

Report for:	Cabinet – 10/07/12	Item Number:	
Title:	Council Tax Benefit (CTB and Final Approval) Scheme – (Options for Consideration
Report Authorised by:	Stuart Young – Assistant	Chief Execut	ive QA V

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Head of Revenues, Benefits and Customer Services

Ward(s) affected: All Report for: Key Decision

1. Describe the issue under consideration

- 1.1 The Government is proposing to transfer support for Council Tax to local authorities from 2013–14 and to cut funding for it by 10% as part of its deficit reduction programme. Council Tax Benefit (CTB) will be abolished, and local authorities must develop their own systems for rebating council tax. However, entitlement rates for pensioners in England will still be set nationally and maintained at their existing level, this will have the impact of increasing the 10% reduction for other claimants should the reduction in benefit be passed on.
- 1.2 This report sets out what the Government's proposals will mean for Haringey, sets out proposals for a new reduction scheme for consultation, and sets out mitigating action against the financial impact.

2. Cabinet Member introduction

- 2.1 The Welfare Reform Act 2012 is a key part of the Government's agenda to reduce the national deficit and, in my view, represents real cuts. Sitting within this is the decision to abolish the national Council Tax Benefit system, introducing a 10% reduction in funding for council tax benefit (CTB) and a requirement that Councils develop local CTB schemes.
- 2.2 Presented as "Localism", in reality, the provisions, especially with regard to the forecast further cut in DEL Treasury budgets, mean local councils simply won't



have the funds to pick up responsibility for a central government cut which, if absorbed, will cause Haringey Council to reduce the impact on its budgets by making further cuts to valuable services.

- 2.3 Furthermore the government have made clear that Business Rates, which were to be localised are now likely to be sliced in half, with 50% used to support the funding of core Council services including Council Tax Benefit, rather than coming directly to the Council as core revenue.
- 2.4 Finally, the government appear to be basing their allocation of the remaining funds on future projections of demand on a national trend rather than on either actual levels of demand for benefit or even any localised trend. This will be particularly bad for Haringey, which has seen demand for benefit increase by 11% while the demand nationally has been falling.
- 2.5 This means that the 10% announced cut is more likely to be nearer 17-18%, and when it is also considered that while Pensioners have been exempted from the reduction, the funds for them have been equally reduced in short meaning that the remaining recipients are likely to pick up the bill totalling up to 22% of Council Tax.
- 2.6 Needless to say it is my belief that this represents one of the most appalling policies of the government and it is not insignificant that the unemployed will now be facing the prospect of having to pay 20% local taxation levels, which they last were subjected to paying under the Poll Tax. This is likely to amount to an average additional burden of £5pw, which when put alongside cuts to Working Families Tax Credit, changes to Housing Benefits, and the introduction of Universal Credit is, in my view, likely to have a disastrous impact on the levels of child poverty.

3. Recommendations

- 3.1 Cabinet are asked to agree the following proposals for consultation with the GLA:
 - a) that the Council look to adopt a scheme that will reduce CTB payments for all claimants in line with the reduction in Government grant. In real terms, this will mean a reduction of benefit payments of between 18% and 22%.
 - as a consequence, that CTB rules are changed to mitigate the financial loss to the Council as follows: (these are listed in Appendix A)
 - Calculate Council Tax reduction allowing savings and investments up to £10k
 - Council Tax reduction not granted if less than £1 per week



- 3.2 Cabinet are asked to note that following consultation with the GLA on the proposals at 3.1, and having considered the GLA's response:
 - a) A draft CTB reduction scheme will be published and consultation on that scheme will be carried out with impacted groups
 - b) The findings of the consultation and an equalities impact assessment will inform the final scheme which will be put to members to consider at full Council in January 2013
- 3.3 Cabinet are asked to agree that, with effect from the date on which the provisions in the Local Government Finance Bill at clause 10 ('Power to determine further discounts for certain dwellings') and clause 11 ('Power to determine further discounts for certain dwellings') come into force, the Council Tax exemptions and discounts are also changed to mitigate the financial loss to the Council. These are outlined in Appendix B.

