

Dadansoddi ar gyfer Polisi



Analysis for Policy



Llywodraeth Cymru  
Welsh Government

SOCIAL RESEARCH NUMBER:

29/2023

PUBLICATION DATE:

08/03/2023

# Understanding the impact of Council Tax Interventions in Wales: Standardisation of the Severe Mental Impairment exemption

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.

This document is also available in Welsh.

Understanding the impact of Council Tax Interventions in Wales:  
Standardisation of the Severe Mental Impairment exemption

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Full Research Report: Charlesworth, Z; Clegg, A; Knight-Markiegi, A (2023)  
*Understanding the impact of Council Tax Interventions in Wales: Standardisation of  
the SMI exemption*. Cardiff: Welsh Government, GSR report number 29/2023  
Available at: [https://www.gov.wales/understanding-impact-council-tax-interventions-  
wales-standardisation-severe-mental-impairment](https://www.gov.wales/understanding-impact-council-tax-interventions-wales-standardisation-severe-mental-impairment)

Views expressed in this report are those of the researcher and not necessarily  
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## Acknowledgements

*Policy in Practice would like to thank the following:*

All Welsh councils and third party organisations that took part in this research. This research would not have been possible without this participation.

The Welsh Government, the Welsh Local Government Association, and the Welsh Revenues and Benefits Managers Group who provided invaluable feedback at various stages of this research.

Rory Evans, Tylor-Maria Johnson and Janet Harkin from Policy in Practice, for data analysis, policy insight and proofreading.

Bla translation (<https://bla-translation.co.uk/>) for their excellent work in translating the report into Welsh.

## Contents

1.	Introduction .....	7
2.	Background to the Standardisation of SMI .....	9
3.	Approach.....	14
4.	Methodology.....	15
	Primary evaluation of the implementation of the SMI Council Tax exemption .....	15
	Statistical impact analysis .....	16
	Survey and Interview Data .....	17
5.	Findings: Process Evaluation .....	19
	Introduction.....	19
	Process changes due to the standardisation of the SMI Council Tax exemption .....	19
	Barriers to implementing the SMI Council Tax exemption.....	22
	Evidence of the level of uniformity of use of the standard SMI application form.....	24
	Evidence of ease of access to information relating to SMI .....	25
	Evidence of a clear definition of Severe Mental Impairment.....	27
	Evidence of the implementation of good practice .....	28
6.	Findings: Impact evaluation.....	30
	Council view of the impact of the standardisation of the SMI Council Tax exemption .....	30
	Third party view of the impact of the standardisation of SMI Council tax intervention .....	31
	Evidence of impact: Trends in SMI exemptions 2013 - 2022 .....	32
	Evaluation of the uniformity of impact across Welsh councils .....	35
	Evidence of impact of website accessibility on the application of SMI Council Tax exemptions .....	38

7.	Summary of Findings .....	41
8.	Conclusion and recommendations .....	43
9.	Appendices .....	47
	Appendix 1: Fieldwork Methodology.....	47
	Appendix 2: Survey of Welsh councils – questions relating to the standardisation of SMI .....	48

## List of Figures

Figure 1: Response to survey question regarding awareness of the standardisation of the SMI CT exemption.....	24
Figure 2: Number of Welsh Councils using the standard application for SMI Council Tax exemption.....	29
Figure 3: Accessibility of application for SMI CT exemption from the Council website (number of councils) .....	30
Figure 4: Evaluation of uniformity of SMI Council Tax exemption information and accessibility of application across Welsh councils' websites .....	33
Figure 5: Number of SMI exemptions across Wales 2015-2023 .....	36
Figure 6: Number of SMI exemptions, by Welsh council, 2013 - 2023.....	37
Figure 7: Population potentially eligible for SMI exemptions, by Welsh council, 2013 – 2022 .....	38
Figure 8: Potential population for Council Tax SMI exemption and SMI exemptions for each Welsh council (2022).....	41
Figure 9: Expected SMI Council Tax exemptions against SMI Council Tax exemptions in each Welsh council (2022 – 2023) .....	42
Figure 10: The relationship between website accessibility for SMI Council Tax exemptions and SMI exemptions as a percentage of potentially eligible residents .....	44

## Glossary

Key word	Definition
Attendance Allowance (AA)	The main disability benefit for adults over pension age. Administered by the Department for Work and Pensions.
Council Tax (CT)	A local tax on domestic property administered and collected by local authorities in Britain. The charge is based on the estimated value of a property. Defined classes of dwellings and occupants are exempt from the tax or a discount is applied.
Disability Benefit	For the purposes of this report, this is a collective term for Disability Living Allowance (DLA), Personal Independence Payment (PIP), Armed Forces Independence Payment (AFIP), and Attendance Allowance (AA).
Discount	A discount applied to the full Council Tax. This is applied to certain dwellings when some, but not all, occupants of a dwelling are exempt from Council Tax. Reductions can be at 25% or 50% depending on the categories and number of exempt occupants.
Disability Living Allowance (DLA)	The main disability benefit for children under 16. Administered by the Department for Work and Pensions. Prior to 2013, it was also the main disability benefit for people aged over 16 and under the state pension age. Since 2013, recipients aged 16 and above have gradually been moved to Personal Independence Payment (PIP).
Exemption	Exempt from payment of Council Tax. The classes of dwellings and persons that are provided with exemptions are set by the Welsh Government. Severe Mental Impairment is one of the exempt categories (class U).

Money Saving Expert (MSE)	An organisation and website founded by Martin Lewis that provides financial consumer advice.
Personal Independence Payment (PIP)	The main disability benefit for people aged over 15 and below state pension age. Administered by the Department for Work and Pensions.
Severe Mental Impairment (SMI)	Severe impairment of intelligence and social functioning (however caused) which appears to be permanent.
Supported accommodation	A rented dwelling in which the tenant receives care, support or supervision that is linked in some way to their accommodation.



## 1. Introduction

1.1 In December 2021 the Welsh Government announced an ambitious package of Council Tax reforms with the objective of making the Council Tax system fairer and more progressive whilst maintaining funding for essential local services. These commitments are stated in both the Programme for Government<sup>1</sup> and the Cooperation Agreement<sup>2</sup>. Also in December 2021 the Welsh Government announced plans to consult on measures including revaluation and reform of the tax base. The statement set out that “Options being considered this term include revaluation, a review of the Council Tax Reduction Scheme, and an evaluation of discounts, disregards, exemptions and premiums – with options for more fundamental reform in the longer term.”<sup>3</sup>

1.2 The previous Welsh Government (2016 - 2021) began the process of reform by introducing, in 2019, amongst other actions, four key interventions that worked within the current Council Tax framework:

- The removal of the sanction of imprisonment for non-payment of Council Tax
- The introduction of the Council Tax Protocol for Wales – Good practice in collection of council tax<sup>4</sup>. This is a voluntary code of practice for enforcement and support of people with Council Tax debt and implementation was agreed with all Welsh councils
- Standardisation of the application process for people with a ‘severe mental impairment.’ This involved councils adopting a common application process and standardisation of information provided about the exemption
- Legislation that provided an exemption for care leavers from Council Tax until their 25th birthday with the aim of assisting their transition to adulthood

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<sup>1</sup> [Welsh Government, Programme for Government – Update,](#)

<sup>2</sup> [Welsh Government, Programme for Government – Update](#)

<sup>3</sup> [Welsh Government, Council Tax reform planned](#)

<sup>4</sup> [Welsh Government, Council Tax Protocol for Wales](#)

1.3 In 2022, the Welsh Government commissioned Policy in Practice to undertake research with two key objectives:

- To evaluate local implementation and delivery of the four Council Tax intervention measures introduced in 2019.
- To evaluate the impact of these measures on residents and councils.

1.4 For ease of use, findings in respect of the four interventions are provided in four separate reports. This report evaluates the standardisation of the SMI exemption.

## 2. **Background to the Standardisation of SMI**

- 2.1 The Local Government Finance Act 1992<sup>5</sup>, Schedule 1 (2), provides for the exemption of liability to Council Tax in England and Wales for people with Severe Mental Impairment (SMI). The Act defines Severe Mental Impairment as “severe impairment of intelligence and social functioning (however caused) which appears to be permanent.” Relevant conditions include Alzheimer’s disease, Parkinson’s disease, severe learning difficulties, a stroke and other forms of dementia. The Act sets out the conditions for eligibility including the necessity for the applicant to be entitled to specified disability benefits.
- 2.2 To be eligible, the person affected by SMI must also be entitled to one of the following benefits:
- Incapacity Benefit
  - Attendance Allowance
  - Severe Disablement Allowance
  - Disability Living Allowance (higher or middle rate care component)
  - An increase in disablement pension (as constant attendance is needed)
  - Disability Working Allowance
  - Unemployability Supplement or Allowance
  - Constant Attendance Allowance
  - Income Support (which includes a disability premium)
  - Personal Independence Payment (standard or enhanced rate)
  - Armed Forces Independence Payment
  - Universal Credit (in circumstances where a person has limited capability for work and/or work-related activity)
- 2.3 The Act sets out that if a person with SMI lives alone or only with others with SMI, the property will be fully exempted from Council Tax liability. In other words, there will be no Council Tax charge in respect of the property. If the person with SMI lives

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<sup>5</sup> [Legislation.gov.uk, Local Government Finance Act 1992](https://www.legislation.gov.uk/ukpga/1992/30/schedule/1/2)

with another adult who is not categorised as having an SMI (or eligible for another discount) a 25% discount from full Council Tax liability is applied to the property.

