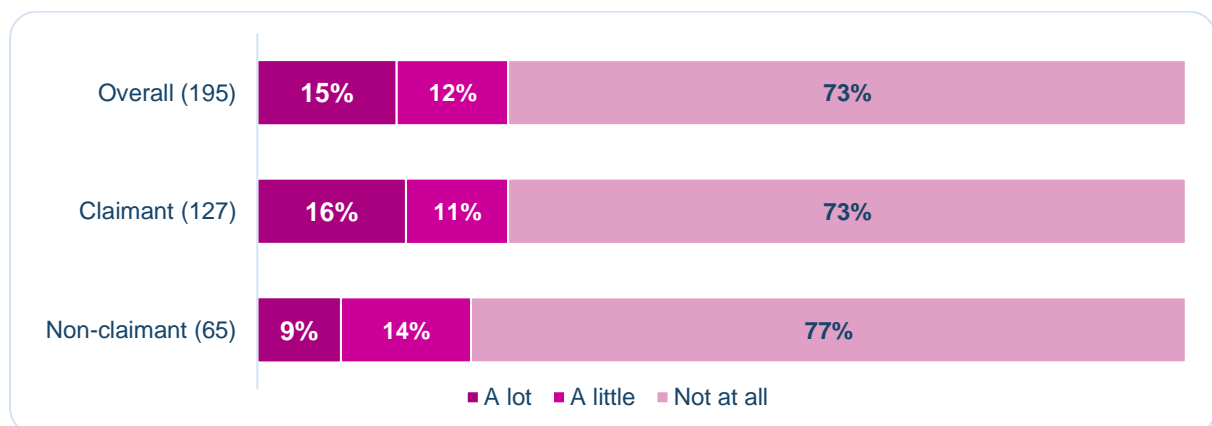
Figure 23: Levels of impact to Proposal F by area (% respondents)



BASE: Varied as labelled

Views of claimants mirrored the overall results, with 16% of claimants thinking that the proposed change would impact on them and their family a lot, 11% thinking it would impact on them a little and just under three quarters (73%) thinking it wouldn't impact on them at all. There were no significant differences between claimants and non-claimants.

Figure 24: Levels of impact to Proposal F respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 65 and over are significantly more likely to agree with proposal F (63%) compared to those aged 35 to 44 (28%) and 55 to 64 (36%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents without a disability are significantly more likely to agree with proposal F (54%) compared to those with a disability (35%).

Respondents from other white backgrounds are significantly more likely to agree with proposal F (72%) compared to white British respondents (40%) but are significantly more likely to think that the proposal would impact them to some extent (58% of white other respondents compared to 20% of white British respondents).

Christian respondents are significantly more likely to agree with proposal F (47%) compared to those with no religion (31%).

Comments on Proposal F

Respondents were asked to provide any additional comments about proposal F. There were 39 additional comments regarding the proposal to have no working age Second Adult Rebate. The most common theme arising from these comments was general agreement with the proposal and it being fair (7 comments).

“Basic common sense.” (non-claimant)

The other comments were themed as follows:

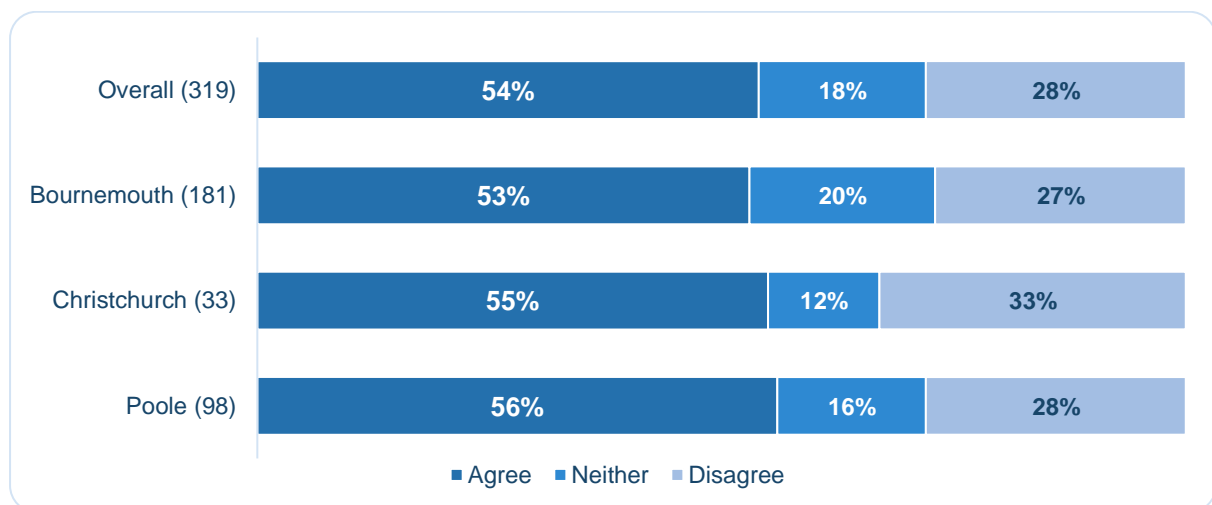
- General disagreement with the proposal / unfair proposal (6 comments)
- Negative financial impact (5 comments)
- Not personally affected (5 comments)
- Other comments (5 comments)
- Individuals' needs should be assessed (4 comment)
- Impact is unknown (3 comments)
- Description of personal circumstances (2 comments)
- Would be impacted (2 comments)
- Comments on the consultation (1 comment)

Proposal G: Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants

Levels of agreement with Proposal G

Over half of respondents (54%) agreed with the proposal to limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants. Just under three in ten respondents (28%) disagreed. There were no significant differences in agreement by area.

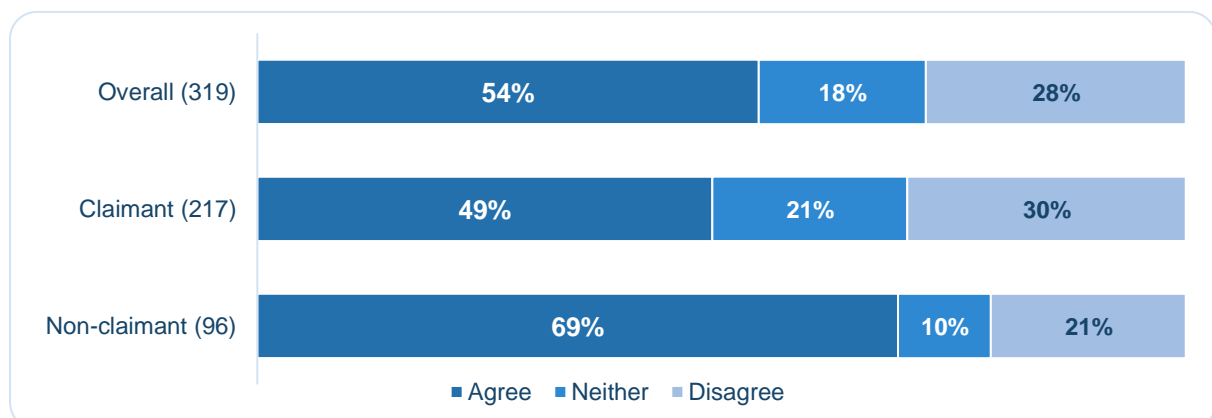
Figure 25: Levels of agreement to Proposal G by area (% respondents)



BASE: Varied as labelled

Just under half of claimants (49%) agreed with proposal G. This compares to 69% of non-claimants agreeing with the proposal. Three in ten claimants (30%) disagreed with the proposal compared to just over one fifth of non-claimants (21%).

Figure 26: Levels of agreement to Proposal G by respondent type (% respondents)

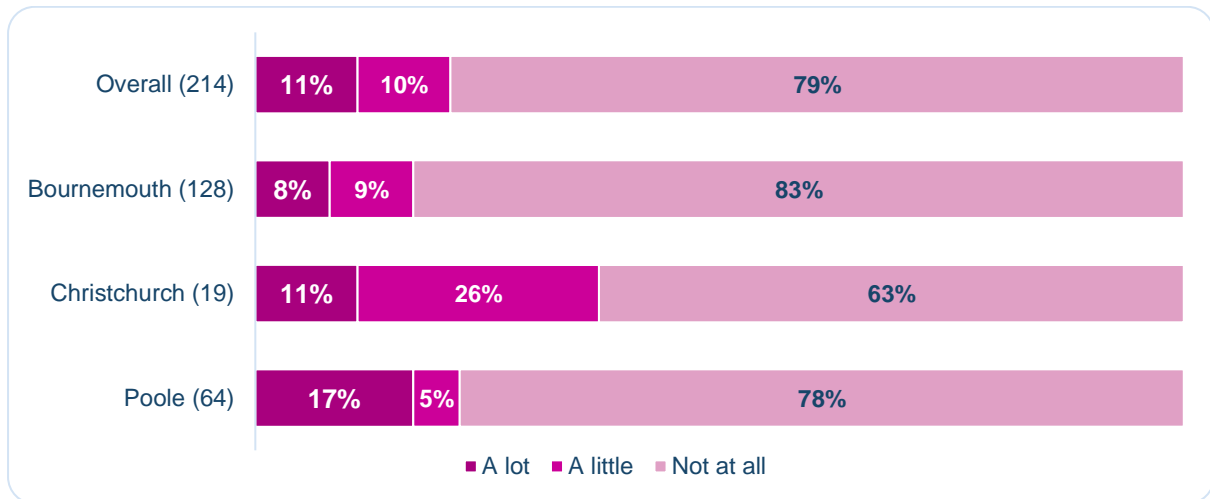


BASE: Varied as labelled

Impact of Proposal G

Just over one in ten respondents (11%) thought that the proposed change would impact on them and their family a lot whilst 10% thought it would impact on them a little. Just under four fifths of respondents (79%) thought the proposed change wouldn't impact on them at all. Respondents in Christchurch (63%) were significantly less likely to think that the proposal wouldn't impact on them at all compared to respondents in Bournemouth (83%).

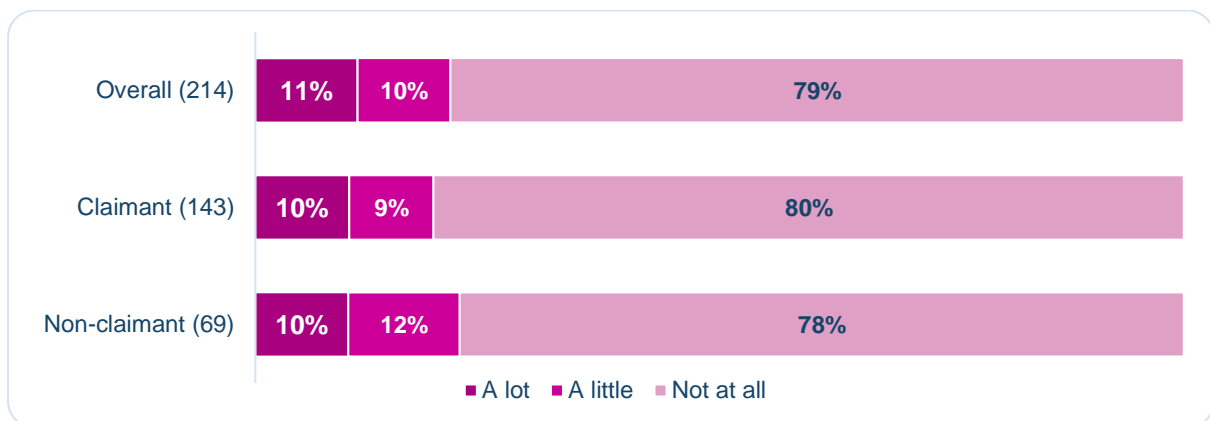
Figure 27: Levels of impact to Proposal G by area (% respondents)



BASE: Varied as labelled

Views of claimants mirrored the overall results with 10% of claimants thinking that the proposed change would impact on them and their family a lot, 9% thinking it would impact on them a little and four fifths (80%) thinking it wouldn't impact on them at all. There were no significant differences between claimants and non-claimants.

Figure 28: Levels of impact to Proposal G respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 16 to 34 are significantly less likely to agree with proposal G (32%) compared to those aged 55 to 64 (58%). Respondents aged 16 to 34 and 35 to 44 are significantly more likely to think that the proposal would impact them to some extent (53% and 32% respectively) compared to those aged 45 to 64 (10%).

Respondents without a disability are significantly more likely to think that proposal G would impact them to some extent (27%) compared to those with a disability (13%).

Respondents from other white backgrounds are significantly more likely to think that the proposal would impact them to some extent (42%) compared to white British respondents (15%).

Parents are significantly less likely to agree with proposal G (43%) compared to those without children (60%). Parents are also significantly more likely to think that the proposal would impact on them a lot (18%) compared to those without children (7%).

Comments on Proposal G

Respondents were asked to provide any additional comments about proposal G. There were 55 additional comments regarding the proposal to limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants. The most common theme arising from these comments was general disagreement with the proposal and it being unfair (15 comments).

“Not quite sure how it’s fair to restrict a family to 2 children or where to draw a line.”
(claimant)

“It’s not really fair as some families will struggle...” (claimant)

The other comments were themed as follows:

- General agreement with the proposal / fair proposal (11 comments)
- Negative financial impact / families will struggle (10 comments)
- Other comments (8 comments)
- Not personally affected (5 comments)
- People should take responsibility for number/cost of children (5 comments)
- Should be assessed on income (3 comments)
- Description of personal circumstances (3 comments)
- Multiple births should be excluded (2 comments)
- Misinterpreting proposal (2 comments)
- Impact is unknown (1 comment)
- Comments on the new council (1 comment)
- Comments on the consultation (1 comment)

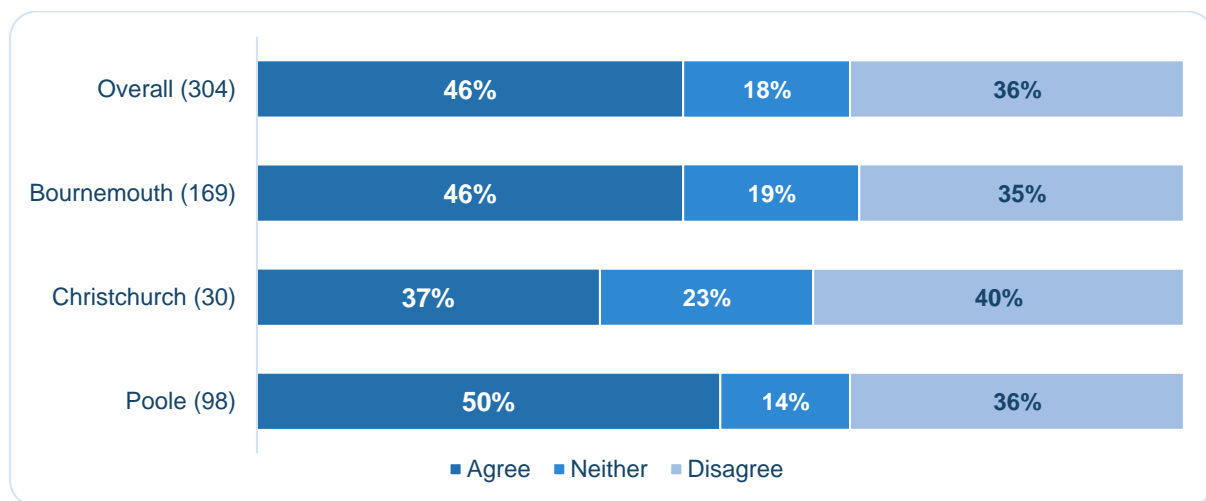
Proposal H: Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants

Levels of agreement with Proposal H

Under half of respondents (46%) agreed with the proposal to disregard Bereavement Support Payment and Infected Blood Schemes financial support. Just under two out of ten (18%) neither agreed nor disagreed and just over one third (36%) disagreed.

There are no statistically significant differences in the results by area.

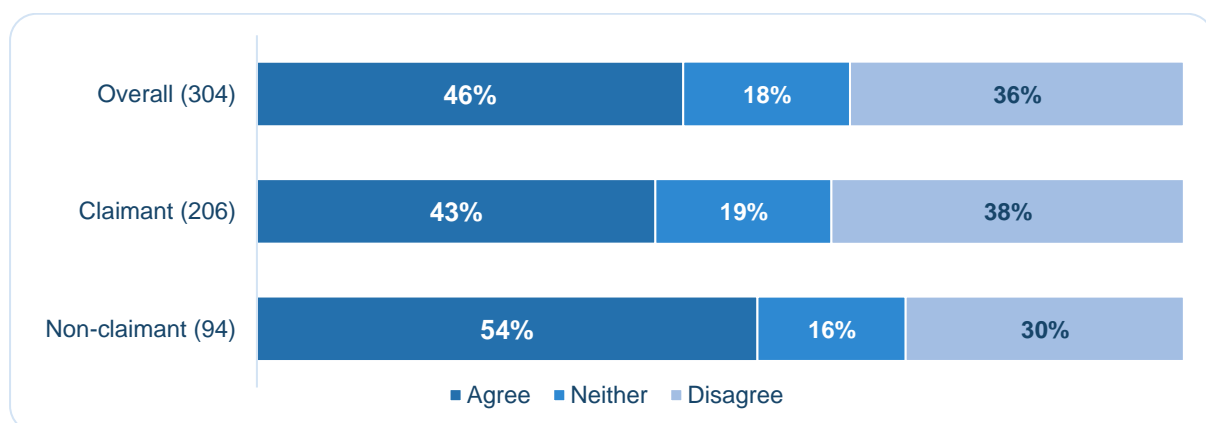
Figure 29: Levels of agreement to Proposal H by area (% respondents)



BASE: Varied as labelled

Claimants are less likely to agree (43%) and more likely to disagree (38%) than non-claimants.

Figure 30: Levels of agreement to Proposal H by respondent type (% respondents)

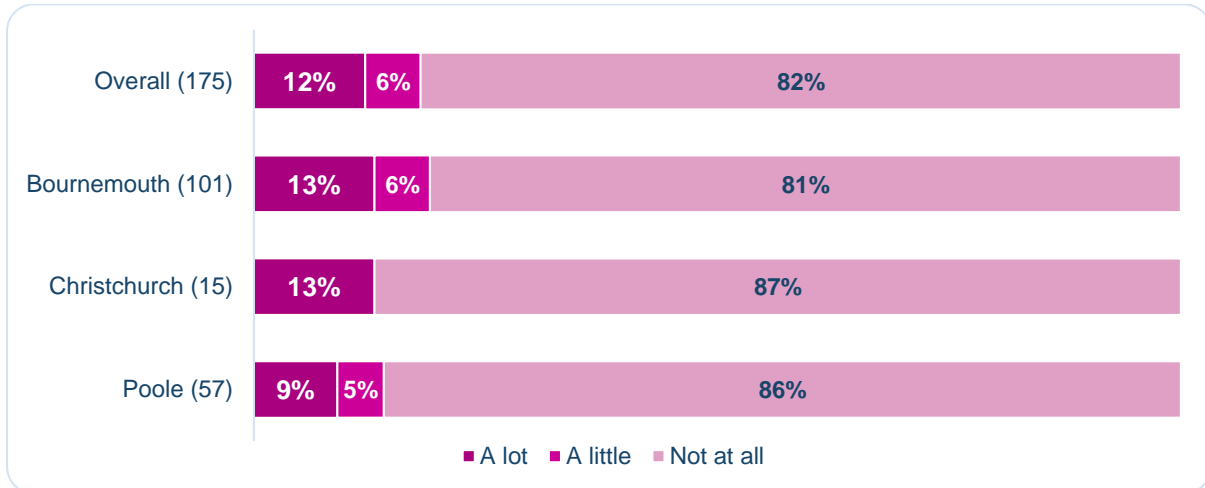


BASE: Varied as labelled

Impact of Proposal H

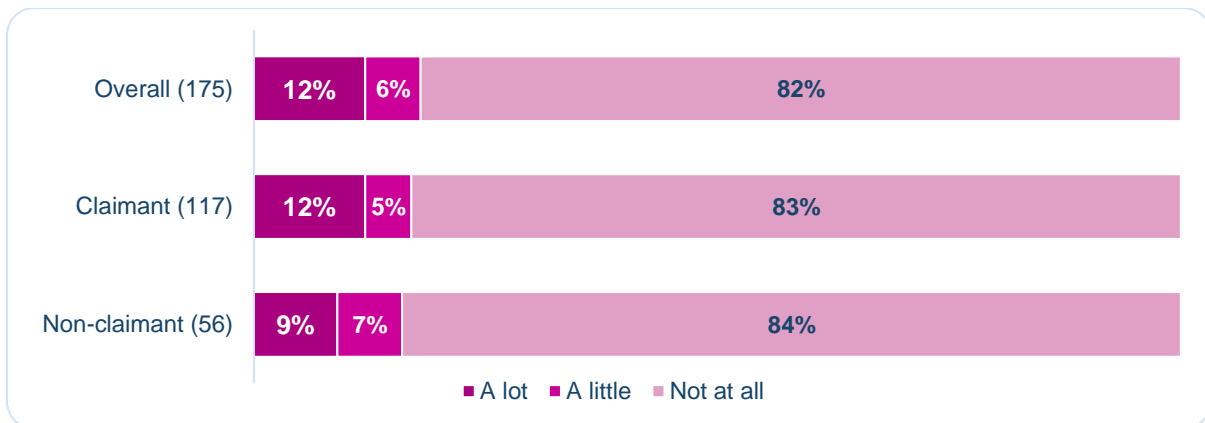
Just over one in ten respondents (12%) said that they would be impacted by Proposal H a lot, with 6% saying that they would be affected a little. Over four fifths (82%) thought that they would not be impacted by this proposal at all. There are no statistically significant differences in the results by area or by respondent type.