4. Background information

- 4.1 On 17 February 2011, the Government published its Welfare Reform Bill, setting out some of the most significant proposed changes to the welfare system in decades. The Bill was passed by Parliament on 8 March 2012 and became the Welfare Reform Act 2012. The Act contains the provision to replace six working age benefits including Housing Benefit with the new Universal Credit. A key change in the Act is the Government's proposal to abolish the national Council Tax Benefit system and replace it with the implementation of a Local Council Tax Support Scheme from 1 April 2013.
- 4.2 CTB is currently a means tested benefit that is administered by local authorities on behalf of the Department for Work and Pensions. Claimants in receipt of means tested out-of-work benefits generally receive full assistance; eligible claimants who work or have other income are likely to get partial relief; around 60% of all pensioners are entitled to CTB, although not all who are entitled actually claim. The amount of CTB awarded reduces the Council Tax bill for each financial year.
- 4.3 The Government's proposed model is based on the assumption that claimant numbers will reduce. However, actual figures for Haringey show that there has been an 11% increase in claimant numbers over the last three years. This trend is set to continue, taking into account the current economic situation. Because the Government has protected pensioners from any changes, there is varying liability between councils depending on the number of pensioners living in the area.
- 4.4 The Government's funding arrangements are still out for consultation but the impact on local authorities is expected to be up to £6m. The financial loss to Haringey, incorporating expected growth, is estimated at between 12% and 15%, £4.56m to



Haringey Council £5.70m.

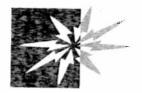
- 4.5 The new scheme must be approved by 31st January and will come into effect 1st April 2013. Failure to implement a scheme will result in the local authority absorbing any shortfall (for Haringey this could be up to £5.70m). Although the Medium Term Financial Plan includes assumptions around the potential impact, any shortfall above the anticipated level will result in further reductions to services.
- 5. Recommended Option and impact on Haringey
- 5.1 In line with the majority of London Boroughs, it is proposed that Council Tax Benefit payments are reduced in line with the Government's proposed reduction in funding. Haringey has 36,000 CTB claimants comprising 35% of all households. 85% of claimants also get housing benefit and 71% are currently on 100% CTB. Pensioners make up approximately 30% of the CTB caseload.
- 5.2 In real terms, after protecting pensioners, this will mean a reduction of benefit to claimants as shown below:

Financial loss to the Council	Maximum reduction in Council Tax Bill (compared to current levels)	Additional average cost to claimant per annum (%)	Additional average cost to claimant per annum (£)
12%	82%	18%	£175
15%	78%	22%	£219

5.3 Appendix C provides an indication of the impact of the proposed changes to CTB and the wider welfare reforms on households in Haringey. This analysis identifies key types of working age households in Haringey and shows the extent to which they are likely to be impacted by CTB reductions, changes to Local Housing Allowances from January 2012 and the introduction of an overall benefits cap from April 2013.

6. Mitigating the financial impact

- 6.1 There are a number of actions the Council can take to mitigate the financial impact on the authority as a result of the Government's proposals. Appendices A and B outline the possible changes that can be made to achieve this. These include:
 - changes to Council Tax Benefit rules
 - changes to Council Tax exemptions and discounts.
- 6.2 It is proposed that the Council adopts rule changes 1 and 2. These are listed in Appendix A and are as follows:
 - Calculate CT reduction allowing savings and investments up to £10k



- Council Tax reduction not granted if less than a £1 per week.
- 6.3 These changes to the CTB rules would make approximately £435k savings.
- 6.4 Local authorities also have the opportunity to make changes to certain categories of council tax discounts and exemptions. These are listed in **Appendix B**. It is proposed that all of the possible changes (1-5) are adopted. These could result in an additional saving depending on collection rates.

7. Other options considered

7.1 We have considered a number of options for the overall scheme. However, these options have not been taken forward because they could have a disproportionate impact on some claimant groups over others or result in a shortfall in the Council's budget which would have to be met by reductions in services.