2.4 As legislation governing the SMI discount covers the whole of England and Wales the application of the discount is expected to be uniform. However, research in 2017 by Money Saving Expert indicated that application of the discount was not uniformly applied across councils in England<sup>6</sup>. The report, *The Disregarded Discount*, published in 2017, described application of the discount as “a postcode lottery”. The research methodology consisted primarily of information received from councils through Freedom of Information requests and direct approaches to councils requesting information on support for people with SMI through a ‘mystery shopper’ exercise. The findings of the research revealed significant variation in application and understanding of the SMI exemption between councils. In response to the research findings, Martin Lewis, founder of Money Saving Expert, said:

*“The law rightfully recognises that many vulnerable people who have a severe mental impairment such as dementia or Alzheimer’s are entitled to a Council Tax reduction. Sadly, many councils do not. And the result is 10,000s of people who the state aims to help have been drastically overpaying on their Council Tax for years. Council Tax rules state that, like students, those diagnosed as ‘Severely Mentally Impaired’ (SMI) and eligible for certain benefits are disregarded for Council Tax purposes.... Yet the number of people actually receiving the discount is paltry. This report shows the reason for this seems to lie primarily at the door of councils in England, Scotland, and Wales, which are meant to administer it.”*

*“Our Freedom of Information data and mystery shopper research shows many councils’ frontline staff are unaware of this rule, deny it or misunderstand its meaning. So even if a potential claimant has heard of the discount, he/she can struggle to make an application. This has led to a postcode lottery – with people in some areas 77 times less likely to get it than elsewhere.”*

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<sup>6</sup> [Kirsty Good, Steve Nowotny, Megan French and Sabrina Dougall, \*The Disregarded Discount\*](#),

2.5 Findings from the Money Saving Expert report identified three key reasons for differential levels of take up of the discount and for low take up of SMI:

- Councils misunderstood the criteria, and some were not giving potential claimants the correct information about who qualifies for the exemption
- Claimants were not being provided with the correct information on how to submit a claim. The research found that 68% of councils across the UK were unable to clearly explain the process for submitting a claim
- There was a link between poor communication and low uptake; councils failing to provide clear information and people failing to successfully claim the discount.

2.6 The recommendations from the Money Saving Expert report were that:

- A review is carried out of local authority procedures regarding the Council Tax SMI exemption. This should include analysis of the claim procedure, the quality of communications, and the disparity of policies regarding backdating
- There should be an assessment of how many people could be eligible to claim the SMI exemption and how many are in receipt of it
- A standardised application procedure should be introduced which includes the standardised application form, and this should also be available on Government websites
- All councils should adopt the standardised procedure
- Councils should be equipped with the necessary resources and information to effectively administer the SMI exemption

2.7 In 2019, as part of its commitment to make Council Tax fairer, the previous Welsh Government responded to the report by working with Money Saving Expert to implement the recommendations across Wales. The implementation of the recommendations included:

- The introduction of a standardised application form to be used by all councils
- A commitment from all Welsh councils to adhere to a standardised assessment and application procedure

- Measures to publicise the SMI exemption including an updated page on the Welsh Government website and an information leaflet to ensure consistent information was available about discounts and exemptions

2.8 In April 2019 the Welsh Government issued a statement about these measures.

*“For the first time, people who have received a severely mentally impaired (SMI) diagnosis and meet the eligibility criteria will be treated consistently throughout Wales to ensure they receive the same support and discounts no matter where they live. They will also be able to claim back any council tax discounts, to the point when they were diagnosed.”*

*“To access this support the Welsh Government, MoneySavingExpert.com and Welsh local authorities, have developed a single, simple, and easy-to-use form, which people with SMI can use to claim what they are entitled to. The form is now widely available in all local authorities and advice centres across Wales.<sup>7</sup>”*

2.9 Money Saving Expert welcomed the intervention stating: *“the Welsh Government and all 22 Welsh local authorities have made every change called for by MSE in our 2017 report, The Disregarded Discount. This means the application form for the discount will be standardised across the country, and backdating is to be allowed by EVERY council in a standardised way.”*

2.10 Council Tax collection data suggests that the number of people in receipt of SMI exemptions across Wales has risen since 2019. However, this may reflect demographic or other change across the Welsh population as well as the SMI intervention by the Welsh Government.

2.11 The Welsh Government wishes to evaluate whether its objectives for the intervention on standardisation of the SMI exemption have been met. Namely, whether there is greater uniformity of application of the SMI exemption from Council

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<sup>7</sup> [Welsh Government, Press release: Wales leads the way in helping most vulnerable access crucial Council Tax discount](#)

Tax across Welsh councils. This report sets out the available evidence for whether this is the case.

*Impact of Covid*

- 2.12 The pandemic, starting in the winter of 2019, led to widespread business disruption and increased pressure on councils as they were charged with operationalising COVID-19 support to residents. This research attempts to separate out the effects of the pandemic from those that are due to the introduction of the interventions. The report highlights where COVID-19 impacts may have affected results.

### 3. **Approach**

3.1 Findings from this research are drawn from desk-based research, quantitative analysis and fieldwork.

3.2 Desk-based research synthesises previous research findings and examines Welsh council websites in order to evaluate the implementation of the standardisation of the SMI Council Tax exemption. This informs an understanding of uniformity of implementation across councils and identifies good practice.

3.3 Statistical and data analysis are used to understand:

- Whether the number of SMI Council tax exemptions awarded in a council area correlate to the number expected
- Change in the number of exemptions in relation to SMI across Wales and the level of variation of change across regions
- Correlation between the guidance provided by councils, using website guidance as the indicator, and application of the SMI Council tax exemption

3.4 Surveys, interviews and discussions with stakeholders provide context to findings.



## 4. Methodology

### Primary evaluation of the implementation of the SMI Council Tax exemption

4.1 Websites of all 22 Welsh Councils were reviewed to inform the following research questions:

- Does the council use the standard application form for SMI Council tax exemption introduced by the Welsh Government as part of the intervention?
- Does the council provide information on the SMI Council tax exemption?
- How easy is it to access information on the SMI Council tax exemption?
- Is there evidence of good practice in implementation of the exemption?

4.2 The Welsh Government website has a clear route to information on the SMI Council Tax exemption. The Welsh Government's SMI webpage is displayed immediately after the entry of the phrase "Severe Mental Impairment." However, it cannot be assumed that residents searching for information would use the terminology "Severe Mental Impairment." It is more probable that residents would search for information from the Council Tax pages. Entering "Council Tax" in the Welsh Government's search function on the home page provides a clear route to the Discounts and Exemptions home page, which then displays, and allows selection of, the category "Severe Mental Impairment." The route to information on the Welsh Government website is:

Council Tax > Discounts and reduction > Severe Mental Impairment

4.3 The Welsh Government's Severe Mental Impairment information page has the following features:

- A plain language description of the exemption including a list of benefits required for the exemption
- The level of discount applicable
- A link to the standard application form (PDF version) or alternative action that could be taken (contact your local Council Tax department and a link to the Council Tax contact details for all Welsh Councils) and a link to the availability of the information in Welsh.

- 4.4 In reviewing websites for Welsh councils the clear route and easily accessible information demonstrated by the Welsh Government website is used as a benchmark.
- 4.5 Websites were reviewed in June 2022 and may have been amended since then.

### **Statistical impact analysis**

- 4.6 Stats Wales provides data on the dwellings receiving the SMI Council Tax exemption by local authority for 2013 - 2023. The data table was filtered for dwellings receiving Exemption U, Severely Mentally Impaired. The survey describes these dwellings as being “occupied only by persons that are severely mentally impaired, or only occupied by persons that are severely mentally impaired together with students.” This data set does not identify partial discounts to Council Tax due to SMI. It therefore does not reflect the full number of residents with SMI being supported by a council.
- 4.7 In order to understand the level of application of the SMI Council Tax intervention and the uniformity of application of the SMI Council Tax exemption across Welsh councils, a measure of the potentially eligible population is required. There is no data available on the exact population eligible for an SMI Council Tax exemption within each borough therefore a proxy for the number of potentially eligible households was identified for each council. The proxy is a figure that can be used to represent the potentially eligible population but consists of an identifiable subset of that population.
- 4.8 The proxy for potential eligibility to the SMI Council Tax exemption is comprised of two elements: the first is that the person is currently receiving an eligible disability benefit and the second element is that the person has a severe mental impairment such as dementia, severe learning disability or Alzheimer’s disease.
- 4.9 For the purpose of this research a household is counted as potentially eligible for an exemption if an adult in the household is in receipt of any of the following disability benefits; Personal Independence Payment (PIP), Attendance Allowance (AA) or Disability Living Allowance (DLA), and the disabling condition of the main claimant for the household indicates SMI.