Figure 31: Levels of impact to Proposal H by area (% respondents)



BASE: Varied as labelled

Figure 32: Levels of impact to Proposal H by respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Those aged 35-44 are significantly more likely to think that the proposal would impact them to some extent (30%) compared to those aged 55-64 (12%).

Respondents from other white backgrounds are significantly more likely to think that the proposal would impact them to some extent (43%) compared to white British respondents (12%).

Parents are significantly more likely to neither agree nor disagree (25%) with this proposal than respondents without children (15%). Two fifths of parents (40%) agree with the proposal compared to 49% of those with no children.

Comments on Proposal H

Respondents were asked to provide any additional comments about proposal H. There were 34 additional comments regarding the proposal to disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants. The most common theme arising from these comments was a general misunderstanding or misinterpretation of the proposal (15 comments). Respondents interpreted that the proposal would make people worse off.

“Another example of taking money away from people who aren't in a position to argue back..” (claimant)

“Why should those who are already suffering be made to suffer more?” (claimant)

The other comments were themed as follows:

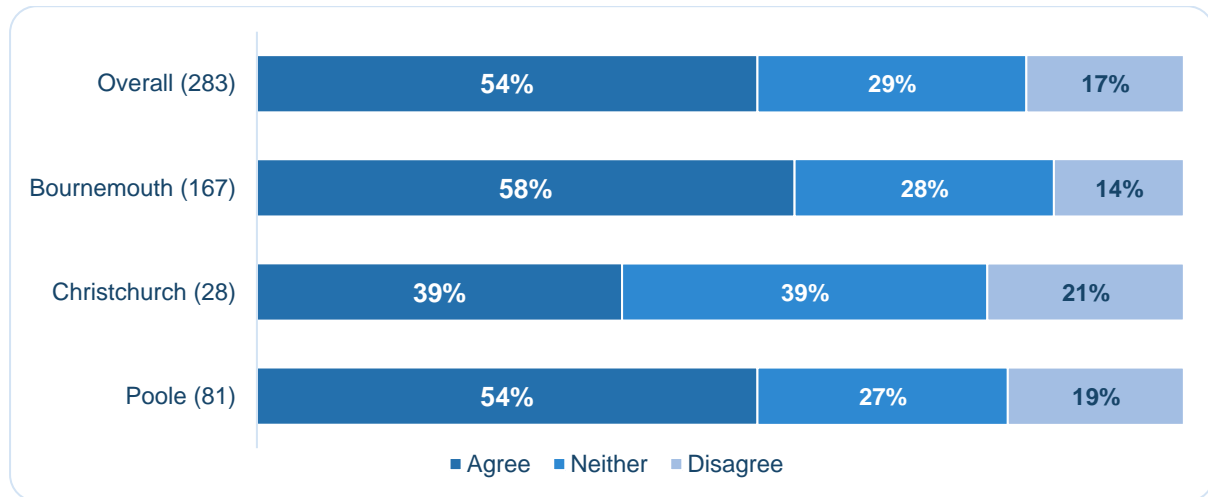
- General agreement with the proposal / fair proposal (7 comments)
- Other comments (5 comments)
- Description of personal circumstances (3 comments)
- Impact is unknown (3 comments)
- General disagreement with the proposal / unfair proposal (3 comments)
- Comments on the consultation (1 comment)

Proposal I: Mirror the Housing Benefit 'Temporary Absence' rules

Levels of agreement with Proposal I

Over half of respondents (54%) agreed with the proposal to mirror the Housing Benefit 'Temporary Absence' rules. Just under three out of ten (29%) neither agreed nor disagreed and 17% disagreed. The results vary by area, with respondents from Bournemouth (58%) significantly more likely to agree with the proposal than those from Christchurch (39%).

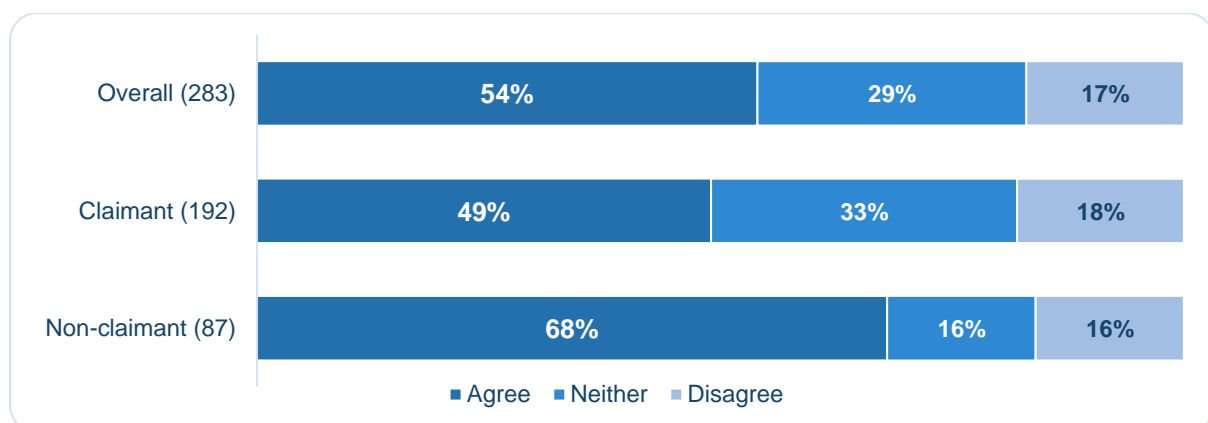
Figure 33: Levels of agreement to Proposal I by area (% respondents)



BASE: Varied as labelled

Claimants (49%) are less likely to agree and more likely to neither agree nor disagree (33%) with the proposal than non-claimants (68% agree and 16% neither agree nor disagree). There are no statistically significant differences in levels of disagreement between claimants and non-claimants.

Figure 34: Levels of agreement to Proposal I by respondent type (% respondents)



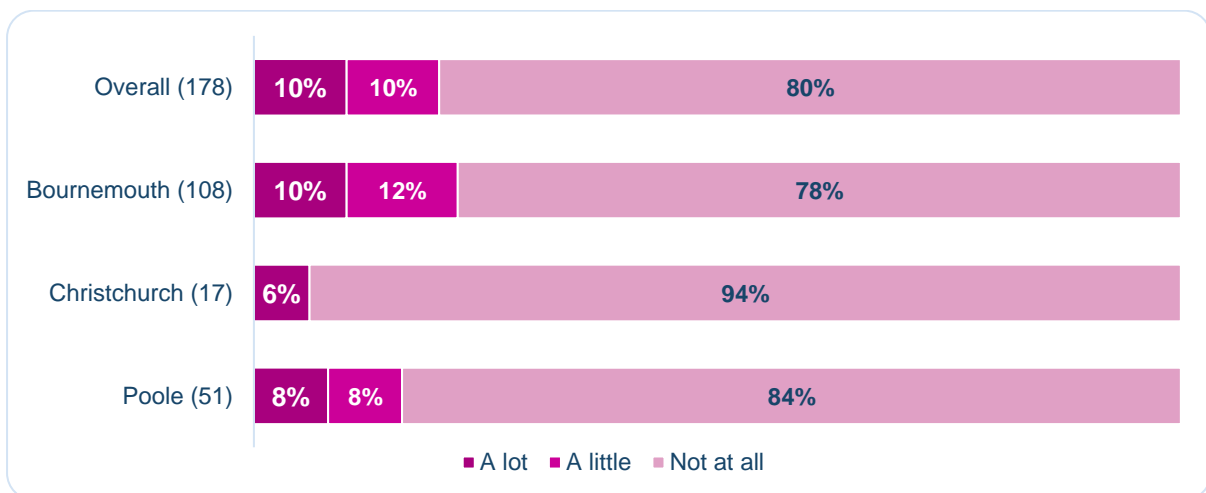
BASE: Varied as labelled

Impact of Proposal I

One out of ten of respondents (10%) said that they would be impacted by Proposal I a lot, with 10% saying that they would be affected a little. Four fifths of respondents (80%) thought that they would not be affected by this proposal.

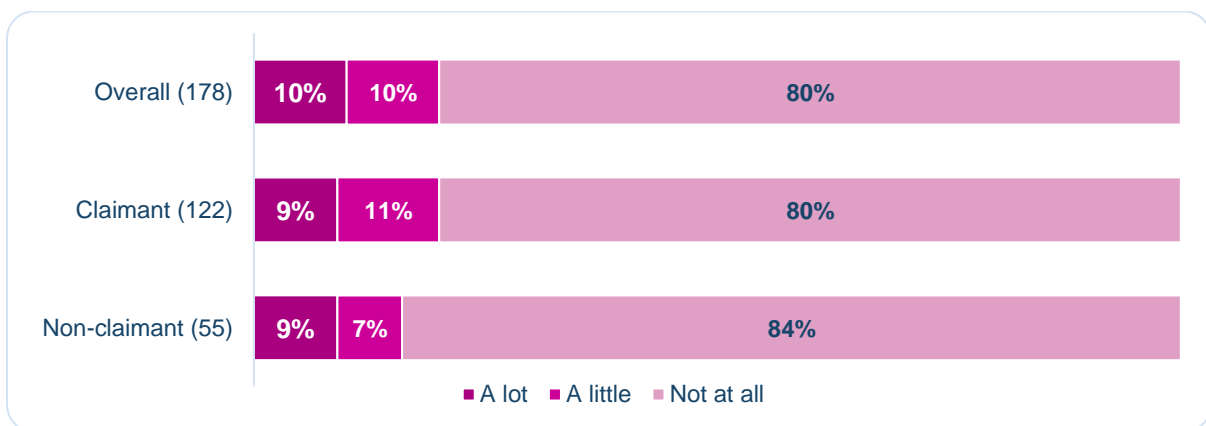
There are no statistically significant differences in the results by area or by respondent type.

Figure 35: Levels of impact to Proposal I by area (% respondents)



BASE: Varied as labelled

Figure 36: Levels of impact to Proposal I by respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Respondents aged 35 to 44 and 55 to 64 are significantly less likely to agree with Proposal I (43% and 49% respectively) compared to those aged 45 to 54 (65%).

Respondents with a disability are significantly more likely to disagree with the proposal (21%) compared to those without a disability (9%).

Respondents from other white backgrounds are significantly more likely to agree with proposal I (80%) compared to white British respondents (57%) but are significantly more likely to think that the proposal would impact them to some extent (39% of white other respondents compared to 14% of white British respondents).

Comments on Proposal I

Respondents were asked to provide any additional comments about proposal I. There were 30 additional comments regarding the proposal to mirror the Housing Benefit 'Temporary Absence' rules. The most common theme arising from these comments was general agreement with the proposal and it being fair (11 comments).

"I feel that the authority would be justified in bringing the rules in line with those of Housing Benefit (LHA) as it would make the process the same across all of the authorities benefit schemes." (claimant)

"I understand these rules and agree with them." (claimant)

The other comments were themed as follows:

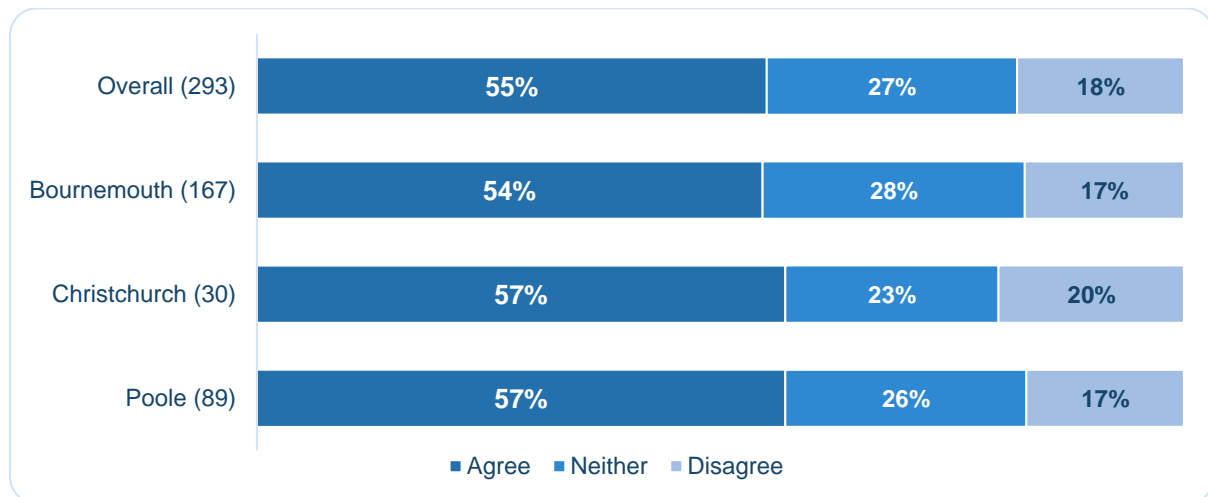
- Rules should depend on the reasons for absence (6 comments)
- General disagreement with the proposal / unfair proposal (5 comments)
- Other comments (5 comments)
- Negative financial impact (4 comments)
- Description of personal circumstances (2 comments)
- Comments on the consultation (2 comments)
- Impact is unknown (1 comment)
- Misinterpreting proposal (1 comment)

Proposal J: Introduce a self-employed minimum income floor

Levels of agreement with Proposal J

Over half of respondents (55%) agreed with the proposal to introduce a self-employed minimum income floor. Just over one quarter (27%) neither agreed nor disagreed and 18% disagreed. There are no significant differences by area.

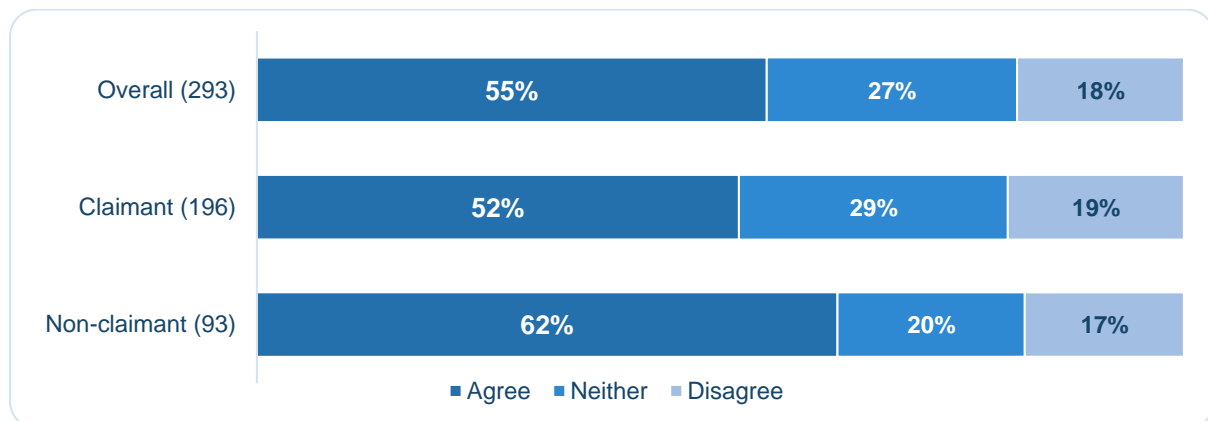
Figure 37: Levels of agreement to Proposal J by area (% respondents)



BASE: Varied as labelled

Non-claimants are more likely to agree with Proposal J (62%) than claimants (52%). Just under three out of ten (29%) claimants neither agree nor disagree. There are no significant differences in levels of disagreement between claimants and non-claimants.

Figure 38: Levels of agreement to Proposal J by respondent type (% respondents)

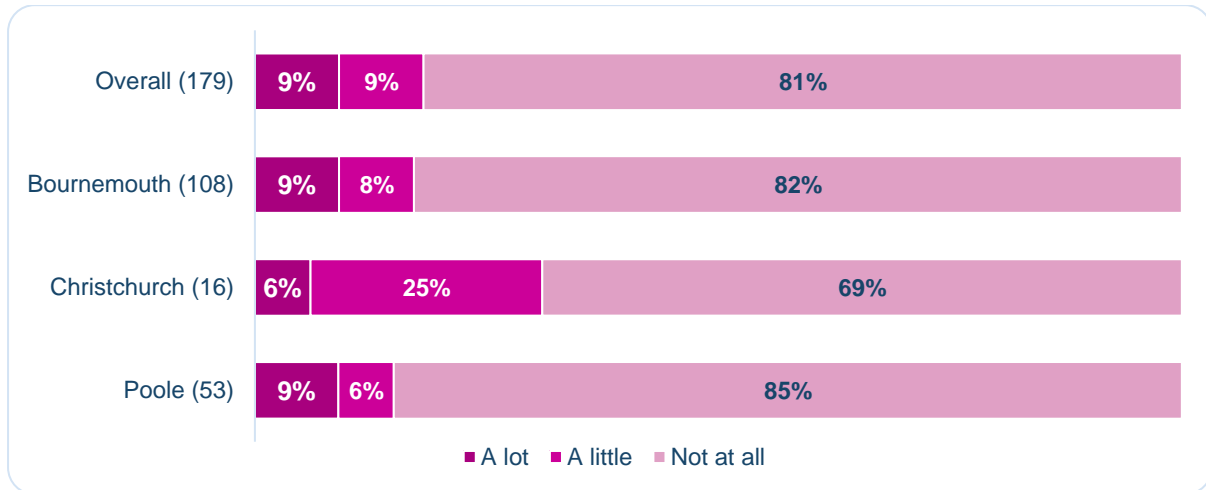


BASE: Varied as labelled

Impact of Proposal J

Just under one out of ten of respondents (9%) said that they would be impacted by Proposal J a lot, with 9% said that they would be affected a little. Just over four fifths of respondents (81%) thought that they would not be affected by this proposal. The response varies by area, with slightly fewer respondents in Christchurch feeling that the proposal would affect them a lot (6%), but one quarter (25%) responded that the proposal would affect them a little.

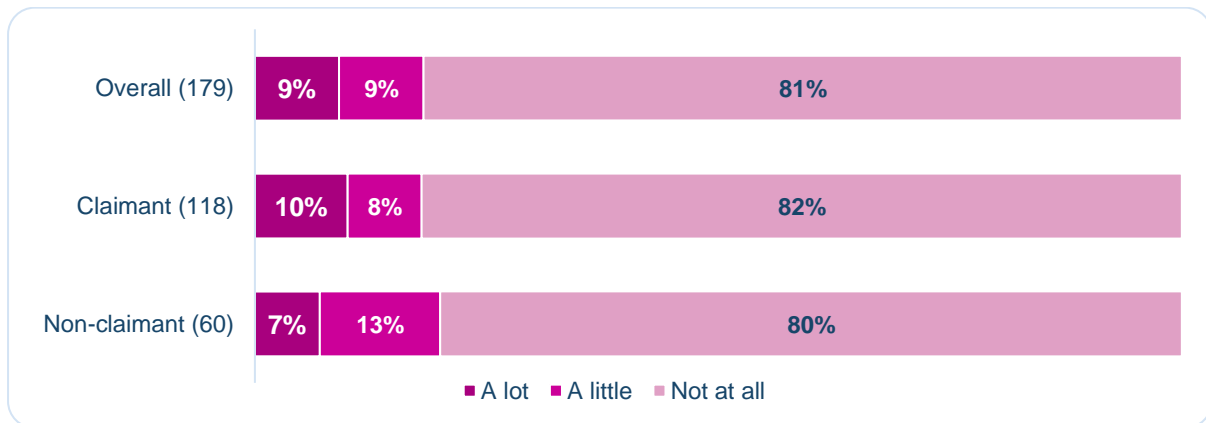
Figure 39: Levels of impact to Proposal J by area (% respondents)



BASE: Varied as labelled

There are no differences between the views of claimants and non-claimants.

Figure 40: Levels of impact to Proposal J by respondent type (% respondents)



BASE: Varied as labelled

Differences in response

There are differences by age, with fewer people aged 16-34 agreeing with this proposal (34%) than those aged 65 and over (69%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents aged 35 to 44 are significantly more likely to think that the proposal will impact them to some extent (43%) compared to those aged 45 to 54 (15%) and 55 to 64 (10%).

Respondents without a disability are significantly more likely to think that proposal J would impact them to some extent (30%) compared to those with a disability (10%).

Christian respondents (63%) are significantly more likely to agree with Proposal J compared to those with no religion (57%).

Respondents without children are significantly more likely to feel that this proposal will not impact them at all (86%) than parents (70%).

There are no differences by employment type for this proposal.

Comments on Proposal J

Respondents were asked to provide any additional comments about proposal J. There were 32 additional comments regarding the proposal to introduce a self-employed minimum income floor. The most common theme arising from these comments was general agreement with the proposal and it being fair (8 comments).

"This change seems fair." (non-claimant)

The other comments were themed as follows:

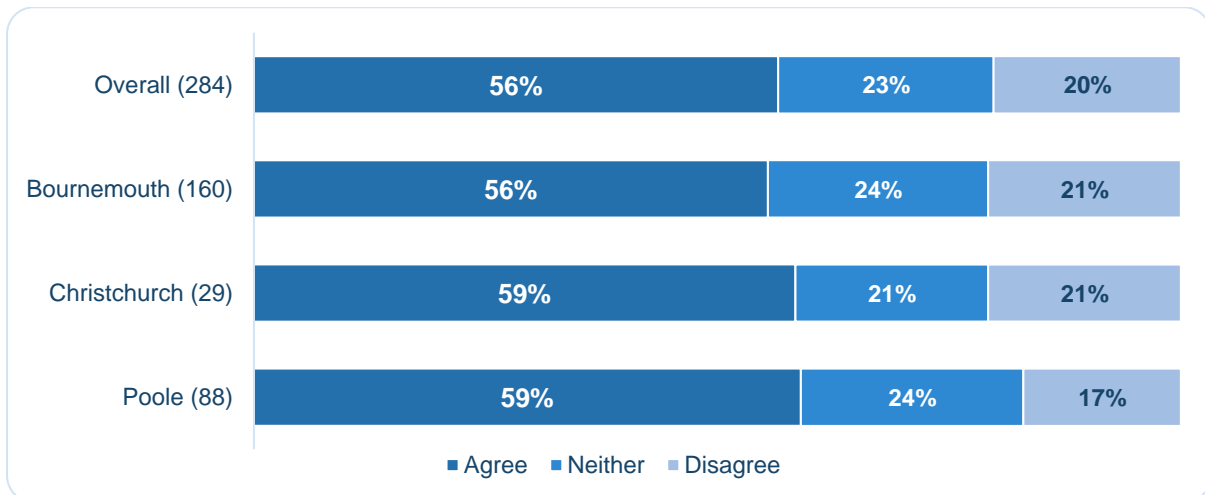
- General disagreement with the proposal / unfair proposal (7 comments)
- Other comments (7 comments)
- Negative financial impact (4 comments)
- Calculation should be based on actual earnings (4 comments)
- Positive financial impact (3 comments)
- Description of personal circumstances (2 comments)
- New business should have more time (2 comments)
- Should be dependent on circumstances (1 comment)
- Comments on the consultation (1 comment)
- Impact is unknown (1 comment)

Proposal K: Introduce fixed period assessments for Universal Credit recipients of 26 or 52 weeks

Levels of agreement with Proposal K

Over half of respondents (56%) agreed with the proposal to introduce fixed period assessments for Universal Credit recipients. Two in ten respondents (20%) disagreed. There are no significant differences by area.

