

Estimating pension-age Council Tax Support take up

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Introduction

Independent Age commissioned Policy in Practice to quantify the scale of unclaimed Council Tax Support (CTS) among low-income pensioners. By leveraging publicly available data alongside Policy in Practice's administrative data, partnerships, proprietary analytical methods, and sector expertise, this project provides comprehensive estimates of Council Tax Support take up, the number of people missing out on Council Tax Support and unclaimed financial support for those over State Pension Age.

This document outlines the methodology and key findings on the number of eligible households missing out on Council Tax Support and the total value of unclaimed support.

Project objectives

The primary objective of this research is to generate robust estimates of unclaimed CTS at the highest possible level of granularity. The project aims to:

1. Calculate the number of pensioners missing out on support at local authority level, defined as those eligible for support but not receiving it.
2. Estimate regional take up rates, meaning the percentage of the eligible population currently claiming.
3. Estimate the total value of support failing to reach low-income households at local authority level.

To estimate all three key metrics we will use a combination of local-authority level and regional information from local and national data sources.

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Main results

This analysis builds upon the methodology established in the [Missing Out Report 2025](#), published by Policy in Practice. In it, we estimated unclaimed caseloads and financial support across 12 benefits, including Council Tax Support (CTS) for both working and pension-age households.

In this updated analysis, the total number of pensioners missing out on Council Tax Support is estimated at approximately **1.65 million**. This translates to a total of **£1.97 billion** in unclaimed financial support and an overall take up rate of **50%**.

Table 1. Estimated missed claims, unclaimed financial support, and take-up rates by Family Resources Survey (FRS) regions

FRS region	Missed claims (million)	Amount unclaimed (£ billion)	Take up rate (%)
England	1.37	£1.71	50%
East Midlands	0.12	£0.16	49%
East of England	0.14	£0.18	48%
Greater London	0.18	£0.18	52%
North East England	0.07	£0.10	60%
North West England	0.20	£0.25	51%
South East England	0.21	£0.26	46%
South West England	0.16	£0.23	46%

West Midlands	0.13	£0.16	55%
Yorkshire and Humber	0.16	£0.19	47%
Scotland	0.17	£0.13	51%
Wales	0.11	£0.12	48%

Total 1.65 £1.97 50% Source: Policy in Practice analysis based on FRS (2023-24), admin

and publicly available data.

These figures represent an increase of approximately 88% in missing out caseload and 64% in unclaimed financial support compared to the Missing Out Report 2025 estimates. This growth is driven by three primary factors:

1. **Incorporation of the standard route in missing out estimations:** Previous estimates assumed that all pensioners claiming CTS did so via the passported (Pension Credit) route, as this was the only publicly available take up rate. This study introduces a dual pathway model:
 - Passported via Pension Credit
 - Standard (Low-Income) Route: We introduced the "standard route" as an analytical category to capture households whose income is above the Pension Credit threshold but who still qualify for CTS. This group consistently demonstrates a lower take up rate than the Pension Credit pathway across all regions. This is unsurprising, as these households must apply directly to the local authority rather than being passported via Pension Credit, and their awards are typically lower. Accounting for this specific group of low income pensioners explains most of the increase in the number of pensioners missing out on support and subsequent unclaimed financial support - **approximately 80% of the increase in missing-out caseload is associated with this change.**
2. **Use of new Pension Credit take up rates at the local authority level:** The Missing Out Report 2025 applied a national Pension Credit take up rate of 65% across all local authorities, based on figures published by the Department for Work and Pensions (DWP). This analysis uses the latest, more granular take up estimates, now published by DWP at local authority level. This new data presents a slightly lower national average take up rate of 63% (weighted by regional CTS caseload) and a simple average of 61%. It also reveals significant local disparities, with 68% of local authorities in Great Britain showing take up rates lower than the previous 65% national average. By using these localised take up rates, our model more accurately identifies a larger population of pensioners currently missing out on support, **representing approximately 8% of the increase in this group**
3. **Refined financial award calculations:** The Missing Out 2025 report assumed a flat average award equal to 75% of the total Council Tax liability for all pensioners. This new analysis utilises administrative data from our Low Income Family Tracker (LIFT) to calculate regional average awards for the Passported (Pension Credit) pathway and regional Family Resources Survey (FRS) estimates for the standard route, resulting in more representative figures. On average, the CTS award for households below the Pension Credit threshold (usually passported via Pension Credit) was

92%, while the award for the standard route was 60% nationally.

The following sections show the main estimations in greater detail and outline the methodological caveats to consider when interpreting these results. A comprehensive explanation of the data sources used and the specific calculation processes can be found in the Methodology section.

Proportions of CTS claims by pathway

To calculate the number of pensioners missing out on support, we first established the proportion of existing claims made through each pathway. These proportions were estimated using the FRS, which allows for a detailed analysis of household income against benefit eligibility rules.

For all pensioners currently receiving CTS, we identified the share who were financially eligible for Pension Credit versus those with incomes above that PC threshold who must apply via the standard route. Establishing this ratio allows us to distinguish between households that qualify for maximum support and those who qualify for reduced support based on their income.