- Person Independence Payment data is provided by the table “PIP Cases with Entitlement” where the main claimant has a cognitive disorder or dementia.
- Attendance Allowance data is provided by the table “AA: Cases in Payment” where the main claimant has a main disabling condition of dementia or severe mental impairment.
- Disability Living Allowance data is provided by the table “DLA: Cases in Payment” where the main disabling condition is dementia or severe mental impairment.

4.10 Benefits data is taken from Stats Wales data sets covering the period August 2013 to March 2023, which is the most up to date record at the time of drafting this report.

4.11 To compare the proxy for the eligible population with the population actually receiving the SMI Council Tax exemption the data for each population is taken from the same financial year.

### **Survey and Interview Data**

4.12 Primary quantitative and qualitative data collected through online surveys and face-to-face interviews was analysed to inform both the process and impact evaluation.

4.13 Welsh councils were surveyed to gather the council’s understanding of the four Council Tax interventions. Specific questions addressed the implementation of the standardisation of SMI and its impact. These are provided in Appendix 2. All councils were invited to take part and surveys were disseminated primarily to the Revenues and Benefit Manager. There were 23 responses to the survey from 14 councils. A list of participating local authorities and the roles of participants are provided in Appendix 1.

4.14 Semi structured interviews were held with third party agencies in order to gather views on the implementation and impact of Council Tax interventions. In relation to the SMI intervention, representatives from The Alzheimer’s Society, Money Saving Expert, Age UK Cymru and MIND were interviewed. Interviews took approximately an hour and were semi structured.

4.15 The surveys and interviews provided a descriptive snapshot of the awareness, experience and impact of the Standardisation of SMI.

## 5. Findings: Process Evaluation

### Introduction

5.1 As part of the implementation of the standardisation of the SMI exemption Welsh councils agreed to:

- Adopt the standardised application form
- Adopt a common approach to assessment and application of the SMI Council Tax exemption
- Use common, consistent and clear literature. This includes information on how to claim and provision of a standard leaflet on the exemption.

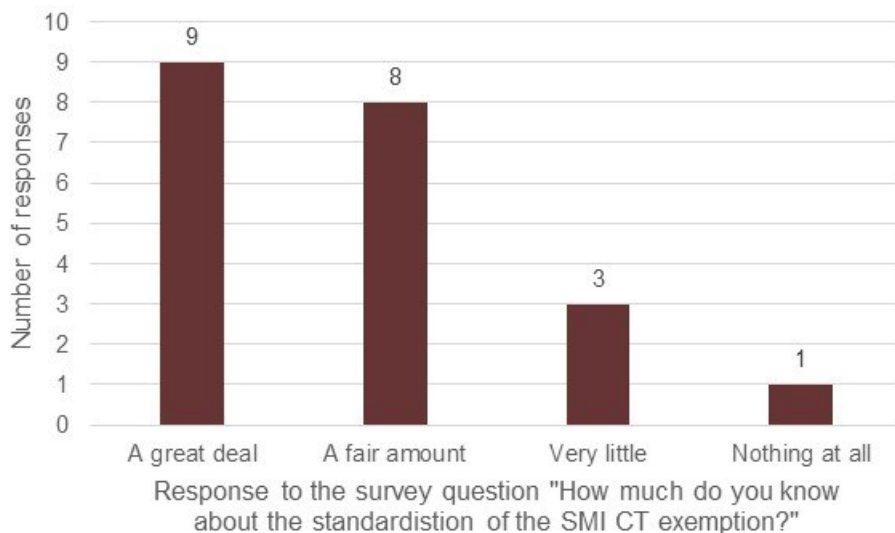
To understand how far councils had implemented these measures both fieldwork and primary research were employed.

- Welsh council websites were evaluated in June 2022 to see whether the council used the common application form, whether there was clear signposting to information on the SMI exemption and if councils provided a clear description of the exemption.
- A survey of council officers sought to understand the process of implementation and application of the exemption within the council.

### Process changes due to the standardisation of the SMI Council Tax exemption

5.2 A survey of Welsh councils sought to understand the level of awareness of the SMI Council Tax exemption across councils. Awareness appeared to be reasonably high with the majority of respondents (73%) stating that they knew a great deal or a fair amount about the exemption.

**Figure 1: Response to a survey question regarding awareness of the standardisation of the SMI CT exemption**



(Source: Survey of Welsh councils, 21 total responses)

Even though awareness of the measure appears to be high, when asked if they require further training on the exemption, half of those responding said that they did require further training.

5.3 Councils were asked to identify changes made due to the introduction of the standardisation of SMI. The main implementation measure mentioned by councils was the adoption of the standard SMI exemption application form on the council’s website. This was mentioned by 12 out of the 16 responses. 3 out of 16 respondents to the survey mentioned change to backdating rules. All Recovery Officers respondents mentioned halting any recovery procedure once possible SMI is indicated and signposting to application for the exemption. One respondent stated that the intervention led the council to review the terminology used on their website and elsewhere *“because phrases such as ‘severe mental impairment’ deter many candidates, their families and friends from making an application.”*

5.4 The standardisation of application form was felt by councils to be a positive change in administration of the SMI Council Tax exemption.

*“The standardised application process has supported the administration of the discounts/exemptions.”*

*[It is] a clear application, user friendly. It is standardised to allow support agencies to understand the form across Wales. The form looks less complex."*

(Survey of Welsh councils)

- 5.5 The survey of council officers indicated that implementation of measures to promote the SMI Council Tax exemption differs between councils. Although the majority of respondents mentioned the standardisation of the application form, any change above this measure was not universal. The variance can be seen in the following responses:

*"The only change was to adopt the standardised application form"*

*"We adopted the Wales-wide standard form but used modern terms rather than the statutory terms that prevent many from making an application for support. In 2020/21 we had a campaign to increase the amount of applications, including posters in offices and inserts with Council Tax bills."*

*"Nothing has changed"*

(Survey of Welsh councils)

- 5.6 The survey also indicated variation in the level of promotion of the measure. All respondents stated that the website was the main source of information for residents on the SMI Council Tax exemption. Two councils mentioned training of staff and one council mentioned specific awareness campaigns.

*"The council website is used to provide information and links to Welsh Government information booklets"*

*"Information is provided during the annual billing process and details are also available on the council's website. There is also a dedicated cost of living web page where details on SMI are contained. Social Media campaigns are also carried out from time to time trying to raise awareness of the discounts/exemptions available."*

(Survey of Welsh councils)

Alzheimer's Society suggested that councils could promote the exemption more and actively pursue applications. For example, they suggested that referrals could be

made directly from other services such as memory assessment clinics. They were concerned that without active engagement around the measure, the SMI exemption *“falls between the cracks.”*

### **Barriers to implementing the SMI Council Tax exemption**

- 5.7 Respondents to the council survey identified two key barriers to greater implementation of the SMI Council Tax exemption:
- The role of GPs and requirement for medical certification
  - The terminology “Severe Mental Impairment” which can deter some applicants or their carers.
- 5.8 The role of GPs and the need for medical certification, particularly around the start date of Severe Mental Impairment for backdating purposes, was seen as problematic by councils. The willingness of GPs to certificate a condition and the knowledge of the exemption varied across GP practices. One respondent mentioned that doctors were more likely to certificate long-term conditions and the respondent felt that people with shorter term mental impairment, perhaps due to a recoverable illness, were excluded from the support. A number of respondents mentioned that the need to obtain this evidence meant that only people with adequate support could access the exemption. The need to obtain medical certification was seen to slow down the exemption award process.

*“I'd like to remove the GP certificate however there does need to be a mechanism for certifying a person's SMI status.”*

*“Is there a need to require both benefit entitlement and medical certificate?”*

*“[There is a] lack of consistency across the medical profession”*

*“Doctors do not understand the criteria”*

*“I think the statutory definition of SMI needs to be reviewed. The regs are old and further (detailed) clarification needed to assist doctors/qualified practitioners”*

(Survey of Welsh councils)



- 5.9 An interview with Alzheimer’s Society also mentioned the medical certification as being problematic stating that it is *“a lengthy process with a 4,000 case backlog”* . They stated that the nature of neurodegenerative disease means that certifying the start of a condition is also problematic. Mind Cymru felt that the medical definition itself was too tight and perhaps did not cover all conditions that result in SMI (e.g., mental illnesses such as schizophrenia).
- 5.10 Money Saving Expert stated that it remained challenging for people to get a diagnosis from medical professionals. Sometimes the medical profession can discourage applications. They felt there needed to be more guidance for the medical profession about which medical professionals can evidence SMI, and the definition of SMI. They stated, *“the medical community needs to be better informed.”* Money Saving Expert welcomed the standardisation of backdating to diagnosis but recognised that this caused an additional challenge to the medical profession as many of the relevant conditions are progressive and so determining an exact date for commencement of SMI is difficult.
- 5.11 The terminology “Severe Mental Impairment” was seen as problematic by about half of the council survey respondents.