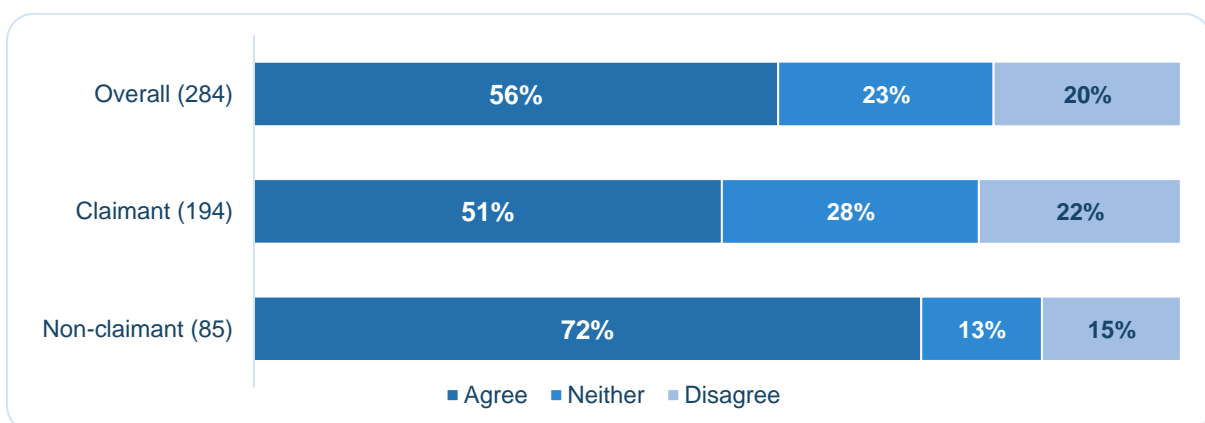
Figure 41: Levels of agreement to Proposal K by area (% respondents)



BASE: Varied as labelled

Just over half of claimants (51%) agreed with Proposal K, compared to just under three quarters of non-claimants (72%). Just over two out of ten claimants (22%) disagreed, whilst 15% of non-claimants disagreed.

Figure 42: Levels of agreement to Proposal K by respondent type (% respondents)



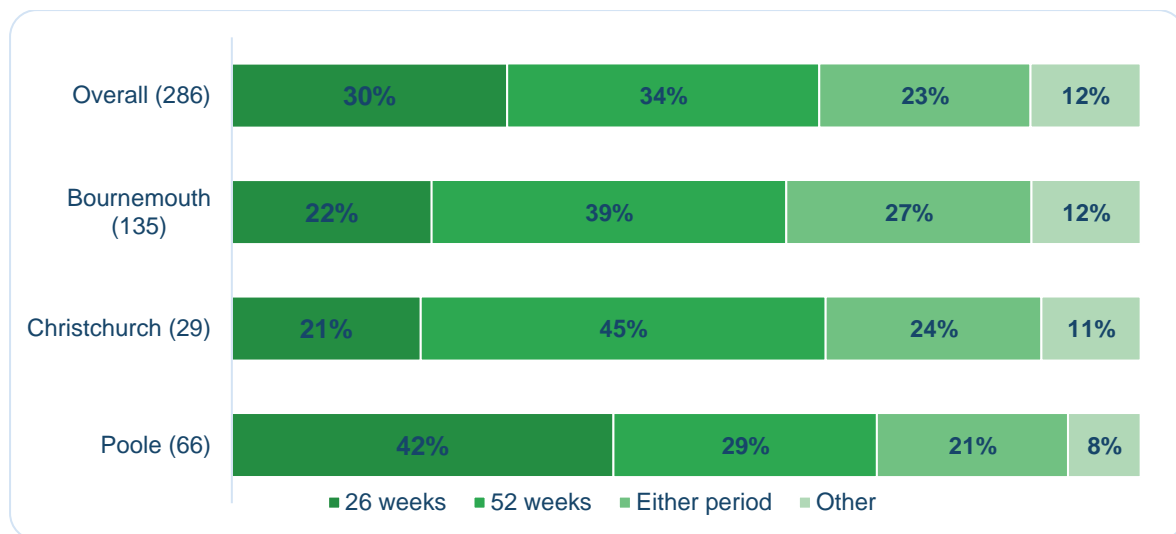
BASE: Varied as labelled

Views on the assessment period

Respondents were asked whether they would prefer a 26 week or 52 week assessment period. Overall, 30% of respondents would prefer a 26 week assessment period, with just over one third (34%) selecting 52 weeks. Just over one out of ten (12%) respondents gave 'other' as their response, with 4 of these giving their suggestion. Just under one quarter of respondents (23%) would have 'either period'.

The results vary by area, with Bournemouth (39%) and Christchurch (45%) preferring a 52 week period, whilst Poole respondents (42%) prefer 26 weeks.

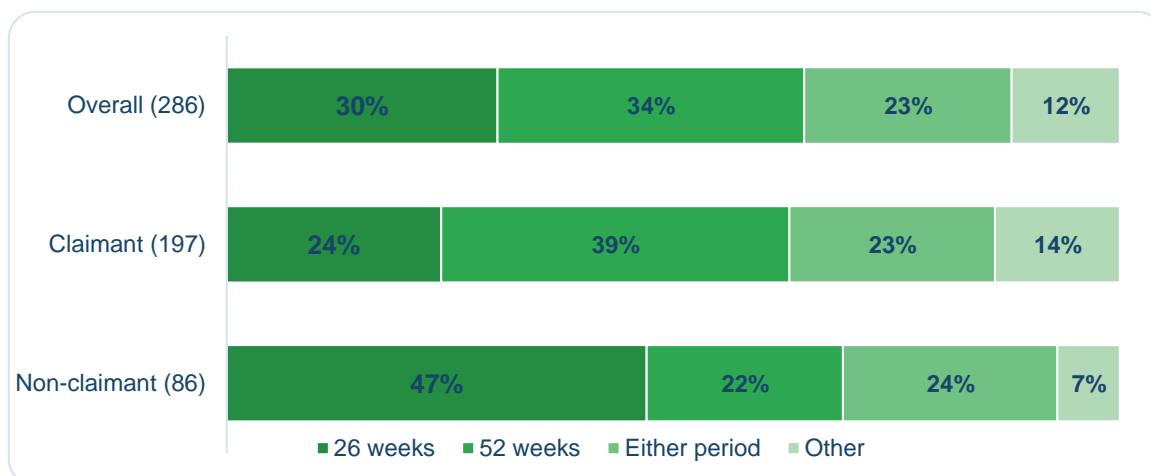
Figure 43: Preferred assessment period by area



BASE: Varied as labelled

When looking at claimants and non-claimants, just under four out of ten of claimants (39%) prefer a 52 week period, with just under a quarter (24%) favouring a 26 week period. Just under one half of non-claimants (47%) chose a 26 week period and 22% chose 52 weeks.

Figure 44: Preferred assessment period by respondent type



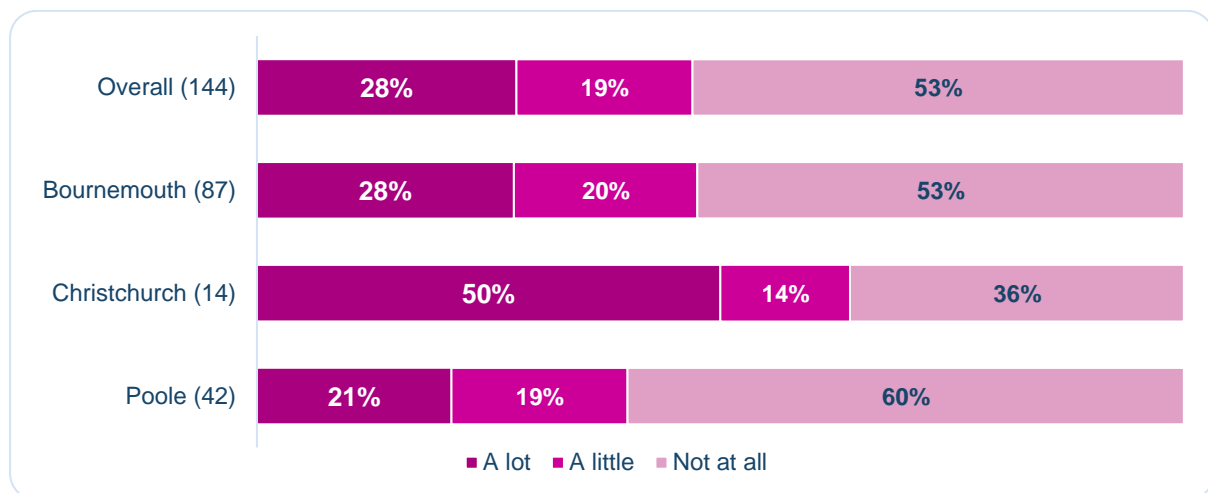
BASE: Varied as labelled

Impact of Proposal K

Just under one third of respondents (28%) thought that introducing both a 26 week and a 52 week assessment period would impact on them and their family a lot whilst around one fifth (19% for 26 weeks and 21% for 52 weeks) thought it would impact on them a little. Just over half of respondents thought the proposed change wouldn't impact on them at all.

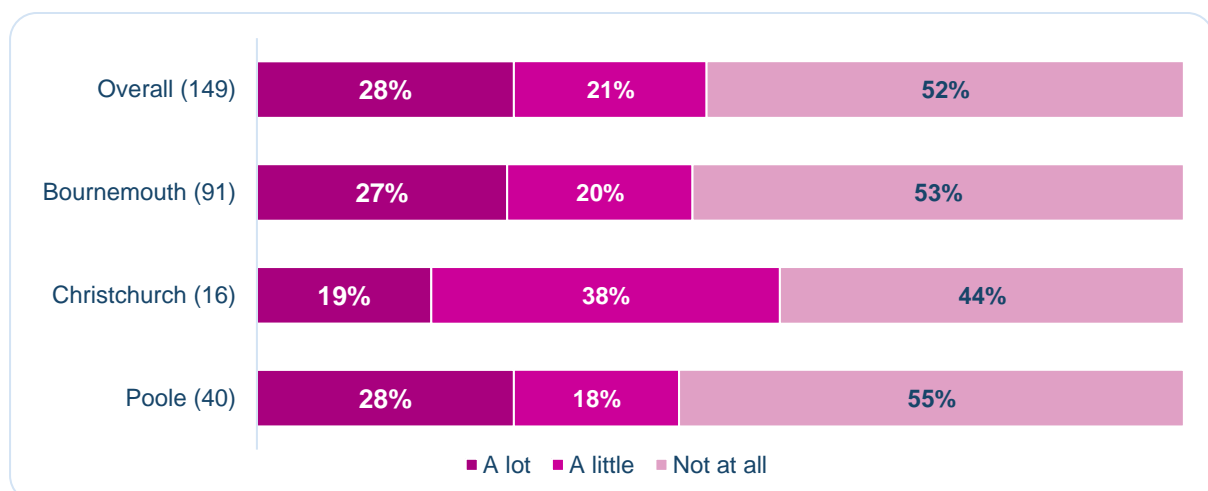
The results vary by area, with respondents in Christchurch significantly more likely to think that an assessment period of 26 weeks would impact them a lot (50%) compared an assessment period of 52 weeks (19%). More respondents in Poole (28%) felt that they would be impacted a lot by a 52 week assessment period (28%) compared to 26 week period (21%). Respondents in Bournemouth thought there would be a similar impact for either assessment period.

Figure 45: Levels of impact of a 26 week assessment period by area (% respondents)



BASE: Varied as labelled

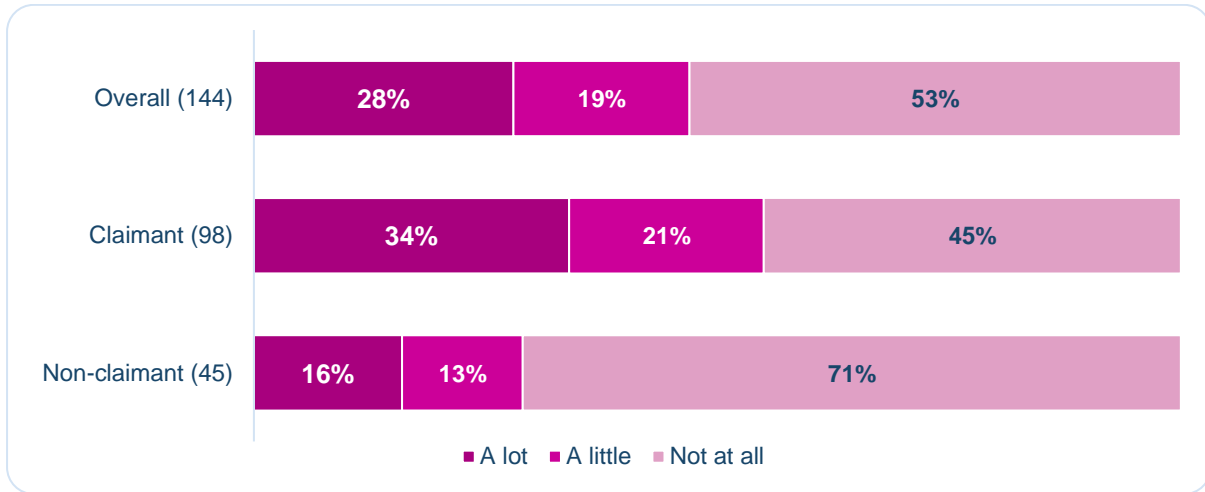
Figure 46: Levels of impact of a 52 week assessment period by area (% respondents)



BASE: Varied as labelled

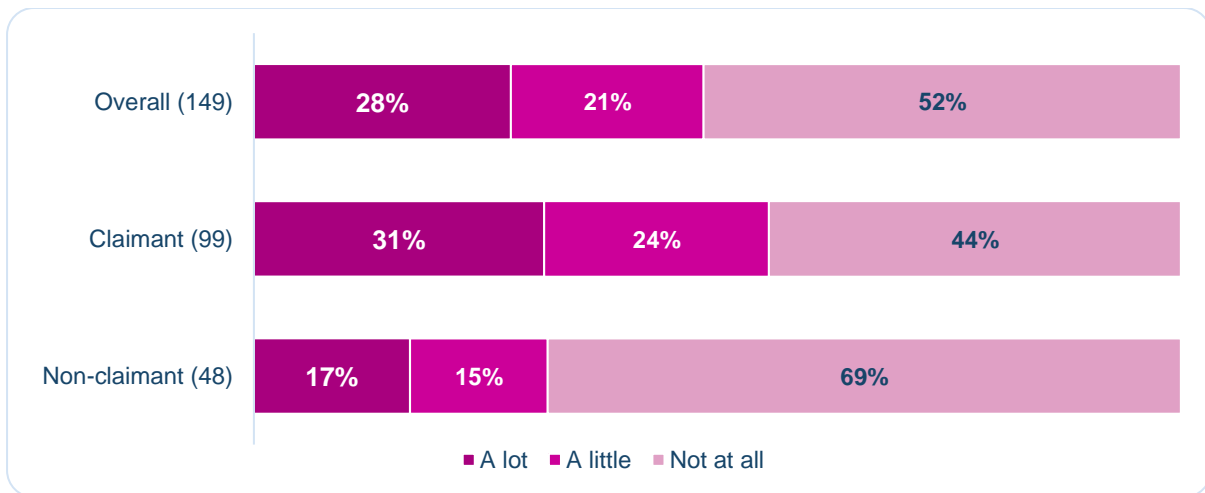
Looking at claimants, the results are fairly similar for impact of the two assessment periods; 34% of claimants feel that a 26 week assessment period would affect them a lot, compared 31% for a 52 week assessment period.

Figure 47: Levels of impact of a 26 week assessment period by respondent type (% respondents)



BASE: Varied as labelled

Figure 48: Levels of impact of a 52 week assessment period by respondent type (% respondents)



BASE: Varied as labelled

Differences in response

There are differences in responses by age, with those aged 65 and over significantly more likely to agree with the proposal (79%) than those aged 35-44 (48%), those aged 45-54 (55%) and those aged 55-64 (56%). However, this is likely to be because non-working age claimants are not affected by the proposal.

Respondents aged 65 and over are more likely to prefer a 26 week assessment period (62%) than those aged under 65. Conversely, those aged 16-34 and 55-64 are more likely to prefer a 52 week assessment period (40% and 39% respectively) than those aged 65 and over (17%). However, non-working age claimants are not affected by the proposal.

Comments on Proposal K

Respondents were asked to provide any additional comments about proposal K. There were 49 additional comments regarding the proposal introduce fixed period assessments for Universal Credit recipients of 26 or 52 weeks. The most common theme arising from these comments related to the monitoring period they prefer (9 comments).

“I think every 26 weeks is a good amount of time although I would worry that this time could mean a significant amount is either overpaid or owed?” (claimant)

“I agree with this period [52 weeks] because it should be up to everyone to disclose information at the right time, but the government needs to check once a year to make sure.” (claimant)

“I think 52 weeks is more realistic as its also ties in with self-employed reviews and avoids a potentially un-payable bill with only 6 months worth of collection time.” (claimant)

The other comments were themed as follows:

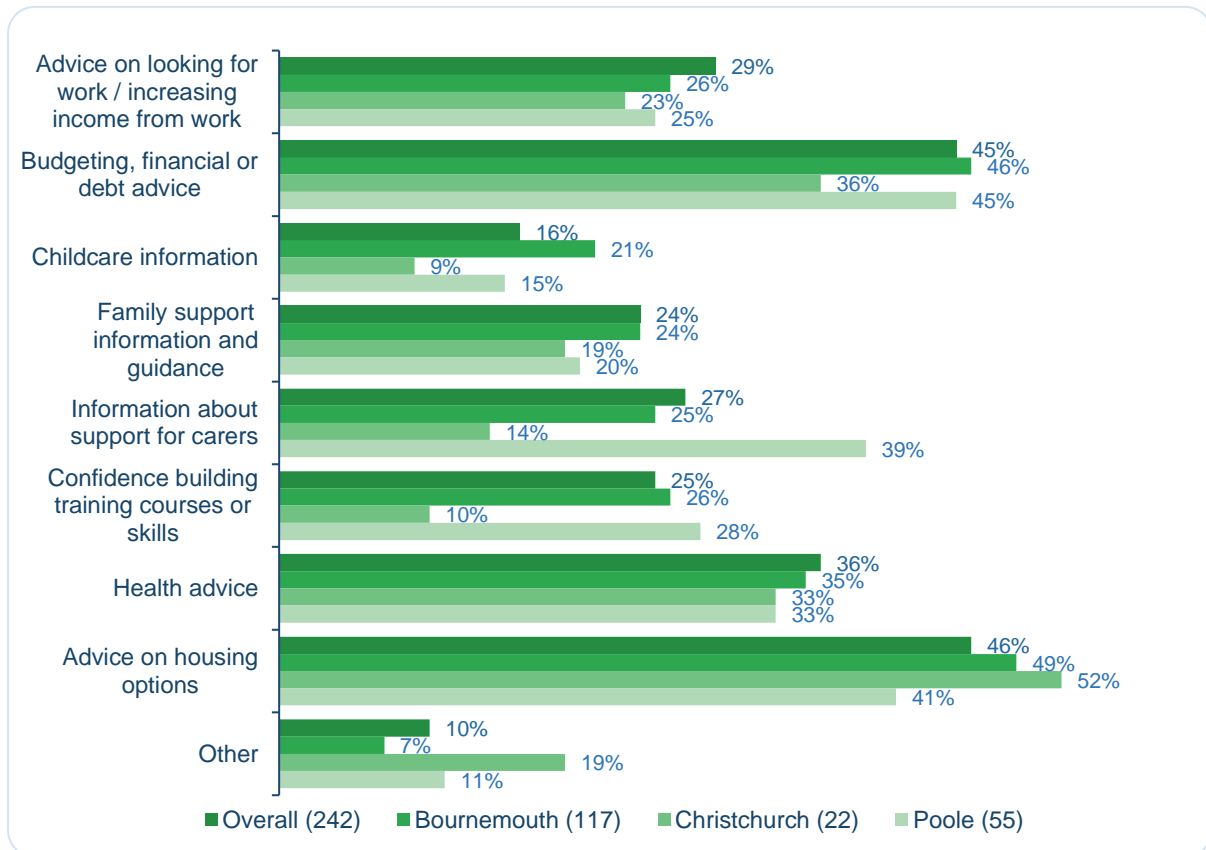
- Related to reducing administrative time / bureaucracy (7 comments)
- Other comments (7 comments)
- There is a potential for overpaying or arrears (5 comments)
- It makes sense to align with Universal Credit (5 comments)
- Suggesting alternative assessment periods (5 comments)
- Introducing a review period could cause stress/anxiety (5 comments)
- Doesn't want the proposed changes to affect them (4 comments)
- They are disabled/have mobility issues (3 comments)
- Not personally affected (3 comments)
- A fixed period will disadvantage those who have a genuine change in circumstances (1 comment)

Information and Support

Respondents were asked what information or support would help them (or others affected) to manage the change. Advice on housing options (46%), budgeting, financial or debt advice (45%) and health advice (36%) are the top three types of information or support that would help respondents to manage the change.

