

Modernising and improving the administration of council tax

Consultation questions

Question 1: The government intends to change the default bill instalments from 10 months to 12 months. Do you agree with this approach? Why/why not?

We support moving the default to 12 months because smaller monthly instalments reduce short-term cashflow pressure for many residents on fixed/low incomes (a common profile in almshouses). However, the change must be accompanied by clear communication, retention of choice, and protections for those who may prefer or need the current arrangement (e.g. pensioners who receive lump sums or have benefit payment cycles). Councils should proactively offer advice and alternative options to vulnerable residents.

Question 2: If the government were to move to 12-month instalments by default, do you agree taxpayers should be able to request to pay in 10-monthly payments? Why/why not?

Yes - taxpayers should be able to request 10-month payments. Different households have different cashflow patterns (pension timing, seasonal incomes, tenancy/licence arrangements). Preserving an opt-out to 10 months protects choice and avoids unintended hardship.

Question 3: What impacts, if any, do you think this change will have on local authorities' cash flow and ability to pay precepting authorities? [Local Authorities and other interested parties]

Not applicable – local authorities only

Question 4: Do you feel you have a good understanding of how council tax revenue is used by your local authority?

Many almshouse residents are likely to not have a clear understanding of how council tax revenue is used. Residents are often older and less likely to access online or technical budget documents or are less able to engage with the services offered. Clearer, plain-language explanation would help in a variety of formats for those with accessibility needs – such as by post or telephone.

Question 5: Do you agree further information should be provided on how council tax is spent? Why/Why not? How should this information be presented?

We support more transparent, accessible information so taxpayers can see the link between council tax and local services. Presentation should be: a short plain-language summary on the bill (2–4 bullet points of major services funded), an easy printed leaflet or large-print insert, and a simple web page with a short video/infographic. All materials must be accessible (large print, screen-reader compatible) and signposted with phone/face-to-face help options.

Question 6: Do you feel you have a good understanding of the support offered by your council and how to claim this? How might this be improved?

For our members, understanding is patchy. Not all members will have a good understanding of the support that is offered, either at charity level or individual resident level. Councils should include a clear “Do you need help?” section on bills with: who qualifies, simple examples, an eligibility checklist, direct telephone contact details, and where to get independent advice. Outreach via local charities (including The Almshouse Association) would also improve take-up.

Question 7: What further information, if any, do you think would be helpful to see on this support? How should this be presented?

Useful additions: (a) typical turnaround times for applications, (b) what evidence is normally needed, (c) examples (case studies) showing how support reduced bills, (d) whether support is discretionary and how decisions are appealed. This information could be included on the bill, council website, and in accessible print leaflets distributed to housing providers.

Question 8: Do you agree with the proposed new name and definition of the disregard, as set out above? Why/Why not?

We welcome renaming the “severe mental impairment” disregard to a less stigmatising term and modernising the definition to reflect current understanding and reduce barriers to claim. Any new name/definition should be straightforward, non-stigmatising, and consistent with other benefits systems to avoid confusion. In light of the Welsh government’s decision to change to “Significant cognitive impairment”, we would suggest that the government align with this name and definition to prevent confusion and to aid clarity.

Question 9: What are your views on whether the proposed definition is consistent with the existing eligibility for the disregard? [Local Authorities and other interested parties]

Not applicable – local authorities only

Question 10: Have you, or your family members, experienced any barriers to claiming this support? Please describe.

Our members have a variety of needs and circumstances. Some members face difficulties in accessing support for a variety of reasons: (a) stigma and off-putting language, (b) difficulty obtaining the required medical evidence (transport and GP appointment barriers for older residents), (c) inconsistent council practices and forms, and (d) lack of awareness among residents and some housing providers.

Question 11: Are you aware of any households facing barriers when accessing this support? Please describe. [Local Authorities and other interested parties]

Not applicable – local authorities only

Question 12: What, if anything, do you think could put someone off applying for this support?

Stigmatising language, complex forms, requirement for medical certificates, fear of stigma or losing other entitlements, lack of awareness that help exists, and digital-only application processes.

Question 13: What do you think the government could do to improve access and accessibility to this disregard?

Simplify applications, allow different evidence types (e.g. supporting statements from carers or social prescribers), provide a government-recommended but optional standard form, ensure paper/telephone routes remain, and fund outreach via charities and sheltered housing managers.