*“The stigma around the wording 'severe mental impairment' can be a barrier to individuals claiming the reduction. Whilst it is evident that some customers would be entitled to a reduction, although minimal, some do not claim as they do not consider that they are 'severely mentally impaired' and therefore alternative wording should be considered.”*

*“I would welcome an alternative phrase to 'severe mental impairment' as this can be a barrier to customers claiming a reduction.”*

(Survey of Welsh councils)

- 5.12 Money Saving Expert felt that the terminology “Severe Mental Impairment” would deter some applications due to associated stigma. They felt that *“work was needed to change the name.”*
- 5.13 Money Saving Expert stated that there may be confusion about the wording of the legislation that requires a person to prove that they are *entitled to* disability benefits.

Some potential recipients of the exemption may choose not to claim disability benefits although they are entitled to them. Councils tend to use receipt of relevant disability benefits as proof of entitlement and may require guidance for when a person is entitled but not claiming.

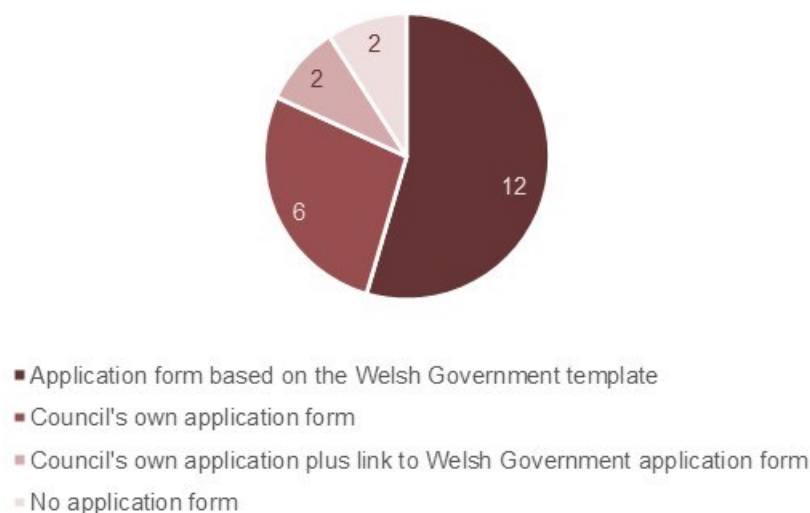
- 5.14 Councils responding to the survey did not see COVID-19 as a barrier to implementation of the standardisation of SMI Council Tax exemption. Two respondents stated that it was slightly harder for GPs to certificate patients but the remainder felt that there had been no impact due to COVID-19.

#### **Evidence of the level of uniformity of use of the standard SMI application form**

- 5.15 The survey of councils suggested that the main source of information on the SMI Council Tax exemption for residents is through the council websites. Examination of council websites therefore provides a useful method of evaluating implementation.
- 5.16 Primary research was undertaken as part of this evaluation consisting of an examination of Welsh council websites. The findings indicated that the standard SMI application is not uniformly accessible across Welsh council websites.

The research found that 12 Welsh councils use the standard application form for the SMI exemption, six use their own form (typically one form for all discounts and exemptions), and two councils direct applicants to both their own form and the standard SMI application form. The remaining two councils did not have application forms accessible from their websites. One of these councils listed Severe Mental Impairment as a category for Council Tax exemption and directed all those who wished to apply for an exemption to contact the council. The other council did not have an application form accessible from the website and did not list Severe Mental Impairment on its discount and exemption pages.

**Figure 2: Number of Welsh Councils using the standard application for SMI Council Tax exemption**



*(Source: Survey of 22 Welsh council websites)*

### **Evidence of ease of access to information relating to SMI**

5.17 Accessibility to the SMI Council Tax exemption is a key objective of the introduction of standardisation. The websites of all Welsh councils were evaluated for ease of access to information on the SMI Council Tax exemption. Access was divided into Good, Moderate and Poor. Information on the definition of these categories is given below.

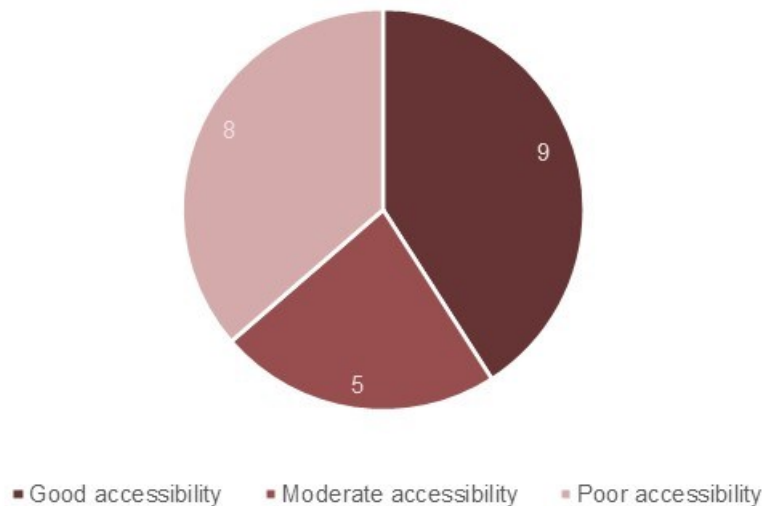
5.18 A council is categorised as having Good accessibility if all the following conditions are met:

- Easy route to information (e.g., Council Tax > Discounts and reductions > SMI > Application)
- Easy access to the application form directly from the web page listing SMI (whether the council uses its own application form or the standard version)

5.19 A council is categorised as having Moderate accessibility if only one of the characteristics for Good accessibility is not met.

5.20 A council is categorised as having Poor accessibility if neither of the characteristics is met.

**Figure 3: Accessibility of application for SMI Council Tax exemption from the council website**



*(Source: Survey of 22 Welsh council websites)*

5.21 Research findings indicated that nine councils had Good accessibility to information about the SMI Council Tax exemption and an application form. Five councils were categorised as having moderate accessibility and eight were categorised as having poor accessibility. Specific examples of council websites that were categorised as having Poor accessibility included:

- A reasonable route to accessing a list of classes of discounts or exemptions but no indication on the same page on how to apply
- Having different information and application forms if “Exemptions” or “Discount” was selected from the main Council Tax page
- No route from the Council Tax main page to information on discounts and exemptions
- Access to SMI information from the Council Tax Reduction page rather than “Discounts and Exemptions” page
- SMI included within an extensive list of discounts and exemptions that required the user to scroll through numerous pages to access SMI information

5.22 One of the main accessibility issues, common to the majority of websites, was the separation of information into “Reduction,” “Discounts” or “Exemptions.” On some websites information on the SMI Council Tax exemption is accessed by selecting Discounts, for other sites it is accessed through selection of Exemptions. A few websites provided access after selection of either Discounts or Exemptions. Information on SMI was typically easier to access if the council had one selection that included both Discounts and Exemptions.

### **Evidence of a clear definition of Severe Mental Impairment**

5.23 Eight out of the 22 Welsh councils had a clear definition of Severe Mental Impairment and the majority of these stated the related benefit eligibility criteria. An example of a clear explanation, including information on backdating, is from Bridgend County Borough Council<sup>8</sup> (below).

#### **Discount for severe mental impairment**

Someone with a severe mental impairment living alone or only with others who have severe mental impairments can claim a 100% council tax reduction. If they live with another person without a severe mental impairment, that household can claim a 25% council tax discount. However if someone who is severely mental impaired lives with two or more adults who are not, there is no discount.

**This discount can be backdated to the date of diagnosis, as confirmed by the doctor and receipt of entitlement to qualifying benefits.**

#### **Eligibility for the severe mental impairment discount**

To claim the severe mental impairment discount, someone needs to be:

- certified as severely mentally impaired by a doctor
- eligible for one of the benefits listed on [the Welsh Government webpage about the severe mental impairment discount](#) 

5.24 At the time of the review the majority of councils did not include additional text defining SMI on their websites. These councils typically include SMI in a list of other exemptions and discounts. This does not necessarily reduce accessibility to information. In some cases a hyperlink to the standard form is included and

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<sup>8</sup> [Bridgend Council: Council tax discounts web page](#)

information within the form goes some way towards providing further definition of the term.

### **Evidence of the implementation of good practice**

5.25 Good practice in communication and application for the SMI Council Tax exemption contained the following characteristics:

- Use of the standard SMI application form
- Ease of access to information relating to SMI
- Clear definitions of SMI

5.26 The table below shows each of the categories evaluated (use of the standard form, accessibility, and clear definition) and the evaluation, by council, for these categories.

