

APPENDIX C

Part One

EQUALITY IMPACT ASSESSMENT

Name of EIA	Local Council Tax Support Scheme (LCTSS)	Is this a new policy?	Y
Service / Business Unit	Service Area	Directorate	
Benefits	Exchequer	Directorate of Finance	
Start Date	Completion Date (Expected)	Completion Date (Actual)	
July 2012	September 2012		
Lead Contact / Officer (extension)	Service Unit Manager Responsible	Publication Date	
Michelle Bowler (ext. 3567) / Joanne Davies (ext. 2243)	Louise Shaw		

Is this a Service Review EIA or a Service Delivery EIA?	Service Delivery EIA
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Name (lead contact first)	Job title	Service	EIA Trained – Y/N
Ilys Cookson	Assistant Executive Director	Exchequer	Y
Louise Shaw	Service Unit Manager	Exchequer	Y
Michelle Bowler	Operations Manager	Exchequer	Y
Joanne Davies	Team Manager	Exchequer	Y

The following supporting documents are attached;

1. Support & advice for people suffering financial difficulties (**Appendix C – Part 2**)
2. Datapack (**Appendix C – Part 3**)

Note: data on the current Council Tax Benefit caseload has been extracted from systems to support the development of this EIA. The data is based on the number claimants (liable people). Some of the data is directly related to known personal circumstances. Other data is based on information related to benefit type and / or applicable amounts and has been used to model caseload, options and impact. As such it is proxy data and indicative of the wider caseload population.

Summary Box
<p>The Government intends to introduce legislation to reduce Council Tax Benefit grant to Local Authorities (LA) by 10% from April 2013, and in addition require from the same date that each LA have designed, and have in place, either its own locally developed Council Tax Support Scheme, or use the government default national scheme, which is aligned with its Universal Credit programme.</p> <p>Using the default national scheme would give a short fall in funding in real terms of 22% (£4.2million). Tameside MBC cannot fund this 22% shortfall (£4.2m) and therefore is designing a</p>

local scheme that will meet the affordability envelope and balance the impact against the cost of providing a Local Council Tax Support Scheme (LCTSS).

The Government has mandated that people of state pension credit age are to have their current Council Tax Benefit levels protected. Furthermore, the guidance makes it clear that vulnerable groups should be protected, with the detail of any scheme being expected to be compliant with the following legislation:

- The Equality Act 2010 – Public Sector Equality Duty (PSED)
- The Child Poverty Act 2010 – duty to mitigate the effects of child poverty
- The Housing Act 1996 – duty to prevent homelessness

Similarly, Authorities are required to consider any impact in relation to the Armed Forces Covenant. These are explained in more detail in the Communities and Local Government 'Localising Support for Council Tax: Vulnerable people – key local authority duties' document, published in May 2012.

This EIA assesses our approach in developing the four proposed options outlined in the Key Decision taken on 31 July 2012. It will detail how we have complied with legislation, by offering protection to claimants of state pension credit age, offering protection to vulnerable people where the constraints of managing within a reduced budget allocation allow, and also how we can support economic growth by incentivising people back into work. All this must be achieved at a reduced cost in order to meet the £4.2 million target.

The development of the draft LCTSS will be taken forward in conjunction with the Sustainable Community Strategy and sub strategies (Housing, Homelessness, Empty Homes, Economic, Children and Young Peoples Plan).

BACKGROUND & SCOPING

Background & Scope

BACKGROUND

The Government is currently preparing legislation to introduce Local Council Tax Support Schemes (LCTSS). This includes a 10% reduction in funding to Local Authorities. The new scheme would need to be operational from April 2013 (subject to legislation coming into force). The effect of a reduction in funding in Tameside is 22% in real terms for new LCTSS, which will require some current recipients to pay more than they do now by receiving less Council Tax Benefit (CTB).

Tameside MBC cannot afford to absorb the expected 22% real terms funding shortfall (£4.2million) and will therefore construct a new scheme in consultation with residents, and other appropriate stakeholders, on how to balance the shortfall against the cost of the scheme.

Those of state pension credit age must be fully protected, as currently laid out in the draft proposed arrangements by Government.

COUNCIL TAX BENEFIT (CTB) CLIENT BASE

At present, the total CTB client base is approximately 26,500 people (based upon the number of benefit applicants / liable people). The benefit caseload is constantly changing as claimants circumstances change and people go onto / come off benefit.

Of this number, there are approximately 11,320 people of pensionable age who will be fully protected as per the Governments guidelines.

Given that these individuals (and their attendant households) will be entitled to full CTB protection, the remaining, reduced, CTB claimant base will therefore be subject to a greater degree of impact as a result of any changes. The degree to which certain groups and individuals are impacted upon will depend on the model chosen. This EIA seeks to gain an understanding of the individuals and groups affected by each component part of the scheme, to allow Elected Members and decision makers to come to a view as to which scheme becomes operational.

APPROACH TO DEVELOPING OPTIONS

The Council intends to introduce a new LCTSS with effect from the 1 April 2013. In designing the new scheme we have used a robust consultation process to gain views from stakeholders, as well as existing CTB claimant data and demographic information. The consultation will support the assessment and understanding of how the changes will impact on recipients, with a focus on those with a protected characteristic (where known).

This EIA encompasses the development of the four proposed options, of which the following elements were taken into consideration:

- Simplifying the administration process – the current council tax benefit system is complex and expensive to administer, consideration needs to be given to how the process can be simplified to reduce costs and improve the customer journey
- Offer “full” protection to vulnerable groups – measure how full protection to certain groups impacts the remainder of the claimants who do not fall into a protected category
- Offer “limited” protection to vulnerable groups – measure how limited protection to certain groups impacts the remainder of the claimants who do not fall into a protected category
- Offer “no” protection to vulnerable groups - measure how no protection spreads the maximum level of support across all claimant groups
- Offer work incentives – how does the cost of offering work incentives impact the maximum levels of support across all claimant groups
- Increase non dependant deduction
- Reduce maximum levels of capital that a claimant can have
- Which income should be taken into account for the purposes of the assessment
- Cap maximum levels of support
- Reduce taper deductions
- Remove/reduce income disregards
- Start dates of claims
- Removal of second adult rebate
- Abolish backdates
- Development of a small hardship fund to support extreme cases of financial difficulties linked to specific circumstances.

After modelling various different options, some of the elements considered were discarded as they did not add a substantial value to the financial target of £4.2 million or it would have made the administration process more complex.