Question 14: What are your views on a government provided (but not prescribed) form that councils and taxpayers could use to improve consistency of claiming the disregard in England? How should the government incentivise councils to use such a form?

A government template form would improve consistency and reduce administrative burden. Incentivise councils via guidance, best practice toolkits, and recognising adoption in performance/quality frameworks. Encourage councils to co-design the form with sector stakeholders (including charity housing providers) to ensure accessibility.

Question 15: What are your views on the disregards set out for carers and apprentices?

Almshouse residents often interact with carers, and it is important that this vital work is recognised. The carers disregard is important, but application thresholds/hours should be reviewed to reflect modern caring patterns (e.g. more short-hour carers doing substantial unpaid work). Although the work of the Almshouse Association does not typically include apprentices, we would suggest that the government ensures that thresholds reflect current apprenticeship pay levels, so eligible apprentices are not excluded or placed under unnecessary hardship.

Question 16: Do you believe the current eligibility criteria for apprentices and/or carers is appropriate?

Not entirely. Criteria should be periodically reviewed and aligned to current labour market and caring patterns; hours thresholds and earnings thresholds for carers and apprentices should be updated in line with the current economic climate. This would ensure that support remains in line with people's circumstances.

Question 17: Are there any other disregards which should be considered in respect of certain cohorts who do not fall within the current disregards?

The government may wish to consider targeted disregards or tailored support for: (a) residents in supported or charitable housing (where licence terms differ from tenancy), (b) people with progressive frailty/age-related disability not captured under the current definitions, and (c) people in recovery from severe illness where short-term disregard would prevent enforcement escalation.

Question 18: Do you or anyone in your household fit into one of these cohorts? If so, what would be the impact of any new forms of support on your household?

Many almshouse residents would benefit. New supports would reduce financial stress, avoid escalation to enforcement, and improve wellbeing and housing stability for fragile older people.

Question 19: What are your views on how information is currently provided by councils.

Provision varies widely, with inevitably some councils producing excellent plain-language materials whilst others rely heavily on dense online content. This variation increases inequity, and makes it more difficult for membership charities such as ourselves to provide support on a national basis. Councils should standardise core content (what the bill is for, support available, payment options) and tailor distribution to local needs.

Question 20: What council tax information do you believe could be communicated digitally?

Detailed budget breakdowns, interactive FAQs, step-by-step claim pages, application portals, reminders, and tailored online calculators could be digital. However, essential notices such as summaries, reminders and access to the service should always be available in paper/telephone form for those who need it.

Question 21: In relation to any suggestions in question 20, how could councils ensure this was accessible to all residents?

Maintain parallel non-digital channels, provide assisted digital support (phone/face-to-face help), produce print/large-print versions, ensure websites meet accessibility standards, and partner with local charities (including almshouse charities) to distribute and explain content.

Question 22: What are your views on the current process for challenging a council tax band? What changes, if any, should the government consider to the council tax band challenge process?

Current challenge routes are confusing for many residents. Government should simplify guidance, provide a clear checklist of evidence, extend timeframes for vulnerable claimants, and fund support/advice services to help people check banding (particularly where older housing stock or historic properties are involved).

Question 23: The government is interested in changing regulations on when councils can request a full bill, or seek liability orders, to a more appropriate and proportionate timeframe.

How long after a reminder notice, should full liability apply:

- after 7 days, as now

- after 14 days
- after 31 days
- **after 62 days**
- after 90 days
- other

Please explain your answer.

We acknowledge that councils are under pressure to recover debt and maintain good finances. However, our residents are often vulnerable, have difficulty with engaging with services and are at risk of homelessness. As such we recommend **62 days** after a reminder (i.e. allow two consecutive monthly reminders plus a short buffer). This gives households - especially vulnerable residents - reasonable time to engage, seek advice, arrange payment plans or obtain support, while still enabling councils to recover debt in a timely fashion when necessary. The new timeframe should be accompanied by mandatory welfare checks before escalation, as well as the ability to be flexible and compassionate to peoples' circumstances.

Question 24: Are there any further steps councils should take before being able to charge for a full-year's bill? For example, offering alternative payment plans, providing further reminder notices or undertaking welfare checks.

Yes – councils should act compassionately and in moderation to avoid placing vulnerable residents under undue stress or leaving people at risk of serious financial hardship. Mandatory steps should include: at least two reminder notices; an attempted welfare check (telephone or in-person where necessary); an offer of a reasonable alternative payment plan; signposting to local debt advice and council tax support; and a brief cooling-off period to allow applications for support to be considered.