7.2 These include:

- Protecting certain vulnerable groups in addition to pensioners
- Protecting band A-C properties
- Protecting claimants on 100% CTB
- Protecting claimants who are working but on low income.
- Absorbing the cost
- Stagger the introduction of the scheme

8. Next Steps

8.1 A new scheme is required to be in place by the 31 January 2013 following full consultation and incorporating the result of an equality impact assessment. This timescale is challenging, especially as primary legislation has not yet been passed. The following provides an indicative high level timetable:

Date	Requirement					
July 2012	Cabinet review and sign off					
	Consultation with GLA					
	Primary Legislation Passed					
August 2012	Consultation with all impacted groups					
October 2012	Secondary Legislation Passed					
November 2012	Analysis of consultation, equality impact assessment and design of scheme					
	Technical changes to IT systems					
January 2013	Full Council ratification					
	Final scheme adopted					
April 2013	Scheme implemented					

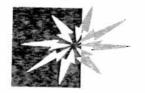


9. Comments of the Chief Finance Officer and financial implications

- 9.1 Government's funding of the new scheme in 2013/14 is expected to equal a maximum 90% of the Council's spend on CTB in 2012/13. The funding will be allocated in advance of 1 April 2013 to enable Councils to plan ahead. The Council will be expected to consider any contingency arrangements for unplanned increases in demand and take-up which it will have to fund from within the existing resource envelope of the Medium Term Financial Plan..
- 9.2 It is expected that Council Tax collection costs will rise and collection rates will fall as we collect tax from some of the most disadvantaged groups. Lower collection rates will result in a smaller Council Tax base, and this will produce a further pressure in the MTFP as the resource base is reduced. Current projections expect this pressure to be constrained with the existing MTFP.
- 9.3 DCLG has issued a document regarding the funding arrangements. This consultation document sets out how the Government intends to distribute funding to support local schemes and a potential further level of protection for some authorities.
- 9.4 It is proposed that funding will be distributed on the basis of shares of previous subsidised Council Tax benefit expenditure. Final allocations are not yet available but will be based on revised forecasts of subsidised Council Tax benefit expenditure, to be issued in the autumn.
- The government does not intend to adjust allocations to reflect the proportion of the caseload comprising pensioners, but believes it is more sensible to look across the wider revenue budget and consider whether adjustments to allocations for a limited number of authorities are needed. Effectively, this would introduce floors and ceilings to funding allocations so that no local authority faces a budget pressure greater than a specified percentage as a result of the funding cut. Given that the proportion of pensioners in Haringey is relatively low compared to rural and semi-rural areas, it is likely that the financial loss will be greater than 10% and this has been factored into projections.
- 9.6 Appendices A and B set out how the Council can mitigate against a proportion of the expected cost increase by amending the CTB rules and certain categories of discounts and exemptions. However, it is not expected that this mitigation will be of an amount that will be sufficient to offset the 10% funding reduction, any increase in demand and a drop in collection rates.

10. Head of Legal Services and legal implications

10.1 The Welfare Reform Act 2012 will abolish council tax benefit, meaning that local authorities will be responsible for adopting a local scheme for council tax support.



- 10.2 The Local Government Finance Bill ('the Bill') was introduced to Parliament on 19 December 2011 and sets out the provisions to be followed in adopting a local council tax reduction scheme. Under section 13A(2) of the Local Government Act 1992, substituted by clause 9 of the Bill, a billing authority must make a localised council tax reduction scheme by 31 January 2013, to take effect on 1 April 2013.
- 10.3 A new Schedule 1A to the 1992 Act, inserted by Schedule 4 to the Bill, makes further provision about council tax reduction schemes including prescribing the consultation process that must be followed. The Council must, in the following order:
 - a. consult any major precepting authority which has power to issue a precept to it,
 - b. publish a draft scheme in such manner as it thinks fit, and
 - c. consult such other persons as it considers are likely to have an interest in the operation of the scheme.
- 10.4 The rationale for consulting with the major precepting authority first, in this case the GLA, is to ensure that they have been involved in shaping the initial proposals within the draft scheme that will be put out to the public for consultation.
- 10.5 Given that the Bill is not yet in force, provision is made within new Schedule 1A to provide that the consultation requirements will not be rendered invalid simply because the provision has not yet been enacted. Councils must still comply with the consultation provisions set out above. Failure to comply with the requirements of the Bill, or to conduct meaningful consultation, will leave the Council open to judicial review.
- 10.6 It is proposed that following consultation with the GLA on the proposals at Appendix A, and having considered their response, a draft scheme will be published and consultation with affected groups will commence.
- 10.7 The Council is proposing a 12 week public consultation, in line with the Government's code of practice. This timetable is proposed owing to the nature of the impact that any reduction scheme will have on people in the Borough. The timescales are tight given that a scheme must be adopted by 31 January 2013, therefore it is essential that consultation with the public commences as soon as possible following consideration of the GLA's response and publication of the draft scheme.
- 10.8 Consultation with affected groups will need to take into account the complexity of the reduction scheme that is proposed, ensuring that the proposals can be understood by consultees to enable them to give an informed response. The Council must ensure it allows adequate time for conscientious consideration of the consultation responses in order that these may inform the final proposals, which will be brought to full Council in January 2013.