The final 4 options selected for consultation meet Government requirements as stipulated above, whilst offering differing levels of support and protection to various groups. This makes the consultation process more robust as the public and stakeholders have the opportunity to tell us which principles they prefer.

OPTIONS A - D

Documented below are details of the four proposed options.

There are three common themes in all of the options. These did not form part of the consultation as there is no change to the current council tax benefit scheme:

1. Protection for all claimants who are **pensioners** (i.e. of pension credit age).
2. Continuing to disregard **war pension/war widows** pension for working age claimants.

3. Continuing to award discount for 4 weeks after starting work where a claimant has previously been **unemployed** for 26 weeks and in receipt of a qualifying pass-ported benefit.

The following three elements are common to each option which have formed part of the consultation as they are changes to the current council tax benefit scheme:

- **Removing Second Adult Rebate** – Under the current scheme Council Tax payers who are not entitled to council tax support due to their own level of income can receive support of up to 25% off their bill if they have other adults on a low income living with them. This might change so we no longer takes these people into account.
- **Abolish Backdates** – Under the current scheme, benefit is usually awarded from the date the claim is received but if the claimant can evidence they had good cause for not claiming earlier then benefit may be awarded from an earlier date. This might change so the persons claim can only start from the date they applied. Changes are proposed to this element following further analysis of the modelling and the consultation feedback. The revised approach would be to pay a benefit backdate where a claimant is already receiving a Department for Work and Pensions (DWP) benefit backdate. The start date would be aligned to the start date for the DWP backdate up to a maximum of 3 months. When a claimant is not on a DWP benefit and has certain extenuating circumstances (e.g. hospitalisation) they can apply to a hardship fund for a benefit backdate. This supports low income households by preventing shortfalls and the alignment with DWP simplifies the process cutting down on administration costs.

OPTION A

Offering protection to “vulnerable” working age people, reducing the level of support across all other client groups

This is a model that offers protection to families with children or disabled people (defined as households where at least one person is in receipt of the care component of the Disability Living Allowance). They will continue to receive the same amount of benefit under the existing CTB scheme. Under this option the maximum level of support available to everyone not protected would be 27% of their council tax, requiring the household to pay the remaining 73%.

OPTION B

Distributing the level of support across all client groups, whilst keeping the majority of the current council tax benefit principles

This option retains the elements of the existing scheme (except for backdating claims and second adult rebates which would be removed). Everyone not protected would receive a maximum level of support of 65%, requiring the household to pay the remaining 35%.

OPTION C (PREFERRED OPTION)

Distributing the level of support across all client groups, offering work incentives and some protection to vulnerable people whilst following Government recommendations to align with the Universal Credit principles

The Council's favoured option. The maximum level of support for people not protected would be 80% of band B council tax. People living in properties in band C or above would also have to pay the full difference between band B and their current band. This option links closely with the proposed Universal Credit principles, and takes into account income information.

Following the consultation work, additional data analysis and further assessment of the modelling and impact a small number of changes have been made to Option C (the Council's preferred option). The changes are summarised below.

- **Child Benefit** – do not count Child Benefit as income. This provides additional support to families and ensures that Child Benefit is not affected directly by the changes to benefit entitlement as a result of the LCTSS. 60% of respondents to the Big Conversation agreed that Child Benefit should be excluded from income.

- **Backdates** – pay a benefit backdate where a claimant is already receiving a Department for Work and Pensions (DWP) benefit backdate. The start date would be aligned to the start date for the DWP backdate up to a maximum of 3 months. When a claimant is not on a DWP benefit and has certain extenuating circumstances they can apply to a hardship fund for a benefit backdate. This supports very low income households by preventing shortfalls and the alignment with DWP simplifies the process cutting down on administration costs.

OPTION D

Total household income & capital taken into account, whilst keeping the majority of the current council tax benefit principles

The maximum level of support for people not protected by the scheme would be 73% of band B council tax. People living in properties in band C or above would also have to pay the full difference between band B and their current band. This option is based on ability to pay, and takes into account income and savings, though not the source of income through other benefits.

Anticipated impact on customer groups & rationale

TAMESIDE POPULATION – COUNCIL TAX BENEFIT CLIENT BASE

(See **Appendix 2** – Datapack)

The population of Tameside is estimated at 216,900 in the 2010 Mid-Year Population Estimate (Office for National Statistics). There are an estimated 99,552 properties in Tameside.

Age (16 and over)

- Population – 16 to 60 / over 60 – 74% / 26%
- CTB client base – 16 to 60 / over 60 – 57% / 33%

The age profile of the CTB client base has a greater proportion of older people compared than the Tameside population. Trends show an increasingly ageing population, with the percentage of the population aged over 65 years having increased by 7.4% over the last 10 years. 2011.

Gender

- Population – Male / Female – 48% / 52%
- CTB client base – Male / Female – 40% / 60%

The gender profile of the CTB client base has a greater proportion of females compared to the Tameside population.

Disability

- Population – Disabled / Not disabled – 11% / 89%
- CTB client base – Disabled / Not disabled – 21% / 79%

The disability profile of the CTB client base has a greater proportion of disabled people compared to the Tameside population. Note: receipt of incapacity and disability related benefits have been used as a proxy for disabled people within the CTB client base figures. As such the best comparison is between working age people in receipt of those benefits in the general population compared with those in the CTB client base (between ages 16 and 60).

Race

- Population – White / Non-white – 95% / 5%
- CTB client base – White / Non-white – 90% / 10%

The race profile of the CTB client base has a greater proportion of non-white people compared to the Tameside population.

Religion & belief / sexual orientation / gender re-assignment / pregnancy & maternity / marriage & civil partnership

Specific data is not available on those protected characteristics for the CTB client base.

Single People / Couples / Families

Information within Council Tax systems allows us to modelled data on family make-up. The data below is indicative and looks at family status and the breakdown between pensioners and non-pensioners.

- Single person households – approximately 14,800 (8,000 – pensioners / 6,800 – non-pensioners).
- Lone parent households – approximately 4,900 (2 – pensioners / 4,900 – non-pensioners).
- Couples with children – approximately 2,580 (120 pensioners / 2,460 – non-pensioners).
- Couples with no children – approximately 4,300 (3,200 pensioners / 1,100 – non-pensioners).

Note: of the 4,900 non-pensioner (i.e. working age) lone parent families, 94% of these are female.