Question 25: Do you believe there are any barriers to councils being able to take the kind of steps set out in Question 24? [Local authorities and other interested parties]

Not applicable – local authorities only

Question 26: What other ways can councils support individuals when they miss a council tax payment?

Early contact by phone, offer of tailored payment schedules (weekly/fortnightly), temporary hold for medical events, referral to local welfare/charity support, and automatic signposting to council tax reduction schemes. Councils could also permit authorised third-party advocates (such as a responsible family member) to liaise on behalf of residents with consent.

Question 27: Do you agree that the government should introduce a cap on the reasonable costs that a court can award for a council's costs for an application for a liability order?

We support a cap. At present, English councils commonly add very different cost sums (often much higher than the administrative cost), producing postcode-based unfairness and causing significant hardship. A cap would promote consistency and fairness. Wales have capped these costs at £70, and we would recommend either maintaining this cap to ensure consistency across the country or ensuring that it only covers the administrative cost of the service.

Question 28: What do you think this cap should be set at? Please explain your answer:

- less than £70
- **up to £70**
- between £71 and £100
- over £100
- other

We recommend a cap **up to £70** for the core liability order application costs. Wales's approach (maximum £70) is a reasonable benchmark and reduces the risk of excessive and punitive additional

charges being added to already vulnerable households. Any cap should be reviewed periodically.

Question 29: Should the cap apply when seeking a liability order on second or empty homes?

Yes. Applying a consistent cap across all liability order applications (including second/empty homes) maintains fairness and prevents very large additional charges being applied simply because a property is non-occupied. For almshouse charities, this would provide reassurance and support in the event of adverse circumstances when almshouses may be without occupation between residents. Whilst the Almshouse Association is unable to comment on its application to second homes, if government wishes to deter avoidance on second homes, it could do so through targeted local premiums or policy tools.

Question 30: Do you believe the current enforcement is or is not proportionate in the context of council tax collection? Why/why not?

Enforcement is often **disproportionate** in practice. Some councils use rapid escalation to liability orders and enforcement agents without adequate welfare checks or attempts to agree payment plans. This approach can cause severe harm to vulnerable older residents and often costs more to pursue than is recovered. We welcome the consultation's intent to rebalance fairness and firmness.

Question 31: What are your views on ways enforcement could better reflect the needs of those in financial or other hardship?

Enforcement policy should require vulnerability checks, mandatory payment plan offers (with realistic instalments), referral to debt advice, and restrictions on use of enforcement agents for households with acute vulnerability unless all alternatives exhausted. Councils should be required to log and review decisions to escalate enforcement to ensure fairness.

Question 32: What are your suggestions on alternative or additional measures to ensure council tax is paid?

Alternatives: earlier, friendly engagement; flexible payment arrangements; deduction from benefits where appropriate; attachment of earnings when suitable; income-linked instalments; supportive interventions (debt advice referral); and targeted pre-emptive help for households with fluctuating incomes. For avoidance by deliberate non-payers, retain firm enforcement but shaped by proportionality principles.

Question 33: What are your views on the current methods available to councils to collect council tax?

Methods (direct debit, online, telephone, instalments, attachment of earnings/benefits, enforcement agents) are broadly appropriate but implementation varies. Councils should prioritise low-cost collection methods (direct debit outreach) and minimise reliance on expensive enforcement action for low-value debts.

Question 34: How else do you think council tax could be efficiently and fairly collected?

Encourage and incentivise direct debit (with safeguards), enable frequent smaller instalments (weekly/fortnightly), better use of data to identify at-risk households early, and improved cross-agency working to offer preventative support. Use standardised procedures to reduce postcode inequality.

Question 35: Do you have any views on anything else related to council tax administration which has not been covered in this consultation and call for evidence? If so, please provide them here.

Almshouse residents are often older and often less digitally connected; reforms should be designed and implemented with the needs of such people in mind. Standardisation of core communications, a government template for key bill content, proactive outreach via local charities/sheltered housing

managers, and adequate resourcing for assisted-digital and early-intervention teams would reduce escalation and improve recovery outcomes. We ask government to publish clear, time-bound guidance for councils on vulnerability checks, the treatment of residents in charitable/supported housing, and monitoring requirements so that changes reduce inequity rather than create new inconsistencies.