Respondents from Poole were more likely to require information about support for carers (39%) than respondents from Bournemouth (25%) or Christchurch (14%).

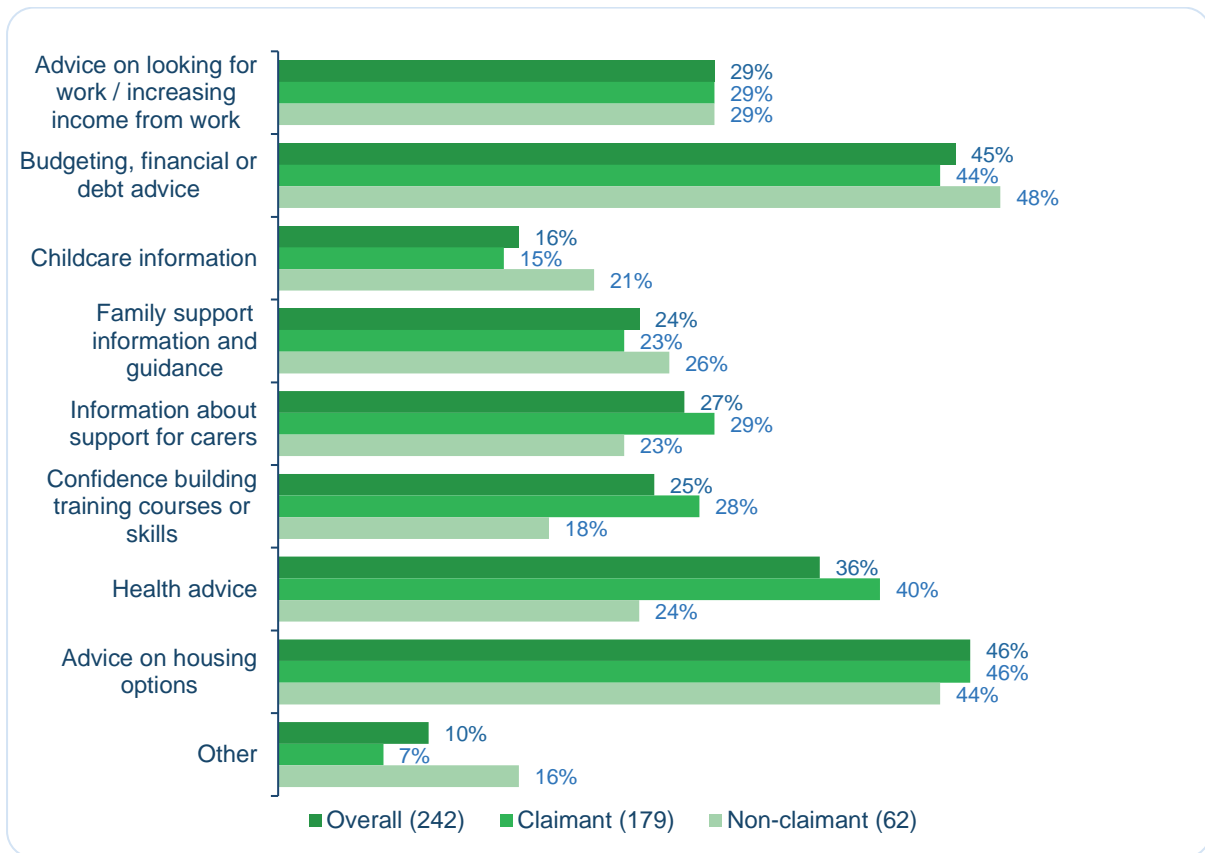
Figure 49: Information and Support by area (% respondents)



BASE: Varied as labelled

Claimants were more likely to request health advice (40%) than non-claimants (24%).

Figure 50: Information and Support by respondent type (% respondents)



BASE: Varied as labelled

Differences in response

Parents are more likely to need budgeting, financial and debt advice (58%), family support information (38%) and childcare information (32%) than those without children.

Those aged 35-44 and 45-54 are more likely to require budgeting, financial and debt advice (27% and 20% respectively) than other age groups.

Those aged over 45 are more likely to need information about support for carers, with this need being highest amongst those aged 65 and over (39%).

Higher proportions of those age groups under 45 would like confidence building training courses or skills, with support highest for those aged 35-44 (38%) and aged 16-34 (37%).

The proportion of those stating they need housing advice is highest amongst other sexual orientations (83%), although the number in this group is low (n=12).

There also appears to be more demand for family support information amongst BME groups (50%), but the number is low (n=10).

8. Additional comments

The survey gave respondents the opportunity to give any comments or suggestions about the proposed new scheme, or about any other options they would like considered. A total of 94 respondents left a comment. Many of these comments were about the new council or the government rather than about the proposed scheme. However, several key themes emerged and are outlined below. All of the comments are available in Appendix 3.

- The negative impact of the proposals (32 comments)
- Comments related to the proposals (22 comments)
- The new Bournemouth, Christchurch and Poole Authority (12 comments)
- Other comment (11 comments)
- Made a suggestion (8 comments)
- The government (4 comments)
- Council tax (5 comments)
- Universal Credits (5 comments)
- Disabilities (4 comments)
- Asked a question about the proposals (3 comments)

Appendix 1: Summary of Responses

Proposal	% Agree				% Impact A Lot / A Little			
	Overall	Bournemouth	Christchurch	Poole	Overall	Bournemouth	Christchurch	Poole
A. Set the minimum contribution at 20% for working age residents not in a protected group	48%	53%	44%	39%	54%	51%	73%	56%
B. Withdraw the family premium for new working age claims and new families	33%	36%	21%	32%	31%	29%	33%	32%
C. Limit backdating to up to a maximum of one calendar month for working age claims	48%	49%	39%	52%	33%	34%	25%	37%
D. Cap scheme at Council Tax Band C for working age claimants not in a protected group	47%	51%	29%	47%	36%	38%	48%	30%
E. Minimum weekly entitlement of 50p	45%	49%	33%	45%	30%	31%	24%	27%
F. No working age Second Adult Rebate.	39%	44%	24%	38%	27%	25%	19%	29%
G. Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	54%	53%	55%	56%	21%	17%	37%	22%
H. Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants	46%	46%	37%	50%	18%	19%	13%	14%
I. Mirror the Housing Benefit 'Temporary Absence' rules	54%	58%	39%	54%	20%	22%	6%	16%
J. Introduce a self-employed minimum income floor	55%	54%	57%	57%	18%	17%	31%	15%
K. Introduce fixed period assessments	56%	56%	59%	59%	-	-	-	-
Impact of 26 week fixed period assessments	-	-	-	-	47%	48%	64%	40%
Impact of 52 week fixed period assessments	-	-	-	-	49%	47%	57%	46%

Proposal	% Agree		% Impact A Lot / A Little	
	Claimant	Non-claimant	Claimant	Non-claimant
A. Set the minimum contribution at 20% for working age residents not in a protected group	40%	40%	56%	49%
B. Withdraw the family premium for new working age claims and new families	33%	24%	29%	33%
C. Limit backdating to up to a maximum of one calendar month for working age claims	41%	68%	34%	31%
D. Cap scheme at Council Tax Band C for working age claimants not in a protected group	43%	59%	36%	35%
E. Minimum weekly entitlement of 50p	42%	52%	34%	20%
F. No working age Second Adult Rebate.	32%	57%	27%	23%
G. Limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for working age claimants	49%	69%	19%	22%
H. Disregard Bereavement Support Payment and Infected Blood Schemes financial support for all working age claimants	43%	54%	17%	16%
I. Mirror the Housing Benefit 'Temporary Absence' rules	49%	68%	20%	16%
J. Introduce a self-employed minimum income floor	52%	62%	18%	20%
K. Introduce fixed period assessments for Universal Credit recipients of 26 or 52 weeks	51%	72%	-	-
Impact of 26 week fixed period assessments	-	-	55%	29%
Impact of 52 week fixed period assessments	-	-	55%	32%

Appendix 2: Respondent Profile

		Overall	Bournemouth	Christchurch	Poole
Gender	Male	148	88	10	49
	Female	167	89	24	53
Age	16 - 34 years	26	12	<10	<10
	35 - 44 years	46	31	<10	<10
	45 - 54 years	87	49	<10	30
	55 - 64 years	127	73	14	40
	65+ years	30	13	<10	15
Disability	Yes	194	109	23	61
	No	109	60	9	39
Ethnicity	White British	272	146	33	91
	White Other	26	17	<10	<10
	BME	12	10	-	<10
Religion	No religion	123	67	11	44
	Christian	162	91	20	50
	Other religion	20	15	<10	<10
Sexual Orientation	Heterosexual	274	157	25	90
	All other sexual orientations	19	<10	<10	<10
Employment	Economically active	85	55	12	17
	Economically inactive	137	76	16	45
Household Status	A family with one or more dependent children	65	37	<10	18
	A single parent household	41	19	<10	14
	A couple without children	42	24	<10	16
	A single person household	133	83	12	38
	A household that includes someone who is disabled	104	54	12	37
	A household that includes a carer	53	24	<10	22

		Claimants	Non-claimants
Gender	Male	109	39
	Female	118	51
Age	16 - 34 years	19	<10
	35 - 44 years	37	<10
	45 - 54 years	66	21
	55 - 64 years	107	21
	65+ years	<10	29
Disability	Yes	166	29
	No	51	59
Ethnicity	White British	196	78
	White Other	17	<10
	BME	<10	<10
Religion	No religion	89	34
	Christian	114	50
	Other religion	17	<10
Sexual Orientation	Heterosexual	193	83
	All other sexual orientations	16	<10
Employment	Economically active	85	50
	Economically inactive	137	40
Household Status	A family with one or more dependent children	42	23
	A single parent household	34	<10
	A couple without children	14	28
	A single person household	110	25
	A household that includes someone who is disabled	93	11
	A household that includes a carer	45	<10

Appendix 3: Comments

Additional comments about Proposal A

People on benefits receive so little I'm not sure how they would meet 20% of the council tax bill.	Poole	Claimant
The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
Irrelevant above question as I do not have a crystal ball.	Other	Non-claimant
Good idea but tax cannot be avoided it's a shame as some people cannot afford it.	Bournemouth	Claimant
I am extremely concerned that many people not in the protected groups may not be able to afford this Council Tax. Examples where DWP makes errors, deliberately more often than not, removing benefits, a year wait to Tribunals or not capable of fighting, maybe sick or disabled and can't work but then DWP removed the monies or simply low income in poverty. Council Tax is extortionate especially where person lives alone.	Poole	Claimant
I will be my official pension age so it should not affect me.	Bournemouth	Claimant
I think this is a very fair proposal.	Bournemouth	Claimant
Hi I haven't been able to work since 2010...my only income is on disability which is hopeless!	Poole	Claimant
There are other people who are on low incomes, not just your protected groups. Everyone should receive a fair assessment.	Christchurch	Claimant
I already pay 20% so this does not affect me.	Bournemouth	Claimant
The problem is "How long is a piece of string"? you state that a minimum of 20% would be payable you are asking for people to give views on what has not been stated as in a maximum figure, which indicates there will be no maximum figure.	Bournemouth	Claimant
I think it's massively unfair to change a benefit that you have already been awarded and you rely on to support your family when your wages etc haven't changed i.e. gone up to account for the loss. As someone who suffers with mental health this would affect me a lot.	Christchurch	Claimant
Very low income so 20% would put me in poverty.	Poole	Claimant
I am in receipt of PIP and my husband is my carer, so am in a protected group, but I feel that some working families on minimum wage would really struggle to pay £20 a month. Surely this should be means tested.	Bournemouth	Claimant

I already pay above that amount.	Bournemouth	Claimant
There seems to be no change for Bournemouth, which is why I agree.	Bournemouth	Non-claimant
As I am on JSA at the moment I have to consider a lot of factors; as I do not know if I'm in a protected group.	Poole	Claimant
I live in Bournemouth and the level of support does not change for my area.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
I am suffering from a heart condition and polycythemia....unable to work and already battling the DWP in ESA payments that have not increased in 4 years, and yet rent and council tax have increased year on year.	Bournemouth	Claimant
I am on JSA at the moment, and as this benefit is capped and with bills and cost of living going up all the time I feel it would be an extra bill to add without support.	Bournemouth	Claimant
It should be very clear that anybody on benefits should not have to pay council tax! It is crippling and so are the costs of housing! I am in a protected group but if I was not I would not be able to survive on the income that I have at present! My outgoings exceed my income in the main anyway! I believe it should apply only to people actually in work and not according to their age! If they earn under a certain amount their contribution should be at a lower rate! Christchurch residents should be determined individually! We never wanted to be pushed in to this situation anyway!	Christchurch	Claimant
As I live in Bournemouth this rule applies to me.	Bournemouth	Claimant
Conservative Party....creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
I don't think this apply to me.	Bournemouth	Claimant
I am already struggling as it is. Further increase in Council tax will cause a further burden.	Poole	Claimant
This won't change anything for me. I think all the councils should be the same.	Bournemouth	Claimant

People on low incomes need more help.	Poole	Non-claimant
The proposal significantly reduces support for people in Christchurch who are already in poverty. If the new council isn't a just cost cutting exercise in overheads of running 3 councils, then it would be better to aggregate the support across the 3 councils to increase support in Bournemouth and Poole and not decrease it so much in Christchurch.	Bournemouth	Non-claimant
Council tax should be frozen for the next few years.	Bournemouth	Non-claimant
People who received benefits and live on them, such as housing benefit and JSA, should not pay council tax on that amount.	Poole	Non-claimant
As a service worker living alone this reduction in council tax will assist me greatly in being able to eat more regularly and help to heat my home.	Bournemouth	Non-claimant
I'm already paying 20% so nothing will change. I still think on the benefits I get this is still far too much.	Poole	Claimant
Seems to be hitting the most vulnerable, who are struggling to make ends meet now.	Poole	Non-claimant
I get no reduction in my council tax at present & don't ever expect to qualify - however I am unaware how many qualify for reductions at present - so if the first question is to increase overall payments of council tax - I feel I will NOT be impacted. BUT if the proposal will decrease overall contributions I do feel I will be impacted as in the end " someone has to pay to keep services " & that someone may well be me as my council tax will go up.	Christchurch	Non-claimant
People need to be able afford their council tax. It should not be related to the value of their home. People need to see in their area what they are paying for.	Poole	Claimant
Why spend 30'000'40.000 on this pathetic survey. as you will do it any way. like you went against the vote NOT to join councils. and you ignored the peplos vote and did it anyway. now you have started this. just to ROB the people to finance for spending on rubbish. that do not benefit anybody but yourselves. to keep you all in your ivory towers and sky-high wages. . waging your finger. saying it's good for the town. which town I say. as you now it won't be spent in Poole which I admit looks like a slum run down .not fit for the disabled as the paths are like going off roading and damage owe mobility scooters ... you all make me sick I have an idea STOP STEELING OF THE POOR. and take a cut in wages. . don't have companies to do these things. do it in house do your jobs your paid over the top for. don't have 10 managers and still contract it out. and where do you think people on benefit's will find . 20 percent. of the food shopping money or the electric and gas. or shall we take it out of the budgets for their kid's school uniforms. as that's just a stupid expense that the poor don't need. so I don't now why I'm filling this in as you will do it anyway .. like you lot normally do .democracy my foot.	Poole	Unknown
The new rules should primarily be fair to the people who have to pay the full amount!	Poole	Non-claimant

As a tenant in receipt of ESA (support group) with a severe disability premium I should continue to be exempt. I am concerned that currently I keep having to provide evidence to the HB/CTC office that my adult son is a full-time student (was college, now University) not earning any income, despite my carer's premium in my ESA and my PIP daily Living (care) premium meaning exemption should be automatic. I hope you will take this opportunity to train your staff to accept the primary reason for exemption as sufficient and stop asking for further reasons to be provided.	Christchurch	Claimant
Even an extra £10 would have a huge impact on my family.	Poole	Claimant
May affect members of my extended family but the reasons for it are agreeable.	Christchurch	Claimant
It seems right that all residents in the area should be subject to paying the same amount.	Bournemouth	Claimant
Especially as on universal credit.	Bournemouth	Claimant
As my partner is in the protected group, It wouldn't affect us. Should our circumstances eventually change, we would start paying. Some families would still struggle affording to pay though.	Bournemouth	Claimant
The 26 or 52 week review could be an issue. If a drastic change happens, potentially too long to wait for a review, will there be override in these cases?	Bournemouth	Claimant
Working age residents not in employment and not in a protected group already find it difficult to make ends meet, mostly families with children but, also single people on Universal Credit. I already find it difficult to live on benefits as I have long and enduring health problems and would find it hard to pay 20% if I were not in a protected group.	Bournemouth	Claimant
We are a family with 2 disabled children that myself and my partner are full time carers for. For us to be able to function we need the both of us at home to be able to care for all 3 of our children. I feel it will put us into poverty.	Poole	Claimant
There are families who can't afford to pay even 20%.	Bournemouth	Claimant
I don't think it should be a set amount it should be based on the individuals circumstances.	Christchurch	Claimant
People with life long disabilities are struggling enough surviving on benefits without this being added too.	Bournemouth	Claimant
I feel that some people will benefit from this however some will still struggle.	Bournemouth	Claimant
Have a 17-year-old - I assume they will be expected pay once they turn 18 and they are in employment.	Poole	Claimant
Not sure where I stand as due to my mental health I cannot work.	Bournemouth	Claimant
I am a single working parent who suffers from arthritis and so moved near my daughter's school to rented accommodation. The council tax band is the highest, which I was not expecting and so 20% is far too high a minimum contribution under the circumstances.	Bournemouth	Claimant
I am in receipt of PIP and ESA these proposals are a cause for concern.	Bournemouth	Claimant
20% is too small an amount.	Poole	Claimant
All I know is I...had been living at a place that was just a room with a bathroom and a sink. Online when I was looking at the place it said council tax was included in the rent. After living there three years I get a 3 year back dated council tax bill of almost 3,000 pounds! For one I've been on and off benefits trying to find work and two if the rules are changed on how	Bournemouth	Non-claimant

certain properties are taxed then fine but backdating my bill three years is wrong. I'm still fighting this but its difficult getting all the benefits documents they need. I don't believe I should owe any of this money I would however be ok with it being a future bill but it being backdated like this is just so wrong I don't understand how this got the go ahead....		
The amount paid for council tax is already absurd and should have nothing to do with income (unless when it comes to reductions for lower incomes) as the rents already high and take up the majority of a person's income.	Poole	Non-claimant
Whilst I always thought that everyone working person should most certainly be paying a fair council tax, when I retired and lived on my own I felt the allocated percentage of tax was to high.	Poole	Non-claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
I applied for the help but never heard anything back from Poole Council. I put this down to them loosing my paperwork I should have sent it back by recorded delivery. I'm 40% disabled...my injury was a patient assaulting me while working.in an NHS hospital.	Poole	Non-claimant
Seems a rather generous 'minimum', as some of these working age residents have undeclared income from the 'black economy'.	Poole	Non-claimant
At the moment Bournemouth council have not changed to Universal credit scheme. I don't know what the implications are when that happens.	Bournemouth	Claimant
Too expensive.	Bournemouth	Non-claimant
What about the workers paying full price in xchurch. Bring the payments down! £157 a month every month is too high.	Christchurch	Non-claimant
I think setting an arbitrary figure (in this case at 20%) without reference to the actual earnings of working age residents could easily give rise to actual hardship for some residents on low/minimal income. A mechanism needs to be put in place to allow some flexibility/discretion having regard to any individual's ability to pay to avoid a repressive tax regime hurting the poorest in society, simply because they are not in a protected group. I make the assumption that you are using the term "protected group" within the meaning of the Equality Act 2010 (although this is not clear from your supporting documentation). If this is so, then in some respects it is a pretty stupid definition to use in the context of the ability to pay, since other than for the "disabled" (where there are ample [and publicly available] correlation statistics linking disability of	Bournemouth	Claimant

individuals to poverty [and child poverty] in the UK). Conversely, there is no direct correlation between the ability to earn (and consequently pay Council Tax) when considering race, sexual orientation etc; since these are characteristics which have no bearing on earnings and hence the ability to pay any particular charge without said charge running the risk of creating hardship as to the ability to pay, and for the associated economic oppression on said individual arising from any actions from the Council in pursuing such debts.		
I think is better to spend less money.	Bournemouth	Non-claimant
If someone who has a long-standing health condition is deemed fit to work, rightly, wrongly, or temporarily, and they have yet to find work, or are only able to find or sustain temporary or part-time work, they would be receiving universal credit, which is a low amount and is well-known to often be delayed. The payment of 20% council tax could easily be the amount that causes them to be unable to pay their rent, which would leave them homeless. For this reason I think the protected group should be extended to anyone receiving Universal credit, or until then, anyone receiving ESA (work-related activity group) or JSA.	Bournemouth	Claimant
These questions are not clear.	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
I find it very difficult because sometimes I don't have enough money to.	Bournemouth	Unknown
Obviously when changes occur, it can affect a vulnerable person's mental health. Hopefully this new amalgamation of three councils has already been tried and tested and should be alright for most people.	Christchurch	Claimant
As a single person living in own home and working part time I think that 25% discount on council tax is not enough.	Bournemouth	Claimant
Everybody needs to make some contribution to council tax no matter how minimal, otherwise we continue to encourage/support 'something for nothing' mentality. We all need to share the burden as we all benefit from services provided.	Bournemouth	Non-claimant
We think it will be a very good idea all the councils merging together.	Bournemouth	Claimant
How will a working age person pay such contributions if and when they have no job or household in low income etc? Personally, don't agree with the council merger itself. Multi-millions spending on a costly merger with unclear benefits. Poole Council should stay.	Poole	Claimant
Costs limited funds income 200-00 year, overall 1300full tax. 1 pay - 200, 1100 subsidy.	Poole	Claimant
It will affect people working on a low income.	Poole	Claimant
This is completely non-sensed. How can one reply to questions that mean nothing?	Unknown	Unknown
20% of £1000.000 a year is £200+ at minimum £18.00 a month depending on what income 'low wages'.	Bournemouth	Claimant
I don't know what is a reference number. I left the letter that I have received from the council. I Don't have family.	Bournemouth	Claimant
Minimum salaries are too restrictive to see anymore to see any more rises in any capacity. Anything under £18,000 p.a	Bournemouth	Claimant