- The Council must ensure that it has due regard to the Equality Duty in making its 10.9 local scheme, including how it will remove or minimise any disadvantage suffered by people with a protected characteristic (by way of their age, disability, gender, gender reassignment, race, religion or belief, sexual orientation, pregnancy or maternity). A comprehensive assessment of equalities impact will be required in order to inform the final proposals.
- 10.10 The Bill allows the Government to make regulations about the prescribed requirements for schemes. Any scheme that the Council adopts must comply with these regulations. In anticipation of the regulations being enacted, and in order that local authorities can ensure that they comply with these requirements, the Department for Communities and Local Government (DCLG) have issued a policy Statement of Intent setting out the policy behind and likely content of the regulations. ("Localising Support for Council Tax - A Statement of Intent", May 2012). The Council will need to take this Statement into account in preparing its scheme.
- 10.11 In addition to adopting a reduction scheme, clause 10 and 11 of the Bill allow the Council to make alterations to the application of discounts and exemptions to council tax. It is proposed that, at such time as these clauses are enacted, the Council make changes as set out at Appendix B in order to mitigate the financial loss to the authority.

11. Equalities and Community Cohesion Comments

- A full equalities impact assessment will be carried out as part of the consultation 11.1 programme.
- It is recognised that there are many areas of the community that will suffer 11.2 difficulties as a result of these changes and we need to consider how best to mitigate against this.

12. Head of Procurement Comments

There are no procurement requirements at this stage of the proposal. 12.1

13. Policy Implication

A full new Council Tax Reduction Scheme policy will need to be written and consulted on. This includes application methods, entitlement criteria, ways to appeal, dealing with changing of circumstances and notification styles.

14. Local Government (Access to Information) Act 1985



14.1 Not applicable

15.Appendices

- Appendix A: Mitigating the cost by changes to the CTB rules
- Appendix B: Mitigating the cost by changes to Council Tax exemptions and discounts
- Appendix C: Analysis of the financial impact of CTB changes on households in Haringey



Appendix A – Mitigating the Cost by making changes to CTB rules

		Financial Impact	Impact on Residents	Band Information
2	Calculate CT reduction allowing savings and investments up to £10k Council Tax reduction not granted if less than a £1 per week.	Saving approx £432k Saving approx £3k	457 claims affected (1%) 287 claims have dependents 103 claims are single parents 289 claims on earnings of less than £50 p/w 86 claims affected (less than 1%) 52 claims have dependents 26 claims are single parents 0 claims on earnings of less than £50 p/w	Band A - 17 Band B - 90 Band C - 172 Band D - 130 Band E:H - 48 Band A - 10 Band B - 26 Band C - 32 Band D - 13 Band E:H - 5
	Total	£435k		



Appendix B: Mitigating the cost by making changes to Council Tax exemptions and discounts

		Current LBH Award	Technical Reform	Projected annual saving
1	Second homes	10% continuous discount until change in status	Option to reduce to 0%	£77k
2	Empty properties undergoing major repair (Class A)	100% exemption for first year, full amount payable thereafter	Option to reduce to 0%	£228k
3	Empty and unfurnished properties (Class C)	100% exemption for 6 months	Option to reduce to 0%	£407k
4	Mortgagees liable	100% exemption from date property becomes empty	Option to reduce to 0%	£21k
5	Empty homes premium	N/A	Introduce a premium of 50% on properties empty for more than 2 years.	£182k
* Th	Total	aving it does not take engage to the		£915k*

^{*} This is the maximum saving, it does not take account of non-collection.