Other considerations

- Economic vulnerability – 74% of the working age claimants (i.e. non-protected people below pension credit age) are out of work. For those with a disability this rises to 97% (although this is a function of incapacity / disability benefits being used as a proxy for disability).
- Carers – 434 (2%) of all claimants receive Carer's Allowance.
- Maternity – 51 (0.3%) of working age claimants receive Maternity Allowance.
- War widows – 61 (0.2%) of all claimants are war widows (of which 11 are of working age).

IMPACT ON CLIENT BASE – OPTION A – D

Tameside has approximately 26,500 claimants of Council Tax Benefit (CTB). Of these, approximately 11,300 are pensioners (i.e. reached pension credit age) and are therefore fully protected under the proposed legislation and will not see any change in their benefit entitlement. The remaining 15,200 claimants are all potentially affected by the changes proposed in the LCTSS consultation and options. The general impact will be that residents of working age will not receive the same level of CTB support as in previous years due to Government reductions in funding. This will have economic impacts on a variety of groups of people who will face additional cost pressures due to changes in benefits more generally such as the introduction of Universal Credit.

General impacts

- Pensioners – 11,300 (43%) claimants fully protected.
- Disabled – 5,700 (21%) claimants are disabled. Of these, 2,550 (45%) are pensioners so are already covered by the full protection afforded to people who have reached pension credit age. The remaining 3,150 disabled claimants will be affected. The level of impact depends on the different options. See below.

In all four options we have looked at the removal of Second Adult Rebate claims and Backdating awards.

Second Adult Rebates

There have been 215 Second Adult Rebate claims made so far within the 2012/13 financial year that would potentially save the Authority in excess of £43,000. Although research shows that 77% of these claims are made by females and 23% by males, the Second Adult Rebate claims only ask for the personal details of the 'second adult' and therefore no further breakdown of who will be affected by the removal of the scheme can be retrieved.

Backdates

There have been 175 backdated awards granted between the period April and August 2012 that would potentially save the Authority in excess of £71,000 over the financial year. Of the 175 people claiming backdates:

- 33% are single claimants
- 34% are lone parents
- 4% are couples with no children
- 29% are couples with children
- 19% who are in receipt of Income Support

- 23% who are in receipt of an unemployment benefit such as Job Seekers Allowance
- 25% who are in receipt of a sickness related benefit such as Incapacity Benefit or Employment and Support Allowance
- 15% who are in employed and in receipt of an earned income
- 1 % who are in receipt of a pregnancy related income such as Maternity Allowance
- 3% who are in receipt of a carers related benefit such as Carers Allowance
- 14% who are in receipt of "Other" income, such as Occupational Pensions, Tax Credits, Income from Boarders

The three main reasons identified for awarding a backdate are due to:

- Medical reasons
- Bereavement/family/personal issues
- Low income/financial problems

Changes are proposed to this element following further analysis of the modelling and the consultation feedback. The revised approach would be to pay a benefit backdate where a claimant is already receiving a Department for Work and Pensions (DWP) benefit backdate. The start date would be aligned to the start date for the DWP backdate up to a maximum of 3 months. When a claimant is not on a DWP benefit and has certain extenuating circumstances (e.g. hospitalisation) they can apply to a hardship fund for a benefit backdate. This supports low income households by preventing shortfalls and the alignment with DWP simplifies the process cutting down on administration costs.

The information below details how each element of the modelling options affects the current CTB caseload:

OPTION A

48% of the working age caseload is families with children or in receipt of Disability Living Allowance Care and therefore, under option A, they would receive the same level of protection as people of state pension credit age.

The remaining 52% of the working age caseload would only receive a maximum amount of 27% of their council tax liability and therefore would have to pay 73% of their council tax bill.

Under this option, households with no children or not in receipt of Disability Living Allowance Care will see a significant reduction in the level of support that they currently receive and the majority of these people are unemployed, which is broken down as follows:

- 26% who are in receipt of Income Support
- 26% who are in receipt of an unemployment benefit such as Job Seekers Allowance
- 36% who are in receipt of a sickness related benefit such as Incapacity Benefit or Employment and Support Allowance
- 5% who are in employed and in receipt of an earned income
- Less than 1 % who are in receipt of a pregnancy related income such as Maternity Allowance
- Less than 1% who are in receipt of a carers related benefit such as Carers Allowance
- 6% who are in receipt of "Other" income, such as Occupational Pensions, Tax Credits, Income from Boarders

OPTION B

100% of the working age caseload would receive a maximum amount of 65% of their council tax liability and therefore would have to pay 35% of their council tax bill. This will impact all households with and without children, which equates to the following:

- 31% who are in receipt of Income Support, 40% are lone parents, 17% are couples with children, the remaining 43% are singles and couples without children
- 22% who are in receipt of an unemployment benefit such as Job Seekers Allowance, , 20% are lone parents, 18% couples with children and the remaining 62% are singles and couples without children
- 25% who are in receipt of a sickness related benefit such as Incapacity Benefit or Employment and Support Allowance, , 7% are lone parents, 19% are couples with children and the remaining 74% are singles and couples without children

- 17% who are employed and in receipt of an earned income, 41% are lone parents, 43% are couples with children and the remaining 16% are singles and couples without children
- Less than 1 % who are in receipt of a pregnancy related income such as Maternity Allowance
- Less than 1% who are in receipt of a carers related benefit such as Carers Allowance
- 5% who are in receipt of “Other” income, such as Occupational Pensions, Tax Credits, Income from Boarders

Under this option, all households will see a reduction in the level of support that they currently receive and the majority of these people are unemployed.

OPTION C

100% of the working age caseload would receive a maximum amount of 80% of their council tax liability and therefore would have to pay at least 20% of their council tax bill. This will impact households with and without children, the breakdown of claimant groups is the same as in option B as this is representative of 100% of the working age benefit caseload.