I know couples that are both working and cannot make ends meet.	Bournemouth	Claimant
It does not say how much the 20% is of. What changes to the council tax? How can we tell, when we haven't been told?	Bournemouth	Claimant
I'm confused.	Bournemouth	Claimant
Some people may not be able to cover the extra expense.	Bournemouth	Claimant
Contributions should be the same across the board.	Poole	Non-claimant
Due to my disability ad sickness, as I am semi-retired.	Poole	Non-claimant
Was there any point in having a vote some months ago, which 3/4 of Christchurch voted against?	Christchurch	Claimant
Ability to pay it on a fixed income or benefit.	Poole	Claimant
I can't say, I have struggled to even have a TV or get a TV licence over the last few years, as the mortgage had to be paid and I didn't have enough for food or bills and had to give something a miss for the last X years. So I don't know how this might affect the individuals	Bournemouth	Unknown

Additional comments about Proposal B

I thought the new authority was to save money, not impose new austerity. Unfair and harmful policy.	Christchurch	Claimant
The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
Don't make matters worse. Too many in extreme poverty as it is.	Poole	Claimant
Each case should be assessed for its own merits.	Christchurch	Claimant
Having family members who earn just over the threshold to receive UC (that replaces tax credits), families living in in-work poverty need all the help they can get.	Poole	Claimant
Families working or not are already under extreme pressure financially, you state that some 20 plus thousand households receive the benefit of reduction, that equates to tens of thousands of people within the borough financial hardship is inevitable to some of the most vulnerable people who have children	Bournemouth	Claimant
I think it's massively unfair to change a benefit that you have already been awarded and you rely on to support your family when your wages etc haven't changed i.e. gone up to account for the loss. As someone who suffers with mental health this would affect me a lot.	Christchurch	Claimant
Just a tax for disabled people.	Bournemouth	Claimant
See previous answer. Also, what happened to means testing these benefits, it's disgusting that the poorest working families are going to be the worst hit.	Bournemouth	Claimant
Haven't got any family.	Bournemouth	Claimant
Why only new claims, that's not fair? Withdraw it for all.	Poole	Claimant
This does not affect me but if a family had to fine an extra £15 a week or more they could struggle for heating clothing food etc. it could be the difference between them having a life and having to struggle to exist.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears	Poole	Unknown

that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.		
Joining the other councils which can barely hold their own anyway compared to Christchurch will affect me! If help is withdrawn I will be badly affected financially! I am no longer in a family but it is families who get hit hard and who have to cut out other essentials if they do not get helped! It would be a lot better if it was determined according to their ability to pay so that anyone on any benefit did not have it withdrawn! The system needs a shake up and there needs to be some leniency where claims are mucked up and you have to start a new claim or are forced to!	Christchurch	Claimant
New working age claims and new families should be supported not hindered.	Bournemouth	Claimant
Conservative...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
New families may need more assistance.	Bournemouth	Claimant
As I don't have any children under 16 this doesn't apply to me but I know this will make things very difficult for people with young children.	Bournemouth	Claimant
People on low incomes need more help.	Poole	Non-claimant
Working families on low incomes are already struggling to make ends meet in the current environment and this will get no better with inflation on the rise and Brexit approaching and potential significant increases in food costs. Withdrawing the family premium will mean working families on low incomes are worse off yet again, increasing the number of children living in poverty in the new council area.	Bournemouth	Non-claimant
New families face a lot of expense in a country where there are too many cut back. Some new families face travel costs for a sick baby/mother,	Poole	Claimant
Like I said YOU WILL DO IT ANY WAY.	Poole	Unknown
The rules should primarily be fair to the people who have to pay the full amount!	Poole	Non-claimant
It would have a huge impact.	Poole	Claimant
A lot of new families moving into the area is costing the council and the town a lot of money and therefore this will ensure families are aware of the costs and can then decide if the town is the right place for them.	Christchurch	Claimant
Seems a bit like you are punishing people with more than two children by not taking them into consideration for support.	Bournemouth	Claimant
Would mean paying full council tax when on a limited income.	Bournemouth	Claimant
Bournemouth and Poole have this in place. Only fair all councils have the same policy once joined together.	Bournemouth	Claimant

As a single person this proposal would not affect me. I think that for new claims it would affect families a lot especially for families with children. At a time of loss of income, redundancy or unemployment, this is where families need that extra means of support.	Bournemouth	Claimant
This is not right because everyone should get family premium who have family. We have it and other families are same so why do you want to discriminate them.	Bournemouth	Claimant
Why would it be any different for new claimants. The struggle will be the same.	Bournemouth	Claimant
Will be affected if have to renew claim or move I believe and any reduced benefits causes stress and strain.	Poole	Claimant
Isn't this just a duplication of dependent children? If these children are older and working and/or claiming then they have funds to help toward household costs, such as council tax.	Bournemouth	Claimant
I'm retired with a health condition so am in no way affected by such a change but only think that all forms of taxation should be fairly shared amongst the community.	Poole	Non-claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
Help would be nice.	Poole	Non-claimant
What about the workers paying full price in xchurch. Bring the payments down! £157 a month every month is too high.	Christchurch	Non-claimant
I refer you to my points made in proposal A. However, I would add that this proposal creates a two-tier approach to the eligibility of new claimants, viz a viz existing claimants. Essentially by implementing this proposal you place existing claimants in a far better position than new claimants, essentially raising the bar for people who will be under ever more pressure to meet the threshold for support. Apart from the financial pressure for people already on a very low discretionary income, the fact that you intend to operate a two-tier system seems unjust.	Bournemouth	Claimant
Being a single I do not really understand this question as to how it would affect a family.	Bournemouth	Claimant
I don't understand these proposals.	Bournemouth	Claimant
Why would you want to withdraw it in the first place?	Bournemouth	Claimant
Single.	Christchurch	Claimant
Don't know what the outcome would be.	Bournemouth	Claimant

Fear that many families will suffer by the withdrawal especially those with one parent, young mothers with young kids who need to invest time between family and work. These proposals can be alarming to such households and poorly paid contract workers.	Poole	Claimant
Could lead to child poverty.	Poole	Claimant
You will be taking away a family's safety net. 'Discrimination' no new claims and families.	Bournemouth	Claimant
Depends on income but probably penalises the poor (single or couple).	Bournemouth	Claimant
I will be going back to work in September 2019 and as a single parent homed how I will be able to cope with bills as childcare costs are very high.	Bournemouth	Claimant
New families are usually foreigners.	Bournemouth	Claimant
I would not be able to pay the full premium.	Bournemouth	Claimant
I am semi-retired and disabled.	Poole	Non-claimant

Additional comments about Proposal C

Unless the need for backdating is due to severe negligence on the part of the claimant, this would be punitive and unfair.	Christchurch	Claimant
As long as the claim is dealt with within that period.	Bournemouth	Claimant
Why would people not get a claim in right away?	Poole	Claimant
The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
Not fair!	Bournemouth	Claimant
Rents need to be paid on time.	Bournemouth	Claimant
Come on, this Gov. has caused so many to be in hardship, don't go making worse!	Poole	Claimant
People should be paid what they are entitled to, not have money snatched off them by insidiously placed red tape. This could tip families over the edge and cause homelessness.	Christchurch	Claimant
In principle as a general rule I agree, but again there are sometimes genuine reasons as to why some people may have to ask for further backdating, such as hospital stays, bereavement etc.	Bournemouth	Claimant
Just making more people homeless.	Bournemouth	Claimant
Surely there are circumstances where it would be necessary to be flexible. This government seems to have forgotten that they are dealing with human beings, not statistics.	Bournemouth	Claimant
It would need to depend on circumstances, as I know someone that had to backdate approx. 6 months due to a council error	Bournemouth	Claimant
Sometimes it can take longer than a month to sort claim. Claimant shouldn't be penalised because of slowness of process.	Bournemouth	Claimant
Unless of course the delay is due to lazy council pen pushers.	Poole	Claimant
There seems to be no change for Bournemouth, which is why I agree.	Bournemouth	Non-claimant
A month is dark too short, especially for those with learning difficulties.	Christchurch	Claimant
I'm on universal credit but also have health issues and am in process of sorting thing out with my own claim but if I have read it correctly most universal credit claims are assessed monthly and should be given a set period of at least 26 or 52 weeks depending on the claimant's circumstances.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable	Poole	Unknown

in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.		
That's a bit unfair if it takes longer than a month to sort out the claim which it usually does. How are people claiming supposed to cover the rest of the backdating dates payments?	Poole	Claimant
In my experience I have had a claim that should have been paid 6 months prior due to a decision that was overturned! If what you had proposed was to happen in a similar circumstance it would only benefit you! Back date to exactly what is owed and 1 year at least from contacting the department unless evidence can be showed that the department was at failure and the claimant had no choice! Please note for over a year I paid someone else's (with the same name as mine also in Christchurch) council tax. That had to be all paid back to me as I was paying for the two of us due to the council's error! This is a good example of the council's fault and why it should be a minimum of one year backdated!	Christchurch	Claimant
Information has in the past proven difficult to come by for me and often to miss several months of help.	Bournemouth	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
Consider each case on its own merit. As a rule of thumb the proposal is ok but which possibility to appeal.	Bournemouth	Claimant
Unfair.	Bournemouth	Claimant
If there is an error made by the council tax personnel claimants shouldn't be penalised for it.	Poole	Claimant
It's not our fault it takes u 2-3 months to sort payments.	Poole	Claimant
Processes are so complicated it puts vulnerable people off claiming and no support is available.	Poole	Non-claimant
It doesn't apply to me at the moment but if I had to make a claim it may do. It is unnecessarily harsh to do this and will be detrimental to people who need time to organise their claims.	Bournemouth	Non-claimant
That has to be looked at on a case by case basis.	Poole	Non-claimant
Except in exceptional circumstances, i.e. ill health, death of a close relative.	Poole	Non-claimant
People who are in debt have nothing, so why increase debt???	Poole	Claimant
This won't work as you know it can take up to 6 weeks as you are way to slow doing anything.	Poole	Unknown

The rules should be FAIR to the people who have to pay the full amount!	Poole	Non-claimant
Backdating is a lot of admin and is also stressful for the families involved. A cap would be a good idea.	Christchurch	Claimant
Although claimants may be able to make use of the backdated money, I hope that any extra money saved by doing this would be put to good use by the council in the area to benefit everybody.	Bournemouth	Claimant
1 calendar month is enough. Changes need to be reported straight away. Also, already in place in Bournemouth and Poole. Only fair to be consistent once the councils are combined.	Bournemouth	Claimant
Can take (and has taken) UC months to get the payments right, this could have a huge impact. So, unless UC get their act together, this could cost dearly.	Bournemouth	Claimant
This makes it clear for everyone.	Bournemouth	Claimant
I think it should be 2 months because sometimes takes longer for claim and to get all documents ready. And people live busy life this days with less time on their hand.	Bournemouth	Claimant
I think if an amount of money is owed either way it should be paid.	Christchurch	Claimant
This will only work if people are aware of the services available to them, in some cases a person may struggle for months before finding out about assistance therefore will miss out.	Bournemouth	Claimant
Not relevant now but maybe in future. Clearly some circumstances are extenuating but can understand the cut off for the majority of claims.	Poole	Claimant
The current council takes longer than a month to process claims, so to limit backdating is not fair on claimants	Poole	Claimant
YES YES YES!!!! I hope this applies to my current situation!!!!!!!!!!!! backdating is so wrong there is no way I can pay this huge backdated bill off! Almost 3,000 pound backdated bill!!!!!!	Bournemouth	Non-claimant
This is truly awful and will impact people in an extremely negative way. It's bad enough now that the council makes you wait so long for them to sort their end!	Poole	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
I would be happy for new claimants to only be back dated 1 month. However, as I am newly on Universal Credit and not familiar with how it affects my Council Tax support I would be unhappy if I found my Council Tax support had been stopped	Poole	Claimant

and I was not aware that I needed to do something to obtain it. I have been told Universal credit is a paperless system so I'm worried I will not hear about changes. The full Council Tax is a huge amount to someone with little or no income.		
I suppose that backdating only a month, could be a little unfair if people need help filling out forms or didn't know what entitlements were available to claim.	Bournemouth	Claimant
What about the workers paying full price in xchurch. Bring the payments down! £157 a month every month is too high.	Christchurch	Non-claimant
I disagree with this because the issue of eligibility for Council Tax support is not necessarily clear, nor explained in a timely manner to individuals. They may not (as was my own case) be fully aware of or misunderstand their entitlement for Council Tax Support for reasons that they were never properly advised by the benefits authorities or by the Council. Essentially, limiting backdating to a month rather than 6 months allows the Council to profit by limiting its liability for reimbursing monies already paid that should not have been paid in the first place, maybe arising from a lack of education/accurate information on the matter. I will add that the default argument of checking with the CAB, a charity which is not always correct in matters of benefits legislation is a weak one. It strikes me that proposal C is a vehicle to keep money that should have not been paid out in the first place. If the situation was reversed and the Council had been paying out to a claimant for 6 months and wanted to claw back money they would be looking at the whole 6 months and not one month. This proposal risks censure for hypocrisy as a means of retaining monies that it should never have received in the first place had the claimant been properly advised to take immediate action upon the change of their circumstances. It is completely disingenuous to make the assumption that claimants are well versed in the arcane details of the benefits system when a lack of proper advice may often be the root cause of why they did not apply earlier.	Bournemouth	Claimant
I did not realise claims could be backdated even though I receive council tax reduction / support.	Bournemouth	Claimant
If someone can provide proof of why they are claiming late, the backdate should not be limited.	Bournemouth	Claimant
Back dating is good otherwise it leads hardship when not corrected.	Bournemouth	Claimant
I found my benefits took a lot longer to sort and one type took the recommended 13 weeks.	Poole	Claimant
It may affect me if my savings were to fluctuate over the £16k threshold as my income from benefits has historically made them do in the past. I am on income-related ESA and DWP are reviewing my finances (six months' worth) in November this year.	Poole	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
I suppose anything new can create an unknown situation.	Christchurch	Claimant
I have repeatedly had issues that have taken months to resolve one current e.g. Six months if I achieve judgment and expect payment from the start of the application not one month's back pay.	Bournemouth	Claimant
People need to take responsibility for making the claims from which they will benefit in a timely manner or one might question the real need for the claim.	Bournemouth	Non-claimant

Don't know what the outcome would be.	Bournemouth	Claimant
Working age people often caught between jobs, moving home due to work, awaiting wages or benefits, will surely suffer due to such limitations. This can invariably tilt family economics/individuals too very adversely. Severe risk of person losing home, unable to rent etc. low-income family are at high risk.	Poole	Claimant
If you notify changes in circumstances immediately, no need to pay out overpayments after one month.	Poole	Claimant
Process takes a long time, still need the money to pay of the bills that are accumulating during this time.	Poole	Claimant
A family may have an ongoing problem so they may lose out.	Bournemouth	Claimant
I am single and I am sick.	Bournemouth	Claimant
One month to reclaim sometimes is not enough (waiting on return of letters, phone calls etc) E.g. you are extremely lucky if you can ever get through to the council by phone or email. Takes them a month or more to acknowledge receipt of letters etc.	Bournemouth	Claimant
DWP and any others like tax credits, housing council tax can take longer than 1 month to sort things out so I think it should 3 months.	Bournemouth	Claimant
You should not limit back dating, you should give people what they are entitled to.	Bournemouth	Claimant
Shorter back dating period, two or three weeks, avoid money hardship.	Poole	Claimant
I didn't know when I moved to Bournemouth that I had to make a new claim and was only months later I received a council tax bill and realised that I now had to pay for the month I hadn't applied. This knowledge should be available to all but no-one tells you about it and if you've not moved before, how are you supposed to know.	Bournemouth	Unknown

Additional comments about Proposal D

You can't punish people for being poor in band c.	Christchurch	Claimant
The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
You work it out.	Bournemouth	Claimant
Band C is average home it still has people in poverty day by day. People can have no to little income, you would put them liable for Council Tax whilst DWP balls up benefits, it's unfair.	Poole	Claimant
People who are in need of help should receive it - you are paying people with plenty of money and then taking it back off people who are really desperate - what sense is there in this? The government should not bring itself into disrepute by enforcing blanket policies, while claiming to pass them off as reforms.	Christchurch	Claimant
I assume if someone can afford to buy/rent a band D+ property they can probably afford the associated council tax.	Poole	Claimant
Having said does not apply to us, it may be depending on the band of different property as we are supposed to be moving.	Poole	Claimant
I live in a house in band D but need to use the living room as my bedroom as I can no longer manage stairs. The fact that I have the use of bedrooms upstairs is irrelevant as its not practical for me in terms of my disability.	Christchurch	Claimant
Don't understand it.	Bournemouth	Claimant
It would be fair to give that band C support to band D and above, not to just deny support to those groups.	Poole	Claimant
There seems to be no change for Bournemouth, which is why I agree.	Bournemouth	Non-claimant
This would help me a lot as I am in band B at present.	Poole	Claimant
I can understand why this applies in Bournemouth and Poole as your social housing areas are atrocious however why should Christchurch be penalised for being a more pleasant environment. There is social housing within band D in Christchurch and this would be highly unfair.	Christchurch	Claimant
It will not affect me personally because Bournemouth already does this but if existing claims in other bands have their support capped at a lower rate this could mean they need to find that they will struggle to cover the extra amounts they may need to pay and this could affect their family life.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only	Poole	Unknown

needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.		
If I ever end up in an unprotected group I will always have the disabilities I have I am band C. I am a working age though I cannot work and hence it would affect me if the rules changed! It would be unfair as I am totally unemployable! Perhaps you ought to look at people's prospects to actually get a job and / or pay it in the first place in reality!	Christchurch	Claimant
Someone live in band C accommodation should not be receiving any support.	Bournemouth	Claimant
Why make the poor pay for the rich? The highest concentration of income from council tax is from the densely populated poor areas. Yet the largest amount of money spent on maintenance is on the sparsely populated low density rich areas. Why should the poor pay for the rich? Make the rich pay for the rich! Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
I am a Band B resident.	Poole	Claimant
Unfair.	Bournemouth	Claimant
I think that all three should be the same.	Bournemouth	Claimant
If applicant has to claim but has lived in current property for more than two years, don't penalise for at least the first two years of claim, this gives time for applicant to downsize.	Poole	Non-claimant
NO NO NO you should pay council tax in accordance to the levy due to be paid on the accommodation you reside in.	Christchurch	Non-claimant
This is a very helpful proposal.	Poole	Claimant
Rules must be fair to the people who have to pay the full amount!	Poole	Non-claimant
Higher house prices, reflects more bedrooms and more rooms in the houses so agree that they shouldn't get a reduced amount as they may have excess space.	Christchurch	Claimant
Again, I think the rules should be the same for all areas. I do see that it might make a big difference to a certain number of residents in Christchurch, however if they find it difficult to pay the extra the document does state that support may be considered for individual cases. I don't know whether the people in these larger homes have more financial security, but the council needs all the income it can get without jeopardising anyone's ability to support themselves and I hope the extra money will be put to good use in the community.	Bournemouth	Claimant
Anything in council tax bands d and e should have enough income.	Bournemouth	Claimant

If any help can be given to support those on low incomes then that is good. Capping at Band C seems a fair option.	Bournemouth	Claimant
This would have a very direct effect on claimants not in a protected group. Council Tax Benefit should stay the same as now to cover the rent of working age claimants. I am not sure about the law regarding mortgage payments but, at least the interest should be covered to prevent homelessness which is more expensive.	Bournemouth	Claimant
What with people who live in other properties and need help? They will not get help so then they will have to move out to get help. Which could be impossible as moving out costs a lot and you need good earnings to find something new. Which will be closed circle for those people. In my view everyone should be entitled to get help if they need it.	Bournemouth	Claimant
I don't know what band c is.	Christchurch	Claimant
I feel that some households have large incomes and have overdeveloped their properties therefore these people should pay more, this will help the council with the support bills.	Bournemouth	Claimant
If you can afford a bigger and better house you can afford more money than other people to pay for the services of the borough.	Christchurch	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
Do you really care or is this just a legal necessity?	Poole	Non-claimant
Not everybody in council tax band D and above, have pots of money in fact their property may be their only asset.	Bournemouth	Claimant
Would put price up for everyone else - not fair.	Bournemouth	Non-claimant
Again, I think setting an arbitrary figure without reference to the actual earnings of working age residents could easily give rise to actual hardship for some residents on low/minimal income. A mechanism needs to be put in place to allow some flexibility/discretion having regard to any individual's ability to pay to avoid a repressive tax regime hurting the poorest in society, simply because they are not in a protected group. I make the assumption that you are using the term "protected group" within the meaning of the Equality Act 2010 (although this is not clear from your supporting documentation). If this is so, then in some respects it is a pretty stupid definition to use in the context of the ability to pay, since other than for the "disabled" (where there are ample [and publicly available] correlation statistics linking disability of individuals to poverty [and child poverty] in the UK). Conversely, there is no direct correlation between the ability to earn (and consequently pay	Bournemouth	Claimant