**Figure 4: Evaluation of uniformity of SMI Council Tax exemption information and accessibility of application across Welsh councils' websites**

Council ID for SMI purposes	Uses standard application form	Definition of SMI	Accessibility
1	✓	x	✓
2	x	x	x
3	x	x	Partial
4	Partial	✓	✓
5	x	x	x
6	x	✓	Partial
7	x	x	x
8	✓	✓	✓
9	✓	✓	✓
10	✓	x	✓
11	✓	✓	Partial
12	x	x	x
13	✓	✓	✓
14	✓	x	Partial
15	x	✓	✓
16	✓	x	Partial
17	✓	x	x
18	✓	x	✓
19	x	x	x
20	Partial	✓	x
21	✓	x	✓
22	✓	x	x

*(Source: Survey of 22 Welsh council websites)*

5.27 Three councils were evaluated as Good in all three categories. These were Newport<sup>9</sup>, Cardiff<sup>10</sup> and Pembrokeshire<sup>11</sup>. The websites of these councils could be considered as good practice examples for other councils.

<sup>9</sup> [Newport Council: Discounts – Disregarded Persons web page](#)

<sup>10</sup> [Cardiff Council website: Disabled persons' reduction web page](#)

<sup>11</sup> [Pembrokeshire Council website: Council Tax Discounts web page](#)

## 6. Findings: Impact evaluation

### **Council view of the impact of the standardisation of the SMI Council Tax exemption**

6.1 Councils were asked if they thought the implementation of the standardisation of the SMI Council Tax exemption had been effective. 50% of councils surveyed rated their council's implementation of the standardisation of the SMI Council Tax exemption as effective and 25% rated it as ineffective. The remaining respondents did not have a view on this question.

6.2 A number of council survey respondents felt that the introduction of the standardisation of the SMI Council Tax exemption in itself had an impact on applications.

*“We did publicity at a time when changes were made although a lot of the national publicity helped increase awareness.”*

(Survey of Welsh councils)

6.3 Survey respondents felt that the standardisation of SMI had an impact on residents, primarily through more applications as a result of greater awareness and increased ease of application. Respondents stated that the financial impact could be significant and that an awareness of the SMI Council Tax exemption prevented arrears action where possible SMI is identified.

*“This support can be a significant change. Council Tax is a substantial cost for homes.”*

*“[Exemption results in] large, backdated refunds and removal of ongoing charges”*

*“The money saved on council tax is beneficial especially given the current cost of living crisis.”*

(Survey of Welsh councils)



### **Third party view of the impact of the standardisation of SMI Council tax intervention**

- 6.4 Organisations that support residents with mental impairment, mental illness and neurodegenerative disease were interviewed about the impact of the standardisation of the SMI Council Tax exemption. Overall these organisations had limited experience of the impact of standardisation but more experience of the impact of the exemption once applied.

Mind Cymru was supportive of the principle stating that *“it’s a good idea” to introduce this; good for people living with SMI or for carers*” and they welcomed uniformity in approach and the removal of the need to apply for Council Tax support. As part of their own research programme they asked their advisors for feedback on the exemption and only one advisor felt it was ineffective, all other advisors felt it was effective.

Alzheimer’s Society stated that they had not heard from their operations teams that there were issues around application of the SMI Council Tax exemption although they also stated that they had not heard much about it since it was introduced.

- 6.5 Money Saving Expert regard the Welsh Government’s intervention to standardise the SMI Council Tax exemption as a *“success,”* particularly the uniform application of backdating. They felt that it had gone a considerable way to remove the ‘postcode lottery.’
- 6.6 Alzheimer’s Society suggested that the impact on people who were awarded the exemption was significant.

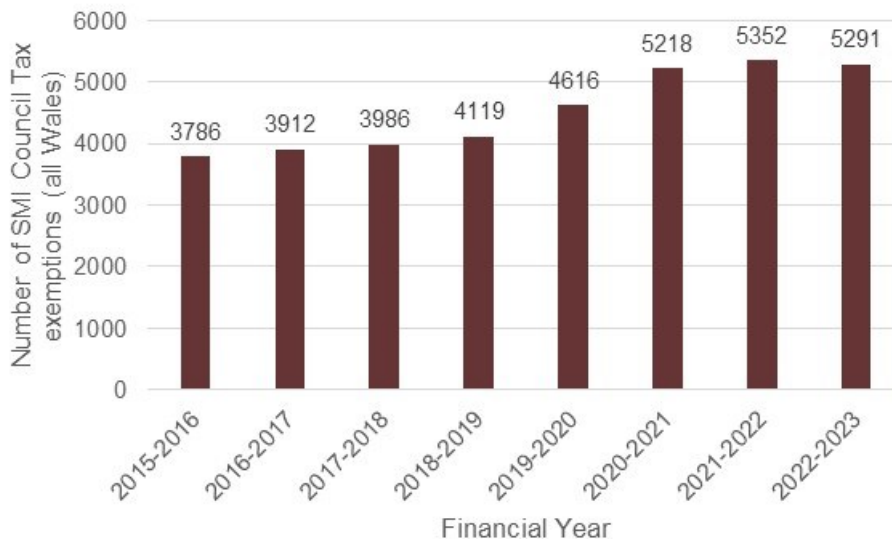
*“[It] reduces bills or payments for people affected by dementia, which already costs a lot for households. Council Tax is probably low down on a list for people at the point of diagnosis; but quite an important step, especially on cost of living and cost of social care.”*

(Alzheimer’s Society)

## Evidence of impact: Trends in SMI exemptions 2013 - 2022

- 6.7 Statistical analysis of the number of SMI Council Tax exemptions provided across Wales can inform an understanding of impact of the Welsh Government's intervention.
- 6.8 Statistical analysis shows that in 2022-2023 5,291 dwellings in Wales were exempt from Council Tax due to the SMI Council Tax exemption.
- 6.9 In the four years before the standardisation of the SMI Council Tax exemption the average number of SMI Council Tax exemptions per year was 3,951. In the four years following the standardisation of the SMI exemption the average numbers of dwellings exempt from Council Tax due to SMI was 5,119 per year. This is a significant increase of 29.6%.

**Figure 5: Number of SMI exemptions across Wales 2015-2023**

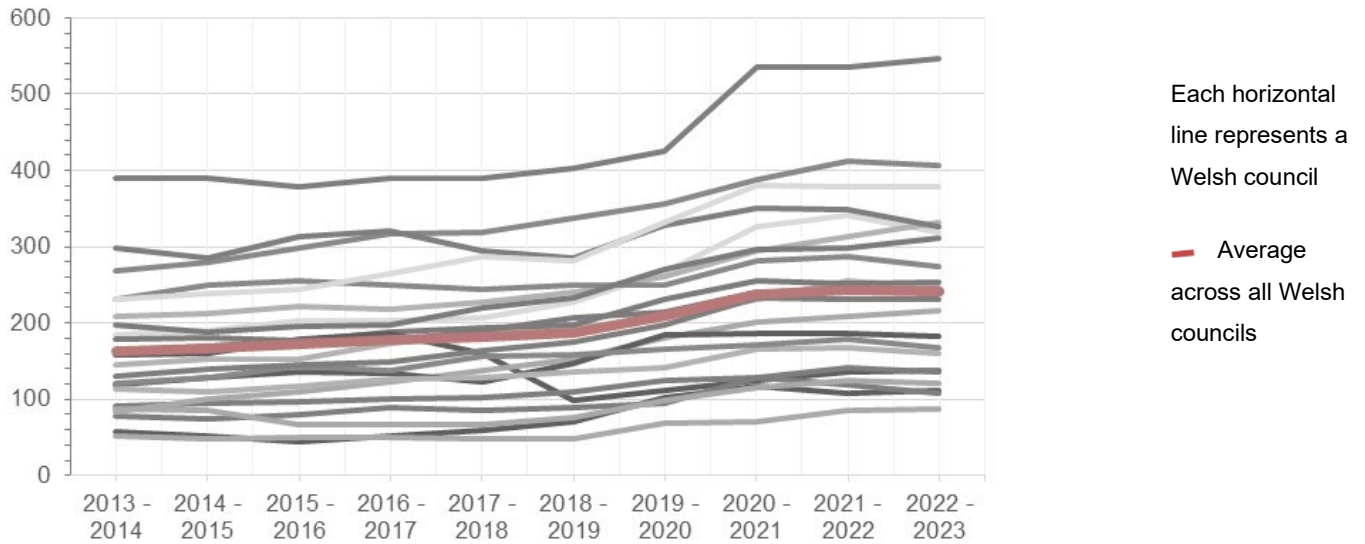


(Source: StatsWales, Dwellings exempt from council tax, by local authority and class)

- 6.10 The number of Council Tax SMI exemptions applied by Welsh councils remained broadly stable from 2013 to 2019. There was a noticeable increase in SMI Council Tax exemptions occurring between 2018-2019 and 2021-2022 (Figure 6).

