

Equality Impact Assessment (EIA)

Document control

Title of activity:	Proposal to amend the Council Tax Support Scheme 2015
Type of activity:	This is a scheme which provides assistance to people on low incomes to help them pay their Council Tax.
Lead officer:	Chris Henry, Head of Council Tax & Benefits, Exchequer & Transactional Services, oneSource
Approved by:	Sarah Bryant, Director of Exchequer & Transactional Services
Date completed:	January 2015
Scheduled date for review:	September 2016

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@havering.gov.uk

About your activity

1	Title of activity	Proposal to amend the Council Tax Support Scheme 2015
2	Type of activity	This is a scheme which provides assistance to people on low incomes to help them pay their Council Tax.
3	Scope of activity	<p>Many people on low incomes can get Council Tax Support to help them pay their council tax bills. The Council Tax Support Scheme is mainly funded by the Government although the Council help pay towards the scheme as well.</p> <p>The Government plan to reduce the money to pay for the scheme from 2015/2016. The CTS grant has been rolled into the Settlement Funding Allocation which has been reduced in 14/15 in-line with core funding reduction. The Council's budget cannot cover a further shortfall in Government funding. Therefore, a proposal has been submitted for consultation to change the current scheme to help bridge the funding gap.</p> <p>The proposed scheme will continue to protect pensioners who will get the same level of council tax support as they do now.</p> <p>The proposals for 2015/2016 are to:</p> <ol style="list-style-type: none"> 1. Reduce Council Tax Support for working age claimants by 15%. This means that every working age household would have to pay a minimum charge of 15% of their Council Tax Bill. 2. Reduce the amount of savings and investments people are allowed to have and still be entitled to claim from £16,000 to £6,000. 3. Abolish Second Adult Rebate. Second Adult

		Rebate supports working age tax payers whose income is too high in their own right for Council Tax Support but who have other adults living in the household whose income is low.
4a	Is the activity new or changing?	Yes – changing
4b	Is the activity likely to have an impact on individuals or groups?	Yes
5	If you answered yes:	

Completed by:	Chris Henry, Head of Council Tax & Benefits
Date:	January 2015

2. Equality Impact Assessment

Background/context:

The Council proposes to amend the Council Tax Support (CTS) Scheme from April 2015. The scheme provides assistance to people on low incomes to help them pay their Council Tax.

The Council needs to make savings in order to balance its budget due to large reductions in government grant and changing funding regimes.

The CTS grant has been rolled into the Settlement Funding Allocation which has been reduced in 14/15 as part of the core funding reduction. The Council's budget cannot cover a further shortfall in Government funding without using reserves, increasing the Council Tax or reducing Services.

The Council has consulted on a range of options including which service to protect and which to reduce and whether residents would wish to pay increases above 2% council tax rather than see service reductions. Changes to the CTS scheme form part of the Council's overall strategy to balance the budget.

The proposed scheme will continue to protect pensioners who will get the same level of Council Tax Support as they do now.

The proposals for 2015/2016 are to:

4. Reduce Council Tax Support for working age claimants by 15%. This means that every working age household would have to pay a minimum charge of 15% of their Council Tax Bill.
5. Reduce the amount of savings and investments working age claimants are allowed to have and still be entitled Council Tax Support from £16,000 to £6,000.
6. Abolish Second Adult Rebate. Second Adult Rebate supports working age tax payers whose income is too high in their own right for Council Tax Support but who have other adults living in the household whose income is low.

At any one time, approximately 10,000 working-age claimants are in receipt of Council Tax Support.

To contextualise the changes, all working age claimants (approx. 10,000) will be affected by the 15% reduction. Currently only 89 working age claimants have capital in excess of £6,000 and 177 working-age claimants receive Second Adult Rebate.

The proposed changes will have disproportionate impact on low income working age households because Council Tax Support is designed for low income working age

households. This is with the exception of the removal of the Second Adult Rebate where the taxpayer's income is too high for Council Tax Support and a rebate is paid in respect of another low-earning adult in the household. 177 claimants are affected by the removal of Second Adult Rebate.

The proposals to change the current CTS scheme to help bridge the funding gap were subject to a three-month consultation, and formed part of a wider package of proposals.

All 10,000 working-age CTS claimants were posted a questionnaire to share their views. A corresponding number of questionnaires were not posted to other residents not in receipt of Council Tax Support. However, the public were invited to comment on the Council's proposals via an online survey.

396 responses were received of which 309 were from paper questionnaires. This represents 4% of the working-age population on CTS or 0.003% of the population in Havering. The responses are summarised as follows:

- 38.4% (152) agree everyone of working age should pay at least 15 per cent of their Council Tax. 58.3% (231) disagree.
- 46.5% (184) agree working age Council Tax payers with more than £6,000 savings or investments should be disqualified from claiming Council Tax Support. 51% (202) disagree
- 55.3% (219) agree second Adult Rebate should be removed from the scheme for working age Council Tax payers whose income is too high to receive Council Tax support. 40.9% (162) disagree

In the overall budget consultation the following results were received from 1987 responses.