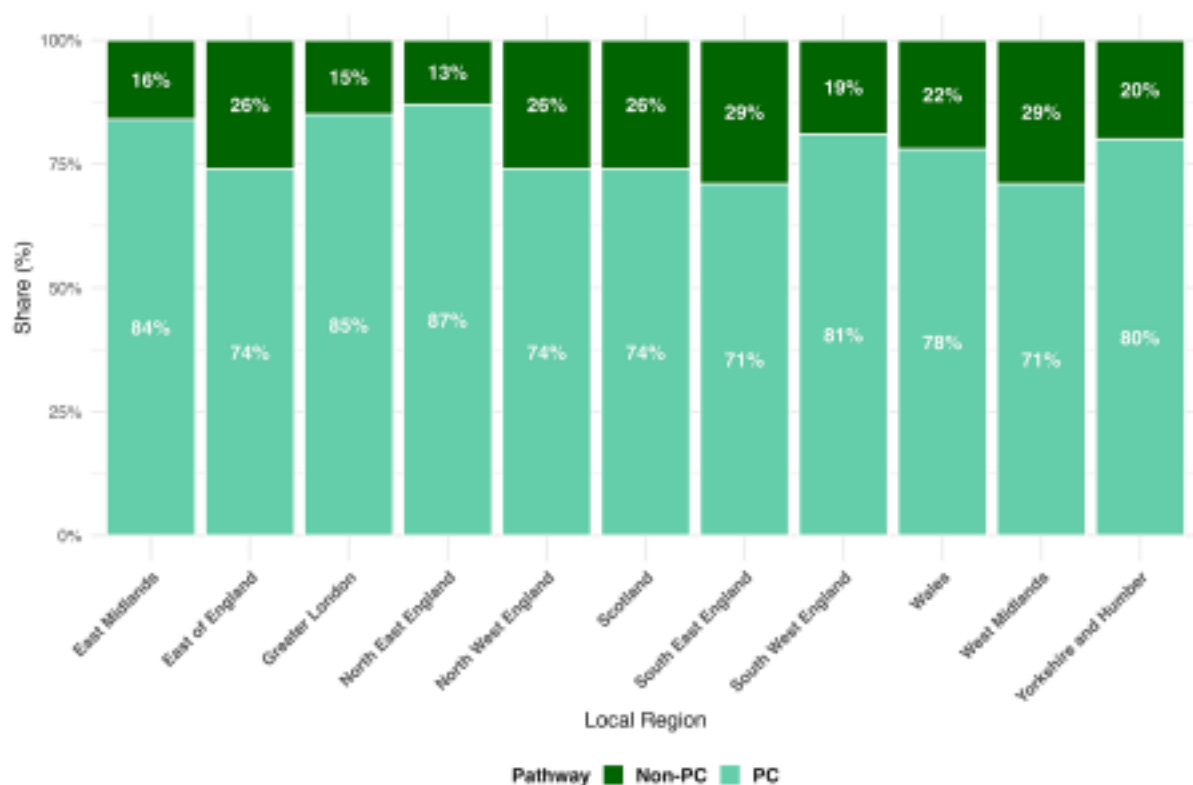
In the figure below, we have categorised these as:

- **"PC" (Passported via Pension Credit):** Households with an income below the Pension Credit threshold. This group captures households eligible for Pension Credit, regardless of whether they are currently claiming it.
- **"Non-PC" (standard route):** Households with an income above the Pension Credit threshold but low enough to qualify for CTS through the standard route.

Our analysis of the FRS suggests that, on average, 78% of pensioners currently claiming CTS have an income below the Pension Credit eligibility threshold. This high proportion indicates that the vast majority of pensioners on CTS qualify via the Passported route.

These proportions are then applied to the official administrative caseload figures published by the Ministry of Housing, Communities & Local Government (MHCLG) to determine the final number of claimants assigned to each specific pathway.

Figure 1: Pensioners claiming CTS: PC and Non-PC



Source: Policy in Practice analysis based on FRS (2023-24).

Take up rates by pathway

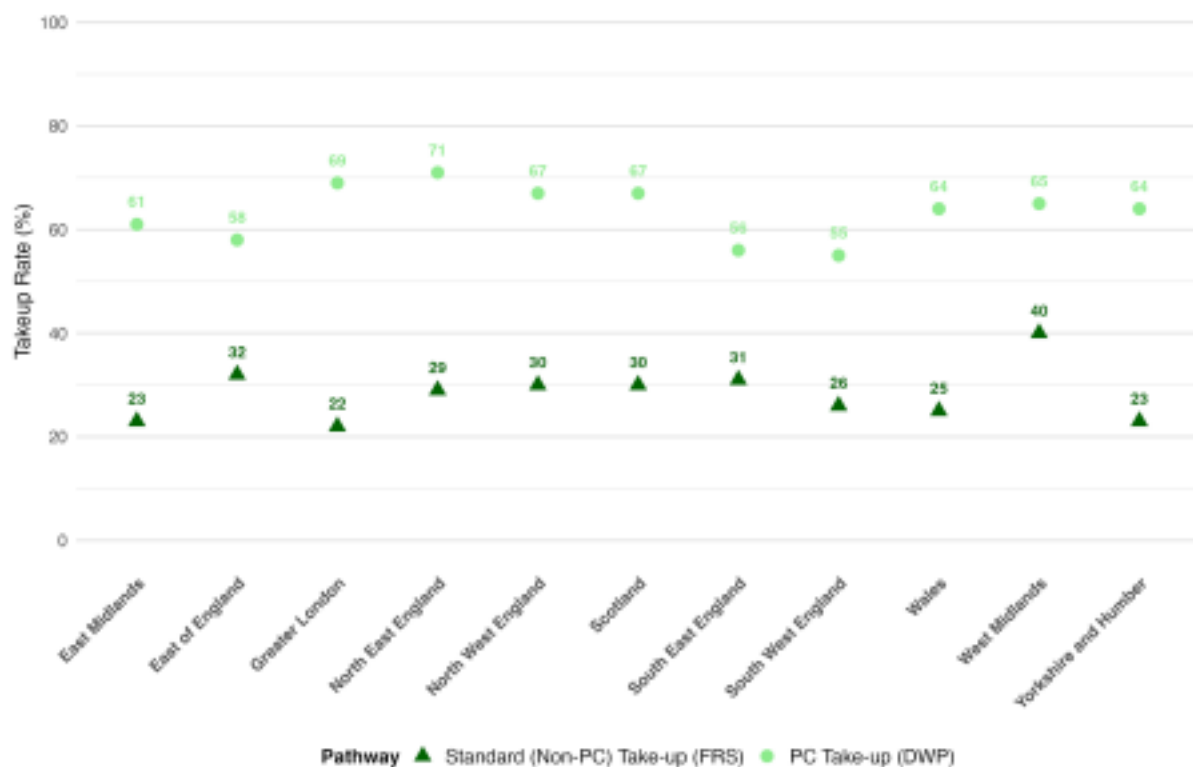
After determining the proportion of existing claims for each pathway, we identified the specific caseload take up rates required for the modeling.

- Passported Route (Pension Credit):** For this cohort, we utilise the latest DWP publications on Pension Credit take up at the local authority level. This approach assumes that the barriers to claiming Pension Credit and its associated "passported" CTR are intrinsically linked; if a household overcomes the hurdles to claim one, they are typically enrolled in the other.
- Standard route (Low Income):** For the standard route, we derived regional estimates directly from the FRS. As detailed in the methodology section, the FRS provides the granular variables necessary for eligibility modeling and benefit receipt analysis at the individual, benefit unit and household levels.