		Technical Reform	Band	Number of properties	Increase in amount owed
[]	Second Homes	10% continuous reduced to 0%	Α	61	£6k
		10 0%	В	114	£13k
			С	148	£20k
			D	122	£18k
			E	67	£12k
			F	16	£3k
			G	13	£3k
	,		Н	4	£1k
			Total	545	£77k
2	Empty properties undergoing major repair (Class A)	100% exemption for first year, reduced to 0%	Α	8	£8k
	,		В	28	£32k
			С	26	£34k
			D	21	£31k
			E	22	£40k
			F	14	£30k
			G	16	£40k
			Н	4	£12k
			Total	139	£228k



Har	ingey Council	Technical Reform	Band	Number of properties	amount owed
Ace.	Empty and unfurnished	100% exemption for 6	Α	45	£22k
	properties (Class C)	months reduced to 0%	В	126	£73k
			С	190	£126k
			D	125	£93k
			E	46	£42k
			F	17	£18k
			G	21	£26k
			Н	4	£6k
			Total	574	£407k
	Mortgagees liable	100% exemption from	A	1	£1k
	Widitgagees liable	date property becomes	В	4	£5k
		empty reduced to 0%	С	10	£13k
			D	0	0
	(E	1	£2k
			F	0	0
			G	0	0
			H	0	0
			Total	16	£21k
	Empty homes premium	Increase from 100% to	A	12	£6k
	Empty nomes promain	150%	В	45	£26k
			С	62	£41k
	,		D	55	£41k
			E	24	£22k
	,		F	11	£12k
			G	18	£22k
			Н	8	£12k
			Total	235	£182k

The financial impact of Council Tax Benefit localisation (CTB), Local Housing Allowance changes (LHA) and the Overall Benefits Cap (OBC) on households in Haringey

Produced by Strategy and Business Intelligence using data from Revenues and Benefits, May – June 2012

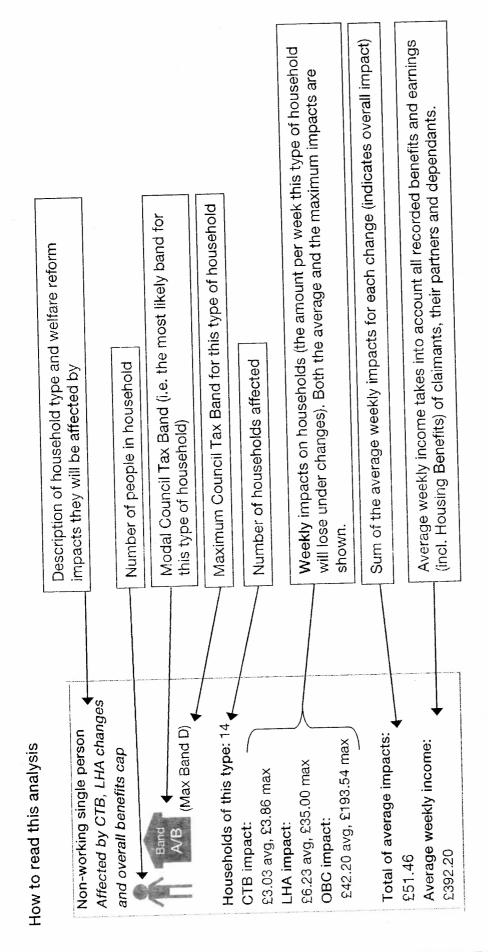
- The payment of Council Tax Benefit (CTB) is being transferred to Local Government control from April 2013 with a 10% cut in grant nationally. Local authorities are able to develop their own schemes within certain guidelines.
 - Haringey's current preferred option is to "top slice" the amount of CTB payable to claimants. After protecting pensioners, in line with government guidance, it is estimated that this will result in an 18% cut to remaining claimants (this is the figure used in the analysis below).

Purpose of this document

- This document provides an indication of the impact of the proposed changes to CTB and wider welfare reforms on households in Haringey. The analysis picks out key types of working age household in Haringey (both working and non-working):
 - Single person
- Single parent with two children
 - Couple with two children
 - Couple with four children

and shows the extent to which they are likely to be impacted by each of the following changes:

- CTB reductions (see above)
- market rates across the board and reduced maximum rates for larger households. The LHA impact analysis used here was completed before Changes to Local Housing Allowance (LHA) from Jan 2012, which include a reduction in allowance from the 50th to the 30th percentile of January 2012 to ensure that the full impact is captured.
- couples and households with dependent children. Households in receipt of certain benefits and tax credits, including Working Tax Credit and The introduction of an Overall Benefits Cap (OBC) from April 2013 which will apply to the combined income from the main out-of-work benefits, plus Housing Benefit, Child Benefit and Child Tax Credit. The cap will be set at £350 for a single person household and £500 for Disability Living Allowance, will be exempt from the cap.
 - For each type of household listed, an average weekly loss (or extra amount payable by the household) is given. A maximum figure (i.e. the largest impact on any single household within the group) is also provided.



- For CTB, the impact on a household is determined by the Council Tax Band and the CTB entitlement of the household alone. The maximum value is likely to be higher than the average because the household with the maximum loss is in a higher band.
 - total of average impacts is given as a rough guide to the overall impact on households. In reality, there may be some interaction The average impacts given for each type of welfare change are calculated separately (i.e. they are the 'marginal' impacts). The between the reforms.
- All figures used in this analysis are correct as at May 2012 (with the exception of LHA impact analysis, see above)

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Total of average impacts: £41.43 Average weekly income: £390.97 Average weekly income: £392.20	Working single person Affected by CTB and overall benefits cap Working single person Affected by CTB, LHA changes and overall benefits		No households of this type (either below threshold for cap or exempt) below threshold for cap or exempt)	Total of average impacts: N/A Average weekly income: N/A Average weekly income: N/A
Maria	Working single person Affected by CTB and overall benefits cap		lo households of this type (either elow threshold for cap or exempt)	l of average impacts: N/A age weekly income: N/A
-	0.000 0.000 0.000		20	Tota Aver
Total of average impacts: £8.81 Average weekly income: £253.29	Working single person Affected by CTB and LHA changes	B (Max Band G)	Households of this type: 775 CTB impact: £2.29 avg, £5.14 max LHA impact: £6.17 avg, £25.00 max	Total of average impacts: £8.46 Average weekly ir.come: £221.44
Total of average impacts: £3.18 Average weekly income: £203.82	Working single person Only affected by CTB changes	Band (Max Band G)	Households of this type: 1788 CTB impact: £2.00 avg, £6.29 max	Total of average impacts: £2.00 Average weekly income: £220.41
		rking	andrago. Para di spining mengangkan gang menjada kanapatan di alah panya panjakan menja	
	Total of average impacts: £3.18 Average weekly income: £203.82	Total of average impacts: £3.18 Average weekly income: £203.82 Working single person Only affected by CTB changes	Total of average impacts: £3.18 Average weekly income: £203.82 Working single person Only affected by CTB changes Band BAND (Max Band G)	Total of average impacts: £3.18 Average weekly income: £203.82 Working single person Only affected by CTB changes Eand B. (Max Band G) Households of this type: 1788 CTB impact: £2.00 avg, £6.29 max

