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Please quote reference on all replies

Dear Lisa

Swale CTRS Consultation

Thank you for the opportunity to respond to the proposed changes to the Council Tax Reduction Scheme (CTRS).

As a precepting authority I recognise the challenges faced by billing authorities following the withdrawal of the CTRS grants and understand the rationale behind why you would consider simplifying the scheme.

From a Kent Police and Crime Commissioner perspective, it was not feasible for me to continue contributing into the scheme once Kent County Council had made their decision to end their support, given they were the major contributor by a considerable margin. However, your proposal for a simplification of the scheme raises a number of concerns that I set out below.

The proposed new scheme, replicated across Kent, could lead to a potential reduction in council tax base and income with an estimated impact of up to £1.9m for the police and crime element of the precept. This element of the precept provides vital funds for the Chief Constable to deliver policing services across Kent as well as my ability to provide support services for victims and witnesses of crime. Given we are already facing substantial funding challenges, the significance of this should not be under-estimated and, while I will do my utmost to limit any impact, any notable change in funding such as this will place additional strain on the services both myself and the Chief Constable provide to the public of Kent. In all likelihood this will mean having to find additional savings of a similar magnitude from the overall policing and crime budget.

While we appreciate that these changes may reduce the administrative burden for your authority, no details were provided to precepting authorities on the cost of administering of the proposed new scheme so I am unable to judge whether these savings are appropriate compared to costs and the potential reduction in precept collected. Since one of the stated objectives is to reduce the cost of administering schemes this information should have been provided.

The cost of the CTRS discount is borne by all taxpayers and this has not been made clear in the consultation. Respondents have not been asked whether they support a greater share of the council tax they pay being used to support those on low incomes and not on much needed services. I believe that it should have been made much more explicit in the consultation that the proposals will impact on all council taxpayers

Billing authorities have a duty with regard to council tax collection ensuring they seek to maximise collection at the lowest possible cost. It is unclear how this proposal, which on your own modelling shows a reduction in precept meets that statutory obligation.

Nationally, the government has recognised that although councils were invited to submit proposals for unitary government, in the meantime councils should continue to deliver essential services and meet statutory obligations and any decisions taken should not compromise the future sustainability of new councils or fetter future decisions of new councils.

I am concerned that this decision to change local CTRS scheme has not considered the impact on any proposed new unitary authorities in Kent. Nowhere in your consultation has it been acknowledged that changing the scheme for 2026-27 to allow higher discounts will likely reduce the overall taxbase (both for existing councils as well as newly re-organised councils). New unitary authorities would be left with lower taxbases, potentially exacerbated over a wider geographical area than just the current district boundary. Because this decision will affect the council tax base (and thus the future sustainability of new councils to deliver a wider range of services) I believe this is a fundamental flaw and should have been explicitly covered in the consultation.

I am clearly concerned about the wider impact should collection rates and precept income reduce and would urge you to ensure that the broader implications for all precepting authorities have been fully assessed before committing to this action. Should you proceed, we would respectfully request that the full impact of this proposal on policing (and other preceptors) is made clear.

Finally, I would appreciate receiving further detail regarding the underlying assumptions and modelling used to derive the projected tax base reductions, including any anticipated changes in collection rates and claimant behaviour. This will assist in better understanding the implications for me when considering my own precept and the funding I have available for policing in Kent.

Yours sincerely

Matthew Scott
Police & Crime Commissioner for Kent