

Appendix 3 ~ Equality Impact Assessment Template

For help in completing this assessment see the guidance notes attached to these forms

Directorate: Policy & Resources	Service: Finance
Accountable Officer: Alison Bell	Telephone & e-mail: 01452 396014 Alison.bell@gloucester.gov.uk
Date of assessment: 08.10.2019	Who was involved in completing this assessment? Alison Bell
Name of service/function/policy/strategy or process: Local Council Tax Support Scheme	
Is this new or existing? Existing but changes proposed, hence this EQIA	
Why has this change been proposed? Amendments to the scheme are proposed	

Part 1 – Screening

1.1 Please provide an Executive Summary of this service/function/policy/strategy or process, including the reasons behind the proposed change and who will deliver this service. Remember to demonstrate how you have shown due regard to both negative and positive aspects, for example:

Negative

- Discrimination, harassment, victimisation and any other prohibited conduct (state how you will eliminate this)
- Prejudice and lack of understanding (how will you foster good relations between people to tackle prejudice and promote good understanding?)
- Which protected characteristics could be negatively affected by this change? Use the table in question 2 to explain these fully

Positive

- Who is to benefit from this change, and what positive opportunities does this offer to Gloucester (residents, GCC and partner agencies)
- Advance equality of opportunity: (remove or minimise disadvantage; meet people's needs; take account of disabilities; encourage participation in public life). (Does not apply to marriage and civil partnership or pregnancy and maternity)
- How might ABCD approaches be implemented?

Prior to April 2013, Council Tax Benefit was administered under a national scheme set by, and fully funded by, Central Government. From April 2013 each local authority has been responsible for setting its own Local Council Tax Reduction scheme – also known as Council Tax Support (CTS). The scheme is no longer funded from Central Government and year on year the funding has reduced. Data shows that only 37 out of 326 local authorities still provide the same level of support which was available under the national scheme. The most common change to the schemes nationally has been the introduction of a minimum payment – which requires all local residents to pay at least some council tax regardless of their income. In the 2017/18 financial year 264 councils expected a minimum payment to be made.

To date, Gloucester City Council has not significantly amended its Council Tax Support scheme, however, the long term financial sustainability of the current scheme is questionable.

It is proposed that Gloucester City Council align to the majority of other local authorities and introduce a minimum payment of 10% from local residents to contribute to local services.

Those of pension age remain unaffected by any of the proposed changes as Council Tax Support for pensioners was never localised and remains part of a national scheme.

The proposal is for the current Council Tax Support scheme to remain in place but to have a minimum payment expectation. The current Council Tax scheme is means tested and support

is awarded dependant upon an individuals' personal, financial and household circumstances.

The scheme itself already has a built in provision for those groups deemed vulnerable in order to minimise any potential disadvantage.

For example, income from disability living allowance, personal independence payments, elements of war pensions, child benefit, child maintenance are all disregarded incomes for council tax support.

In addition, to promote incentives to work Gloucester City Council's scheme has an earnings disregard of £5.00 for a single claimant, £10.00 for couples, and £25.00 for lone parents. Furthermore, there is a weekly childcare disregard applied to earnings of up to £175.00 for one child and £300.00 for two or more. A disregard is an amount of earnings not used in the calculation of net earnings.

It should also be noted that means-tested benefit incomes used in the calculation of support within Gloucester's scheme such as Universal Credit already make allowances for personal circumstances such as disability, caring and incentivise work.

1.2 Which groups could be affected by this change, in either a negative or positive way? Please include the evidence (i.e. consultation/research) as to how you reached this decision.
(Positive – it could benefit, **Negative** – it could disadvantage, **Neutral** – neither positive nor negative impact or **Not sure?**)

'Protected Characteristic'	Type of impact (Positive, Negative or Neutral)	Reason	Evidence base for decision
Age	N/A		Government scheme has provided protection to this group
Disability	Potentially negative / neutral	See full report	See full report
Gender	Potentially negative / neutral	See full report	See full report
Marriage and Civil Partnerships	N/A		
Pregnancy and Maternity	N/A		
Race (including Gypsy & Traveller)	N/A		
Religion/Belief	N/A		
Sexual Orientation	N/A		
Transgender	N/A		
Community Cohesion	N/A		
Other Socio-economic Groups (e.g. Single Parents)	Potentially negative / neutral –	See full report	See full report
Any Human Rights implications?	Neutral	There are no HR implications / no impact as a result of this report	

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

If yes, please consider equalities impact through procurement.