The figure below illustrates the take-up rates by region for both pathways. Both routes demonstrate regional disparities; notably, the standard route exhibits lower take-up rates across every region compared to the passported route.

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Figure 2: Regional take up rate by pathway (passported via PC vs standard route)



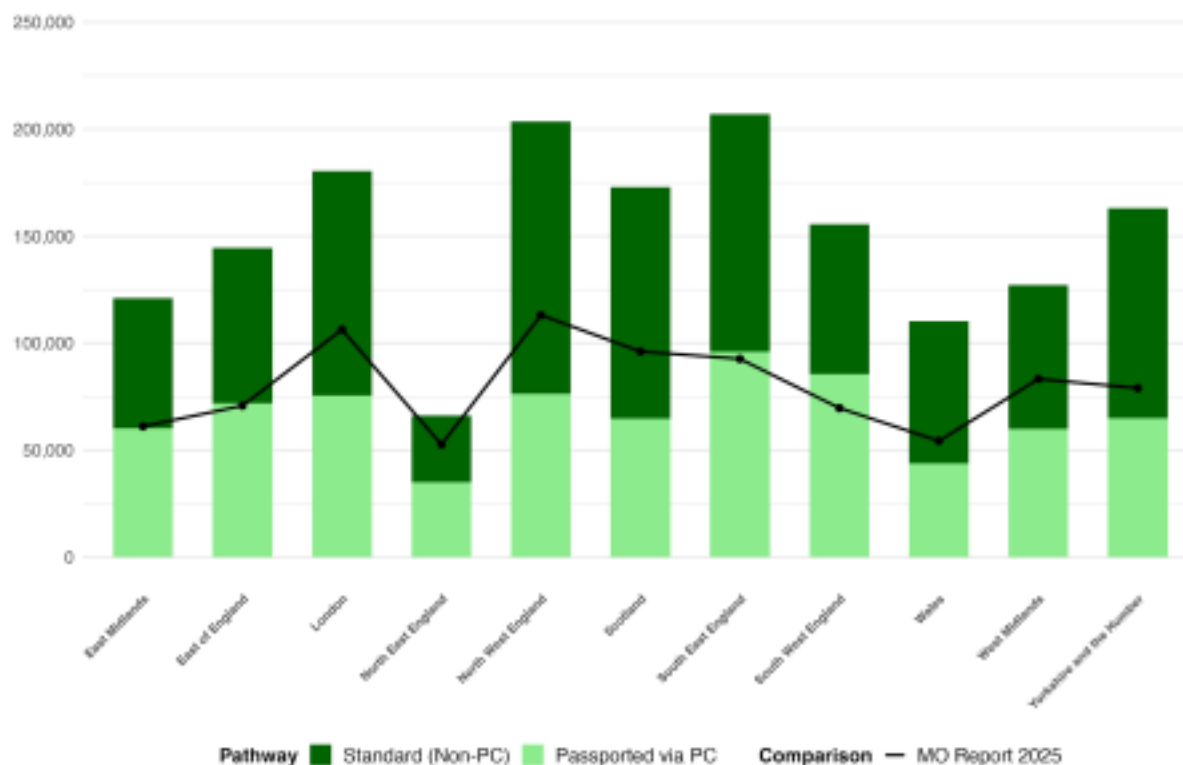
Source: Policy in Practice analysis based on FRS (2023-24) and DWP regional Pension Credit take up rates (2025).

Pensioners missing out on support

By combining the estimated caseloads for each group, Passported and Standard, with their respective take up rates, we calculated the total population missing out on support across both pathways. While we used local authority caseload data for both routes, take up rates at the local authority level were only available for the route passported via Pension Credit. Take up rates for the Standard pathway therefore use regional estimates derived from the FRS income data.

The total number of pensioners missing out on Council Tax Support is estimated at approximately **1.65 million**. This represents an **88% increase** compared to the 0.8 million identified in our previous Missing Out report. As noted earlier, this significant variance is primarily driven by the inclusion of the Standard (Low-Income) pathway, followed by the application of localised Pension Credit take up rates. Together, these methodological improvements have revealed much deeper levels of unclaimed support than previously estimated.

Figure 3: Number of pensioners missing out on CTS by pathway (new analysis versus Missing Out 2025 report)



Source: Policy in Practice analysis using FRS (2023-24), MHCLG statistics on Local Council Taxbase (2025) and DWP regional Pension Credit take up rates (2025).

Financial support going unclaimed

To estimate the total financial value of support currently going unclaimed, we multiplied the number of pensioners missing out on CTS by the regional average awards for each respective pathway. These average awards were calculated by leveraging benefit administrative data held in LIFT and the FRS. Specifically, we utilised LIFT data to determine the regional average award as a percentage of total Council Tax liability for the Passported via Pension Credit route, while performing the same calculation for the standard route using the FRS. These percentages were then applied to the regional average liability for Bands B and C, first incorporating the single-person discount based on the regional proportion of single households. Finally, we applied the average award share to the resulting liability

There are distinct advantages and limitations to both data sources. The FRS estimates allow for better regional representation, as the data is sampled to be representative at that level and includes "higher-income" households that may still qualify for smaller amounts of support. However, these awards are based on the simplified means-test model used for