To simplify the administration process, option C proposes that all people on “passported” benefits, such as Income Support, Jobseekers Allowance Income Based and Employment and Support Allowance Income Related, will automatically receive the maximum level of support with their council tax. This represents 69% of the working age caseload, which is broken down as follows:

33% are single people with no children

26% are single people with children

19% are couples with no children

22% are couples with children

To bring in line with Universal Credit, option C proposes to change the rate at which council tax support is withdrawn where a person has more income than the law says they need to live on. This means any excess income above the minimum amount that the law says they need, is fully taken into account. This would be applied to all standard claims that are not passported as described in the paragraph above. This is income such as, earnings, Job Seekers Allowance Contribution based & Employment and Support Allowance Contribution based. This change would affect 15% of the working age caseload who would see a reduction in the level of support they currently receive, which is broken down as follows:

35% are single people with no children

31% are single people with children

8% are couple with no children

26% are couples with children

To reduce the level of support given to people living in larger properties, there will be a cap on the maximum amount of support that can be awarded and this will be at a maximum level of ‘Band B’ Council Tax liability. The effect of this restriction means that those claimants living in more expensive properties with have a larger shortfall. This change would effect 7% of the working age caseload which is broken down as follows:

18% are single people with no children

29% are single people with children

6% are couple with no children

47% are couples with children

Removing the 20% income taper for the calculation of CTSS means more standard income will be taken into account in the assessment of standard claims. This will not impact on passported benefit claims. This will effect 15% of the working age caseload which is broken down as follows:

35% are single people with no children

31% are single people with children

8% are couple with no children

26% are couples with children

Also, in line with Universal Credit, we will apply a set £12.16 earned income disregard to all standard worker claims. The current scheme has various earned income disregard rates and this change will benefit single people or couples without children but will reduce the amount of disregarded income for lone parents or couples with children. This will effect 18% of the working age caseload which is broken down as follows:

17% are single people with no children

40% are single people with children

7% are couple with no children

36% are couples with children

In addition to the £12.16 earned income disregard as a further incentive for claimants to get back into work we will allow all workers to keep 35 pence for every £1.00 they earn and only use the remaining 65% in the CTSS calculation.

As a further work incentive to work, we will disregard the child care costs for claimants in employment, in line with the Universal Credit amount. Currently this will assist 47 claimants which is broken down as:

87% are single people with children

13% are couples with children

In order to reward Claimants who are financially providing for their old age, we will also disregard 100% of any contributions towards an occupational pension from their earned income. Currently this will assist 147 claimants who in the current scheme only allowed 50% of this income disregarded. This is broken down as follows:

12% are single people with no children

45% are single people with children

8% are couple with no children

38% are couples with children

Taking fully into account Child Benefit income in the CTSS calculation, would effect working age customers with children not in receipt of a 'passported' income equating to 13% of the working age caseload which is broken down as follows:

54% of these cases are lone parents

46% are couples with children

Taking fully into account Child Maintenance income in the CTSS calculation, would effect working age customers with children not in receipt of a 'passported' income, of which 81% are working and in receipt of earned income. This equates to less than 1% of our working age caseload and is broken down as follows:

82% of these cases are lone parents

18% are couples with children

Protection will be given to working age claimants in receipt of 'non passported' sickness related benefit such as Incapacity Benefit or Employment and Support Allowance. Customers in receipt of Disability Living Allowance (Care element), This will effect 5% of the working age caseload and is broken down as follows:

52% are single people with no children

9% are single people with children

21% are couple with no children

18% are couples with children

In line with Universal Credit, we will remove the 'Enhanced Disability Premium' and Severe Disability Premiums' for working age claimants in receipt of 'non passported' sickness related benefit such as Incapacity Benefit or Employment and Support Allowance. This will effect 1% of the working age caseload and is broken down as follows:

64% are single people with no children

6% are single people with children

13% are couple with no children

17% are couples with children

To simplify the administration process, option C then proposes that all people on "non-passported" benefits, such as Job Seekers Allowance (Contribution Based), sickness related benefit such as Incapacity Benefit or Employment and Support Allowance (Contribution Based), employed and in receipt of an earned income, in receipt of a pregnancy related income such as Maternity Allowance, a carers related benefit such as Carers Allowance or other" income, such as Occupational Pensions, Tax Credits, Income from Boarders will have their benefit capped at 80% of their Council Tax bill. This represents 31% of the working age caseload, which is broken down as follows:

41% are single people with no children

30% are single people with children

5% are couples with no children

24% are couples with children

OPTION D

All working age claimants would receive a maximum amount of 73% of their council tax liability as support and therefore would have to pay 27% of their council tax bill. This will impact all households with and without children as broken down in option B, with the following additional changes:

To reduce the level of support given to people living in larger properties, there will be a cap on the maximum amount of support that can be awarded and this will be at a maximum level of 'Band B' Council Tax liability. The effect of this restriction means that those claimants living in more expensive properties with have a larger shortfall. This change would affect 7% of the working age caseload which is broken down as follows:

18% are single people with no children

29% are single people with children

6% are couple with no children

47% are couples with children

To count in full all unearned and earned income in full including disability related income such as Disability Living Allowance. This change would affect 16% of the working age caseload which is broken down as follows:

14% are single people with no children

44% are single people with children

6% are couple with no children

37% are couples with children

To simplify the administration process, option D then proposes to remove all earned income disregards for people in remunerative work. This change would affect 13% of the working age caseload which is broken down as follows:

- 18% are single people with no children
- 45% are single people with children
- 5% are couple with no children
- 32% are couples with children

Capping the savings limit to £6,000 for all working age claimants means anyone with savings in excess of £6,000 will no longer be eligible for Council Tax Support. This change would affect 1% of the working age caseload which is broken down as follows:

- 61% are single people with no children
- 12% are single people with children
- 13% are couple with no children
- 14% are couples with children

Analysis of evidence & impact

Data sources / evidence used

- Communities and Local Government Department Guidance – Localising Support for Council Tax.
 - Statement of Intent.
 - Vulnerable people – key local authority duties.
 - Taking work incentives into account.
 - Equality Impact Assessment.
 - Explanatory note on draft regulations.
- Residents Opinion Survey 2011 / Citizens Panel 2012
- Consultation reports
 - Big Conversation results analysis
 - Citizens Panel results analysis
 - Findings from Local Council Tax Support Scheme focus groups
- Office for National Statistics
 - Census 2001
 - Mid-Year Population Estimates 2010
 - NOMIS 2012
- Capita Modelling Toolkit
- Capita CDS reporting module

Consultation & Engagement

In designing the new scheme we used a robust consultation process to gain views from the public and stakeholders. The consultation has supported the assessment and understanding of how the changes will impact on groups of people. The consultation plan was as follows:

August – September 2012 – consulting on the options for a new CTSS

- Big Conversation (open to all 219,300 Tameside residents)
- Citizens Panel (tri annual survey of a bank of 2000 residents)
- Focus groups with appropriate organisations (e.g. Citizens Advice Bureau)
- Council Mobile Advice Centre (mobile information service)
- “Go to” days (Officers attending various locations around the borough to complete surveys with the public)

The survey methods used have enabled us to reach a variety of people and groups who could be affected by changes to CTB. Using the Big Conversation website enabled all Tameside residents with computer access (at home, work or in local libraries) to respond to the consultation. The Big Conversation (launched in December 2011) is the Council’s central consultation tool for redesigning services. Supporting the Big Conversation platform was the paper/online survey to the Council’s Citizens Panel. The Panel is made up of 2000 residents who are representative of Tameside’s overall population.

Another channel of consultation was to hold focus groups. To ensure the focus groups were accessible to all members of the public, two focus groups were arranged, one in the day and one in the evening. Invites were issued via the post to a cross section of residents and private landlords, this included council tax payers currently in receipt of council tax benefit of working age and state pension credit age and council tax payers who were not in receipt of council tax benefit. The week before the focus groups were due to take place, telephone calls were made to remind the residents that had been invited and to also give them an opportunity to ask any questions ahead of the meetings.

Two further focus groups were held and the following stakeholders were invited:

- Welfare Rights
- Citizens Advice Bureau
- Housing Strategy
- Housing Options
- Shelter
- Tameside Third Sector Coalition
- Adults services (drug, alcohol, elderly, disability areas)
- New Charter Housing Association
- Adullham Housing Association
- Ashton Pioneer Housing Association
- Symphony Housing Association
- Riverside Housing Association
- Irwell Valley Housing Association
- Your Housing Group Housing Association
- Regenda Housing Association
- Mosscares Housing Association

A separate focus group was arranged with a local user-led disabled people’s organisation, People First, who support people with learning disabilities. We arranged to attend one of their service users meetings to get their feedback on the proposed changes.

A number of “Go to” days were organised to run throughout the consultation period, the purpose of these events was for benefit officers to be out around the borough to engage with the public and provide assistance with the completion of the surveys. The aim was to ensure we visited all areas of Tameside to ensure that all residents had the same opportunities to be involved in the

consultation process. Below are details of the "Go to" days that were organised:

- Disability Network at Loxley House
- Age UK, Stalybridge
- Denton Children's Centre
- Hindu Temple, Hyde
- Hyde Town Hall
- Droylsden Library
- Stalybridge Library
- Denton Library
- Mossley Library
- Dukinfield Library
- Stalybridge Job Centre
- Hyde Job Centre
- Ashton Job Centre

In addition to the above "Go to" days we also had benefits officers available throughout the consultation period in customer services at the council offices to provide advice and get customer feedback by completing the surveys.

The Local Housing Allowance Team have access to a mobile advice centre (MAC) which travels around the Greater Manchester Authority areas providing support to benefit claimants about Local Housing Allowance and other Welfare Reform changes. During our consultation period they had organised locations in Tameside for the MAC to visit. Benefit officers attended these dates to promote the CTSS consultation. The MAC was stationed at the following locations:

- Ashton Market
- Asda in Hyde
- Crown Point North Shopping Centre, Denton

To publicise the Big conversation a press release was published in the Advertiser newspaper to inform residents about the Government cuts and the proposed changes. An advertising campaign was run in the Advertiser and the Reporter, these were considered the most suitable publications due to the high volume of households they reach in the Borough.

In addition to this a postcard was devised which was distributed across Tameside households and public areas. Using customer insight we identified the following areas to have high concentration of benefit claimant household.

- Ashton Hurst
- Ashton St Michael's
- Ashton St Peters
- Ashton Waterloo
- Denton South
- Droylsden West
- Stalybridge North
- Hyde Godley
- Hyde Newton

Using this information benefit visiting officers specifically targeted these households to deliver postcards which explained the proposed changes and how they could be involved in the consultation process. In addition to this, whilst the visiting officers have been conducting benefit reviews at claimants' homes, they have been promoting the CTSS consultation and assisting with the completion of the survey.

Information postcards promoting the consultation were also left at all of the councils customer service areas and Registered Social Landlords customer service areas who verify benefit claims on behalf of the benefits service, such as New Charter, Peak Valley, Irwell Valley & Ashton Pioneer Homes.

The survey on the LCTSS that was undertaken as part of the Big Consultation elicited a total of 132 valid responses. As such, any trends and analysis are indicative only. The questionnaire sought to gain respondents views on the details of each proposal, and provides an insight into which groups view particular aspects of each option as more or less favourable. Responses to the questions were broken down by age, gender, employment status, whether they had caring responsibilities, and the classification they best felt reflected their household circumstances.

Of those who responded, over two-fifths (41.7%) were in receipt of CTB (38.6% stated that they weren't in receipt of CTB, whilst 18.2% did not answer this question). If non-respondents are excluded, then just over half (50.9%) are in receipt of CTB. This is greater than the most recent Citizens Panel review (Summer 2012), in which 17.3% of respondents stated they were in receipt of CTB, compared to 80.2% who weren't. 49.6% of respondents were female, 38.6% male, and 16.7% did not answer the question.

In terms of employment, 21.2% of survey respondents were employed full-time, 10.7% employed part-time, 3.8% (5 respondents) self-employed, 38.6% unemployed and 12.1% retired (15.2% of respondents chose not to answer the question).

Conclusions drawn from evidence & analysis of the effects on equality

Each of the four options under consideration will have a varying degree of impact depending on the constituent parts of each. Assessment of impact and the degree of favourability for each element is based on a number of factors.

The following principles run through all four options and will be applicable to any future LCTSS:

- Pensioners. There will be no change to the amount of help pensioners currently receive (national scheme) – approximately 11,300 claimants (43% of the total).
- War widows. There will be no change to the 100% war pensions / war widows pension disregard for working age claimants – approximately 11 claimants.
- Unemployment. Extended payment rules will remain. 4 week run on if unemployed for 26 continuous weeks or more and in receipt of certain qualifying pass-ported benefits – approximately 776 claimants.
- Backdate. Abolish backdates – approximately 639 claimants.
- Second Adult Rebate. Abolish Second Adult Rebate – approximately 215 claimants.

There will be a positive impact on those of pensionable age who are eligible claimants / liable persons as these individuals are protected. This satisfies the Government's requirement to protect vulnerable pensioners. Approximately 2,550 of the protected pensioners are disabled, 45% of the total disabled claimants.

