

### Stage 1 and 2 Equality Impact Assessment Templates

Directorate: Finance

Service: Revenues & Benefits

Accountable Officer: Andrew Hatcher

Telephone & e-mail: 01303 853348

Date of assessment: 15 August 2016

Names & job titles of people carrying out the assessment:  
Andrew Hatcher – Revenues & Benefits Strategic Manager

Name of service/function/policy etc: Council Tax Reduction scheme

Is this new or existing? New

### Stage 1: Screening Stage

#### 1. Briefly describe it's aims & objectives

From 1 April 2013, under planned welfare reform, the government abolished Council Tax Benefit. Shepway, like other councils, replaced it with its own scheme called Council Tax Reduction.

At the same time, instead of repaying local councils for the amount they paid out, the Government gave them a single annual grant. This was not as much as the amount that was paid out in Council Tax Benefit and Shepway, like other councils, needed to find a way of making up the difference.

The existing scheme for Council Tax Reduction runs until 31 March 2017. The Council is required by law to approve a scheme for the year ahead by 31 January 2017 at the latest, which has been subject to consultation. This EIA reflects the proposed changes to the scheme from April 2017.

#### 2. Are there external considerations? (legislation/government directive etc.)

The Government gave us certain rules around which we needed to design our new local scheme. One of these rules is that people of pensionable age are protected and will receive the same amount of discount as they did under Council Tax Benefit.

#### 3. Who are the stakeholders and what are their interests?

The policy will apply to any Council Tax payer who applies for Council Tax Reduction and any groups representing customers in the district.

#### 4. What outcomes do we want to achieve and for whom?

To introduce an amended Council Tax Reduction scheme with a balanced across the board impact to all working age customers.

#### 5. Has any consultation/research been carried out?

Yes, a 12 week public consultation was carried out and presented to members.

If **yes** please provide details and outcomes, if **no** please outline any planned activities

#### 6. Are there any concerns at this stage which indicate the possibility of inequalities/negative impacts? (Consider and identify any evidence you have - equality data relating to usage and satisfaction levels, complaints, comments, research, outcomes of review, feedback and issues raised at previous consultations, known inequalities) If so please provide details.

The proposed scheme retains the features of the governments default scheme and is means tested thereby protecting, to some extent, the most vulnerable groups. The reduction in funding means it is not possible to fully protect everyone. However within the governments default scheme there are already inbuilt disadvantages, as described below, which cannot be avoided. The Council has identified areas to reflect welfare reform changes such as changes in Housing Benefit legislation to ensure a consistent approach.

#### 7. Could a particular protected characteristic be affected differently in either a negative or positive way? (**Positive** – it could benefit, **Negative** – it could disadvantage, **Neutral** – neither positive nor negative impact or **Not sure?**)

	Type of impact, reason & any evidence
Disability	<ul style="list-style-type: none"> <li>It is possible that some people in this group will be affected less favourably because of the greater difficulties they may face in coping with the changes, for example, by finding paid employment.</li> <li>Other welfare reforms may further impact on some members of this group</li> <li>The alternative of service cuts could potentially affect this group more than others</li> <li>Depending on the nature of the disability some members of this group may find it more difficult to understand this change. This could lead to arrears and the associated problems that this can cause.</li> </ul>
Race (including Gypsy & Traveller)	<ul style="list-style-type: none"> <li>There will be no difference in the way ethnic groups are treated under any new Council Tax Reduction scheme. However, some ethnic groups experience different levels of disadvantage and therefore they may find it more difficult to cope with the changes by, for example, finding work.</li> <li>There may also be potential communication issues where</li> </ul>

	spoken English is not the recipient's first language and where documents printed in standard English is not the optimum method of communicating with CTR recipients
Age	<ul style="list-style-type: none"> <li>• Pensioners will be treated more favourably</li> <li>• On the face of it all working age recipients of Council Tax Reduction appear to be treated the same. However, in practice this may not be the case as some groups may find it harder to cope with the changes than others, for example by finding work.</li> <li>• Under the Council Tax Reduction scheme the system of applicable amounts differentiates between those under and over 25</li> </ul>
Gender	<ul style="list-style-type: none"> <li>• Lone parents may face greater difficulties in finding work. As many more female than male claimants are lone parents, women may therefore be treated less favourably indirectly.</li> </ul>
Transgender	<ul style="list-style-type: none"> <li>• Shepway District Council holds no information on the gender reassignment status of its Council Tax Payers. However national data shows that this group experience higher levels of disadvantage and social financial exclusion. They may therefore find the change more difficult to cope with.</li> </ul>
Sexual Orientation	<ul style="list-style-type: none"> <li>• Shepway District Council holds no data on the sexual orientation of its Council Tax payers locally. However national data demonstrates that many lesbian, gay and bisexual people experience higher levels of disadvantage and financial exclusion than other groups. They may therefore find it more difficult to cope with the changes by, for example, finding work.</li> </ul>
Religion/Belief	<ul style="list-style-type: none"> <li>• As for ethnicity some religious groups may experience different levels of disadvantage</li> </ul>
Pregnancy & Maternity	<ul style="list-style-type: none"> <li>• Some people in this group may be affected less favourably because of the greater difficulties they may face in finding work</li> </ul>
Marriage/ Civil Partnership Status	<ul style="list-style-type: none"> <li>• Couples receive higher premiums than single people but this considers joint householder needs.</li> <li>• Couples will not be able to receive extra help through a sole occupancy discount if over 18.</li> </ul>

**8. Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?**

- It is possible that some people in these groups will be affected less favourably because of the greater difficulties they may face in coping with the changes by, for example, finding work.
- It is possible that the cumulative impacts of this change and other national benefit changes will have disproportionately larger impact on groups such as those with caring responsibilities, substance misuse or domestic violence.