Council Tax) when considering race, sexual orientation etc; since these are characteristics which have no bearing on earnings and hence the ability to pay any particular charge without said charge running the risk of creating hardship as to the ability to pay, and for the associated economic oppression on said individual arising from any actions from the Council in pursuing such debts. As not many people fall into this category, and that the sums involved from the Council's point of view are relatively modest, I think this arbitrary limit should be ignored and instead reference be made to the actual disposable income of the claimants.		
I think each person should be assessed individually (means tested?)	Bournemouth	Claimant
If someone is living in a home banded C or higher which is rented, and their financial circumstances deteriorate, are they supposed to move to a rental which is banded B or A? There is very high demand for such rental properties in this area, so that could not be possible to do.	Bournemouth	Claimant
I'm confused!	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
If people can afford to live in residency above band C then one presumes they can afford or should budget for the tax it attracts.	Bournemouth	Non-claimant
Don't know what the outcome would be.	Bournemouth	Claimant
Not clear how this cap impacts/affects people.	Poole	Claimant
Yes, as long as people can afford the amount that is set out.	Bournemouth	Claimant
The larger the residence or area of residence, the more you need to pay.	Bournemouth	Claimant

Additional comments about Proposal E

There has to be a minimum where costing overtakes the amount of work involved. I would suggest that small amounts could be paid yearly.	Bournemouth	Claimant
The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
Should be more.	Other	Non-claimant
Pathetically low considering the rip off Council Tax is.	Poole	Claimant
Confused!	Poole	Claimant
OK, what the heck can people do with 50p?	Christchurch	Claimant
This makes sense. Anything under 50p isn't going to really affect people's finances dramatically (like a 20p reduction).	Poole	Claimant
Don't send out letters costing MORE than 50p to notify people either.	Bournemouth	Claimant
To be fair 50p is nothing in this day and age. Whether claimants get it or not is not going to make much difference unless it registers that their getting it and enables them to claim other benefits because of it	Bournemouth	Claimant
There seems to be no change for Bournemouth, which is why I agree.	Bournemouth	Non-claimant
I live in Bournemouth and that is already in place there.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
If local Govt. can afford to spend money on white elephants i.e. Imax, surf reef, two unnecessary structures opp. the Sovereign centre back in the day, they should be held accountable and not try to claw back the money as proposed.	Bournemouth	Claimant

I think it is useful to provide a 50p amount to keep people on benefits where fair! However, I see this being abused by the department to stop paying out a lot more money where it is needed!	Christchurch	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
50p is a lot for someone on u/c especially if they have been sanctioned!	Bournemouth	Claimant
Some people need more help.	Poole	Non-claimant
My god are you deranged. this exactly what I'm on about. the rich will benefit not the poor that will have to find it.	Poole	Unknown
Not really sure a payment of £2 a month will be worth the procedure of claiming!	Bournemouth	Claimant
Rules should be fair to the people who have to pay the full amount!	Poole	Non-claimant
Minimum should be set at £5 per week.	Christchurch	Claimant
I think it probably costs more to apply a reduction under 50p than it does cost the council to actually pay it. I am in receipt of certain benefits and I would not mind losing 50p. It does seem hard to justify paying out less than fifty pence.	Bournemouth	Claimant
Agree with this policy.	Bournemouth	Claimant
Not clear of the implications.	Bournemouth	Claimant
I simply could not imagine a minimum weekly payment of 50p meaning anything. Either a claimant has a claim or they have not. I will cost more to administer than the value of the award.	Bournemouth	Claimant
What good is 50p to anyone?	Christchurch	Claimant
Only in future if circumstances change.	Poole	Claimant
Amount too low.	Poole	Claimant
Waste of office costs/postage etc.	Bournemouth	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant

I think anyone entitled to £1/month should still gain the benefits of the fact that they are on a fairly low income. I doubt it would affect me much but a family on a fairly low income may be entitled to an access to leisure card, which may make a big difference to them. I would make the minimum 25p.	Poole	Claimant
£1 would be a more practical level.	Bournemouth	Non-claimant
50p is ok I think?	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
Too costly to administer - choose a higher minimum.	Bournemouth	Non-claimant
Don't know what the outcome would be.	Bournemouth	Claimant
I suspect these are small entitlements which is not a huge dent to council coffers, hence should be awarded to the local residents.	Poole	Claimant
One pay more now £20 per month. 50p a week = £200 months, I'm paying £20.	Poole	Claimant
50p to people on low income is a lot of money to lose. Can buy a loaf of bread with it etc. Will increase use at food banks who currently can't manage the demand.	Poole	Claimant
I have no understanding of this 50p of what amount, how long is a piece of string?	Bournemouth	Claimant
Does not justify administration. Donate to charity/homeless.	Bournemouth	Claimant
I don't understand it!	Bournemouth	Claimant

Additional comments about Proposal F

The Unitary Authority has to be seen to be fair, as a majority of claimants would not be affected by the change it would be justifiable for the authority to bring all residents in line with the majority. As a Bournemouth Resident (in a Protected Group) I am already subject to this under the current scheme so I would not be affected by this change.	Bournemouth	Claimant
Could affect me in the future.	Poole	Claimant
Again, too many in poverty, too many with nil or too low income and DWP no use!	Poole	Claimant
Everyone should have the right to be treated individually and not considered to be 'attached' to someone else.	Christchurch	Claimant
Will this depend on the employment/parental/marital/disability status of the 2nd adult?	Poole	Claimant
Never understood why there was a second adult rebate when earning.	Poole	Claimant
Utterly ridiculous in the first place surely.	Bournemouth	Claimant
Rebates should be given even if two or one adults. If it's been paid and should be rebated then how many adults shouldn't make a difference if they are entitled to it.	Bournemouth	Claimant
There seems to be no change for Bournemouth, which is why I agree.	Bournemouth	Non-claimant
I am single so the 25% reduction stays but why should couples get an extra reduction for a 2nd person when they have 2 wages coming into the household unless 1 of them is in the protected groups as listed in the written document.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
Why should a couple without children pay twice when they live in the same household? Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant

If the vulnerable person lived on their own they would receive a full rebate. Not only do family carers save the state money caring for vulnerable loved ones it costs them financially.	Poole	Non-claimant
Your nothing but thieves.	Poole	Unknown
Rules must be fair for the people who pay the full amount!	Poole	Non-claimant
I live alone so more difficult to comment on this.	Bournemouth	Claimant
It appears not too many families would be impacted with this policy.	Bournemouth	Claimant
As a single claimant this proposal would not affect me at all. For those with partners I would have thought that the Second Adult Rebate was an essential income to prevent homelessness and enable families to get out of poverty.	Bournemouth	Claimant
Why shouldn't a second adult receive a rebate.	Christchurch	Claimant
All people should be treated as equal with reference to age, only abilities to work due to disabilities should be considered.	Bournemouth	Claimant
I no longer have a dependant living with me. My Daughter lives overseas.	Bournemouth	Claimant
This will affect a large number of families who currently receive the rebate.	Bournemouth	Claimant
Second adult is disabled, we would lose that benefit.	Poole	Claimant
Surely if the first person does not qualify for Council Tax Support then having another earner in the family/household should have no effect on this.	Bournemouth	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
Basic common sense.	Poole	Non-claimant
Of course, the problem is every case is different.	Bournemouth	Claimant
I do not think this question applies to me being a single person living alone.	Bournemouth	Claimant
I may need to live in a flat share so this would affect me.	Bournemouth	Claimant
There should be a second adult rebate, why not?	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant

Don't know what the outcome would be.	Bournemouth	Claimant
Worried that my children when they finish studies may be targeted by this while looking for jobs. Many families would be similarly affected - placing them under severe financial strain. It's like the council doing best to break-up families.	Poole	Claimant
Live by myself.	Poole	Claimant
Yet again more cuts for people on low incomes.	Poole	Claimant
I am confused does this mean one parent families?	Bournemouth	Claimant
Fall in line with Bournemouth and Poole Council but I do think every person in their own right should receive discounts if they're eligible for them. Their own circumstances force them to live with others.	Bournemouth	Claimant
Why is Christchurch different from Bournemouth and Poole?	Bournemouth	Claimant
They may be working less hours than others.	Bournemouth	Claimant

Additional comments about Proposal G

Unfair.	Christchurch	Claimant
As a Single Person with no Dependent Children I would not be affected by this change. However, I feel that the authority would be justified in bringing the rules in line with those of Housing Benefit (LHA) as it would make the process the same across all of the authorities benefit schemes.	Bournemouth	Claimant
No no no! Totally unfair!	Bournemouth	Claimant
It's wrong, on top of Gov austerity and poverty for so many!	Poole	Claimant
This limiting the amount of children thing - who invented that? Surely it is not the children's fault, so how can you possibly blame them? I see, because they do not have a vote, so they are not someone you are too bothered about. I think the way this Tory government has 'reforming' the welfare system has brought us to a newly bad place and it could have been avoided by taxing the people with plenty of money. Instead, you have chosen to take that money from the poorest because it is easier and people will remember this for a long time.	Christchurch	Claimant
This will affect and penalise any family of multiple (twins, triplets etc) this should be limited per birth and not per child as women cannot physically control the number of children they birth at one time and therefore should not be put under extra strain considering it is already difficult with the expense of having multiples already by with limited work and in some cases disability.	Poole	Claimant
Not everyone who has 2 or more children does so by choice. Perhaps an income-based version of a cap could work better.	Poole	Claimant
Well we can't have people on low incomes breeding can we!! Absolutely disgusting. And what happens if you have triplets, or two sets of twins, or 'an accident'? Again. we are human beings, not animals.	Bournemouth	Claimant
No children.	Bournemouth	Claimant
Children do not pay council tax. They do not need council tax support. Why are children considered at all?	Poole	Claimant
I am single but again for far too long people have fleeced the system and just because they have more than 2 children it does not mean they should continue getting lots of extra help that other families with only 2 children do not receive	Bournemouth	Claimant
Apply this to new born only - not families making claims with existing 2 plus dependents.	Christchurch	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or	Poole	Unknown

even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.		
You should be able to show the reality of the size of your family even if the rates remain the same! Align it with Working Tax Credits.	Christchurch	Claimant
We have no children.	Bournemouth	Claimant
The cost of children needs to be considered by all parents. Not only personally but the cost to education, medical treatment, etc	Bournemouth	Claimant
I have children and don't think we should penalise anyone with more than kids	Bournemouth	Claimant
Why should childless singles and couples pay for other people's children. Make them pay for their own or make condoms cheaper and more easily available for ALL ages Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
Very unfair on poor.	Bournemouth	Claimant
They decide to have them.	Poole	Claimant
We need children.	Poole	Non-claimant
Thankfully I don't have children mine have all grown up, but families are struggling already and it's not the child's fault if they are born into a family and in poverty. This will be detrimental to families who may wish to have additional children. Children should be valued in our society and we already have a problem with the aging population, if people are deterred from having children this will only aggravate this problem.	Bournemouth	Non-claimant
That makes no sense if the family has more than two children.	Poole	Non-claimant
Bring in line with child benefit.	Poole	Non-claimant
Generallythis will affect me as if you give discounts to somepeople who pay full council tax will have to pay moreto make up the shortfall	Christchurch	Non-claimant
Pregnancy can happen by accident. Look at their income first.	Poole	Claimant
Have you reading the same bunth I am. stinking Tories.	Poole	Unknown
Rules should be fair to the people that pay the full amount!	Poole	Non-claimant

This will create more child poverty and anti-social behaviour in the long term.	Bournemouth	Non-claimant
Agree bigger households shouldn't mean more discount is automatically given.	Christchurch	Claimant
I don't have children so I'm not sure how much impact this would have on families?	Bournemouth	Claimant
We only have 2 children with no plans for more. So yes, Supporting the maximum of 2 children in line with other benefits seems totally reasonable.	Bournemouth	Claimant
I do not have children but for those who do each child should be covered in Council Tax Support.	Bournemouth	Claimant
This is not fair. Government already cut support for more children which put a lot of families in poverty. This will just push them in to homeless state. It is horrible thing to do to make innocent children suffer to save some pennies.	Bournemouth	Claimant
I think the more children there is in a family the more help they need.	Christchurch	Claimant
It's not really fair as some families will struggle. An in depth look into family income should be made as some households could probably manage without the assistance.	Bournemouth	Claimant
People should be made to take responsibility if they decide to have large families rather than depending on the rest of the community to fund and support them. Long past the time for using children to claim benefits/housing/etc.	Bournemouth	Claimant
That would have a significant impact on families with more than 2 children as It could lead to further situations of deprivation where families do not meet your criteria for discounts.	Poole	Non-claimant
This is fair.	Poole	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
If they cannot afford to raise more than two without taxpayers' support, then go celibate.	Poole	Non-claimant
I think this may help, in reducing how many children people may have. For some it's a meal ticket.	Bournemouth	Claimant
This is a pretext proposal to limit the liability of the Council towards low income young families when it will most likely create hardship and child poverty for some of the most financially vulnerable, just so the Council can save some money on liabilities. The parallel and excuse for streamlining this proposal by analogy with the Housing Benefit rules, which have no direct link to the rules for Council Tax support (being entirely separate legislation) is an ill-disguised attempt to reduce costs at the expense of low income families. Given that the government expresses concern at an aging population, you should be	Bournemouth	Claimant

encouraging larger families rather than seeking to restrict the poor from having larger families on the basis of economic sanctions for having more than two children.		
I'm alone with my twins.	Bournemouth	Claimant
Everyone should be treated equally.	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
Don't know what the outcome would be.	Bournemouth	Claimant
Every family with more than 2 children are going to be severely affected, finances for a low-income family will definitely face severe strain. All this because of a dodgy merger of councils at something £42 million? (heard such cost figure in media). It would be better to distribute their funds to local councils that were stripped of their funds due to austerity measures, which didn't work anyway.	Poole	Claimant
No kids.	Poole	Claimant
Child poverty.	Poole	Claimant
I am single, I live alone in a one-bedroom apartment. For a bit family of working age, this will be a good move.	Bournemouth	Claimant
Not quite sure how it's fair to restrict a family to 2 children or where to draw a line.	Bournemouth	Claimant
You can't dictate on how many children a couple choose to have.	Bournemouth	Claimant
Our family have all grown up	Poole	Non-claimant

Additional comments about Proposal H

Not knowing what these are, I can't say.	Bournemouth	Claimant
I feel that the authority would be justified in bringing the rules in line with those of Housing Benefit (LHA) as it would make the process the same across all of the authorities benefit schemes.	Bournemouth	Claimant
Another example of taking money away from people who aren't in a position to argue back. How would you feel if they did this to you? You act like the country is on the verge of bankruptcy all the time, when there is plenty of money in the system. What is going on? People want to know.	Christchurch	Claimant
Good.	Bournemouth	Claimant
These are not payments claimant intended to get. More through unfortunate circumstances so shouldn't be taken into account.	Bournemouth	Claimant
Bereavement Support Payment is very important at a sad and difficult time for people.	Bournemouth	Non-claimant
I am not in these groups but they should continue getting their help because of the group they are in.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
My son works but would never be able to afford funeral costs etc! People on the net are beginning to advertise their inability to pay for funerals! It should be a legal mandatory obligation for you to help out in every case and only expect repayment if over a certain amount in salary is available!	Christchurch	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
During times of stress people need more leniency.	Bournemouth	Claimant

Why should those who are already suffering be made to suffer more?	Poole	Claimant
I didn't get bereavement support. One exemption, the death of a baby or victim of murder.	Poole	Claimant
Do you know what a funeral costs? I have just buried my sister .and the cheapest was 3500 and the peanuts you call help goes no were. . a country wide strike is needed and you lot can empty your own bin. Strike is what we want.	Poole	Unknown
Rules must be fair to the people that have to pay the full amount!	Poole	Non-claimant
I think this means that people would not be assessed and charged on the extra income provided by these support payments? If that is the case then I agree with this.	Bournemouth	Claimant
I have been seriously unwell with cancer for a long period without being able to take up employment or to save. I do not have any savings and, for people like myself, the Bereavement Support Payment is critical. I have known people with infected blood who have needed financial support just to get by. I think that both of these financial support payments should continue.	Bournemouth	Claimant
Funerals are so expensive. If anyone of my family would die we could not afford it. People on benefits don't have savings to pay.	Bournemouth	Claimant
Everyone should be entitled.	Christchurch	Claimant
Some of these people will need the help.	Bournemouth	Claimant
These payments have already been calculated to cover extra costs and so should not be reduced in paying for council tax.	Bournemouth	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
I lost my husband a few years ago, the allowance helped me through a bad time. When it happens, you need time to decide how you are going to carry on.	Bournemouth	Claimant
When I finally drop dead the council will have to pay for my disposal, I certainly cannot !!	Bournemouth	Claimant
I don't understand why people in such situations would be disregarded for receiving council tax reduction.	Bournemouth	Claimant
Times are hard and again everyone should be treated equally.	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
Please do not do it - it is wrong.	Bournemouth	Claimant

Don't know what the outcome would be.	Bournemouth	Claimant
These support payments are crucial to affected people. It has to stay, councils are cutting deeper and deeper to what result? Not certain. This will be a good time to cancel the proposal to merge councils before worse damage is done.	Poole	Claimant
Not a fair proposal.	Poole	Claimant
At the time you are trying to sort out your life with the loss of your husband and extra £'s is very welcome to reduce the stress and worry from 2 wage packets to only part-time (16 hours) money.	Bournemouth	Non-claimant
I have not got a clue, I am not a lawyer.	Bournemouth	Claimant
Some people need the bereavement support payment would if something happened to us.	Bournemouth	Claimant

Additional comments about Proposal I

A must.	Bournemouth	Claimant
I feel that the authority would be justified in bringing the rules in line with those of Housing Benefit (LHA) as it would make the process the same across all of the authorities benefit schemes.	Bournemouth	Claimant
OK, I see the point if people are living in more than one house, but what if there is a genuine reason for their absence? Again, each case should be assessed for its own merits and stop forcing people into irrational situations.	Christchurch	Claimant
Seems fair.	Bournemouth	Claimant
I think this would maybe depend on the circumstances for the absence.	Bournemouth	Non-claimant
I am on the lowest benefits and can't afford a holiday but why should people be penalised for being absent for just a couple of days.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
I have to go to hospital a lot and have had some long stays there over the years! With those on housing benefit they still have to pay the bills as you do council tax! Both should be payable where absent for health reasons especially. People need to keep their accommodation not get kicked out of it as the bills cannot be paid! That is more expensive for the state!	Christchurch	Claimant
If it ends up with a detrimental effect on benefit paid I would be opposed.	Bournemouth	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
You should not pay for empty property.	Bournemouth	Claimant
My god.	Poole	Unknown

Fair rules for the people who pay the full amount!	Poole	Non-claimant
I understand these rules and agree with them.	Bournemouth	Claimant
I assume this includes foreign holidays, and anyone who can afford more than 4 weeks per year surely has the funds and does not require subsidising by the rest of the community.	Bournemouth	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
I think people who are away from their property are not using services so should be entitled to Council Tax support. People who are unemployed may choose to do voluntary work or study away from home, both of which would make them more employable. They should not be discouraged from doing this by losing Council Tax support.	Poole	Claimant
Again, you are conflating matters on Council tax support with an entirely different set of rules - that for Housing benefit. If for some reason someone had to go abroad for 6 weeks - perhaps a serious family matter are you seriously suggesting that upon their return they should owe the Council a backdated two weeks of Council Tax, and have to go through the rigmarole of reapplying for Local Council Tax support? This is just another conflation with other benefit laws to seek to justify a limitation of liability - in this case probably fairly rarely - but nonetheless an artificial argument for the Council to obtain a financial benefit for itself by reducing the existing rights of the claimants at the expense of the most financially vulnerable in the community.	Bournemouth	Claimant
I agree, unless you have to be absent due to medical treatments that are outside UK.	Bournemouth	Claimant
There are many reasons why someone might have to be temporarily absent from their main home, for instance to provide free care to a friend or relative, and I do not see why this should be penalised.	Bournemouth	Claimant
Unless someone is in hospital or caring for some elsewhere, no homes should be empty at all unless in dis-repair.	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
But for myself a lot.	Bournemouth	Unknown
Dorset is a rich area. Most folk cannot afford X1 homes. Four weeks is more than adequate grace - thank you.	Bournemouth	Claimant
Surely there are certain individuals who have for beneficial means been relocated for periods elsewhere but have to keep their main residence? Just because they are somewhere else does not mean they are any more affluent to pay.	Bournemouth	Claimant

Don't know what the outcome would be.	Bournemouth	Claimant
Do not understand how drastic the impact would be on anyone. From your notes it appears to be drastic and make big difference negatively to claimants. The 13 weeks rule must be brought into effect.	Poole	Claimant
If I may say, layman's terms please - I did not go to Oxford.	Bournemouth	Claimant
Consistency and fairness.	Bournemouth	Claimant
If I'm absent for a length of time I shouldn't have to pay anything towards a council that gives nothing anyway.	Bournemouth	Claimant

Additional comments about Proposal J

It's quite hard to work out what the income of someone who is self-employed will earn. Obviously previous accounts should be taken into account and a figure agreed between the 2 parties with any over-payment or underpayment be sorted at the end of the year.	Bournemouth	Claimant
I feel that the authority would be justified in bringing the rules in line with those of other Benefits as it would make the process the same across all of the authorities benefit schemes.	Bournemouth	Claimant
Too much pressure on individual triers.	Poole	Claimant
This is the first balanced proposal you have issued in this whole questionable scheme. Makes sense, doesn't it, that if people need help they should receive it and if they don't they shouldn't. Not just 'bash the poor', there's hope for you yet (although, in some cases, I would say this is a bit of a long shot).	Christchurch	Claimant
So, you just make it up. Helpful to those people trying to make a living independently.	Bournemouth	Claimant
This would benefit claimants who are setting up own business. So don't have to worry so much about paying until earning certain amount.	Bournemouth	Claimant
Only if the council will guarantee a minimum income for the self-employed.	Poole	Claimant
This change seems fair.	Bournemouth	Non-claimant
People who are self-employed and earning low wages should get some help juts as the rest of us can if we qualify for it.	Bournemouth	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant

As I am self-employed this one will make things hard for me if I earned below the minimum floor one month it's not fair as if I wanted to take a week of holiday or I was off with an illness this would be tough as my earnings would go down but council tax monthly payments stay the same that would make life a struggle because if you don't earn the minimum floor why should payments be set the same universal credit which I am on now do this also as you know and it's already made me financially worse of so this is the same unfair on the self-employed.	Bournemouth	Claimant
The rules must be fair to the people that have to pay the full amount!	Poole	Non-claimant
One day in the future I would like to work for myself, but I would be very worried about how I would be able to support myself as I have only ever been employed full time by others. One worry is not being able to pay council tax and rent and this is a huge barrier, so if this means more flexibility and the possibility of support due to the lower threshold then that is a good thing.	Bournemouth	Claimant
Self-employed people work extremely long hours and it is a proven fact that businesses do not make profit for at least the first three years. Whilst trying to make a company a success you will often be working longer hours, single handily for many different reasons, but more often than not because you cannot afford to pay wages to another person for their help. Self-employed people do not want to work 40+ hours a week, but it is expected when you work on your own that this will be the case. Any money that is made is often put back into the business for supplies and business growth. Many new businesses take loans from banks which need to be paid back monthly before your own wages are taken. If you were also having to pay yourself for working 60+ hours a week how would you ever make a business a success? Most self-employed people take their wage from what is left after supplies, company bills, workshop rent etc have been paid. If you were to ensure that self-employed people were paid minimum wage, it would be taking money away from many businesses and they would not be able to get up and running. It's true the first year of business is the hardest but perhaps you should introduce the floor after 5 years, give businesses a chance or a cap on hours worked? Please remember self-employed people work night and day on their businesses, if not manufacturing their sellable goods but often doing their own paperwork, administration and sales. Surely this cap would lead to people saying they work less hours than they actually do?	Bournemouth	Claimant
It seems unfair that self-employed people may be penalised	Bournemouth	Claimant
As long as a claimant's income does not fall below a certain limit a self-employed person should be paid up to that limit.	Bournemouth	Claimant
A good idea for some trades hitting tough times due to weather or general shortage of work, but again a careful monitoring of each case should take place to ensure nobody takes advantage of the scheme.	Bournemouth	Claimant
Should be a period of time when new registered self-employed people have no minimum income request.	Poole	Claimant
This is important.	Poole	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we	Poole	Non-claimant

should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.		
I am considering self-employment as a health condition limits the hours I can work and I can work when I am well and rest when I am not. I have no skills that I can charge a lot for so I am likely to be needing council Tax support. I think for anyone with a health condition trying to run their own business it would be an additional worry that they would have to pay Council tax based on an income they may not always be able to achieve.	Poole	Claimant
Refer to my Proposal A comments - 'Black Economy'. Don't set it too low.	Poole	Non-claimant
No. This is an entirely arbitrary notional minimum income without any basis in reality. You need to be looking at actual earnings rather than a fictional assumed level of earning that may or may not be a fair reflection of the income status of a claimant. A claimant having been self-employed for one year can evidence this from accounts, bank statements and the like, but having an arbitrary minimum income is making assumptions outside of reality. To conflate this proposal as being valid simply because the rules for Universal Credit use it does not make for a good argument, particularly as the Universal Credit rules have come under serious criticism as to the negative impact on claimants over previous benefit regimes. To take badly drafted, and ill thought out regulations as the basis for conflating those rules with your proposals is not a sound basis for decision making. You should be looking at the actual income, not guessing with an arbitrary value that has no direct connection with the reality for the claimant. That is a fast way to creating injustice.	Bournemouth	Claimant
I believe I am in the system this question refers to, i.e., universal credit, council tax support, self-employed on low income.	Bournemouth	Claimant
The actual income of the self-employed person should be used to calculate their council tax bill, not an imaginary amount based on the minimum wage. I believe this will put people off from starting their own business, and/or put entrepreneurs at risk of homelessness. .	Bournemouth	Claimant
Although I am of working age, I am severely disabled and cannot work, I need most of my money for care. I do volunteer work...	Bournemouth	Claimant
Don't know what the outcome would be.	Bournemouth	Claimant
I think actual income to be taken into account for council tax calculations. Minimum income floor may affect those on a few days' work etc. Unable to comment/understand without actual figures.	Poole	Claimant
When persons are self-employed, work is not always there so monies can be up and down.	Bournemouth	Claimant
Consideration for self-employed.	Bournemouth	Claimant
Why pick on the self-employed it should be the same.	Bournemouth	Claimant

Additional comments about Proposal K

At this present moment in time I am not subject to Universal Credit regulations, however, I feel that the authority would be justified in bringing the rules in line with those of Universal Credit as it would make the process the same across all of the authorities benefit schemes.	Bournemouth	Claimant
Crystal ball?	Other	Non-claimant
As universal credit is applied in real time it should be monitored more frequently as that helps people whose income can drop but also checks if people's income increases and this would help stop people getting into financial difficulty quicker.	Poole	Claimant
People with mental and physical health problems don't just all of a sudden change in 26 weeks or 52 weeks mental health and most physical is life time and having assessments are really stressful and make a lot of anxiety.	Bournemouth	Claimant
I don't want anyone having any benefit or council tax support removed. We see far too many deliberate errors by DWP don't start Council Tax issues.	Poole	Claimant
Have a period that is fixed will disadvantage people who have a genuine change in circumstance and need more support such as losing a job or partner vacates.	Bournemouth	Non-claimant
Doesn't affect us yet but probably will in the future. I think yearly assessments make sense on the real time information.	Bournemouth	Claimant
I'm Disabled & cannot work!	Poole	Claimant
Every year we are assessed for Council Tax, Tax, Working Tax Credits and such like. This is in line with the regular tax year. I agree with this period because it should be up to everyone to disclose information at the right time, but the government needs to check once a year to make sure. Anything else seems a bit patronising - as if the government does not think that people on low incomes are capable of self-assessment and need checking on more often. So, I don't know - maybe they do. It might be a good idea checking more often, or a complete administrative waste of time. So, this is an issue probably best decided by the government (so, of course, they can't decide on it).	Christchurch	Claimant
I think 52 weeks is more realistic as its also ties in with self-employed reviews and avoids a potentially un-payable bill with only 6 months' worth of collection time. Or if it is reviewed every 26 weeks, review in September for everyone on Universal Credit and then in March to tie in with the end of the tax year when everyone is naturally reviewed anyway. Although it means people may be reviewed at odd times to begin with, over the course of a few years everyone will fall into review at the same time and be recalculated at the same times. I think reviewing in set months and set times cuts down the amount of reviews at alternate times for each person and make a set review for everyone easier to calculate quicker and cut admin times.	Bournemouth	Claimant
I'm sure quarterly would be better for all involved.	Poole	Claimant
I see potential for some people to end up with arrears being owed.	Bournemouth	Claimant
Surely it could be flexible depending on the individual business, i.e. length of time established, etc. Too complicated?	Bournemouth	Claimant

It would be best to implement an assessment period monthly for the first two months & thereafter every 6 months as Universal credit at the moment is very inaccurate in the first couple of months.	Poole	Claimant
Continual re-assessing just causes bureaucracy and therefore delays, and cost to the council.	Poole	Claimant
I live in Bournemouth am already on universal credit and my benefit never changes so it will not really affect me unless things change before the proposed changes come into force.	Bournemouth	Claimant
As long as payments aren't stopped every time it's due for a renewal UNLESS someone is late returning information then I don't see it as a problem.	Christchurch	Claimant
How can anyone provide a sensible answer to this without reading the full 192 pages of the full draft Council Tax Support Scheme document? Why is each group not summarised so that the main points on how the changes will affect people in respect of their particular needs, can be easily read and digested without having to read the full document? This whole proposal smacks of another swipe at the poor, sick and disabled and how to force more of us into poverty. The failure of this report to provide a summary is an exercise in blowing smoke over the whole issue and confusing the most vulnerable in our society so that these proposals will be implemented with the least amount of complaint. As a for instance, one only needs to look at this first question. Without reading through the entire 192 pages of jargon and buzzwords, how is anyone supposed to know who is and isn't in the "protected group?" If one doesn't know who is or isn't in a protected group or even what constitutes a protected group how can you expect a meaningful answer to this or any other question? It appears that this whole merger plan is one being sought as a political decision rather than one out of necessity or for the good of residents.	Poole	Unknown
If I get pushed on to Universal Credit it will be a nightmare! I already prove my case twice a year and fight to keep it! Starting a new benefit would be madness for you and me! Besides it is a waste in administrative costs!	Christchurch	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
I do not think this will affect me as my income is likely to remain at a set rate with little or no change.	Poole	Claimant
Surely this is against the EU rules on human rights I will check this.	Poole	Unknown
The rules must be fair to the people that play the full amount!	Poole	Non-claimant
I am currently unemployed and looking for work and whilst I am still looking I want to have a steady stream of money coming into my account so that I can provide for myself and I don't want this to be affected in any way.	Bournemouth	Claimant
It is a financial and emotional burden to have your payments constantly changed. The values change often and it is hard to understand the paperwork that you send out to explain the changes. I think every 26 weeks is a good amount of time	Christchurch	Claimant

although I would worry that this time could mean a significant amount is either overpaid or owed? And this in turn could come at a particularly bad time of the year. Undecided on the best way forward.		
It seems to make sense to have Housing Benefit and Council Tax rules aligned with each other. It can be confusing and if changing some of these things makes the process easier for everybody to understand and administer it is probably a good thing, as long as it doesn't create more financial hardship for residents. It also makes sense to reduce admin time and hopefully costs will be saved there. It would seem more consistent if the customer knew they were to be paying the same every month. Would there be a refund after each assessment if the customer had paid too much?	Bournemouth	Claimant
Especially long term disabled.	Bournemouth	Claimant
UC can change your payment every month, it seems unfair if anything is recorded inaccurately or late, meaning the claimant will be liable still. This would lead to serious hardship. More consultation is needed here.	Bournemouth	Claimant
If circumstances change, this could have a huge impact for a significant length of time resulting in either a huge bill or monthly hardship. There needs to be flexibility like there was before UC.	Bournemouth	Claimant
An assessment should be carried out annually (52 weeks) to enable claimants circumstances to be reviewed on a regular basis, as they are with Direct Payments. Any less than this would be an administrative cost and could block up the system.	Bournemouth	Claimant
Twice annually will be better than on a monthly basis but still cutting down on resources. This also prevents leakage from Council tax funding.	Christchurch	Claimant
More assessment interviews causing more anxiety for people with disabilities.	Bournemouth	Claimant
I have been registered for universal credit since April but out of work since last November, I have been struggling to find suitable employment and it's not through lack of trying. I think that the longer option should be made, this will work as long as people notify the authorities as soon as they have found employment and that the wage is sufficient to survive without much difficulty.	Bournemouth	Claimant
I have mobility issues.	Bournemouth	Claimant
Claimants at supposed to continue paying rent and council tax whilst the claim is being processed. people will get into arrears if they can't afford to do so. 26 weeks is too long a time it should be at the most 6-8 weeks.	Poole	Claimant
No need to waste office/post age costs calculating every month/6 month. A 12-month review should suffice with adjustments being made for the following year and credits/debits carried forward and/or paid back/reclaimed.	Bournemouth	Claimant
It is added pressure for people, and it seems professional bodies do not consider the extra anxiety and upset filling forms and going to interviews can create. What happens if someone is disabled and you decide to conduct interviews etc will you go there? It depends if this is a scheme where you can access the information and send a letter or if you are expecting people to have to do (as an example) a 30 min journey to you at a set time that you choose, to have an interview every 26/52 weeks.	Christchurch	Claimant
I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a	Poole	Non-claimant

lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.		
I anticipate my income could vary quite considerably whether I go self-employed or get work through a temping agency. Council tax is potentially a big bill and I think people should only have to pay it if they are earning enough. Anyone who had an agency job that ended the month of the assessment would have to pay high Council tax for the next 5 months even though they were not earning.	Poole	Claimant
As someone on ESA in the support group for my disabilities I doubt that I fall into the Universal Credit regime. I don't expect any increases in my benefits will change my status, but if it did I would not want to be worrying too frequently as to whether any changes made by the government affected my entitlement under the scheme or not. I would like to know more about the process in contention. Are you saying that the Council can already deduce the level of benefits online at the moment or does it entail having to find paperwork once a year, come into the Council offices (which is not easy for me) etc? I personally prefer that the Council can make such assessments of benefit received directly with the DWP as it is much more straightforward and less stressful and burdensome to a disabled person.	Bournemouth	Claimant
Being in the system, I am assessed by the council / benefits office every March / April anyway. So, I would be happy to leave to 52 weeks.	Bournemouth	Claimant
Stability is key, assessments can be stressful.	Bournemouth	Claimant
There's nothing worse than being put under pressure.	Bournemouth	Claimant
Don't know what the outcome would be.	Bournemouth	Claimant
Not in favour of narrow periods of review, nor cost effective and maybe avoidable expenditures for council. Tw year reviews would be much better and cost-effective measure.	Poole	Claimant
In my case I suffer from P.T.S.D, PAD and CMI. All of these do affect me, so if they wish to assess me on a more regular basis - bring it on.	Bournemouth	Claimant
You will then be expected to repay any outstanding monies instantly or be threatened with court/money withdrawn - it helps nobody. Like working tax credit. A yearly assessment based on a poor year causes more hard ups.	Bournemouth	Claimant
I could not pay a big lump all in one hit.	Bournemouth	Claimant
Possible money hardships.	Poole	Claimant

All other comments or suggestions

Chase the government for funding, don't penalize people for government failings.	Christchurch	Claimant
Council tax needs to be as small as possible.	Poole	Claimant
It's difficult to come up with a plan that everyone will be happy with. As long as due care and attention is given, because circumstances are different for everyone, then things can be sorted out at the end of that period. I suppose a 26-week review but be best for the claimants who are suffering difficulties.	Bournemouth	Claimant
It is essential that residents with a recognised (in Law) long term illness or Disability are protected and I feel that the 'protected groups' definition should reflect this.	Bournemouth	Claimant
Can 3 councils collect the bins properly and fix the roads? I doubt it just more red tape and bureaucracy. Take a wage cut and do your job.	Other	Non-claimant
I think people on benefits with no income should have all of their tax covered there's no way people on benefits can afford it! Under 27+ should have a cap unless your making over x amount, I feel 27+ your more established. I think you need to look at housing tax bands ..and I think you need to look into more housing for people on benefits! Private rent and council! You can't even get a private rent place because no one takes anyone and the amount you get to rent with is not enough with how much the rent prices have gone up and you're on the list for years with council and they turn people away all the time! How can you get a job if you have no fixed address no bank account! This really affects young vulnerable people!	Bournemouth	Claimant
I would love to be a counsellor or MP.	Bournemouth	Claimant
Make sure this is in final say - DO NOT CAUSE ANY BENEFIT RECIPIENTS to end up paying Council Tax, when nil or low income, even if Protected Groups get re-assessed for benefits, it doesn't mean they suddenly have stable income, it more likely means DWP or outsource assessment companies messed up! Too many pitfalls! DO NOT EVER cause SICK / DISABLED to have to pay Council Tax when NOT working! Not even a percentage! ALL should be exempt!	Poole	Claimant
Another change into a bigger non-accountable authority. Loads of Execs at the top getting shed loads of money for doing less. Soon people will have had enough of austerity, where the poor get poorer, and the rich get richer. Sooner or later the rich will be in their conclaves, guarded 24/7, because the poor will have had enough of this 2-tier society and rise up!	Bournemouth	Claimant
You will do what is best for everyone hopefully as that is what you were elected for.	Poole	Claimant
I think considering both Bournemouth and Poole have had the most of these proposals working already it makes sense to bring it right across the board. The whole reason for combining the councils was to save money and it seems Christchurch need to come into line with everyone else.	Bournemouth	Claimant
We live in Christchurch and our rent is 790 a month - the council only pays 600. So, you do not want to know what I think of the housing benefit/council tax system...on some days can hardly walk. Yet, the government says I am fit for work. They will not give me job. What am I supposed to do? If you want to know what I think - the way the country is run now is a great big lie - there is plenty of money in the system, we could create the economic growth we need. But, greed has got into	Christchurch	Claimant

them, because the empire collapsed. Now they would have slavery back to feed their egos. These are not reforms we are witnessing today, my friend - this is a social system eating itself.		
All support/reductions etc should be income-based and make things easier for those living in in-work poverty.	Poole	Claimant
There are a significant number of pensioners who are on significantly better income than me as a disabled person. They should not be protected. It is supposed to be a means tested benefit after all.	Poole	Claimant
It's very difficult, and I understand that the council has to raise money, but I believe people would rather see non-essential services (The frippery items) being eliminated from budgets, councils have empire built for too long, Bournemouth could lead the way in reducing the council dramatically instead of this constant increase of council tax.	Bournemouth	Claimant
Seems like the people of Christchurch are being hugely penalised for a merger they did not want.	Christchurch	Claimant
20% is high if you are on bottom of income bands.	Poole	Claimant
Make more people homeless.	Bournemouth	Claimant
Make rent cheaper and to force landlords to follow the rules.	Poole	Claimant
I would like you to go back to the old system when people on Job Seekers Allowance did not have to pay ant Council Tax!	Bournemouth	Claimant
I think people who earn the most should pay a bit more towards council tax has that's only fair and people on low wages and those who are disabled or sick should still be exempt has these people have enough stress and pain already, I also think has Bournemouth is a bigger area and costs more money in sectors of the council should have a bit more of an increase in their council tax than Poole and Christchurch.	Christchurch	Claimant
I just hope Bournemouth doesn't end up supporting Poole and Christchurch.	Bournemouth	Claimant
Correct council tax so that single residents pay only 50%, rather than 75%.	Poole	Claimant
As I have already stated, I am on JSA so I do not know the impact the proposed changes will have on me until it happens.	Poole	Claimant
I think most of the options seem fair but feel if people have to struggle to find extra money for the household bills it could greatly affect the quality of life the household may have to make a lot of changes to cope with increased bill costs.	Bournemouth	Claimant
I still don't think they should merge- Christchurch residents are the only ones who are getting majorly affected from the sounds of it but what do people's opinions matter hey?	Christchurch	Claimant
Yes, bin this whole crackpot scheme tell Sajid Javid to go...and the Tories to...deliver the Brexit the people voted for. This whole scheme is one dreamt up by the EUSSR, which will give the local people less democratic say in their local area. Thatcher broke up big councils back in the 70's because they didn't work and nothing I've heard or seen so far leads me to believe this giant authority is for one, going to save money or two benefit local people. The one size fits all approach doesn't work for the EUSSR, and for an example of how that approach has had devastating effects on a local population, you only have to look at the Somerset levels, Cumbria, and York. The flooding in these areas was 100% caused by the EUSSR's "Water Framework Directive." It had nothing to do with the storms, The EUSSR decision to treat silt from the rivers as toxic waste added massively to the costs of dredging and their ban on dredging to promote the growth of marine	Poole	Unknown

life caused misery to the populations of the areas I've mentioned plus a good many more. This new unitary authority will be a complete ***** disaster for locals and this insanity needs to stop. It's not ***** broke so don't try to ***** fix it.		
Stop changing things that work, or can work better, this is all just about POWER AND MONEY. And keeping tabs on people.	Bournemouth	Non-claimant
Send me it in writing.	Christchurch	Claimant
Council tax is another con the government thought up to fiddle even more monies out of the citizens of this once proud country, like VAT etc. the money this government spends on weapons and the EU would be better spent on improving this country instead of running it into the ground and rubbing our noses into it. I could go on and on but it wouldn't do any good because all anybody in power can think about is feathering their own nests.	Poole	Non-claimant
The new council needs to bear in mind that this is a sensitive area that will effect on low income families, including working families. This would be a disincentive for the working poor. Secondly beware what you mean by the term 'fair'. Many people would see that as meaning natural justice but in my experience public bodies don't mean that. They mean, for the most part, that any changes are fair under the law or rules, so you need to be more clear what you mean by that word.	Bournemouth	Claimant
I am a Foster Carer there are no real directives for the council to adhere to. I do not receive a wage as such but am considered working. therefore, need additional help to survive. Universal credits do not work for me because the whole point of being a Foster parent is to care for children needing extra support which means me being at home.	Bournemouth	Claimant
Conservative Party...creating 1st and 3rd class society whilst creating unemployment and lining the pockets of private industry. Conservative Councils have more and more money coming in and spend less and less. Where is the money going that is not being spent! A new car councillor? Holiday in the Bahamas councillor? Going out in your yacht councillor? \$1000 for a hammer?	Poole	Claimant
Yes, I do not agree with this amalgamation with Bournemouth and Poole, with 85% of us living in Christchurch were against. We will see more cut backs in this area, to prop up the other two towns, our crime rate will sky rocket, and as for seeing a local bobby on his beat, is non-existent.....	Christchurch	Claimant
To bring the same discount of 20% across the councils is a good idea. However, for those in Christchurch who pay 8% perhaps a little leeway to adjust to a higher payment.	Bournemouth	Claimant
The application of applying for housing and council tax support is confusing enough, why change something that is no broken. This will not make it any easier to apply and cause more financial heartache for vulnerable people.	Poole	Claimant
I would like a quicker response to claims my last wage slip took two months to sort out so as with anything u need staff to be able to do this.	Poole	Claimant
BELIEVE THERE SHOULD ALWAYS BE A WAY OF HELPING SOMEONE THROUGH THE SYSTEM IF URGENT TEMPORARYSITUATION AROSE WHICH WAS CAUSING GENUINE DISTRESS.	Bournemouth	Non-claimant
All these new changes aren't good for anyone especially as it keeps going up steeply.	Bournemouth	Non-claimant

