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please ask for
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our ref

your ref
CV/JEF

Dear Ms Vaughan

Local Council Tax Support Scheme

Thank you for your recent invitation to influence the consultation process on the above subject. Brighton & Hove City Council is to be congratulated on the early commencement and invitation to consult. Whilst we recognise it is for the respective billing authorities to determine ultimately the most appropriate local ways forward, the opportunity to participate in your early strategic consultations is much appreciated bearing in mind the consequences upon precepting authorities such as ourselves.

We have already advised members of East Sussex Fire Authority to recognise the potential and serious financial consequences arising from the government's policy proposals for the localisation of Council Tax benefit upon the whole of local government; the criticality of the timescales involved in resolving related recovery /mitigation policies; and the significance of the differential effects on an area by area basis and the combined potential consequences upon our medium term spending plans.

The most critical issues for us, are to seek confirmation that the advocated approach(es) will best protect long term council tax yield; reduce potential early year losses to minimum levels; and be based upon sensible and prudent presumptions so that such projections of yield are reality based and we are not left with collection fund losses to deal with in retrospect. I doubt whether this differs much from any other authorities' respective goals on this issue.

Your papers give a very clear indication of the scope of likely adverse impacts on some of the poorest households and, from a risk perspective, the Authority recognises that these will include some of our own highest risk groups. However, the Government's strategy is clearly aimed at the Council Tax Benefit system and the Authority would expect that the savings to be found from within those arrangements and not 'passported' on so that precepting authorities such as ESFRS (or the billing authorities themselves) were left with having to absorb any funding gaps.

I am advised that our Treasurer, Mr Duncan Savage, will now attend East Sussex Financial Officer Association meetings to liaise with the other billing authorities covering our area and provide a Fire Authority viewpoint. I would presume that there is at least some strategic finance dialogue between the City and ESFOA officers on proposed options for the future to seek to prevent our respective local communities and council tax payers seeing very different principles, or practical working arrangements emerge that might prove locally divisive and create potential political tensions via any resultant confusion by local council taxpayers and benefit claimants on any such differences. However, I suspect that you have already well-established links to ESFOA members on this issue.

Turning to the City Council's consultation proposals, as indicated above, our strategic objectives are clear – financial risk minimisation in both short and long term; realistic projections of yields from the outset; whilst understanding the social impacts that may arise seeking reassurances of equitable and fair treatment for local vulnerable people and consistency of approach in so far as this proves possible. You have an unenviable task....

As these strategic goals are reasonably clear, I would suggest that the detailed stages of your consultations are undertaken through the Treasurer, Mr Duncan Savage. Duncan will call upon any individual members of the financial services teams in ESCC or ESFRS as required.

I would suggest that future consultations may cover the following generic topics to ensure officers can respond to any ESFA concerns arising:

- a) Progress with research on suggested strategic options, yields and related degrees of risk - high, medium, low, timecales etc.
- b) Expected equality and diversity assessment outcomes and mitigation plans, if any
- c) Initial Feedback from other stakeholders if any
- d) Setting City Council options into context of other local approaches – to what extent is their commonality of approach /differences and underlying reasons.
- e) What we can do to assist, if anything – i.e. further sources of information; public messaging /comms and sign pointing etc.
- f) How we might best use any communications with those adversely affected to offer services which might be useful to them of which they may not be aware.
- g) Seeking endorsement of the 'best' outcome based approach

Yours sincerely,

Des Prichard
CHIEF FIRE OFFICER & CHIEF EXECUTIVE