**9. Are there any human rights implications?**

No (if yes please explain)

**10. Is there an opportunity to promote equality and/or good community relations?**

Yes (if yes how will this be done?)  
As part of the consultation local community and volunteer groups were invited to give feedback into the consultation process. These groups support some of the most vulnerable in our society and represent a cross section of impacted customers.

**11. If you have indicated a negative impact for any group is that impact legal? (not discriminatory under anti-discrimination legislation)**

Yes (please explain)  
The changes to funding are government lead with a view to the reduction of the overall welfare bill. The legislation for the default scheme adopted by Shepway District Council is as laid by parliament and supported by relevant caselaw and DWP/DCLG guidance.

**12. Is any part of this policy/service to be carried out wholly or partly by contractors?**

No

**Please note that normally you should proceed to a Stage 2: Full Equality Impact Assessment Report if you have identified actual, or the potential to cause, adverse impact or discrimination against different groups in the community. (Refer to Quick Guidance Notes at front of template document)**

**13. Is a Stage 2: Full Equality Impact Assessment Report required?**

Yes

**14. Date by which Stage 2 is to be completed and actions**

January 2017

**Please complete**

We are satisfied that an initial screening has been carried out and a full impact assessment is **required\*** (please delete as appropriate).

Completed by: Andrew Hatcher

Date: 15 August 2016

Role: Revenues & Benefits Strategic Manager

Countersigned by Group Manager:

Date:

## Stage 2: Full Equality Impact Assessment Report

**15. Summarise the likely negative impacts for relevant groups identified in the screening process** (Refer to Stage 1, Questions 7-8, start to think about possible alternatives)

Council Tax payers who are receipt of Council Tax Reduction may be unable to afford the additional charge and may fall into arrears.

**16. What consultation/involvement activities have taken place or will need to take place with groups/individuals from each relevant protected characteristic or equality group?** (refer back to Stage 1, Question 5)

A total of 5,000 Council Tax payers were sent a consultation pack. 3,780 of these customers were emailed directly and encouraged to use the online survey and supporting information. 1,220 were directly mailed and directed to the web based consultation asking for their feedback on the changes.

The ratio of people claiming Council Tax Reduction in the district to those that do not, is approximately 4:1.

To reflect this, 3,780 Council Tax payers were selected, along with 1,300 Council Tax payers who are claiming Council Tax Reduction. The Council Tax payers claiming Council Tax Reduction were balanced between those in receipt of a passported benefit, those in receipt of a low income, disabled and those with children. However, some of these areas overlap, for example, someone in receipt of a passported benefit may also be disabled and have young children. The full breakdown of consultees was:

- 3,780 Council Tax payers
- 222 Council Tax payers who are in receipt of a passported DWP benefit and Council Tax Reduction
- 81 Council Tax payers who are in receipt of Council Tax Reduction based on their low earned income
- 325 Council Tax payers who are in receipt of Council Tax Reduction and are disabled
- 202 Council Tax payers who are in receipt of Council Tax Reduction and have children
- 390 other Council Tax payers who are in receipt of Council Tax Reduction

In addition, a briefing session was held with local stakeholder organisations. These were invited because they work closely with people who are affected by changes to the Council Tax Reduction.

Lead contacts from groups were contacted to make them aware of the consultation and

invited to the session to give feedback on the proposals. The organisations contacted included: Age UK, Sanctuary Housing, Department for Work and Pensions, Shelter, East Kent Housing, Shepway Citizens Advice Bureau, Folkestone Rainbow Centre, Red Zebra, Porchlight, B48's, Side by Side Advocacy Service and the Shepway Employment Forum. Shepway District Council representation from Housing Options and the Community Safety Unit were also included.

**17. What other research has been or will need to be carried out to help you with the assessment?**

None

**18. Results of research/consultation (what does it tell you about the negative impacts?)**

The multiple changes to benefits coupled with the reduction in Council Tax support is having a severe affect on Council Tax payers and creating debts which people are finding difficult to pay off.

**19. Conclusions & Action Planning**

You should explain what and how negative impacts have been reduced or removed and how positive impacts are to be improved or included.

Your final decisions or recommendations may include making immediate changes, stopping or proceeding with a new policy, justifying a decision or adding objectives/targets to the service development plan/equality scheme (long term changes).

You could use the template below to record your conclusions/actions. You should also make reference to any additional monitoring or research that is still required, or was not retrievable at the point of assessment, but will be required in subsequent reviews or in order to complete actions.

<b>Impact/Issue</b>	<b>Action/Objective/Target or Justification</b>	<b>Will this remove negative impact?</b>	<b>Resources</b>	<b>Lead Officer &amp; Timescale</b>
Increased debt and reduced collection rates	Provide support and budgeting advice for those customers who are experiencing difficulty with paying. This will be supported with a robust Income and Debt Management policy and weekly monitoring of collection rates.	Yes this will serve to negate the impact	The Council Tax team will conduct a face to face interview where required and conduct a means test enquiry analysing all income with	Jane Worrell - complete

			a focus on priority debt.	
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**20. How will you monitor, evaluate and check the policy in the future?**

The scheme will be agreed for 3 years and any changes must be subject to further consultation.

**21. When will a review take place?**

As above.

**Please complete**

We are satisfied that a full impact assessment has been carried out.

Completed by: Andrew Hatcher

Date: 24 October 2016

Role: Revenues & Benefits Strategic Manager

Countersigned by Group Manager:

Date: