



A2B Access to Benefits for Older People

Response to 2007 Executive Review of Domestic Rating Reform – Terms of Reference

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1.0 Introduction

1.1 A2B is a not-for-profit organisation with a four year, fixed term life-span. Its vision is to empower and enable the older people of Northern Ireland to maximise their take-up of benefit entitlements.

1.2 A2B will be developing online resources, available to older people, their carers, and Voluntary Sector and Governmental advisers to screen older people for benefit eligibility, prepare their claims applications, and submit their data for claims processing.

1.3 A2B welcomes the opportunity to respond to this consultation and the fact that domestic rating is being reviewed. We would welcome further information, when available, on any progress made to date, in particular the Minister's proposed paper to the Executive. We would also welcome the opportunity, if it arises in future, to be consulted on further detailed proposals relating to any of the elements of this document.

1.4 This response follows the layout of the general headings within the Terms of Reference document.

2.0 Aim

2.1 We welcome the recognition that the review needs to look at both short and longer term solutions; however, it is important that these are not developed in isolation but as two parts of a longer process. One of the factors which make it difficult for older people to access benefits is that the welfare system is ever-changing, so it would be helpful to them (and indeed other groups) if there is some consistency in the way that reliefs are applied for and assessed.

2.2 We would draw your attention to the recently-established Benefit Simplification Unit within the Department for Work and Pensions and their publication 'Simplification: Guide to Best Practice'¹.

2.3 We agree with the overall objectives, in particular that the rate burden is equitable and that reliefs are effective in protecting those who are less able to pay. Transparency of the system is vital – we would draw your attention to recent

¹ <http://www.dwp.gov.uk/publications/dwp/2006/simplification-guide-best-practice.pdf>

Consumer Council research on water² and would suggest that the points made in it around transparency are just as relevant to the subject of domestic rates.

3.0 Policy

3.1 A2B welcomes the enhanced reliefs for pensioners which were introduced earlier this year; however there is little information available on how this process works. We would like to see more detail provided for the public, explaining who might be eligible for rate relief.

3.2 As there is little information available to us at this time about the various types of subordinate legislation, we cannot comment in any great detail about the proposals. We are concerned that any move to allow deferral of payments is simply a means of putting off the problem rather than addressing it. For older people who are unable to afford to pay their rates, effective reliefs should be put in place now.

3.3 Likewise, the proposal to introduce rating of vacant property may impact on older people who are in hospital or residential care. If such a system is to be introduced, it should not be applied to properties in such cases.

4.0 Key Considerations

4.1 In our opinion, one consideration is not being taken on board – the provision of reliefs for those who are unable to pay. This is not covered in this part of the document, nor in Appendix A. Ensuring that those who cannot pay are protected by a system which is accessible and transparent is of vital importance to those people; not just in fiscal terms.

5.0 Scope of review

5.1 We have already commented above regarding vacant properties and deferral of payment. Any changes made to the new rate relief scheme should be targeted at those who just miss out under the scheme as it stands and at those who are disabled or provide care for others.

5.2 We would welcome further information on the possibility of introducing a single pensioner discount and broadening the Disabled Person's Allowance. On

² [http://www.consumercouncil.org.uk/filestore/documents/Final - Water and the Consumer.pdf](http://www.consumercouncil.org.uk/filestore/documents/Final_-_Water_and_the_Consumer.pdf)

paper, we would welcome both of these options but would recommend that more detailed consultation should be carried out.

5.3 A2B would like to know more about the proposal to use existing data to identify applicants and how this might be carried out. Underclaiming of benefits is a serious issue and identification of potential applicants will be of little merit unless it is accompanied by targeted campaigns to inform those people and measure which make it easy for them to make a claim.

5.4 All the options which are identified in this paper, in particular the longer term ones, will require further and substantial public consultation. More detail on what exactly is being proposed will be necessary, as will a full Equality Impact Assessment.

6.0 Key Stages and Timetable

6.1 Under Stage 3 in the timetable, we are concerned at the use of the term 'brief consultation.' While we appreciate legislative timescales can be tight, OFMDFM guidance states that 12 weeks should be the good practice timescale for public consultation and that 8 weeks should be the minimum³.

6.2 The general public, including older people, are key stakeholders and the running of a consultation over the summer months precludes many community groups from taking part. Consultation over the coming months should be carried out on an ongoing basis with disadvantaged groups and those that represent them.

³ <http://www.ofmdfmi.gov.uk/practical-guide-policy-making.pdf>