Yes No

1.4 Is a Full People Impact Assessment required? If you have identified any potential or actual negative impact you will need to complete a Full People Impact Assessment (Part 2 below)

Yes No

Date it is to be completed: 08/10/2019

I AM SATISFIED A FULL PEOPLE IMPACT ASSESSMENT IS NOT REQUIRED

Author of People Impact Assessment to complete:	
Assessment completed by: Ali Bell Role: Intelligent Client Officer (Revs & Bens)	Date: 08/10/2019
Service Manager/ Director to Complete	
Countersigned by: Role:	Date:
Date Reviewed at SMT or other meeting (please state)	
	Date:
Cabinet Member to complete:	
Signature: Post:	Date:

Attach this EIA to the relevant SMT, Cabinet or Council report. Please keep a signed copy with your team for auditing purposes and forward an electronic copy to Emily Bolland, Community Wellbeing, so that it can be archived and published, where required.

Part 2 – Full Equality Impact Assessment

2.1 Summarise the likely negative impacts for relevant groups identified in the screening process (start to think about possible alternatives)

In the interests of transparency I have decided to undertake the full PIA, as all customers who claim and receive Council Tax Support from Gloucester City Council will be affected in a non-discriminatory way. The only 'protected' group are those of pension age who remain protected by the national Council Tax Support scheme and not part of the localised scheme. Thus, they shall be disregarded for the purpose of this PIA.

DISABLED CUSTOMERS – I have marked this up as potentially negatively affected / neutral.

None of the proposals will affect disabled customers in isolation as all households are potentially affected.

People who receive War Pensions will continue to receive protection by having this income disregarded in the calculation of LCTS. This protection is extended to households who are transferring to Universal Credit as War Pensions are disregarded in the calculation of that benefit and therefore will not be taken into account in the assessment of LCTS.

There are currently 215 households (4% of the total caseload) who meet the criteria of having a disabled resident where the income of the claimant or partner does not automatically passport them to the maximum level of award allowed under the scheme.

Disabled households will continue to receive additional protection within the scheme through higher income disregards applied within the calculation and certain benefits paid specifically to meet additional financial pressures caused by disability will continue to be disregarded in full.

In addition, recovery activity can be tailored to meet the needs of vulnerable households and the council will work with those households to help them pay their council tax liability.

There is a range of other support available to disabled households in the form of direct additional income through welfare benefits, grants or other council tax disregards to assist with costs associated with meeting the additional needs caused by disability.

The changes present some positives for disabled households by making the scheme more accessible to maximise take-up where national evidence shows take-up for this form of support has reduced.

GENDER – I have indicated that this group could potentially be negatively affected / neutral. The reason for this is that there are a higher proportion of single parent households who are female. There are 1,833 single parent households.

Additional support for vulnerable groups which could include single parents is already inbuilt into Gloucester City Council's current scheme. For example, child benefit and child maintenance are disregarded as income. Furthermore, to promote incentives to work Gloucester City Council have an earnings disregard of £5.00 for a single claimant, £10.00 for a couple and £25.00 for lone parents. There is also a weekly childcare disregard of up to £175.00 for one child and up to £300.00 for two or more children. A disregard is an amount of earnings not used in the calculation of net earnings.

The scheme is designed to incentivise work and Universal Credit makes it easier for single parent households to move into employment providing means to reduce any negative impact felt by individual households

OTHER SOCIO-ECONOMIC GROUPS – I have indicated that this group could potentially be negatively affected / neutral. The reason for this is again all working age customers will potentially be affected by this proposal, but not in a discriminatory way.

The existing caseload has a high proportion of single parent households, 1,833 (35%), who are potentially affected by the changes proposed.

Carers who are not already in receipt of a benefit passporting them to the maximum support the scheme currently provides is low. There are currently 124 households (2%) who provide care for a severely disabled person.

Additional support for vulnerable groups which could include single parents is already inbuilt into Gloucester City Council's current scheme. For example, child benefit and child maintenance are disregarded as income. Furthermore, to promote incentives to work Gloucester City Council have an earnings disregard of £5.00 for a single claimant, £10.00 for a couple and £25.00 for lone parents. There is also a weekly childcare disregard of up to £175.00 for one child and up to £300.00 for two or more children. A disregard is an amount of earnings not used in the calculation of net earnings.

The scheme is designed to incentivise work and Universal Credit makes it easier for single parent households to move into employment providing means to reduce any negative impact felt by individual households

In addition, recovery activity can be tailored to meet the needs of vulnerable households and the council will work with those households to help them meet their liability.

2.2 What consultation/involvement activities have taken place or will need to take place with groups/individuals from each relevant equality group? (do not forget to work with the Consultation Team and use data from relevant systems)

A public consultation took place between 9th August 2019 and 22nd September 2019
In addition, local advice and support agencies were consulted.

Here is a document to explain the consultation campaign.



COUNCIL TAX
SUPPORT 2020 - cam

2.3 What other research has been or will need to be carried out to help you with the assessment? Will you need support from other teams or departments to complete this?