Similarly, those on low incomes and / or reduced means as a result of a previous period of continuous unemployment will also be protected by virtue of keeping support for 4 weeks once back in employment, having been out of work for more than 26 continuous weeks. Approximately 15,200 claimants are of working age (i.e. not pensioners). Of these, approximately 11,200 (or 74%) are out of work.

The Council consulted through the 'Big Conversation' on a number of potential scenarios in respect of what elements should make up a LCTSS, particularly in respect of the degree to which people should be liable, the level of income that should be considered when deciding upon the eligibility of a claim, and the need to take into account personal circumstances such as family make-up, and disability.

Where the Council has discretion to offer protection to particular groups of people, 62.1% of respondents to the Big Conversation consultation indicated that people who are disabled should be

prioritised for protection. The next group most favoured for prioritisation was families with children (52.3%), followed by lone parents (48.5%).

Each Option contains within it a headline overall level of protection that can be offered, based on the costs attributed to its component parts. Overall, Option C received the most favourable response, with 67% of respondents either agreeing or strongly agreeing that 'All claimants of Council Tax Support (except pensioners) should only receive a maximum amount of 80% of their council tax bill in support. Therefore, all claimants would have to pay at least 20% of their council tax bill (plus any amount over a band B)'.

Option D, which would see claimants have to pay 27% of CT liability, found agreement amongst 42.9% of respondents, whilst Option A (in which non-protected claimants would have to pay 73% of their liability), found agreement amongst 36.8%. Finally, Option B had the lowest agreement levels, with just 31.6% agreeing that all households, including those on a low income, should have to pay at least 35% of their Council Tax bill.

Option A, incorporating as it does the protection outlined above to those of pensionable age, is expanded to include families and those in receipt of the care component of Disability Living Allowance (DLA). This increases the number of protected CTB claimants to approximately 21,500, or 80% of the total claimant base.

Whilst offering protection to the largest overall number of claimants, this option would require non-protected claimants to pay 73% of their Council Tax liability, and would thus greatly affect those households without children, or not in receipt of the care component part of DLA. Analysis indicates that this option would impact more on those on low incomes, affecting over 6,000 people currently on either Income Support, Job Seekers Allowance, or Employment Support Allowance. There would be a positive impact in respect of the protected characteristic of age – for those vulnerable pensioners who are protected, together with children under the age of 16 in households which would see their benefit unchanged.

There is also a positive impact for disabled people, given the level of protection this Option affords those claiming DLA (inc. care component).

From the Big Conversation, 42.7% of respondents either 'strongly disagree' or 'tend to disagree' with this proposition. Support for it was higher amongst existing CTB claimants than non-claimants, 44.5% compared to 28%. There is a gender divide with respect to this question, with only 28% of women agreeing with the proposal, compared to 46% of men.

Under Option B, where remaining non-protected claimants would be required to pay 35% of their Council Tax liability, affects approximately 15,100 people, and has greater impact on those claiming Income Support, Job Seekers Allowance, or Employment Support Allowance. Furthermore, those affected include a large number of single parent households, in particular female lone parents. All households not protected under this option would see an increase in Council Tax liability.

55.3% of respondents disagree with this option (with over a quarter, 30.7%, expressing strong disagreement, accounting for the largest proportion for any option). Less than a third of respondents (31.6%) agree with the statement, while 12.3% neither agree nor disagree. 62% of male respondents disagree with the statement, whilst 48.2% of women disagree. Neither men nor women support this proposal in significant numbers. Unemployed residents tended to disagree with the proposal (68.6%), more than for any other employment status. By contrast, only 37% of full-time employed respondents disagree.

Option C, where non-protected claimants would be required to pay 20% of their Council Tax liability, offers the greatest spread of protection in that it offers up to 80% of CTB to liability to all affected claimants (the number of which would be greater in this option, but spread more evenly). Disabled people are partially protected in this option as DLA care element will not be included in

calculations regarding unearned income.

Similarly, it supports those in work through disregarding 35% of earned income when calculating CTB entitlement. From the consultation, 71.7% of respondents either agreed, or strongly agreed with this.

The principles contained within Option C also received favourable feedback from the Big Conversation. Of all the propositions put forward which underpin the four options, the one with most agreement was to Question 14- 'All claimants of Council Tax Support (except pensioners) should only receive a maximum amount of 80% of their council tax bill in support. Therefore, all claimants would have to pay at least 20% of their council tax bill (plus any amount over a band B)'.

Overall nearly two-thirds (67%) of respondents agreed with this principle. Furthermore, 55.5% agreed with the statement that 'People who receive Council Tax Support, but live in property in a higher council tax band (eg C or above) should be asked to pay the full difference between band B and the band for their property'. Agreement to this question between men and women was broadly similar, with 56.9% of male respondents agreeing or strongly agreeing, compared to 59.3% of women. By age, agreement with the statement is highest among 60+ year olds (81.3%). However, this represents only 13 respondents. All age groups agree with the statement, with agreement lowest among 30-44 year olds (50%).

Similar results emerge from the most recent Citizens Panel, with 54.3% agreeing that the statement that those in receipt of Council Tax Support but who live in a higher band property than band B should pay the difference.

Questions were asked as to what exclusions should apply if all income isn't counted, two-thirds of those who responded thought that Child Benefit should be excluded for the purpose of calculating CTB. Between men and women, 61.3% of men and 61% of women agree with Child Benefit being excluded.

Nearly a quarter of respondents living as a couple with children agree (73.7%), while nearly two-thirds (64.3%) of respondents living as a couple without children also agree, that Child Benefit should be excluded. The level of agreement among single people not living with a partner, but with children, is 53.8%. The lowest level of agreement for the exclusion of Child Benefit was from single respondents living with no children at 47.6%.

Similarly, over two thirds who responded to this question stated that Disability Living Allowance should also be excluded. This rose to 83.3% amongst current CTB recipients.

Under Option D, remaining non-protected claimants would be required to pay 27% of their Council Tax liability. This option would count all unearned and earned income in full including disability related income such as Disability Living Allowance, which could therefore place disabled people at a disadvantage under this option. Consultation responses indicate that the counting of all types of income was supported, with 62.5% of respondents agreeing and just over one-quarter (25.9%) disagreeing. Three-in-five male respondents (59.2%) agree with the proposal, compared to 65.5% of female respondents. Of those in full-time employed, 71.3% of respondents agreed, with similar agreement among part-time employed respondents (75%). Over half (53.1%) of unemployed respondents also agreed.

CONCLUSION – OPTION C (PREFERRED OPTION)

Option C is the Council's preferred option. The principles used to build up Option C received positive support in the consultation process.

Following the consultation work, additional data analysis and further assessment of the modelling and impact a small number of changes have been made to Option C (the Council's preferred option). The changes are summarised below.

- **Child Benefit** – do not count Child Benefit as income. This provides additional support to families and ensures that Child Benefit is not affected directly by the changes to benefit entitlement as a result of the LCTSS. 60% of respondents to the Big Conversation agreed that Child Benefit should be excluded from income.
- **Backdates** – pay a benefit backdate where a claimant is already receiving a Department for Work and Pensions (DWP) benefit backdate. The start date would be aligned to the start date for the DWP backdate up to a maximum of 3 months. When a claimant is not on a DWP benefit and has certain extenuating circumstances (e.g. hospitalisation) they can apply to a hardship fund for a benefit backdate. This supports low income households by preventing shortfalls and the alignment with DWP simplifies the process cutting down on administration costs.

Impacts and key points for consideration regarding Option C are summarised below.

- **Age – pensioners.** Approximately 11,300 claimants (43% of the total) are pensioners (i.e. have reached pension credit age) and receive full protection.
- **Age – working age / non-pensioners.** Approximately 15,200 claimants (57% of the total) are non-pensioners (i.e. have reached pension credit age) and are of working age. All these people will be impacted on in some way as the maximum amount of benefit received will be capped at 80%. Under the current scheme 6 out of 10 of all claimants receive 100% benefit.
- **Age – children.** Child Benefit will be disregarded from income. This will affect approximately 1914 claimants. In addition, 100% of child care costs up to the Universal Credit maximum will be disregarded, affecting approximately 80 people. Both of these elements provide additional support to families and children.
- **Disability.** Approximately 5,700 claimants (21% of the total) are disabled. Of these, approximately 2,550 claimants (45% of all disabled claimants) are pensioners so are already covered by the full protection afforded to people who have reached pension credit age. Of the remaining disabled claimants who are not of pension credit age, approximately 1,000 claimants (18% of the total disabled claimants) are given some protection by the exclusion of benefit payments for care element of Disability Living Allowance from income.
- **Armed Services Covenant.** Continued 100% disregard for war pensions / war widows pensions (affecting approximately 60 claimants)
- **Work incentives.** Extended payment rules will remain. Continuing to award discount for 4 weeks after starting work where a claimant has previously been unemployed for 26 continuous weeks and in receipt of certain qualifying benefits (affecting approximately 780 claimants). Alongside this;
 - 35% of earned income will be disregarded (affecting approximately 2,800 claimants).
 - 100% of child care costs up to the Universal Credit maximum will be disregarded (affecting approximately 80 people).
 - 100% of occupational pension contributions will be disregarded from earned income (affecting approximately 160 people).
- **Economic / social vulnerability – child poverty / homelessness.** A number of elements of Option C look to share the burden of the reduced budget for Council Tax Benefit (CTB) across all claimants once protected groups have been accounted for. By doing this households on the lowest incomes outside of a protected group are protected as far as possible within the funding available. For example;
 - Cap maximum support to a Band B property.
 - Pass-ported entitlement.
 - Maximum benefit cap of 80%, the highest cap on maximum benefit amount of all four options.

MITIGATIONS / SUPPORT

Hardship Fund

If the final decision on the scheme includes a hardship fund, this will be used to mitigate the impact

on the most vulnerable, as some funding would be set aside to support a local discretionary scheme. Anyone suffering severe financial hardship as a result of the changes would be allowed to apply for additional support towards paying their council tax. At this stage, details of how this may be administered are unknown, however it is anticipated there will be a set criteria. One suggestion is that funding for such a scheme could be made from the Social Fund payments that are due to transfer from the Department of Work & Pensions (DWP) to the authority. However, it is anticipated that there will be considerable demand on these funds, which must therefore be managed through a robust set of criteria.

Support & advice for those suffering financial difficulties

(See **Appendix 2** – Support & advice for people suffering financial difficulties).

Services are available within Tameside, such as Tameside’s Welfare Rights and Citizens Advice Bureau, who offer free and confidential support to members of the public in relation to benefit matters and debt advice.

Tameside Welfare Rights service can be accessed via freephone, on- line and local customer service offices, full details can be found at <http://www.tameside.gov.uk/welfarerights>

Citizens Advice Bureau’s main office is located in Ashton Under Lyne, however they run a number of outreach session throughout the Borough. Details can be found at http://www.tamesidecab.org.uk/outreach_surgeries.

Other support is available through the following services:

- Cash Box Credit Union
- Money Information Network Tameside
- Social Fund – access to grants & loans such as: Crisis Loans; Community Care Grants; Budgeting Loans
- Community Legal Advice via Legal Aid
- National advice and information through:
 - Money Advice Service.
 - National Debtline.
 - Consumer Credit Counselling Service.
 - Debt Advice Foundation

Taking action		
Issue	Lead officer	Timescale
Developing proposals for a Hardship Fund and ensure it is appropriately managed and promoted	Louise Shaw	On-going
Develop a LCTSS that is understandable and accessible to residents, with appropriate guidance and support provided	Louise Shaw	On-going
Ensure that changes to CTB are communicated appropriately (i.e. different media) and in a timely manner.	Louise Shaw	On-going
Monitoring (by protected characteristic group where appropriate) those presenting to the Council with concerns over Council Tax Liability, eligibility for CTB, and access to help / advice.	Louise Shaw	From April 2013

Monitoring progress

Ilys Cookson – Assistant Executive Director / Louise Shaw – Service Unit Manager

Contact officer(s)
Joanne Davies – Team Manager

Sign off

Signature of Service Unit Manager	Date
Louise Shaw	26 September 2012
Signature of Assistant Executive Director / Assistant Chief Executive	Date
Ilys Cookson	26 September 2012

APPENDIX C

Part two

SUPPORT & ADVICE FOR PEOPLE SUFFERING FINANCIAL DIFFICULTIES

1.0 BACKGROUND

- 1.1 Changes to benefit entitlement may have an impact on recipients of benefits which could lead to problems managing finance, increased levels of indebtedness and other related factors such as stress and anxiety resulting from changes in circumstances.
- 1.2 In order to support people who have difficulties there are a number of different resources available ranging from debt counselling and management advice, to loans and grants aimed at helping people get through periods of financial hardship. This document, whilst not exhaustive, provides an outline of the sources of support available.

