

PAUL GRAY

Mr. Turnbull

You say letter to show this to the Prime Minister  
with the DOE note.

10 October 1989

RCG 10/10

faxed 1820  
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COMMUNITY CHARGE BILL

Getting this right is crucial since the bill landing on people's doormats will be the sharp end of the public's relationship with the Community Charge. I still feel a little uneasy about the draft for consultation the Prime Minister is now being asked to approve. This is largely a matter of presentation, but two points of substance also arise.

SUBSTANTIVE POINTS

It is intended to minimise the risk of legal challenge by showing specific grants etc, as estimated, in a footnote. Such a risk could arise, it is said, because of deficiencies in the complex regulations which specific grants etc will need.

But the transitional relief is now included on the face of the bill. Yet it too will be dependent upon regulations which are also bound to be complex and open to challenge. There is an apparent inconsistency here.

Secondly, the reference to the safety net is only to a contribution from it. It is not clear if there will also need to be references to contributions to it where they arise. If this is not necessary, well and good, but we ought to be sure beforehand. If contributions to also have to be indicated it adds weight to the case (see below) for simply referring to one 'adjustments' figure.

Both these points need to be clarified.

PRESENTATIONAL POINTS

Referring to 'Government transitional relief' and "Government rebate" (note new addition here of 'Government') next to each other could well cause

- **confusion**, as to what each one is
- **concern**, if one or both spaces remain empty (as for millions they will)
- **criticism**, if one or both are small in relation to the bottom line (as they also will be for millions).

Allied to the point above about the safety net, I wonder therefore whether a more prudent course would be to have just one heading and figure on the face of the bill for "adjustments" (covering safety net, "other adjustments" and transitional relief but not rebate) with more detail in the explanatory leaflet I assume will be accompanying all bills. Otherwise, there is the prospect of three extra items to confuse the issue yet whose net effect is likely in most cases to be small in relation to their potential for controversy.

*John Mills*  
JOHN MILLS