

Equality Impact Assessment of proposed Council Tax Support Scheme

Lead Assessor	Scott Crudgington Strategic Director (Resources)	Assessment team	Su Tarran Head of Revenues and Benefits Shared Service Mark Simpson Corporate Change Manager
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Start date	01/11/12	End date	08/11/12	Review date	The adopted Council Tax Support scheme will be reviewed annually. An equality impact assessment will be conducted on any proposed changes resulting from those reviews.
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Stevenage Borough Council as a service provider, employer and community leader is committed to achieving equal opportunity, being wholly inclusive and ensuring fair access for everyone, no matter what their race, ethnic or national origin, religious belief, disability, age, sex, sexuality, marital status or income. Equality Impact Assessments (EqIAs) are an important part of the process in ensuring that our intention is translated into action.

Carrying out EqIAs helps to ensure that decisions taken by Stevenage Borough Council are made in a fair, transparent and accountable way, considering the needs and the rights of different people in the community. An EqIA is essentially a tool for service improvement - to ensure we focus on the needs of our customers, the people of Stevenage.

EqIAs take the user through the process of considering available evidence of the impact of a policy, service or function on equality groups with the aim of identifying actions to eliminate any identified discrimination and take opportunities to promote equality and diversity. EqIAs will be carried out on Stevenage Borough Council services, policies and functions that are relevant to equality and are new or under review.

Based on the 'protected characteristics' under the Equality Act 2010, the EqIA considers the impact on the following groups when reviewing, developing or making decisions about new or existing policies, services or functions:

- Disability
- Race
- Gender
- Sexual orientation
- Gender reassignment
- Age
- Religion and belief
- Marital status
- Pregnancy and maternity.

In addition, socio-economic factors are also considered in EqlAs, as directed by the Executive of Stevenage Borough Council. Note however that, as this factor is non-statutory, decision makers should use their discretion when considering the analysis of socio-economic impact.

EqlAs are a demonstration of our compliance with the requirements of the Public Sector Equality Duty as described below.

The Public Sector Equality Duty – Section 149 of the Equality Act 2010

A public authority must, in the exercise of its functions, have due regard to the need to –

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Step 1: Collecting evidence

This step involves identifying the aims of the policy, service or function and collects evidence relating to the impact on service users and particular groups.

What is being assessed?

The impact of Stevenage Borough Council’s proposed Council Tax Support Scheme is being assessed.

The Government has abolished Council Tax Benefit from the 1st April 2013. It is replaced by a statutory requirement for all Council Tax billing authorities to develop their own Council Tax Support Scheme, based on local priorities.

Council Tax Benefit expenditure is currently fully funded by central government. This will be reduced by approximately 10% for Council Tax Support Schemes. It is for the Council to decide whether to find the required savings by making conditions of entitlement to Council Tax reductions more stringent, or by making cuts to other services, or possibly by a combination of these options.

The enacting legislation does not affect people of pensionable age, who will continue to receive the same level of support towards their Council Tax bills.

The Council’s proposed scheme says that entitlement to Council Tax Support will be given on 91.5% of a claimant’s Council Tax Bill, rather than on 100% as it currently is with Council Tax Benefit. This means that everyone (except pensioners) will be required to pay 8.5% of their Council Tax Bill. This includes people who pay nothing under the current rules.

The impact of the proposed reduction in Council Tax support on people with protected characteristics is assessed in this document, in so far as this can be done with the information available.

<p>What are the aims?</p>	<p>The Council has a statutory duty to adopt a Council Tax Support Scheme in accordance with the Local Government Finance Act 2012.</p> <p>The aim of the scheme is to specify reductions in the Council Tax bills for people whom the council considers to be in financial need.</p>																											
<p>Who may be impacted?</p>	<p>The scheme will affect approximately 4,777 people in Stevenage who get Council Tax Benefit and are not of pensionable age. This figure varies from day to day as people come on and off Council Tax Benefit because of changes in their personal circumstances.</p> <p>The scheme will also affect future applicants for Council Tax Support, who would have otherwise been entitled to Council Tax Benefit, had the way in which entitlement is worked out remained unchanged.</p>																											
<p>What measures are already in place?</p>	<ol style="list-style-type: none"> 1. The scheme is a statutory requirement and has no specific aims in relation to the Council's equality duties. 2. Everyone will be able to access the Council Tax Support Scheme in the same ways as they currently access the Council Tax Benefit Service. 3. Everyone affected by the proposed scheme will be sent information advising them of the change. Details of the scheme will be published on the Council's website and the Council's Customer Service Advisers will be trained on the new arrangements. <p>The scheme will be administered by East Herts Council, on behalf of Stevenage Borough Council, through the existing Revenues and Benefits Shared Service. The effectiveness of it reaching all sections of the community will be monitored through the Revenues and Benefits Joint Management Board.</p>																											
<p>What is the evidence of impact?</p> <p>What do we know about the people who may be impacted?</p>	<p>Under the proposed scheme, the 8.5% amounts shown in the table below must be paid by everyone applying for Council Tax Support, depending on which Council Tax band their home falls into.</p> <p>Those amounts cannot be reduced by an award of Council Tax Support under the rules of the Council's proposed scheme.</p> <table border="1" data-bbox="472 1038 1064 1374"> <thead> <tr> <th>Band</th> <th>Full Council Tax Bill</th> <th>8.5%</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>£970.12</td> <td>£82.46</td> </tr> <tr> <td>B</td> <td>£1,131.80</td> <td>£96.20</td> </tr> <tr> <td>C</td> <td>£1,293.49</td> <td>£109.95</td> </tr> <tr> <td>D</td> <td>£1,455.17</td> <td>£123.69</td> </tr> <tr> <td>E</td> <td>£1,778.54</td> <td>£151.18</td> </tr> <tr> <td>F</td> <td>£2,101.92</td> <td>£178.66</td> </tr> <tr> <td>G</td> <td>£2,425.29</td> <td>£206.15</td> </tr> <tr> <td>H</td> <td>£2,910.34</td> <td>£247.38</td> </tr> </tbody> </table> <p>This represents a new or increased bill payable by people on low incomes and/or receiving state benefits. People who</p>	Band	Full Council Tax Bill	8.5%	A	£970.12	£82.46	B	£1,131.80	£96.20	C	£1,293.49	£109.95	D	£1,455.17	£123.69	E	£1,778.54	£151.18	F	£2,101.92	£178.66	G	£2,425.29	£206.15	H	£2,910.34	£247.38
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	<p>currently do not pay any Council Tax will not receive an increase in their state benefits to help meet their new Council Tax bills.</p> <p>People whose Council Tax Benefit is currently the equivalent of 8.5% of their Council Tax Bill, or less, will no longer be entitled to help towards their Council Tax bills.</p> <p>The greatest impact of the proposed scheme, will be felt by people who have higher costs of living and have restricted scope for finding employment or increasing their earnings from employment. Such people are:</p> <ul style="list-style-type: none"> • Disabled • Carers • Parents, particularly those with children aged under five • Lone parents. <p>These groups have limited ability to find the means to pay increased Council Tax bills. Therefore, the proposed scheme has a disproportionate impact on them. The actual additional amounts that these groups will be required to pay will vary, depending on the Council Tax Band their home falls into and on the level of entitlement they have to Council Tax Support, which depends of their personal circumstances and income.</p> <p>Of the 4,777 people (non-pensioners) getting Council Tax Benefit:</p> <ul style="list-style-type: none"> • 1,057 are disabled or have disabled children (22%) • 216 are carers (4.5%) • 2,629 have dependant children (55%), of which • 1,099 have children aged under five (23%) <p>All the figures shown in this document are indicative only. They have been extracted from data held for the purposes of administering Council Tax Benefit and do not necessarily give a complete profile of people affected by the proposed scheme.</p> <p>The proposed scheme retains several types of 'premiums' which allow appropriate levels of support to be awarded for disabled people, carers and those with disabled children. The 'premiums' reflect the additional living costs incurred by disabled people and do not specifically mitigate the impact of having to pay extra Council Tax.</p> <p>Although the direct financial change will be applied on the same basis to everyone claiming Council Tax Benefit, there is insufficient evidence to determine if any of the other groups of people with protected characteristics are likely to be more significantly affected than others.</p>
<p>What do we still need to find out?</p>	<p>The Council holds information about Council Tax Benefit claimants which is required for the purposes of calculating and paying benefit. This includes some information about age, disability, gender, and pregnancy and maternity, but only in cases where that information is needed to work out entitlement to benefit.</p>

No information is routinely held about the other protected characteristics of race, sexual orientation, gender reassignment, religion and belief. The information held about the marital status of claimants is incomplete.

The Council may consider what steps could be taken to collect information about people with protected characteristics which would enable a more thorough assessment to be made of the impact of the proposed scheme. This could include collecting information which would help identify any groups of people who may experience a disproportionate impact.

Step 2: Assessing the impact

This step involves using the evidence we have gathered to analyse the impact of a policy, service or function on people with protected characteristics. The table below provides details of the potential impacts as well as information about what can be done to mitigate negative impact or further the aims of the equality duty.

The Council obtained views and comments on the proposed Council Tax Support Scheme through a range of approaches. These included a postal questionnaire sent to everyone who will be affected by the scheme, a telephone survey, an online survey on the Council's website, a focus group discussion and a Café Choice consultation session in the town centre.

At the time of the consultation, the proposed scheme was that entitlement to Council Tax Support will be given on 90% of an applicant's Council Tax Bill, rather than on 100% as it currently is with Council Tax Benefit. This means that everyone (except pensioners) will be required to pay 10% of their Council Tax Bill. This would include people who pay nothing under the current rules.

The majority of responses disagreed or strongly disagreed with the proposed scheme. When specifically asked about the proposals in respect of certain groups of people, including those with protected characteristics, there was an increase in the percentage of respondents who disagreed with the proposal.

As a result of the consultation, the proposed Council Tax Support Scheme was amended so that it says entitlement to Council Tax Support will be given on 91.5% of an applicant's Council Tax Bill, rather than on 100% as it currently is with Council Tax Benefit.

Overall, the impact on all groups is negative, with a greater impact on people with limited capability to increase their income in order to pay an increased Council Tax Bill arising from a change in the benefit rules.

In having due regard for the likely impact of the proposed Council tax Support Scheme on people with protected characteristics, there may be options for mitigating any disproportionate impact. This could be done by protecting certain groups from the cut in government funding. The options are all financial in nature:

- Increase Council Tax
- Use reserves
- Reduce other budgets

- Reduce the amount of benefit paid to unprotected claimants

The Council may wish to discount these options as unaffordable, in light of the pressure on its budgets. However, this leaves no other means by which the impact of the proposed scheme can be avoided.

Assessing the Impact Table

Does the policy/service/function have a potential positive or negative impact in relation to...		1. Negative or disproportionate impact	2. Positive impact	3. Actions to mitigate negative impact (or comment on impact)	4. Actions to further promote equality (or comment on impact)
Race, ethnicity and national origin	Asian or Asian British (including Indian, Pakistani, Bangladeshi, Chinese etc)	<p>The proposed scheme will reduce the amount of support given to people on low incomes who currently claim Council Tax Benefit irrespective of race, ethnicity and national origin.</p> <p>The Council does not hold information about the ethnicity and national origin of Council Tax claimants. It is therefore not known whether certain ethnic groups are disproportionately reliant on Council Tax Benefit. Or whether certain ethnic groups are prone to having, on average, larger families and subsequently may experience a disproportionate impact from the proposed scheme.</p>	None.	<p>The Council will work with the Citizens Advice Bureau to provide advice and support to affected claimants in the areas of money management and benefit entitlement maximisation.</p> <p>The impacts of the scheme will be reviewed during the implementation phase and any unintended consequences will be considered and addressed in the future scheme designs.</p>	None.
	Black or Black British (including Caribbean and African)				
	Mixed Race				
	White (including British/Irish/Scottish/Eastern European)				
	Travellers or Gypsies				
	People who don't speak English				
Gender and Gender Identity	Women	<p>The proposed scheme will reduce the amount of support given to claimants on low incomes who currently claim Council Tax Benefit, irrespective of gender.</p> <p>Figures indicate that 53% of</p>	None.	See above.	None.
	Men				
	Transgender and Transsexual				

		<p>current working age claims are from single women. 38% of current working age claims are from lone parents, with 36% of these being from women.</p> <p>The proposed scheme appears likely to have a disproportionately negative impact on lone parents who are women and in particular, lone parents of children aged under five who are women. This is because these groups have a disproportionate reliance on Council Tax Benefit.</p> <p>No information is held about the sexuality of claimants, so the impact on transgendered and transsexual claimants has not been considered.</p>			
Disability People with...	Physical or mobility impairments including wheelchair users	<p>The proposed scheme will reduce the amount of support given to people on low incomes who currently claim Council Tax Benefit irrespective of disability. This includes:</p> <ul style="list-style-type: none"> ▪ People who are unable to work because of illness or disability ▪ People with limited ability to work because of illness or disability. <p>These groups either cannot</p>	None.	See above.	None.
	Hearing impaired/deaf				
	Visually impaired/blind				
	Mental health problems				
	Learning disabilities				
	Long standing illness or non-visible conditions such as epilepsy or				

	diabetes	work, or have limited capacity for employment due to a disability. Therefore, The proposed scheme will have a disproportionately negative impact on people with disabilities.			
Age		<p>The proposed scheme will reduce the amount of support given to people on low incomes who currently claim Council Tax Benefit and are not of pensionable age.</p> <p>The level of support for claimants of pensionable age is unchanged by the proposals.</p> <p>Of the working-age claimants who will be affected by the proposed scheme, there is no evidence to suggest a disproportionate impact on any particular age groups.</p>	None.	See above.	None.
Sexuality	Heterosexual/straight	The Council does not hold information about the sexuality of Council Tax Benefit claimants, so the impact on transgendered and transsexual claimants has not been considered.	None.	See above.	None.
	Gay man				
	Lesbian/Gay Woman				
	Bisexual				
Religion/ belief	Christian	The Council does not hold information about the religion and beliefs of Council Tax Benefit claimants, so the	None.	See above.	None.
	Buddhist				

	Hindu	impact on people holding specific beliefs has not been considered.			
	Jewish				
	Muslim				
	Sikh				
	Other				
	No religion or belief				
Marital status	Single	The proposed scheme will reduce the amount of support given to claimants on low incomes who currently claim Council Tax Benefit, irrespective of marital status.	None.	See above.	None.
	Married				
	Civil partnership				
	Divorced	Of the working-age claimants who will be affected by the proposed scheme, there is no evidence to suggest a disproportionate impact on claimants with any particular marital status.			
	Separated				
	Widowed				
	Cohabiting/Unmarried partners				
Pregnancy and maternity	Pregnancy	The proposed scheme will reduce the amount of support given to people on low incomes who currently claim Council Tax Benefit, irrespective of pregnancy or parenting responsibilities. This includes approximately 23% of claimants who have children	None.	See above.	None.
	Maternity (including breastfeeding mothers)				

		<p>aged under five.</p> <p>These groups of people, who claim Council Tax Benefit, have restricted capacity for employment due to parenting responsibilities.</p> <p>The proposed scheme will have a disproportionately negative impact on pregnant claimants and on those with children aged under five.</p>			
*Socio-economic	Low income	<p>The proposed scheme will reduce the amount of support given to people on low incomes, who currently claim Council Tax Benefit. This includes:</p> <ul style="list-style-type: none"> ▪ Unemployed people ▪ Part-time workers who cannot find full time work ▪ People with caring responsibilities 	None.	See above.	None.
	Homeless				
	Unemployed				
	Part time workers				
	Carers				
	People who need to use public transport				
	Other				
*Other Parents Carers	Parents/lone parents	<p>The proposed scheme will reduce the amount of support given to claimants on low incomes who currently claim Council Tax Benefit, including lone parents.</p> <p>Approximately 1,808 of current working age claims are from lone parents.</p>	None.	See above.	None.