**Figure 6: Number of SMI exemptions by Welsh council, 2013 – 2023**

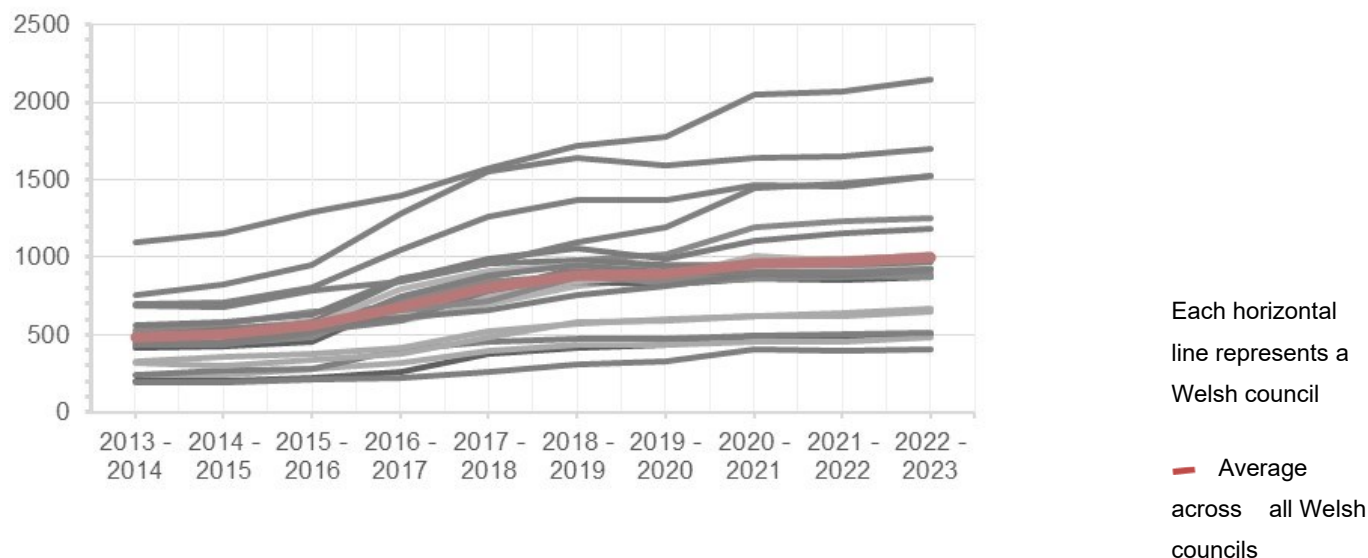
(Source: StatsWales, Dwellings exempt from council tax, by local authority and class)



*The relationship of trends in SMI exemptions and the eligible population*

6.11 In order to understand whether the increase in SMI Council Tax exemptions from 2019 reflects an increase in the population eligible for exemption, or whether it is a reflection of the Welsh Government’s SMI Council Tax intervention in 2019, trends in the eligible population for SMI Council Tax exemption were examined for the same period. (Figure 7).

**Figure 7: Population potentially eligible for SMI exemptions by Welsh council, 2013 – 2022**



*(Source: DWP Stat-Xplore. Datasets: AA cases in payment, DLA cases in payment, PIP cases with entitlement. Filtered by local authority and disabling condition)*

- 6.12 Overall the population of Welsh residents potentially eligible for the SMI Council Tax exemption has seen a year-on-year increase since 2013. However, the trend in the potentially eligible population does not show a significant rise from 2019.
- 6.13 From 2013-14 to 2018-2019 the potentially eligible population grew significantly at an increase of 83%. Over this period SMI Council Tax exemptions grew at a much slower pace, increasing by just 15%. This indicates that some residents potentially missed out on SMI Council Tax exemptions in these years.
- 6.14 From 2019, when standardisation of the SMI Council Tax exemption was implemented, the number of SMI exemptions increases at a higher rate than the increase in the potentially eligible population.
- 6.15 In the period 2018 - 2019 to 2022 - 2023 the potentially eligible population increased at a rate of 12%. Over the same period SMI exemptions increased by 28%. Since the implementation of the standardisation of the SMI Council Tax exemption the award of exemptions has increased at a higher rate than the eligible

population. This reverses the situation before 2019 when increases in the potentially eligible population rose faster than the award of exemptions.

- 6.16 Given that the significant increase in SMI Council Tax exemptions awarded from 2019 – 2023 outstrips the increase in the potentially eligible population over this period, it is likely that the implementation of the standardised approach to SMI Council Tax exemptions introduced by the Welsh Government and Welsh Councils in 2019 achieved the objective of increasing applications for SMI Council Tax exemptions across Wales.

### **Evaluation of the uniformity of impact across Welsh councils**

- 6.17 A further objective of standardisation of the SMI Council Tax exemption was to increase uniformity of application across Welsh councils. An understanding of uniformity of application of the intervention can be derived from the correlation between the potentially eligible population for SMI Council Tax exemption and the number of SMI Council Tax exemptions applied by each Welsh council.
- 6.18 It is worth noting that the correlation between the population that is potentially eligible for the SMI Council Tax exemption and SMI Council Tax exemptions applied is not expected to be absolute. There are other drivers, beyond levels of disability within a population and council administration, that are likely to have an impact on the number of residents eligible for the SMI Council Tax exemption. These include:
- Household composition, particularly the number of single-person households within a borough. This is because a resident eligible for the SMI Council Tax exemption needs to be living alone, or to have all other adults in the household discounted for Council Tax liability purposes, in order for a full exemption from Council Tax liability to apply. If a resident eligible for the SMI Council Tax exemption resides with a person counted for Council Tax liability purposes, a 25% discount on the Council Tax charge is applied rather than a full exemption from liability. Published data on discounts, rather than exemptions, is provided as an aggregated total; it is not possible to ascertain discounts relating specifically to SMI.

- Age profile of residents of the borough; potential eligibility increases with age due to the high correlation of dementia with age.
- Availability of care facilities, such as supported accommodation, available within a borough. Residents supported at live-in facilities would not be liable for Council Tax and so would not be provided with a Council Tax exemption. The availability of this type of provision is likely to vary across Wales.

6.19 Even with these caveats, if implementation of the SMI Council Tax exemption has been uniformly applied across councils, then each council would show a reasonably similar relationship between potential eligibility and SMI Council Tax exemptions applied, within reasonable bounds.

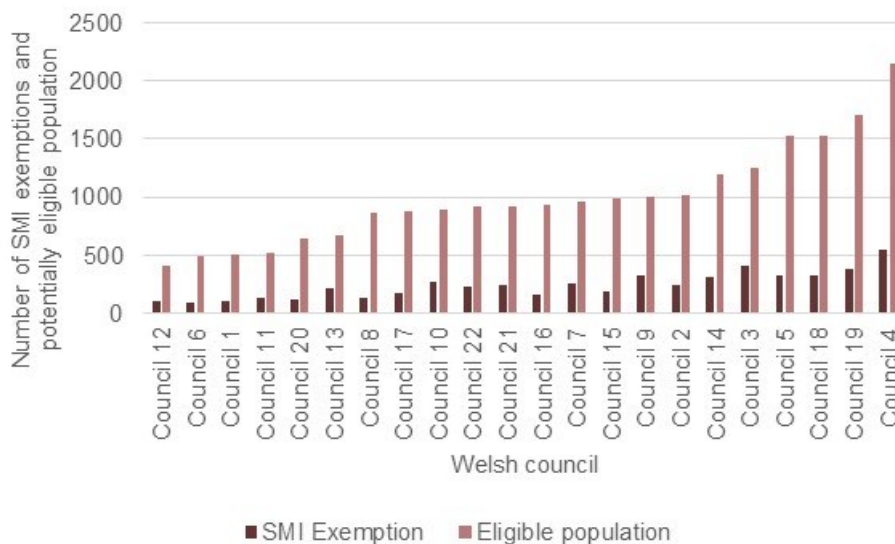
6.20 Figure 8 shows the potential eligibility for SMI Council Tax exemption in 2022 and the number of SMI Council Tax exemptions applied in 2022 - 2023, by Welsh council. There is a clear relationship between the potentially eligible population for the SMI Council Tax exemption and the number of SMI Council Tax exemptions applied. Councils with a higher potentially eligible population for SMI Council Tax exemption apply a greater number of SMI Council Tax exemptions. There are no significant outliers to this pattern.

6.21 The correlation between the potentially eligible population for the SMI Council Tax exemption and the number of exemptions awarded is strongly positive<sup>12</sup>.