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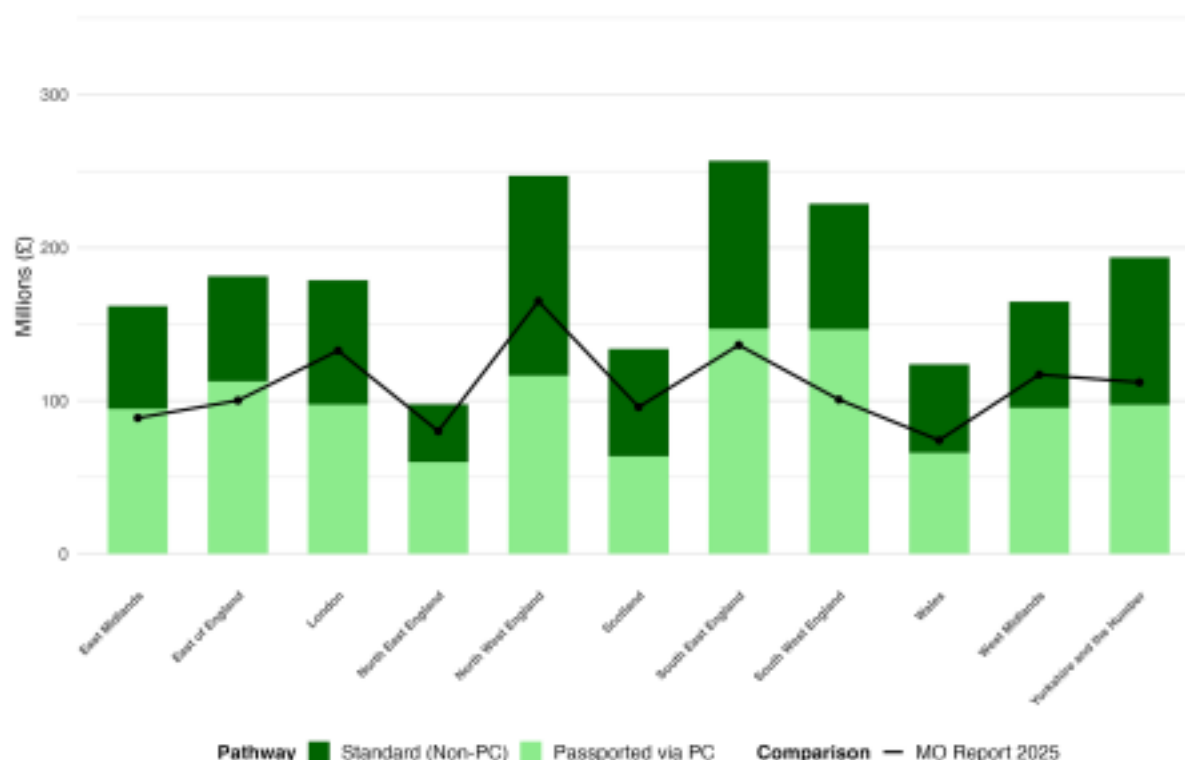
this exercise, which is less realistic. For example, our FRS model assumes all PC claimants receive a 100% award, whereas in reality, households with non-dependants or other specific characteristics may receive less. Conversely, LIFT estimates are based on administrative data and actual assessments rather than simplified models, providing a more accurate representation of awards. However, LIFT data primarily includes lower-income

households, which typically qualify for higher awards.

Given these considerations, we choose to use LIFT data for the Passported via Pension Credit route and FRS estimates for the Standard (low-income) route to ensure the most realistic results. Our final estimates suggest that the total unclaimed CTS for pensioners in Great Britain is **£1.97 billion**.

This represents an increase of approximately 64% compared to the financial support estimated in our previous Missing Out report (£1.2 billion). This rise is a logical outcome of our methodological refinements: it reflects the incorporation of the standard route, the application of lower, more granular take-up rates, and the use of higher, yet more accurate awards, for the Passported via Pension Credit pathway.

Figure 4: Financial support going unclaimed by pathway (new analysis versus Missing Out 2025 report)



Source: Policy in Practice analysis using FRS (2023-24), MHCLG statistics on Local Council Taxbase (2025), and Low Income Family Tracker (LIFT)

Methodological caveats and data limitations

While this analysis utilises the most robust data available, several methodological factors should be considered when interpreting the results. These caveats primarily centre on the use of survey data versus administrative records and the specific modeling choices made during the assessment.

1. Experimental nature of regional estimates

The regional take-up rates calculated for the Standard (Low-Income) route, also referred to throughout this report as the "Non-PC" pathway, should be treated as experimental estimations. These figures, alongside the calculated proportions of pensioners on CTS via both the Passported and Standard pathways, are derived solely from the 2023-2024 Family

Resources Survey (FRS). Given the experimental nature of these regional breakdowns, they provide an indicative rather than a definitive view of regional variation.

2. Underestimation risk in take up calculations

It is probable that the take up rates presented for the Standard pathway represent an underestimation of the actual figures. This is due to several inherent characteristics of survey-based modeling:

- **Snapshot versus longitudinal data:** By relying on the FRS, we estimate eligibility and receipt based on a "point-in-time" snapshot (the specific day of the interview). In contrast, administrative data allows for an analysis across a full financial year. A longitudinal view typically captures a higher number of recipients and entitlements than a single-day survey snapshot.
- **Income under-reporting:** Historically, the FRS has undercounted benefit income due to respondent recall bias, creating a discrepancy between survey results and official administrative records. While the DWP is currently mitigating this by linking survey data directly to administrative records for major benefits, those corrections were beyond the scope of this project.
- **Non-dependant deductions:** For the purposes of this exercise, we did not incorporate non-dependant deductions into the CTS eligibility assessment. The prevalence of non-dependants within the sample was not found to be significant; however, their inclusion would likely have slightly reduced the estimated eligible population. Consequently, excluding these deductions tends to artificially lower the calculated take up rates.

3. Simplification of Pension Credit income thresholds.

To determine whether a family (benefit unit) followed the Pension Credit passported route or the standard route, we utilised four primary income thresholds based on household composition and disability status.

While the actual PC calculation includes additional premiums and specific household features, these were excluded to streamline the model as they are less prevalent across the

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general population. This simplification may result in a small proportion of households being misclassified; however, the impact on the overall caseload estimate is expected to be minimal. Table 2 summarises the four income thresholds used.

Table 2: Weekly Pension Credit income thresholds by household composition

Household composition	Weekly amount (£)
Single (No Disability)	£227.1
Single (Disabled)	£312.6
Couple (No Disability)	£346.6
Couple (Disabled)	£519.6

Methodology

To provide estimates of take-up rates, number of pensioners missing out, and unclaimed financial support for Pension Age CTS, our analysis distinguishes between two primary eligibility pathways:

- 1. **Passported via Pension Credit:** Pensioners automatically qualify for CTS if the claimant of their partner receives the Guarantee Credit element of Pension Credit. In this case, we considered as passported via the Pension Credit route every household whose income is below the Pension Credit threshold.
- 2. **Standard (low-income) route:** Pensioners whose income exceeds the Pension Credit threshold but remains low enough to qualify for CTS under the means test application.

We estimate the three core metrics: number of pensioners missing out on support, take up rates, and financial value, independently for each pathway. The total number of pensioners missing out and total unclaimed financial support represent the sum of these two distinct cohorts.