		Lone parents are restricted in their capacity for employment because of parenting responsibilities. Therefore, this group is disproportionately negatively impacted by the proposed scheme.			
	Carers of people with disabilities	<p>The proposed scheme will reduce the amount of support given to claimants on low incomes who are carers of people with disabilities.</p> <p>Carers have limited scope to take up employment or to increase hours of work if they are employed, because of their caring responsibilities.</p> <p>It is not possible to identify the total number of carers claiming Council Tax benefit from the data currently available. However, figures suggest that some 4.5% of Council Tax Benefit claimants are carers.</p>	None.	See above.	None.

Step 3: Planning for improvement

With potential impact identified, this step involves setting out what we will do to mitigate negative impact or further promote equality.

Goal	Actions	Person responsible	Resources needed and source	Time frame to implement	How actions are integrated into planning
The scheme will be reviewed on an annual basis, when the impact on equality groups will be considered.	Review impact on protected groups as part of the annual review of the scheme and report to Executive.	Scott Crudgington Strategic Director (Resources)	None.	One year.	Revenues and Benefits Shared Service Joint Management Board.
Enable thorough impact assessment of relevant equality groups such as religion and belief, ethnic background and sexual orientation, gender reassignment and marital status.	Obtain relevant information from Council Tax Support claimants	Scott Crudgington Strategic Director (Resources)	To be determined	During 2013/14	Revenues and Benefits Shared Service Joint Management Board.
The proposed scheme has no attributable goal in terms of equality.	None	N/a	N/a	N/a	N/a
None of the negative impacts will be addressed.	None.	N/a	N/a	N/a	N/a
There are no positive impacts.	None.	N/a	N/a	N/a	N/a

Step 4: Outcome of assessment

In this step the outcome of the EqIA is identified. An EqIA has four possible outcomes; more than one may apply to a single policy, service or function.

Outcome		Tick
1. No major change needed (unlikely outcome).	The EIA demonstrates the policy, service or function is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	<input type="checkbox"/>
2. The Policy has been adjusted.	The EIA identified potential problems or missed opportunities and adjustments were made to remove barriers or better promote equality. Details of the actions taken and planned are in the Action Plan table above.	<input type="checkbox"/>
3. Continue the policy without adjustment.	The EIA has identified the potential for adverse impact or missed opportunities to promote equality but the policy, service or function will be continued without change. See the box below for the reason for this outcome.	<input checked="" type="checkbox"/>
4. Discrimination identified – stop and rethink.	The EqIA has shown actual or potential unlawful discrimination under the Equality Act 2010 and will be removed.	<input type="checkbox"/>

Reasons for continuing with service, policy or function un-amended despite identifying the potential for adverse impact or missed opportunities to promote equality:

Following consideration of the responses from consultation, attempts have been made to reduce the impact on claimants by requiring them to pay the first 8.5% of their net Council Tax liability, rather than the 10% proposed during the consultation. Officers have also explored alternative funding sources within the Council's General Fund Budget, but have failed to identify any acceptable alternative budgets that could be diverted to support the scheme. In addition, both the County Council and Police Authority have requested SBC to design a scheme that was financially sustainable without the need for either of the preceptors to have to make cuts elsewhere within their budgets.

SIGN OFF BY LEAD ASSESSOR

Name: Scott Crudgington
 Position: Strategic Director (Resources)
 Date approved: 30/11/12

SIGN OFF BY HEAD OF SERVICE

Name: Su Tarran
 Position: Head of Revenues and Benefits Services
 Date approved: 30/11/12