2.0 CITIZENS ADVICE BUREAU

- 2.1 The Citizens Advice service aims to provide the advice people need for the problems they face, and to improve the policies and practices that affect people's lives. Part of the national Citizens Advice Bureau, the Tameside service provides free, independent, confidential and impartial advice to people on their rights and responsibilities.

- 2.2 Advice on a variety of issues is offered with debt and benefits being two of the most common client problems that are discussed. Specialist advice is available on both welfare rights and debt. The Tameside Service is based in Ashton-under-Lyne, with outreach sessions available at centres across the borough.

3.0 MONEY ADVICE SERVICE

3.1 The Money Advice Service (<https://www.moneyadviceservice.org.uk/>) is an independent service, set up by government to help people make the most of their money, the organisation gives unbiased money advice in the UK – online, over the phone and face to face.

3.2 The Service is paid for by a statutory levy on the financial services industry, raised through the Financial Services Authority. The organisations statutory objectives are to enhance the understanding and knowledge of members of the public about financial matters (including the UK financial system), and to enhance the ability of members of the public to manage their own financial affairs.

4.0 TAMESIDE WELFARE RIGHTS SERVICE

4.1 Run by Tameside Council, the service provides clear, concise, free and confidential advice and representation in matters of welfare benefits. Services offered include:

- Undertaking casework.
- Offering representation at appeal hearings.
- Providing training.
- Debt advice.

4.2 The advice given by the service is impartial, confidential, and free. The role of the service is to give people information to be able to exercise their rights.

5.0 CASH BOX CREDIT UNION

5.1 Cash Box is a community savings and loan cooperative, where members pool their savings to lend to one another and help run the credit union. Anyone who lives or works in Tameside can join. Cash Box offers a safe place to save money and to borrow loans at low rates of interest. The credit union aims to promote financial inclusion by offering secure savings and affordable loan products. Services currently offered include:

- Savings accounts.
- Low interest loans.
- White goods scheme.
- Payroll deduction.

6.0 MONEY INFORMATION NETWORK TAMESIDE

6.1 MiNT is a partnership of organisations based in Tameside. The MiNT partners cover a wide range of organisations, including housing associations, Tameside Council, independent advice agencies and the credit union. The aim of the network is to ensure that everyone living or working in Tameside has access to all the personal finance information that they need. In 2012 MiNT was awarded £780,000 from the Big Lottery Fund to deliver budgeting training and support to 16-24s over a 5 year period.

7.0 SOCIAL FUND

7.1 Currently the Social Fund includes Funeral Payments, Maternity Grants, Crisis Loans, Budgeting Loans, Community Care Grants and Cold Weather Payments. Winter Fuel Payments are also a type of Social Fund payment, but they are restricted to people who have reached an age equivalent to the state pension age for women. People on a low income may also be able to get benefit to help with living costs, rent or other housing costs and Council Tax.

7.2 **Crisis Loans** – People needing financial help with an emergency or disaster may be able to get a Crisis Loan. At present, Crisis Loans have to be repaid, but do not accrue interest. Anyone who applies for a Crisis Loan should:

- Be aged 16 or over.

- Not have enough money to meet their immediate short term needs in an emergency or as the result of a disaster.
- Think there will be serious damage or risk to their health or safety without the loan.

A Crisis Loan can help cover the following short term needs:

- Meeting daily living expenses.
- Rent in advance.
- Board/lodging charges.
- Residential charges for a hostel.
- Pre-paid meter fuel debt.
- Travel expenses if the person is stranded away from home.

A Crisis Loan can also help if either of the following applies:

- The person applying has suffered a disaster like a fire or flood that has caused a lot of damage and help is needed to meet other expenses like replacing household items and clothing.
- The person applying has been awarded a Community Care Grant and is moving out of institutional or residential accommodation and doesn't have enough money to pay advance rent to a non-local authority landlord.

(Note: from April 2013 responsibility for Crisis Loans is devolved to local authorities)

7.3 **Community Care Grants** – Community Care Grants are intended to help with expenses so that people can live in the community and families can stay together. At present, Community Care Grants do not have to be repaid. A person is eligible to apply for a grant if:

- They are getting Income Support, income-based Jobseeker's Allowance (JSA), income-related Employment and Support Allowance (ESA) or Pension Credit when they apply.
- They are leaving institutional or residential care in the next six weeks and are likely to receive Income Support, income-based JSA, income-related ESA or Pension Credit when they leave.

(Note: from April 2013 responsibility for Community Care Grants is devolved to local authorities)

7.4 **Budgeting Loans** – Budgeting Loans can help with essential lump sum expenses for people living on means-tested benefits. At present, Budgeting Loans have to be paid back to the Social Fund, but they are interest free.

A person can apply for a budgeting loan if they are getting Income Support, income-based Jobseeker's Allowance (JSA), income-related Employment and Support Allowance (ESA) or Pension Credit on the day that they apply. They must have been on one of these benefits for at least 26 weeks.

A budgeting loan can be used to help with:

- Furniture and household equipment.
- Clothing and footwear.
- Rent in advance and/or removal expenses to new accommodation.
- Improvement, maintenance and security of a home.
- Travelling expenses.
- Expenses associated with getting or starting a job.
- Maternity or funeral expenses.
- Hire purchase payments and other debts, if the money was borrowed for expenses in any of the other categories.

8.0 **COMMUNITY LEGAL ADVICE**

8.1 Community Legal Advice is a free and confidential advice service in England and Wales paid for by legal aid. A person who is living on a low income or benefits, may be eligible for free specialist advice from legal advisers on issues including: benefits and tax credits; debt, education; housing; employment; and family problems. Community Legal Advice has a free translation service available in 170 languages.

9.0 NATIONAL ADVICE AND INFORMATION

9.1 Nationally there are a large number of different organisations that provide debt and financial advice for people who are having difficulty managing finances these include the following organisations:

- National Debtline (<http://www.nationaldebtline.co.uk/>) – This helpline provides free confidential and independent advice on how to deal with debt problems.
- Consumer Credit Counselling Service (<http://www.cccs.co.uk/>) – The service provides free debt advice and is available online.
- Debt Advice Foundation (<http://www.debtadvicefoundation.org/>) – Debt Advice Foundation is a registered national debt advice and education charity offering free, confidential support and advice to anyone worried about loans, credit and debt.