Data sources

Our analysis integrates publicly available datasets with Policy in Practice’s data to ensure the highest degree of accuracy. The data sources include:

- 1. **The Family Resources Survey (FRS) 2023-24:** We used the FRS to identify households where the Household Reference Person (HRP) was of pension age to calculate eligibility and claiming status across both CTS pathways, along with regional average CTS awards. As a continuous, representative survey of approximately 20,000 private households in the UK, the FRS provides the comprehensive variables necessary for detailed benefit eligibility modeling, including granular data on specific income sources and benefit receipt at the individual, benefit unit, and household levels

While the FRS is a robust tool, it has recognised limitations, such as:

- **Under-reporting:** Survey respondents occasionally under-report benefit income and savings, particularly at the extreme ends of the income spectrum.
- **Time-lag:** There is an inherent delay between the period of data collection and official publication.
- **Sample size constraints:** Disaggregating data by small regions or specific demographic characteristics can result in smaller sample sizes, affecting local precision.
- **Response rates:** Declining response rates over time pose a general challenge to long-term representativeness across the research sector.

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Despite these caveats, the FRS remains the best available information for this

analysis. Its unique ability to disaggregate specific income sources and benefit types allows for a level of eligibility modeling that is not possible with other national datasets.

2. **Department for Work and Pension (DWP), Households potentially eligible for Pension Credit (October 2025):** Local authority-level data on Pension Credit take-up.
3. **Ministry of Housing, Communities and Local Government (MHCLG), Live tables on local government (March 2026):** Local authority-level data on total CTS caseload and Council Tax Liabilities.
4. **Policy in Practice's Low Income Family Tracker (LIFT, February 2026):** We leveraged anonymised administrative data from the LIFT platform to calculate a more robust average CTS award per region and to sense-check the FRS estimates.

Unlike the FRS, LIFT data offers near real-time insights with high accuracy specifically for low income households. Policy in Practice currently holds data for approximately 100 local authorities across the UK, providing a substantial and diverse evidence base.

While LIFT provides superior accuracy regarding award values and low income household behavior, we continue to use the FRS for our primary missing-out indicators. This ensures that the findings remain statistically representative at a national and regional level.

Data preparation: FRS analysis

The FRS provides data at the individual, benefit unit (family), and household levels. For this study, the **Benefit Unit** was selected as the primary unit of analysis, as it aligns with the standard unit of assessment for CTS and other means-tested benefits. We then apply the following steps:

Step 1: Defining the population of interest

To isolate the relevant cohort, we filtered for all benefit units where the legally liable person, identified as the Household Reference Person (HRP) on the FRS, was of State Pension age and the partner, if relevant, was also of State pension Age. This identified the population of pensioners directly responsible for Council Tax payments and eligible for pension age CTS, excluding non-dependants living within other households who were not the primary claimant.

This process reduced the FRS sample to approximately 30% of the original dataset (roughly 5,600 records, excluding Northern Ireland) distributed as follow:

Table 3: Distribution of families with pension age HRP across regions

Region	Sample Size	Sample Share
East Midlands	380	7%
East of England	560	10%
Greater London	350	6%
North East England	270	5%

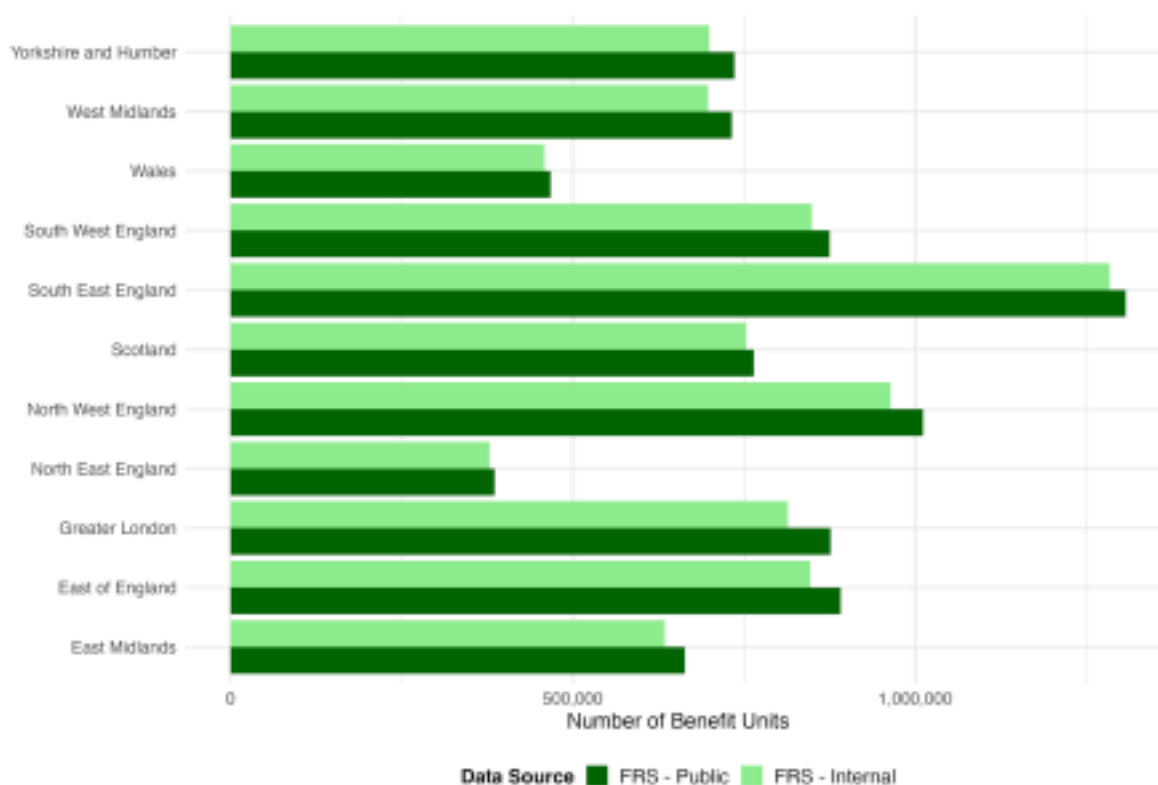
North West England	570	10%
Scotland	670	12%
South East England	770	14%
South West England	640	11%
Wales	540	10%
West Midlands	380	7%
Yorkshire and Humber	480	9%
Total	5,610	100%

Note: Numbers rounded to the nearest 10. Source: Policy in Practice analysis based on the Family Resources Survey (2023-24).

To validate our selection of benefit units (families) we compared our regional distribution with the FRS published data from StatXplore

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Figure 5: Comparison of Benefit Units with pension age HRPs (internal versus DWP published analysis)



Source: Policy in Practice analysis based on the Family Resources Survey (2023-24) and StatXplore.

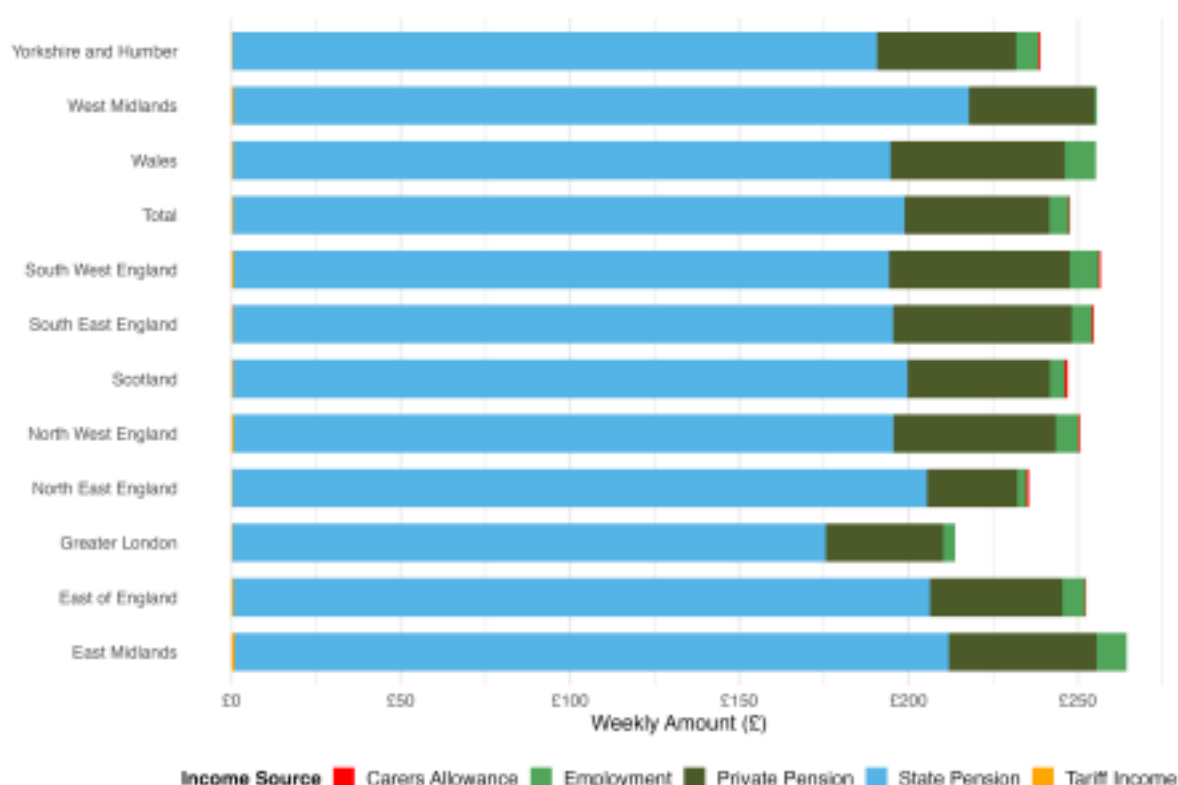
Step 2: Income calculation for modelling

The FRS offers a highly disaggregated view of income components, which is essential for modeling CTS eligibility since specific income sources are "disregarded" (ignored) during the assessment.

Following the national regulations for Pensioner CTS, our income calculation includes only the following components:

- Net Earnings: Derived from both employment and self-employment.
- Net Pensions: Including both Private/Occupational and State Pensions but excluding pension credit.
- Carer's Allowance
- Tariff Income: Calculated based on the capital and savings held by the benefit unit. For every £500 over the £10,000 saving threshold, £1 is added to the family's income.

Figure 6: Average weekly income across FRS regions



Source: Policy in Practice analysis based on the Family Resources Survey (2023-24)

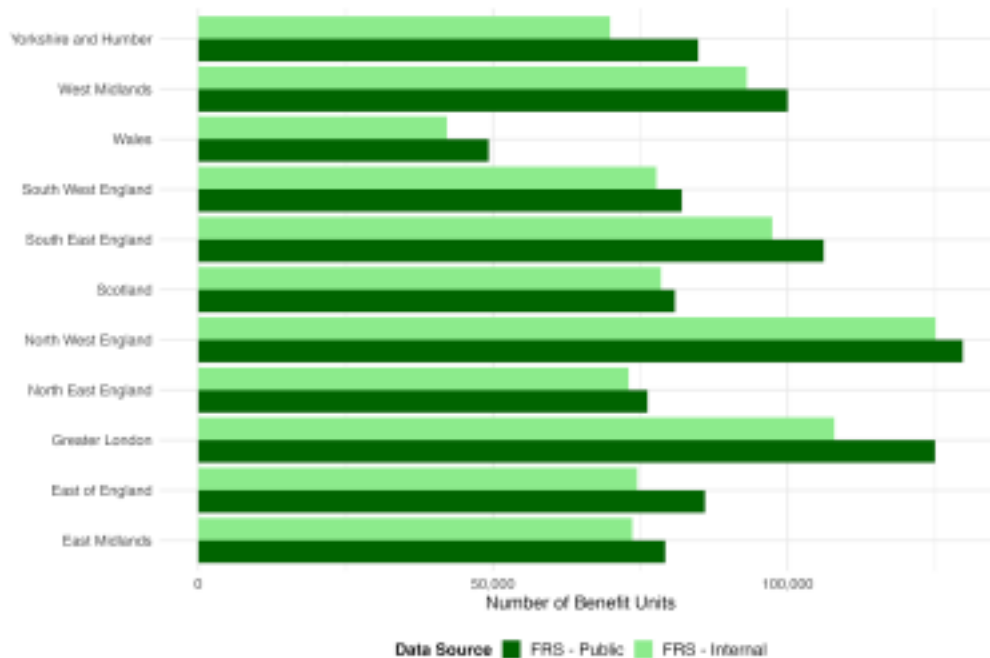
Step 3: Identification of benefit receipt

The FRS is structured across several relational tables, each providing a different level of granularity. To accurately model benefit claimants, we cross-referenced indicators from the Adult, Benefits, and Benefit Unit (Benunit) tables. This integration allowed us to identify more accurately families currently in receipt of: **Pension Credit, Council Tax Support, Housing Benefit, and Disability Benefits** for CTS modelling (includes **Attendance Allowance, the Daily Living component of Personal Independence Payment, and the Adult Disability Payment**).