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<sup>12</sup> ( $r(22) = 0.90$ )

**Figure 8: Potential population for Council Tax SMI exemption and SMI exemptions for each Welsh council (2022)**

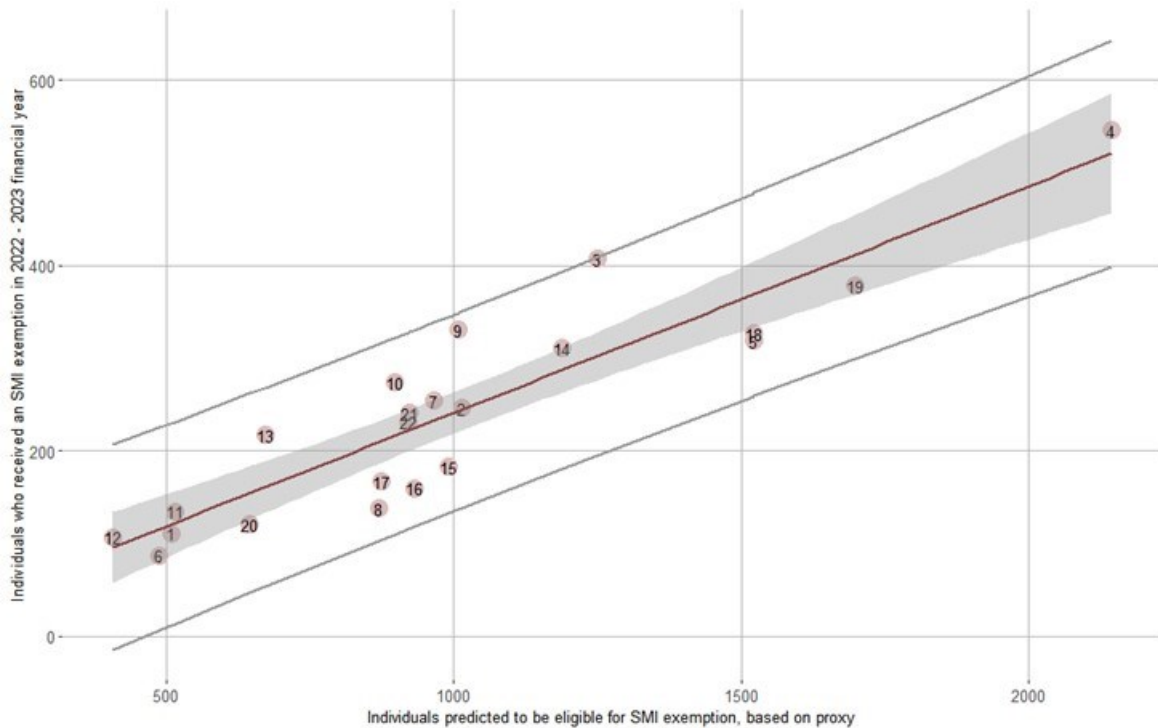


*(Sources: SMI exemptions from StatsWales, Dwellings exempt from council tax, by local authority and class. SMI potential eligibility from DWP Stat-Xplore. Datasets: AA cases in payment, DLA cases in payment, PIP cases with entitlement. Filtered by local authority and disabling condition)*

6.22 To understand whether a council’s application of SMI Council Tax exemptions is in line with the expected number of SMI Council Tax exemptions the number of SMI Council Tax exemptions applied for each resident potentially eligible was calculated as a baseline. The number of SMI Council Tax exemptions against potential eligibility for SMI Council Tax exemption, for each council in Wales, is shown on the graph below (Figure 9). The grey lines on the graph represents the prediction intervals. In this case, the prediction intervals are used to show whether 95% of SMI exemptions fall within normal distribution.

6.23 No council applies SMI Council Tax exemptions at a level that is significantly outside expectations. Caerphilly Council is notable as being the furthest from the mean as it provides a higher level of SMI Council Tax exemptions than expected given the potential eligible population (council 3 on the graph). Overall, there appears to be reasonably strong uniformity of application of the SMI Council Tax exemption across councils in Wales.

**Figure 9: Expected SMI Council Tax exemptions against SMI Council Tax exemptions in each Welsh council (2022 – 2023)**



(Sources: SMI exemptions from StatsWales, SMI potential eligibility from DWP Stat-Xplore)

### Evidence of impact of website accessibility on the application of SMI Council Tax exemptions

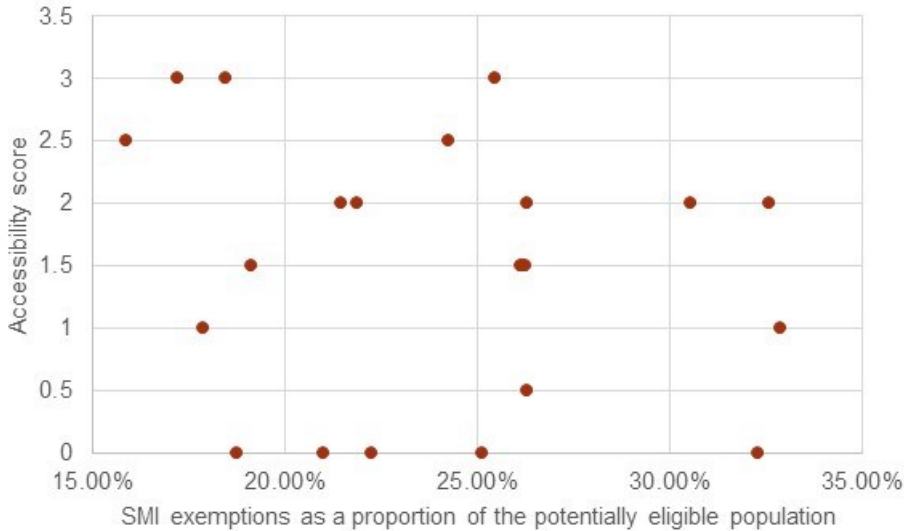
6.24 Statistical analysis indicates that Welsh councils tend to apply expected levels of SMI exemptions, within reasonable bounds, given the size of potentially eligible populations. However, implementation of the standard SMI application form and website information around the SMI Council Tax exemption appears to vary across Welsh councils. Comparing a council’s distance from the mean number of expected awards with a measure of the council’s website accessibility enables an evaluation of the impact of website accessibility on the number of SMI Council Tax exemptions provided by a council.

6.25 Each council is given an accessibility score based on the number of positive accessibility features shown (between 0 and 3). This accessibility score is compared to the proportion of SMI exemptions per potentially eligible resident. If website accessibility is a key driver of the number of SMI exemptions awarded by a council we would expect to see a correlation between these.



6.26 Figure 10 suggests that there is no significant relationship between website accessibility, as illustrated through council websites, and the number of SMI Council Tax exemptions applied by the council (given the potentially eligible population). The council providing the highest number of SMI exemptions per eligible resident (32%) had an accessibility score of just 1 and two of the councils with the highest accessibility score showed a low level of SMI exemptions as a proportion of their potentially eligible population.

**Figure 10: The relationship between website accessibility for SMI Council Tax exemptions and SMI exemptions as a percentage of potentially eligible residents**



*(Sources: Website accessibility from website survey, SMI exemptions from StatsWales, SMI potential eligibility from DWP Stat-Xplore)*

6.27 There is very weak correlation<sup>13</sup> between website accessibility and Council Tax exemptions awarded. This comparison suggests that the ease of accessibility to information and application for the SMI Council Tax exemption, as measured by features of a council’s website, may only have a minor effect on the number of SMI Council Tax exemptions applied by a council.

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<sup>13</sup>  $r(22) = -0.19$

## 7. Summary of Findings

7.1 There is awareness across councils and third party organisations that support people with SMI of the introduction of standardisation of the SMI Council Tax intervention. The intervention is welcome by councils and organisations that support residents with SMI.

7.2 The majority of councils surveyed as part of this research felt that the introduction of a standard approach to SMI Council Tax exemptions has been effective. Nevertheless, the level of implementation measures introduced by councils varies. Most councils stated that they use the standard application form but the majority of respondents were not aware of the introduction of any additional measures, such as publicity, training or improved website accessibility, that were introduced as a result of the intervention within their council.

7.3 Welsh council websites show a lack of uniformity in the implementation of the standardisation of SMI.

- The standard SMI exemption form is accessible from the website of just over half of Welsh councils. The remaining councils either continue to use their own form or do not provide access to any application via their website
- Nine Welsh councils had a clear path to accessing information on the SMI Council Tax Exemption
- Eight Welsh council websites contained a clear definition of the SMI Council Tax exemption

7.4 Even though there is variation between councils in implementation of the intervention measures there has been a significant increase in the number of SMI Council Tax exemptions across Wales since the introduction of standardisation of the SMI exemption in 2019 (28%). The increase is evident in all councils.

7.5 The rise in SMI Council Tax in exemptions occurred alongside a much smaller increase (12%) in the potentially eligible population. From 2013 – 2019, there was a significant increase (83%) in Welsh residents in receipt of disability benefits with relevant disabling conditions, indicative of potential eligibility for the SMI exemption. During the same period the number of SMI exemptions increased by only 12%. In

other words, the population potentially eligible for an SMI Council Tax exemption rose faster than the number of SMI exemptions awarded. From 2018-2019 to 2022-2023 this has been reversed, with exemptions rising at a greater rate than the potentially eligible population. Since 2019 exemptions have increased by 28% in comparison to the potentially eligible population which increased 12%.