I am an NHS worker living alone. 70% of my salary goes towards rent. This leaves me very little for food and bills. Every month is a struggle to juggle between eating healthy or warming my home...I can't have both. I am 60 years old.	Bournemouth	Non-claimant
I feel everyone over the age of 18 should pay council tax. As everyone over that age use council services.	Christchurch	Non-claimant
People want to see police on the beat, public toilets opened and pest control.	Poole	Claimant
Stop wasting my time you will do it any way you thieves.	Poole	Unknown
Minimum floor for pensioners who have no other benefits.	Poole	Claimant
It is all aimed at reduction for so many groups. Focus is and should be how much they can pay. The system must be fair for the people that have to pay the full amount.	Poole	Non-claimant
I am not sure from the information you have provided as to whether these changes will impact a household where no adult is liable for Council Tax e.g. Parent in receipt of ESA support Group with severe disability premium and carer's premium, living with an adult non-dependant full time student living on SFE loans. Also, will religious groups (ministers, priests, other clergy etc) still be exempt?	Christchurch	Claimant
Getting discount on my council tax, helps me enormously, being a single parent, trying so hard to make ends meet.	Poole	Claimant
A lot of people are dependant on the council due to bad circumstances (ill health, unemployment etc) and I hope that when you consider your changes you keep these people in mind as ideally they only want to rely on these services for a limited amount of time until they are able to find a way out of dependency on the state-so please don't do anything that punishes or penalises them.	Bournemouth	Claimant
The only comments are that these are all discussed at the same time so that all changes happen together. It may mean a lot if changes for some families so maybe a time period before the new changes come out would be a good idea for people to ensure they are able to cover the increased costs associated with the individual s claims.	Christchurch	Claimant
Every bodies individual needs should be taken into consideration.	Bournemouth	Claimant
The whole UC/Income support etc fiasco has huge bearing on CTR. Until the UC system starts working properly, how can anyone trust that CTR will be calculated properly. I've tried reading the consultation document, seriously, who can understand and follow it? Other than those who wrote it or are solicitors or do that for a living.	Bournemouth	Claimant
I consider that to have one Council Tax System for the whole Authority will be fair and workable. I am concerned for families with more than two children having less income in a period where everything is more expensive, especially food, clothes, and rents. The Authority should have a mind to payments which will protect the vulnerable, prevent homelessness, which will cost more and, seek an equitable society where people feel acknowledged.	Bournemouth	Claimant
This proposal is discriminatory against families and children and it is horrible that council which already have big problem with housing and homelessness would even think of changes to make more people families homeless. Housing in Bournemouth is so expensive, agencies are very unfair and already refuse people on benefits to rent properties. Where	Bournemouth	Claimant

would we all have to go if councils will cut help more. Only streets are left unfortunately. It is very sad that peoples are getting richer and for this other people have to get poor and no one cares.		
I wish everything just stayed the same as this is all very confusing and unsettling.	Christchurch	Claimant
It is going to take a long time to change everything. However, it would be a useful if the ages of each ward should be taken into consideration in relation to fair distribution of funds in particular our ageing community to assist with our ever-increasing requirements for care.	Christchurch	Claimant
People living with disabilities are being targeted again by uncaring authority departments.	Bournemouth	Claimant
It is difficult to say about the time we will need receive some support.	Bournemouth	Non-claimant
I am a little bit concerned that the well-off people in the area (and there are plenty) will benefit from this council shake up and the people that are struggling to survive (even normal working families), will continue to suffer unless these proposals are handled with great care.	Bournemouth	Claimant
What about Disabled claimants of Council Tax Support what is to happen to them?	Bournemouth	Claimant
The complexities of the system are fully appreciated. However, the amount paid by Council taxpayers must be the same for all Councils from the beginning and not "harmonised" over a period of time. It has therefore to be ensured that amount paid in overall is sufficient to cover claims/services etc.	Christchurch	Non-claimant
The current scheme reinforces the view that the rich should be in a position to get richer whilst the poor get poorer and is grossly unfair! A cap depending on postcodes is the most ridiculous scheme I have possibly come across to date!	Bournemouth	Claimant
The protected groups are the most vulnerable and as such must continue to receive the maximum council tax support.	Bournemouth	Claimant
As stated previously, I am in receipt of PIP and ESA and this situation worries me - if it ain't broke, don't fix it????	Bournemouth	Claimant
No relief for empty homes Increase tax for 2nd homes Take account of air b n b earnings.	Bournemouth	Non-claimant
This targets the poorest in society as usual.	Poole	Claimant
This assessment should be sent to all council tax houses within the new area. Sending assessments to people restricting the income they receive is only going to have one result. Ask the people having to give the money (i.e. the tax payers) whether they agree or not.	Bournemouth	Non-claimant
Why send to recipients of support only?	Bournemouth	Non-claimant
I'm not totally sure how Universal Credit works but do the same calculations for UC also cover Council Tax Support or is the calculation duplicated by local council offices just for Council Tax Support element?	Bournemouth	Claimant
I'll just repeat that I think the backdated council tax should defiantly be limited to one month. Back dating it three years for me is just insane. I'm poor and was living in a little room I don't understand why its council taxed to being with.	Bournemouth	Non-claimant

Please ensure that you are not taking even more money from people and take into consideration the extremely high rents in the area.	Poole	Non-claimant
You have stated that UC claimants will receive CTS but you have not mentioned those that are still on legacy benefits such as ESA, will they still receive the benefit?	Poole	Claimant
This questionnaire is pitched on the assumption that the Council Tax subsidy will be implemented and I strongly disagree with it. The consultation is 'fixed' and should have allowed a respondent to disagree with the proposal and exit not force them to answer questions that assume it is already agreed. I think that this proposal will distort the market and lead to conflict between residents, between those who are receiving it and maybe not working and those that get up and go out to work watching their neighbours paying less and also having a lie-in. If a resident or house owner cannot meet the obligations (Mortgage, utility bills etc etc.) of living in that house then we should help them find accommodation that is within their means, not subsidise a situation that leads to false expectations. It is wrong to supplement central government benefits and universal credits by adding more benefits, they are either enough or not enough and we should better focus on getting central govt benefits for those on low incomes at the right level, not 'let them off the hook' by local government adding top-up benefit. This will just make the benefit system more complicated and obscure again.	Poole	Non-claimant
I would like unemployed people to be able to do work for the Council in lieu of paying Council tax. It would give them work experience and, even a small financial saving, would add to the quality of their lives.	Poole	Claimant
Devise a scheme to tax all the unwelcome 'Travellers' who illegally encamp in the area every year. My taxes should not be used to support these low-lives!	Poole	Non-claimant
Means testing is the only way forward Income fluctuates especially in the self-employed.	Bournemouth	Non-claimant
Remove student exemption.	Bournemouth	Non-claimant
I am concerned with the approach of conflating unrelated legislation to make an argument to restrict Council liability to claimants, given that the claimants for a tax support scheme are probably some of the most vulnerable in our society. It seems somewhat pernicious and self-serving on the part of the Council to the detriment of the existing rights of vulnerable members of the community. I think the Council should be more focused on the claimants ability to pay the Council tax from their income rather than operating arbitrary guidelines. Council officers should be given some latitude to make reasoned decisions based on the financial status of claimants with regard to their ability to pay rather than rely on arbitrary cut-offs.	Bournemouth	Claimant
I didn't see a category referring specifically to 65+ age group. I am concerned that limiting to Council Tax Band C will omit many retired people in homes above that banding:- 1) those 65+ who haven't as yet downsized, but much more specifically 2) those 65+ who have already moved into retirement complexes, where astonishingly the Council Tax bands can be well above Band C. I noticed an advert for a retirement 2 bedroom (generous size for the type)...with a VERY HIGH COUNCIL	Bournemouth	Non-claimant

BANDING equal to a large house in a prestigious area...which is incredible as any additional facilities provided, restaurant, hair dressing, swimming pool, have NOTHING to do with Council Provision.		
Within self-employment I suppose you include live-in landlords, renting out a room in their house to support themselves. In that case you should certainly set the minimum income rule. For me for example, at present that I have not secured a job, and I do not collect any kind of benefits, the monthly council tax represents 25% of my gross income. How I am supposed to live on what is left?? Therefore, it is a must to relate council tax to incomes!	Bournemouth	Non-claimant
I have left various comments with the questions, I will say that the walk-in centre at Bournemouth town hall is brilliant, being able to see someone and sort out a problem quickly is great.	Bournemouth	Claimant
Park home reduction as the land is owned not by the council and the council does not maintain the land.	Other	Claimant
Please stop penalizing those on low and precarious incomes and consider fair, incremental taxes for the more wealthy so that basic services are provided, as ultimately this maintains a civilised society. Please be aware that homelessness and vulnerably housed people are terrible for social health and the cost in the long term is very high indeed.	Bournemouth	Claimant
Stability is key, assessments can be stressful.	Bournemouth	Claimant
I was paying council tax for an open flat with no car park and garden. Yet other tenants in my building don't pay council tax. This is not fair.	Bournemouth	Claimant
You're a bunch of greedy *****.	Unknown	Unknown
This questionnaire is absolutely incomprehensible. I am in receipt of council tax support but I am not a council tax advisor or assessment person. I do not know to who these questions addressed to like what is the minimum contribution of 20% for the working age residents or what is 'temporary absence' rules, to who and how they apply. If you are making a questionnaire, you should explain every question in detail.	Bournemouth	Claimant
The council merger is too drastic to impose on the people of the local county. At a time of drastic changes in local hospitals, NHS, police services etc. Too much changes are detrimental to our society and health to take in. Very long-standing councils like Poole Council, active for some 768 + years must not be axed. Cut out these austerity measures - people did not vote for this. Austerity did not bring benefits.	Poole	Claimant
To save money on bus subsidies make the people of bus passed - all of them pay 50p or £1 each time they get on buses. Reading Council are trialling it. Also cut rent subsidies it's crazy £1200 pcm the council pay a large % of it in benefits don't go for high rent if you can't afford it - what a save.	Poole	Claimant
Pensioners who have large savings/pensions should be assessed and not exempt from paying full council tax fees. Yet again it's the vulnerable people who are targeted by these proposals.	Poole	Claimant
Universal Credit is the worst program that has happened. Persons need to talk to persons, I am not a robot and computers do not have feelings or compassion.	Bournemouth	Claimant
I'm afraid you have to work on a monthly basis. Use email (not letters) bite the bullet and treat everybody on an individual basis and not the easy route for you.	Bournemouth	Claimant

Stop giving foreigners council tax and housing benefit.	Bournemouth	Claimant
I have not claimed/do not claim benefits detailed in this document so know nothing of the process for making a claim. I am aware that increasing pressure for claims must be costly and hat non-claimants are required to meet these costs.	Christchurch	Non-claimant

Equality Impact Assessment Template for the BCP Programme

209

Part 1 - The Project		
Policy/Service under development/review:	Bournemouth, Christchurch and Poole Council Tax Support Scheme 2019/20	
BCP Workstream	Benefits & Revenues	
BCP Workstream Lead	Adam Richens	
Equality Impact Assessment Team:	Sam Johnson Beverly Elliott	
Date assessment started: August 2018	Date assessment completed: 05/11/18	Date approved: 13/11/18
<p>What are the aims/objectives of the policy/service?</p> <p>The Council Tax Support Scheme provides a means tested Council Tax reduction to residents. The Scheme document explains the calculation of the reduction including the means test. The Scheme aims to provide low income residents, upon receipt of a claim, a reduction to their Council Tax within Council budgets, whilst providing protection for vulnerable residents who meet the conditions defined within the ‘protected group’.</p> <p>Following public consultation in 2012 the original scheme was approved by Council in December 2012 and started from April 2013. Included in this decision was the definition of the ‘protected group’. This was decided based upon the aim of ensuring the most vulnerable in our community are protected from the Council Tax liability restriction calculations (minimum contribution), to continue to give the closest possible calculation to the amount they would have received had Council Tax Benefit continued.</p> <p>The Government prescribes the rules for claimants who have reached the State Pension Credit Qualifying Age but has devolved responsibility to Councils to define a working age Scheme. As of July 2018, there were 26,869 households receiving some level of Council Tax Support in Bournemouth, Christchurch and Poole. 47% of these are of State Pension Credit Qualifying Age and their entitlement is calculated using the Government prescribed Regulations. 53% are of working age (14,241) and of this 14,241, 8,019 meet the ‘protected group’ criteria. 47% of recipients of Council Tax Support (12,628 are State Pension Credit Qualifying Age) will continue to see no change when compared to how their Council Tax Benefit was calculated when claiming Council Tax Support which replaced it, apart from where the Government has amended the</p>		

Equality Impact Assessment Template for the BCP Programme

Part 1 - The Project

prescribed Regulations since 2013.

The proposed changes aim to amend the Council Tax Support scheme for **working age customers** only from April 2019 in line with Government Welfare Reform in Housing Benefit (HB) and continue to provide a reduction to Council Tax on a means tested basis, within Council budgets, whilst protecting vulnerable residents from the minimum contribution change, where the working age claim fits the conditions for the 'protected group'.

The conditions for the 'protected group' (also known as vulnerable group) are:

It is a working age claim and the claimant or partner is in receipt of any of the following:

- War disablement pension, war widows pension or war widows disablement pension
- Disability premium, enhanced disability premium or severe disability premium
- Disabled child premium
- Carer premium
- Support component within their employment and support allowance, or
- Universal Credit recipients, who are not pensioners, but the applicant or their partner is in receipt of an income or premium listed above.

Of the working age Council Tax Support recipients approx. 8,019 meet the 'protected group' criteria, protected from the minimum contribution changes.

The proposed changes to the **working age scheme** reflect that this will be an aligned scheme for the new Council, some of the proposals are already in place in Bournemouth, Christchurch and Poole:

- Maximum council tax support set at 80% where not in a protected group (already in place in Bournemouth & Poole)
- New entitlement (or where would have become entitled to Family Premium) on/after 1 April 2019 will not receive the family premium (already in place in Bournemouth & Poole)
- Backdating limited to up to a maximum of one calendar month (already in place in Bournemouth & Poole)
- Support capped at Council Tax Band C where not in a protected group (already in place in Bournemouth & Poole)
- Minimum weekly payment of 50p (already in place in Bournemouth & Poole)
- No working age Second Adult Rebate (already in place in Bournemouth & Poole)
- To limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for new applicants/new

Equality Impact Assessment Template for the BCP Programme

211

Part 1 - The Project	
<p>families or those who have a 3rd or subsequent child on or after 01/04/19</p> <ul style="list-style-type: none"> • Mirror the HB Bereavement Support & Infected blood schemes income rules • Mirror the HB temporary absence rules 	
What outcomes will be achieved with the new or changed policy/service?	
<p>The Council wants to achieve a fair Council Tax Support Scheme within the available budget. Customers who have reached the state pension credit qualifying age are protected from the changes by national legislation (prescribed Regulations). In addition financial protection will continue to apply to the minimum contribution for certain working age customers by maintaining the existing maximum level of Council Tax Support that can be claimed (100% of the eligible liability). This applies where it is a working age claim and the claimant or partner is in receipt of any of the following:</p> <ul style="list-style-type: none"> • War disablement pension, war widows pension or war widows disablement pension • Disability premium, enhanced disability premium or severe disability premium • Disabled child premium • Carer premium • Support component within their employment and support allowance, or • Universal Credit recipients, who are not pensioners, but the applicant or their partner is in receipt of an income or premium listed above. 	
<p>Are there any associated services, policies or procedures? S13A and Schedule 1a of the Local Government Finance Act 1992</p> <p>Council Tax Reduction Schemes (Prescribed Requirements) (England) Regulations 2012</p>	<p>Yes</p> <p>http://www.legislation.gov.uk/ukpga/1992/14/section/13A</p> <p>http://www.legislation.gov.uk/uksi/2012/2885/contents/made</p>

Equality Impact Assessment Template for the BCP Programme

Part 1 - The Project	
Please list the main people, or groups, that this policy/service is designed to benefit and any other stakeholders involved:	Liable Council Tax payers who are on a low income.
With consideration for their clients, please list any other organisations, statutory, voluntary or community that the policy/service/process will affect:	

Part 2 – Supporting Evidence¹
<p>Please list and/or link to below any recent & relevant consultation & engagement that can be used to demonstrate a clear understanding of those with a legitimate interest in the policy/service/process and the relevant findings:</p> <p>https://www.bournemouth.gov.uk/councildemocratic/GetInvolvedHaveyoursay/ConsultationTracker/Consultations/council-tax-support-consultation.aspx</p> <p>Please see attached Bournemouth, Christchurch and Poole Shadow Authority Council Tax Support Consultation Committee Report Summary December 2018.</p> <p><i>If there is insufficient consultation or engagement information please explain in the Action plan what further consultation will be undertaken, who with and how.</i></p>

212

¹ This could include: service monitoring reports, research, customer satisfaction surveys & feedback, workforce monitoring, staff surveys, opinions and information from trade unions, previous completed EIAs (including those of other organisations) feedback from focus groups & individuals or organisations representing the interests of key target groups or similar

Equality Impact Assessment Template for the BCP Programme

213

Part 2 – Supporting Evidence¹
<p>Please list or link to any relevant research, census and other evidence or information that is available and relevant to this EIA:</p> <p>Link to Government EQIA: https://www.google.co.uk/url?sa=t&rct=j&q=&esrc=s&source=web&cd=1&ved=2ahUKEwjrgonb9bzeAhULsaQKHURiAZIQFjAAegQIAxAC&url=https%3A%2F%2Fassets.publishing.service.gov.uk%2Fgovernment%2Fuploads%2Fsystem%2Fuploads%2Fattachment_data%2Ffile%2F474772%2Fhousing-benefit-abolishing-family-premium-regulations.pdf&usg=AOvVaw3gQ6efG8_esHVUIJ2DCyRu</p>
<p>Please list below any service user/employee monitoring data available and relevant to this policy/service/process and what it shows in relation to any Protected Characteristic:</p>
<p><i>If there is insufficient research and monitoring data, please explain in the Action plan what information will be gathered.</i></p>

Part 3 – Assessing the Impact by Equality Characteristic		
<p>Use the evidence to determine to the impacts, positive or negative for each Equality Characteristic listed below. Listing negative impacts will help protect the organisation from potential litigation in the future, it does not mean the policy cannot continue. <i>Click here</i> for more guidance on how to understand the impact of the service/policy/procedure against each characteristic. If the impact is not known please explain in the Action plan what steps will be taken to find out.</p>		
	Actual or potential positive outcome	Actual or potential negative outcome

Equality Impact Assessment Template for the BCP Programme

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	Actual or potential positive outcome	Actual or potential negative outcome
1. Age ²	<p>Claimants whose claim meets the criteria for meeting the qualifying age for State Pension Credit are not affected by these changes as the scheme is defined within the Prescribed Requirements rules set by Government.</p> <p>Claimants in the protected working age group will pay less Council Tax than those not in the protected group.</p> <p>The protection is similar to that given by Government previously within the Council Tax Benefit legislation.</p>	Working age claimants not in a protected group will pay more Council Tax than those in a protected group or those claims that meet the qualifying age for state pension credit.
2. Disability ³	Working age claimants who due to their disability receive one of the incomes of premiums listed in part 1, page 2 will be considered within the 'protected group'.	Working age claimants who do not meet the conditions of the protected group will be entitled to less Council Tax Support than those in the protected group.
3. Sex/Gender	None	Men and women with dependant children will be equally affected by the following proposals: New entitlements (or where would have become entitled to

² Under this characteristic, The Equality Act only applies to those over 18

³ Consider any reasonable adjustments that may need to be made to ensure fair access

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	Actual or potential positive outcome	Actual or potential negative outcome
		family premium) on/after 1 April 2019 do not receive the family premium. To limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for new applicants/new births after April 2019.
4. Gender reassignment ⁴	None	None
5. Pregnancy and Maternity	None	Women will be affected by the following proposals: New entitlement (or where would have become entitled to family premium)on/after 1 April 2019 do not receive the family premium. To limit the number of dependant children within the calculation of Council Tax Support to a maximum of two for new applicants/new births after April 2019.
6. Marriage and Civil Partnership	None	None
7. Race	None	None

⁴ Transgender refers to someone who considers that they do not identify strictly to one gender to the other, identifying themselves as neither male nor female.

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	Actual or potential positive outcome	Actual or potential negative outcome
8. Religion or Belief	None	None
9. Sexual Orientation	None	None
10. Any other factors/groups e.g. socio-economic status/carers etc. ⁵	Customers liable for Council Tax will continue to be able to apply to the Local Authority for a discretionary reduction under Section 13A(1)(c) of the 1992 Act.	Customers liable for Council Tax will continue to be able to apply to the Local Authority for a discretionary reduction under Section 13A(1)(c) of the 1992 Act.
11. Human Rights	None	None

Any policy which shows actual or potential unlawful discrimination must be stopped, removed or changed.

⁵ People on low incomes or no income, unemployed, carers, part-time, seasonal workers and shift workers

Equality Impact Assessment Template for the BCP Programme

Part 4 – Equality Impact Action Plan

Please complete this Action Plan for any negative or unknown impacts identified in the assessment table above.

Issue identified	Action required to reduce impact	Timescale	Responsible officer

217

Key contacts for further advice and guidance:

Equality & Diversity:

Sam Johnson - E&D Lead for Bournemouth & Poole	sam.johnson@bournemouth.gov.uk
Beverley Elliott – D&D Lead for Christchurch & East Dorset	belliot@christchurchandeastdorset.gov.uk
Susan Rice-Ward – E&D Lead for Dorset County Council	susan.ward@dorsetcc.gov.uk

Consultation & Research:

Lisa Stuchberry – Insight Manager for Bournemouth & Poole

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