

Thinking about the five options we have considered. To what extent do you agree that we have chosen the right option as our preferred option?

Strongly disagree.

If 'Disagree' or 'Strongly disagree' Please state your reasons and which option you would suggest should be our preferred option and why.

Z2K has carried out extensive research on the impact of the localisation of Council Tax Benefit in London. Our research has shown that the minimum payment required by the majority of London council's Council Tax Support (CTS) schemes is pushing their most deprived residents deeper into poverty. We therefore commend Kingston for supporting its poorest residents by maintaining 100% CTS for working age claimants and are pleased to see that there are, as yet, no plans to introduce a minimum payment. We do however strongly object to the proposals contained within this consultation, which amount for reducing the level of support available, particularly for working claimants.

In-work poverty is a serious problem in London. Over the ten years to 2011/12, the number people in in-work poverty increased by 440,000. Now 57% of adults and children in poverty are in working families. Proposed measure 1, increasing the taper rate and reducing the disregard for claimant's in receipt of Working Tax Credit, will significantly reduce the income of Kingston's working poor. In the case study given a working family with one child would have their annual council tax liability increase by £301.08, which amounts to more than a weeks income. Not only would such an increase have a significant impact on a low income family's standard of living, thereby pushing them deeper into poverty, it would also weaken work incentives. The Local Government Finance Act 2012 requires CTS schemes to ensure that 'work pays' but we believe that these changes could act as disincentive to working or working more hours.

Despite the fact that Kingston's CTS scheme does not have a minimum payment 910 claimants were issued with a court summons for non-payment in 2014/15. These claimants will have been working part time on a low incomes and struggling to meet their reduced council tax liability. This demonstrated that even prior to these changes a significant number of low income workers in Kingston were having difficulty paying their council tax, these proposed changes will only increase that number.

We are also concerned about the impact of these changes on children living in poverty in the borough. The proposed measures 2 and 4 (removal of family premium and applicable amounts for third and fourth children) will have detrimental effects on larger families and lone parent families – both groups already at higher risk of living in poverty. Lone parent families are more likely to be in part time work and/or on a low income, meaning that they will also be hit by proposed measure 1.

92% of lone parents are women and the removal of the family premium and applicable amounts for third and fourth children will hit BME families disproportionately as they statistically more likely to have larger families. We note that the consultation document states the council will pay due regard to its Public Sector Equality Duty when considering

these charges. So in light of these impacts on vulnerable groups, in particular BME families and women, we hope that the council will be undertaking a full and detailed equalities impact assessment before coming to a decision.

We note that the consultation document states that the proposed measures are motivated not by a desire to achieve savings but to bring Kingston's CTS scheme in-line with the national benefits system. If that is the case it should be noted that the removal of tax credits for a third or subsequent child is only for children born after April 2017. As such if the council goes ahead with these changes it would be consistent for proposed measure 4, the removal of applicable amounts for a third and fourth child, only to be introduced from April 2017 and only for children born after then.

Are there any other options you think we have not considered that we should?

We believe that Council Tax should be increased to cover any shortfall, as set out in Option 2.

To what extent do you agree or disagree with each of the proposed measures?

PROPOSED MEASURED 1 - Make changes to the way we work out how much CTRS claimants are entitled to. These will affect the CTRS components including tapers, disregards, premiums, allowances and applicable amounts.

Strongly disagree

PROPOSED MEASURED 2 - Removal of the 'Family Premium' from CTRS claimant's applicable amount for new claims and new births from April 2016.

Strongly disagree

PROPOSED MEASURED 3 - Backdating CTRS claims to 4 weeks only from 1st April 2016.

Neither agree nor disagree

PROPOSED MEASURED 4 - Removal of applicable amounts for third and subsequent children born after April 2017.

Strongly disagree

PROPOSED MEASURED 5 - There will be no eligibility for 18 to 21 year olds under CTRS from April 2017.

Strongly disagree

If you currently receive support through the CTRS, what impact will our proposals have on you?

N/A

What could we do to avoid or lessen any negative impacts?

N/A