Identifying these recipients is critical for the Standard (low-income) route modeling, as these benefits often trigger additional premiums within the CTS means test.

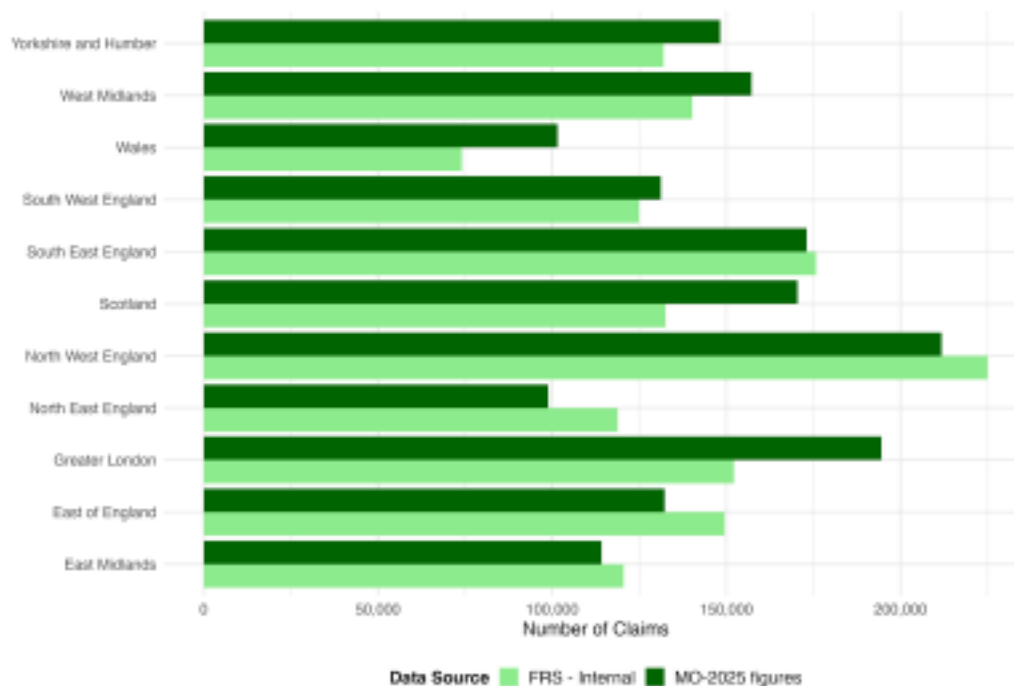
We validated our filtered results against official publicly available statistics. While it is expected that raw FRS survey data will not perfectly mirror administrative totals due to differences in data collection and reporting, our modeled estimates align closely with the

Figure 7: Comparison of Pension Credit claims at Benefit Unit level (internal analysis versus DWP published analysis)



Source: Policy in Practice analysis based on the Family Resources Survey (2023-24) and StatXplore

Figure 8: Comparison of pension age CTS claims (internal analysis versus Missing Out 2025 report)



Source: Policy in Practice analysis based on the Family Resources Survey (2023-24) and the Missing Out 2025 report, which relies on publicly available take up and caseload information.

Income threshold calculation: FRS analysis

To identify eligibility for the **Passported via Pension Credit** route, we assessed whether a

Benefit Unit's income fell below specific thresholds. These thresholds are modeled on the Pension Credit eligibility criteria and vary according to household composition and disability status. The thresholds used are for 2025/2026.

A Benefit Unit was flagged as "Disabled" if any member was in receipt of **Attendance Allowance (AA)**, the **Daily Living component of Personal Independence Payment (PIP)**, or **Adult Disability Payment (ADP)**.

Pension Credit Eligibility: FRS Analysis

A Benefit Unit was identified as eligible for Pension Credit if it met both of the following requirements:

- 1. **Age requirement:** Both partners must have reached State Pension age. In the case of “mixed-age couples” (where only one partner has reached State Pension age), eligibility was only considered if the individual was currently a recipient of Housing Benefit.
- 2. **Income threshold:** Weekly net income must fall below the previously described thresholds.

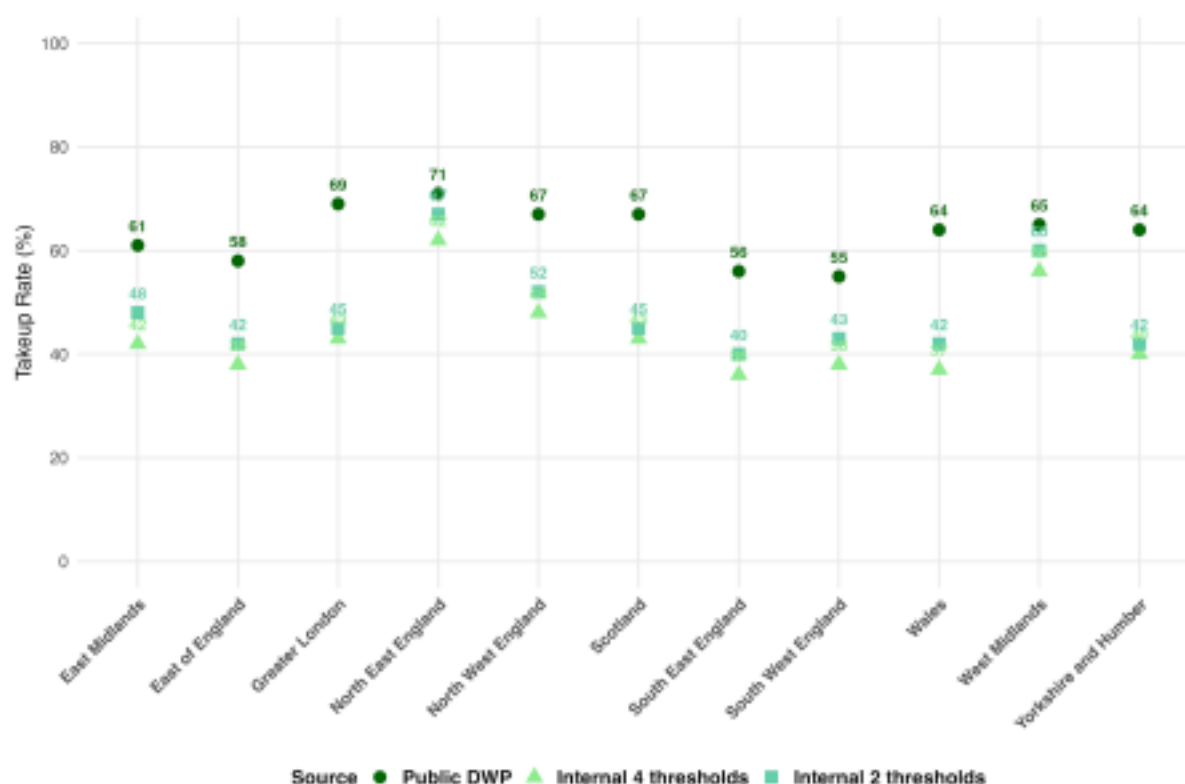
Since there are no official public figures for the total eligible population (the denominator used in take up rate calculations), as a comparative exercise, we derived our own Pension Credit take up rates and compared them to the recently published by the DWP.

It is important to note that the two take up rates are not directly comparable due to differences in data sources. Whereas the DWP regional rates were developed by linking administrative records,including Winter Fuel Payments, with HMRC data on employment, tax credits, and occupational pensions, our rates were developed using the FRS. The discrepancies between utilising administrative versus survey data for entitlement and recipient estimates are covered in the section on methodological caveats of this report.

Despite these methodological variances, our analysis demonstrates consistent regional patterns that align with the trends observed in official DWP data.

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Figure 9: Comparison of Pension Credit estimated take up rates (internal analysis using two thresholds versus DWP published analysis)



Source: Policy in Practice analysis based on the Family Resources Survey (2023-24) and DWP Households potentially eligible for Pension Credit (2025)

Council Tax Support eligibility: FRS analysis

To identify Benefit Units eligible for CTS, we applied a simplified version of the statutory means test logic for the pension age scheme through the following stages:

1. **Capital limit:** A primary filter was applied to exclude any household with savings exceeding the £16,000 capital limit. Under statutory rules, households above this threshold are generally ineligible for support via the standard route, regardless of their income.
2. **Assessment of needs allowance:** The total income of the Benefit Unit needs to be compared against a defined "needs allowance." For this analysis, we used the same four income thresholds established in the Pension Credit eligibility modeling. Any income exceeding this allowance was identified as "excess income" or "income above the need allowance".
3. **Application of the statutory taper:** The maximum potential award for pensioners is 100% of their Council Tax liability. For households with income below their needs allowance, this 100% award is maintained. For those with excess income, the maximum award is reduced by the statutory 20% taper (20 pence for every £1 of excess income - calculated in step 2).
4. **Calculation of the CTR award:** The final CTR award was calculated as the difference between the Benefit Unit's estimated Council Tax liability and the calculated taper. Liability was estimated using regional average liabilities of Bands B and C, applying the 25% Single Person Discount where applicable.
5. **Determining eligibility:** A Benefit Unit was flagged as "eligible" if the calculated award was greater than zero. As a methodological simplification, we did not account for Non-dependant Deductions. This was considered a reasonable approach as only a small proportion of the sample reported living with other adults who were not

their partners (around 1%).

Council Tax award: LIFT and FRS data

To calculate the average Council Tax Seduction (CTS) award for those passported via the Pension Credit route, we used Policy in Practice's Low Income Family Tracker (LIFT). The LIFT platform enables the identification of pensioners claiming CTS through each specific pathway. By processing this data through our policy modelling engine, we were able to determine average awards as a precise share of each household's total Council Tax liability.

Our analysis incorporated administrative data from over 90 local authorities across every region in Great Britain, providing a robust sample for calculating regional averages. We consider these figures highly representative; the administrative nature of LIFT data ensures that complex factors, such as non-dependant deductions and local premiums, are accurately captured within the reported award amounts.

For the Standard route, the average award was calculated as a weighted average of the modelled award, as a share of the Council Tax liability for Bands B and C.

Pensioners missing out on support: publicly available data and FRS

To calculate the number of pensioners missing out on support, we first disaggregated the total official CTS caseload into two distinct pathways: those passported from Pension Credit and those qualifying via the standard low income route. This was achieved by applying the regional proportions derived from our FRS modelling to the total published figures, allowing us to determine the estimated number of current claimants qualifying through each specific route.

Next, we calculated the total "eligible population", representing the sum of both claimants and non-claimants, for each route by applying the corresponding take up rates. For the passported route, we employed the local authority level Pension Credit take up rates, while for the Standard route, we applied regional take up rates estimated via the FRS. The total eligible population is then defined as the combined sum of the eligibility estimates for both pathways.

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Finally, we identified the unclaimed figures by subtracting the number of actual claims, as recorded in the published data, from our estimated total eligible population. This resulting figure represents the total number of pensioners who are entitled to Council Tax Support but are not currently receiving it.

Financial support going unclaimed: publicly available data and FRS

To estimate the total unclaimed financial support, we applied regional average awards to the number of pensioners missing out on support for both pathways.

These average awards were calculated as a percentage of the total Council Tax liability, which was then applied to the regional average liability for Bands B and C. The total unclaimed financial support represents the combined sum of both eligibility pathway.

About Policy in Practice

Families on the lowest incomes have the most complicated finances, often because government departments aren't able to talk to each other effectively.

Policy in Practice sets out to make government policy simple to understand, empowering people with the clarity and confidence they need to make positive decisions. As a team of policy experts, we have developed services that overcome departmental silos to help people to tackle rising living costs and build resilience, enable councils to be proactive and track the impact of their intervention, and improve safeguarding decisions while saving social workers' time.

Better Off is a software tool used by millions of people and thousands of advisors each year to help assess eligibility for the widest possible range of support without needing to be experts in the benefit system. It is free for individuals and available for advisors as an API and a self-serve tool for their organisation's website.

LIFT (Low Income Family Tracker) is an analytics platform used by nearly a hundred local authorities. It combines their benefits administration data with advanced analytics to identify and support people with low financial resilience. It enables councils to increase take up of financial assistance to prevent homelessness, arrears and to increase take up of support.

MAST (Multi Agency Safeguarding Tracker) is a service backed by the LGA and NHS Digital that links data across adults, children, fire, police and health on a daily basis. This helps frontline staff to proactively identify where there are multiple contacts with the same individual or family to make better informed safeguarding decisions.

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