The provisions for potentially vulnerable groups already inbuilt and indigenous to Gloucester City Council's Local Council Tax scheme have mitigated down any potential negative impact.

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

As our Council Tax Support scheme covers ALL working age people in the Gloucester City area I believe that we can accurately state we are not being prejudicial to anyone due 'protected characteristics'. The scheme is for all and accessed by all. Historically, extra provision has been made for those groups identified as vulnerable and the scheme will retain those provisions.

2.5 Conclusions & Action Planning

You should explain what negative impacts there may potentially be and how they have been reduced or removed. Remember to also highlight 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 proposal's development plan.

You can 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.

Impact/Issue	Action/Objective/Target or Justification	Will this remove negative impact?	Resources	Lead Officer & Timescale
Financial Impact	All working age people will be equally impacted, regardless of any 'protected characteristics'. Those identified as from vulnerable groups have additional financial protection inbuilt into the current scheme which will remain	The policy will have a financial impact on working age people who claim Council Tax Support		
Review recovery procedures	Ensure help, support and advice is made available to households struggling to pay council tax, internally or via stakeholders and avoid incurring additional recovery	Will limit instances of any negative impact		
Collection Monitoring	Collection levels will be monitored to identify instances of inability to pay additional liability as a result of the changes particularly in relation to small balances	Will help to inform any future changes or alternate approaches to collection to support affected households		
Review Discretionary Hardship Scheme	The council has further discretion to support households where exceptional hardship exists	Can support those most severely affected		

2.6 How will you monitor, evaluate and check the policy in the future?

The policy is subject to review and alteration annually

Relevant associated data such as collection rates, accounts which are summonsed, caseload and cost of the scheme are part of normal service monitoring

2.7 When will a review take place?

Annually

Please complete

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

Author of People Impact Assessment to complete:	
Assessment completed by: Ali Bell Role: Intelligent Client Officer (Revs & Bens)	Date: 08.10.2019
Service Manager/ Director to Complete	
Countersigned by: Role:	Date:
Date Reviewed at SMT or other meeting (please state)	
	Date:
Cabinet Member to complete:	
Signature: Post:	Date:

Attach this EIA to the relevant SMT, Cabinet or Council report. Please keep a signed copy with your team for auditing purposes and forward an electronic copy to Emily Bolland, Community Wellbeing, so that it can be archived and published, where required.

Equality Impact Data

Total number of working age households – 5,253

- **2,528 single households**
- **1,833 single parent households**
- **892 couple households (581 of these have children)**

There are currently 1,432 non-UC households who are entitled to receive the maximum amount of LCTS allowed under the scheme. This is broken down by

- **624 in receipt of ESA(IR)**
- **612 in receipt of IS**
- **196 in receipt of JSA(IB)**

Data on households with carers and people with disability in the home is limited because of the information requirements to assess awards of LCTS

Of the households who are not in receipt of a passported benefit i.e. one which awards the maximum level of LCTS which can be awarded under the current scheme there are;

- **121 households where there is a disability premium included in the calculation of the LCTS award**
- **124 households where there is a carer premium included in the calculation of the LCTS award**

The proposals do not directly impact on these households as many do not currently receive the maximum level of LCTS and will not have to contribute more than they already are

Impact of 10% minimum Payment on Identified groups with protected characteristics

Household Group	Number	Average current award	Average award after 10%	Average loss	Maximum Loss
All Claimants	5253	17.15	15.66	1.49	5.56
Single Parents	1833	15.72	14.53	1.29	4.42
Couples with children	581	19.59	18.1	1.49	5.56
Households with disability not passported to maximum LCTS					
Households with disability not passported to maximum LCTS	215	17.87	16.59	1.28	5.56
Households with caring responsibilities not passported to maximum LCTS					
Households with caring responsibilities not passported to maximum LCTS	124	18.41	17.22	1.19	5.56
Households passported to maximum LCTS (JSAIB / IS / ESAIR)					
Households passported to maximum LCTS (JSAIB / IS / ESAIR)	2640	19.49	17.54	1.95	4.17
ESA Passported customers	624	19.44	17.5	1.94	3.41

Notes to table

- Single parents have a lower current award due to Single Person Discount
- The maximum loss cases are very rare within the caseload and relate to properties with higher Council Tax Bands. There are only 18 claims in the whole caseload who receive more than £30 per week in LCTS (less than 0.5%)
- ESA cases are not all disabled but likely to have a higher proportion of disabled residents. The data required to calculate LCTRS does not always show residents with disability if there is an overriding benefit which passports the household to the maximum award
- Average loss only is represented. With the exception of the passported claimants where nearly all are affected there are between 25% to 33% of households who would not have to pay more if a minimum contribution of 10% was introduced