3, LHA erall benefits	(Max Band E)	type: 27 avg,£ 5.15 max 3 avg, £55.00 max 2 avg, £87.18 max	pacts: £51.31 :ome: £534.36	parent with 2 B, LHA verall benefits		his type (either r cap or exempt of WTC)	mpacts: N/A come: N/A
with 2 children Affected by CTB, LHA changes and overall benefits cap		Households of this type: 27 CTB impact: £3.71 avg.£ 5.15 max LHA impact: £16.88 avg. £55.00 max OBC impact: £30.72 avg, £87.18 max	Total of average impacts: £51.31 Average weekly income: £534.36	Working single parent with 2 children Affected by CTB, LHA changes and overall benefits cap		No households of this type (either below threshold for cap or exempt because in receipt of WTC)	Total of average impacts: N/A Average weekly income: N/A
with 2 children Affected by CTB and overall benefits cap	Band (Max C Band E)	Households of this type: 96 CTB impact: £3.84 avg, £5.15 max OBC impact: £50.76 avg, £305.20 max	Total of average impacts: £54.60 Average weekly income: £553.21	Working single parent with 2 children Affected by CTB and overall benefits cap	Band (Max C)	Households of this type: 2 CTB impact: £4.00 avg. £4.58 max OBC impact: £26.06 avg, £51.35 max	Total of average impacts: £30.06 Average weekly income: £596.40
Non-working single parent with 2 children Affected by CTB and LHA changes	Band E)	Households of this type: 111 CTB impact: £3.47 avg, £5.15 max LHA impact: £6.77 avg, £23.08 max	Total of average impacts: £10.19 'Average weekly income: £450.96	Working single parent with 2 children Affected by CTB and LHA changes	Band (Max	Households of this type: 55 CTB impact: £2.80 avg, £5.15 max LHA impact: £6.96 avg, £22.26 max	Total of average impacts: £9.76 Average weekly income: £555.05
Non-working single parent with 2 children Only affected by CTB changes	Band (Max C Band G)	Households of this type: 1183 CTB impact: £3.52 avg, £8.57 max	Total of average impacts: £3.52 Average weekly income: £373.89	Working single parent with 2 children	Band (Max C Band F)	Households of this type: 699 CTB impact: £2.46 avg,£ 6.29 max	Total of average impacts: £2.46 Average weekly income: £488.56
	workir	-uoN			orking	V	or page when the designation of the

Non-workir children Only affect	Vorking		Total of aver	Working fa	rking		Total of ave Average we
Non-working family with 4 children Only affected by CTB changes	(Max Band F)	Households of this type: 50 CTB impact: £4.95 avg,£ 7.43 max	Total of average impacts: £4.95 Average weekly income: £481.98	Working family with 4 children Only affected by CTB changes	(Max Band F)	Households of this type: 205 CTB impact: £4.30 avg, £7.43 max	Total of average impacts: £4.30 Average weekly income: £681.23
Non-working family with 4 children Affected by CTB and LHA changes	(Max Band E)	Households of this type: 6 CTB impact: £5.02 avg, £6.29 max LHA impact: £19.75 avg, £49.62 max	Total of average impacts: £24.77 Average weekly income: £732.37	Working family with 4 children Affected by CTB and LHA changes	(Max Band F) Band F) Band F)	Households of this type: 34 CTB impact: £4.68 avg, £6.29 max LHA impact: £24.65 avg, £152.14 max	Total of average impacts: £29.33 Average weekly income: £759.07
non-working fairing with 4 children Affected by CTB and overall benefits cap	(Max Band F)	Households of this type: 36 CTB impact: £5.23 avg, £7.43 max OBC impact: £161.59 avg, £641.24 max	Total of average impacts: £166.82 Average weekly income: £645.76	Working family with 4 children Affected by CTB and overall benefits cap	(Max Band E)	Households of this type: 11 CTB impact: £4.89 avg, £6.29 max OBC impact: £113.22avg, £174.68 max	Total of average impacts: £118.11 Average weekly income: £732.50
fren cted by CTB, LHA nges and overall ben	Cap (Max Band Band Band Band Band Band Band Band	Households of this type: 11 CTB impact: £4.76avg, £6.29 max LHA impact: £29.76avg, £178.85 max OBC impact: £169.02 avg, £414.80 max	Total of average impacts: £203.54 Average weekly income: £700.39	king family with 4 dren cted by CTB, LHA nges and overall bene	Band Band	Households of this type: 4 CTB impact: £4.49 avg, £5.15 max LHA impact: £13.44 avg, £22.26 max OBC impact: £94.3 avg, £229.28 max	Total of average impacts: £112.23 Average weekly income: £699.74