- 7.6 The number of dwellings receiving the SMI Council Tax exemption is normally distributed across councils. No council has significantly fewer exemptions than expected relative to the Welsh potentially eligible population. Welsh councils fall within the expected bounds of the number of exemptions per potentially eligible resident. No council awards exemptions significantly lower than expected.
- 7.7 The level of award of SMI Council Tax exemptions, compared to the potentially eligible population, does not appear to be related to ease of access to information on a council's website. The findings show no significant relationship between these. In other words, ease of access to application via a council's website does not appear to result in higher numbers of SMI Council Tax exemptions being applied. Similarly, poor accessibility via the website does not appear to hinder application of SMI Council Tax exemptions.
- 7.8 The number of Council Tax exemptions awarded by a council in respect of both the SMI exemption and the care leavers exemption do not appear to be related to website access and information. In other words, councils with good access may award slightly lower levels of exemptions than the mean, and those with poor access and information may award slightly higher levels of exemptions than the mean.

## 8. Conclusion and recommendations

### *Implementation and process*

- 8.1 Organisations that support people with SMI and Welsh councils are supportive of the standardisation of the SMI Council Tax exemption measure. Awareness of the intervention appears to be reasonably high across councils and third party organisations.
- 8.2 The level of implementation of the measure appears to vary. Some councils made little change to process apart from introduction of the standard application form, whilst others have introduced awareness campaigns and reviewed their literature around the measure. Alzheimer's Society was concerned that SMI Council Tax exemptions still fall between the cracks due to lack of promotion and joint working between those responsible for medical assessments or social care and Council Tax departments.
- 8.3 Introduction of a standard application form for SMI Council Tax exemption was one of the key measures of the intervention. For some councils, introduction of the standard form was the only noticeable change to process. Even so, the standard application form is provided on the websites of only 12 Welsh councils. The introduction of the standard form by these 12 councils indicates that there may be a trend towards greater standardisation but this may not have been fully implemented across all councils. For those councils still to implement the standard application form and ease of accessibility, good practice examples from other councils may serve as useful examples.
- 8.4 Accessibility to information on the SMI Council Tax exemption varies between councils. Accessibility is hindered through access paths being dependant on terminology that is used differently between councils. Particularly the terms "reduction," "exemption," or "discount." In order to access information a resident may be signposted using any of these terms, depending on the council. In some cases, users must go through multiple paths to find information on the full range of Council Tax exemptions. Councils may wish to consider using a common approach

whereby all reductions, discounts and exemptions follow the same path until separation by clear definition.

- 8.5 Councils and third party organisations felt that the need for medical certification and the terminology “Severe Mental Impairment” created barriers to implementation.

### *Impact*

- 8.6 Third party organisations representing people with SMI and Welsh councils feel that the impact of Council Tax exemption for people with SMI is significant. The impact is felt through financial support, simplification of administrative burden and prevention of arrears action. Councils felt that the standardisation of the SMI Council Tax exemption has been effective.
- 8.7 Data analysis supports the councils’ view on the effectiveness of the intervention. Since the introduction of the standardisation of the SMI Council Tax exemption across Wales (2019) there has been a 29% increase in the number of SMI Council Tax exemptions provided by Welsh councils. This is likely to reflect both an increase in awareness of the exemption and better accessibility to information.
- 8.8 There appears to be reasonable uniformity in the number of SMI exemptions across Welsh councils compared to the potentially eligible population. A level of variation in the number of exemptions between councils, compared to the potentially eligible population, is expected due to demographic differences between boroughs, health variation across Wales and the local housing profile.
- 8.9 The uniformity in the number of SMI Council Tax exemptions across councils sits alongside a lack of uniformity of information accessed through Welsh council websites. Given that councils state that the main access to SMI information and application is through their websites, ease of application may not be a significant driver of the number of exemptions applied by a council. The increase in SMI Council Tax exemptions seen since 2019 may primarily be driven by an increase in awareness, by councils and the public, following the introduction of the intervention.
- 8.10 The statistical findings presented in this report are based on full SMI exemptions leading to total exemption from Council Tax. However, the exact number of applied

SMI exemptions cannot be fully determined as partial exemptions may have been awarded (e.g., a 25% discount on Council Tax). This occurs when the relevant person resides with other adults who are not exempt. Published data on discounts, rather than exemptions, is provided as an aggregated total; it is not possible to ascertain discounts relating specifically to SMI or care leavers.

### **Recommendations**

- 8.11 SMI exemptions should be monitored across councils on an ongoing basis to ensure that the rise seen since 2019 does not merely reflect the impetus of the Welsh Government's intervention.
- 8.12 Councils should consider appropriate engagement is in place with organisations that support people with SMI, and organisations that undertake medical assessments, to ensure ongoing awareness of the exemption.
- 8.13 The standard SMI Council Tax exemption form should be accessible on all Welsh council websites. Councils should use standardised definitions and a clear explanation on their websites. Councils that have yet to implement the standard SMI application form on their websites could learn from good practice examples identified within this report.
- 8.14 The Welsh Government should consider if further guidance is required for medical practitioners on who can certify SMI, the definition of SMI and setting the start date for SMI. This would assist uniformity of approach across the medical profession.
- 8.15 The Welsh Government should consider working with Welsh councils to separately identify SMI discounts that do not lead to full Council Tax exemption to better quantify application of interventions for future years. A full understanding of the population awarded SMI exemptions or discounts would allow for better monitoring of the relationship between the eligible population and the number of exemptions awarded.
- 8.16 The Welsh Government should review the definition of SMI and amend the terminology so that it is not stigmatising to potential applicants.

- 8.17 The Welsh Government should review, and offer guidance, on evidential requirements for SMI to ensure that they do not deter applications. In order for SMI exemptions to be applied residents must be *entitled to* disability benefits. Guidance may be required for councils if a potentially eligible resident is entitled to relevant disability benefits but has chosen not to apply for these benefits. Where an applicant is in receipt of disability benefits the disabling condition is stated by DWP. It may be worth exploring if the disability award could be used as evidence of a relevant condition without the need for further medical certification. This would require a change in legislation.
- 8.18 The Welsh Government and Welsh councils should consider introducing a common approach to website access on Council Tax reductions, exemptions and discounts. This would prevent residents from having to explore each of these website options in order to find the most relevant path to information.



## 9. Appendices

### **Appendix 1: Fieldwork Methodology**

M·E·L Research used an online survey of Welsh councils using Forsta Plus to gather views. Participants were contacted as a member of the Welsh Revenues and Benefits Management Group or via the Welsh Local Government Association as a member of staff involved in the collection of council tax or support of vulnerable residents. People were invited to take part via email from these two routes, with a link to the online survey. Participation was voluntary and responses were anonymous. The survey took place in August and September 2022.

Third party interviews were conducted by M·E·L Research with a selection of organisations involved with one or more of four council tax interventions. Potential participants were identified using public sources (e.g., organisational websites, LinkedIn) and invited to take part in an online interview. These were semi-structured interviews taking place remotely (via Teams). They took place from August to October 2022.

#### *Participating councils*

Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Carmarthenshire, Denbighshire, Flintshire, Gwynedd, Newport, Powys, Rhondda Cynon Taf, Swansea, Vale of Glamorgan, Wrexham.

#### *Council roles of responding officers*

Recovery Officer, Corporate Taxation & Debt Lead, Council Tax Manager, Enforcement manager, Head of Revenues, Head of Service, Head of Service (Revenues & Benefits), Income and Awards Manager, Income Collection Manager, Operational Manager, Revenue Services Manager, Revenues Manager, Senior Council Tax Team Leader, Service Delivery Manager, Service Manager Revenues, Tax Manager.

## **Appendix 2: Survey of Welsh councils – questions relating to the standardisation of SMI**

### **About you**

1. Which local authority do you work in?
2. What is your job title?

### **Understanding of the interventions**

3. How much would you say you know about the standardisation of the SMI exemption
- 3a. Do you feel you need additional training or information about the SMI exemption? (Yes/No)

### **Questions about SMI**

4. What changes, if any, have you made to the application procedure for the severe mental impairment exemption?
5. What methods, data or evidence have you used to identify people with severe mental impairment?
6. What means and channels have you used to inform the public about the severe mental impairment exemption?
7. What, if anything, has supported the administration of the exemption for individuals with severe mental impairment?
8. What barriers, if any, have you faced in administering the exemption for individuals with severe mental impairment?
9. If you could change one thing about the exemption for individuals with severe mental impairment, what would it be?
10. Have you seen any change in the number of exemptions for individuals with severe mental impairment? (Increase, No Change, Decrease, Don't know)
11. How would you rate the efforts of your local authority to promote the severe mental impairment exemption? (Very effective, Effective, Ineffective, Very Ineffective, Don't know)
12. What difference, if any, was made to vulnerable residents and households that you have referred or supported with this exemption?
13. What has been the impact, if any, of the COVID-19 pandemic on this intervention?