To clarify this, please tick your top three priority services:	Count	Percentage
Crime reduction & public safety	1007	17%
Rubbish & recycling collection	726	12%
Road & pavement repairs	682	12%
Cleaning the streets	613	10%
Social Services for adults (inc. older people)	448	8%
Parks & green spaces	405	7%
Public health	370	6%
Libraries	355	6%
Social Services for children	245	4%
Sports & leisure facilities	222	4%
Young people's Activities	212	4%
Support for schools	177	3%
Attracting businesses and jobs	131	2%
Environmental health & trading standards	125	2%
Public events & activities	98	2%
Housing services & advice	67	1%
Planning services & advice	36	1%
Total	5919	100%

CTS changes were catered for within the package of priorities and it can therefore be seen that in general respondents were in favour of the overall priorities change and a majority of residents were not in favour of raising council tax above 2% in order not to make up reductions proposed.

<u>Council Tax Support Case Group Descriptions</u>	<u>Count</u>
Elderly - Non-Passported - Carer	165
Elderly - Non-Passported - Child Under 5	1
Elderly - Non-Passported - Enhanced Disability	2
Elderly - Non-Passported - Family Premium	6
Elderly - Non-Passported - Family Premium - 1 Child	9
Elderly - Non-Passported - Family Premium - 2 Child	2
Elderly - Non-Passported - Family Premium - 4 Child	1
Elderly - Non-Passported - Non Dependant	378
Elderly - Non-Passported - Other	2130
Elderly - Non-Passported - Severe Disability	388
Elderly - Non-Passported - War Pensioners	29
Elderly - Non-Passported - Working	92
Elderly - Passported - Carer	160
Elderly - Passported - Child Under 5	3
Elderly - Passported - Enhanced Disability	1
Elderly - Passported - Family Premium	16
Elderly - Passported - Family Premium - 1 Child	25
Elderly - Passported - Family Premium - 2 Child	4

Elderly - Passported - Family Premium - 3 Child	2
Elderly - Passported - Family Premium - 4 Child	1
Elderly - Passported - Non Dependant	544
Elderly - Passported - Other	3120
Elderly - Passported - Severe Disability	821
Elderly - Passported - Working	11
TOTAL (Elderly) = 7,911 (43%)	
Working Age - Non-Passported - Carer	71
Working Age - Non-Passported - Child Under 5	469
Working Age - Non-Passported - Disability	211
Working Age - Non-Passported - Disabled Child Premium	20
Working Age - Non-Passported - Enhanced Disability	226
Working Age - Non-Passported - Family Premium	175
Working Age - Non-Passported - Family Premium - 1 Child	778
Working Age - Non-Passported - Family Premium - 2 Child	508
Working Age - Non-Passported - Family Premium - 3 Child	160
Working Age - Non-Passported - Family Premium - 4 Child	39
Working Age - Non-Passported - Family Premium - 5 and above	6
Working Age - Non-Passported - Lone Parent Child Under 5	470
Working Age - Non-Passported - Non Dependant	88
Working Age - Non-Passported - Other	131
Working Age - Non-Passported - Severe Disability	79
Working Age - Non-Passported - War Pensioners	4
Working Age - Non-Passported - Working	535
Working Age - Passported - Carer	314
Working Age - Passported - Child Under 5	206
Working Age - Passported - Disability	261
Working Age - Passported - Disabled Child Premium	31
Working Age - Passported - Enhanced Disability	996
Working Age - Passported - Family Premium	143
Working Age - Passported - Family Premium - 1 Child	620
Working Age - Passported - Family Premium - 2 Child	354
Working Age - Passported - Family Premium - 3 Child	120
Working Age - Passported - Family Premium - 4 Child	29
Working Age - Passported - Family Premium - 5 and Above	2
Working Age - Passported - Lone Parent Child Under 5	1229
Working Age - Passported - Non Dependant	351
Working Age - Passported - Other	1432
Working Age - Passported - Severe Disability	425
Working Age - Passported - Working	25
TOTAL (Working Age) = 10,508 (57%)	
Grand Total Working Age & Elderly)	18419

Age: Consider the full range of age groups	
<i>Please tick (✓) the relevant box:</i>	Overall impact:

Positive		<p>Whilst the proposed changes will impact negatively on working age Council Tax Support claimants, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant. Within the scope of the scheme there is a Council Tax Discretionary policy to enable us to consider cases of hardship which will help mitigate any negative impacts.</p> <p>Pension age claimants (currently men and women aged 62½ and over) will not be affected by the change.</p>
Neutral		
Negative	✓	

Evidence:

At present approximately 57% of Council Tax Support claimants are working age and 43% are pension age.

For comparison, the working age population (18 – 64 years) in Havering is 76% and the pension age population (65 and over) is 24%.

The proposed changes mean that all working age Council Tax Support claimants will have to pay at least 15% towards their Council Tax.

Sources used:

Council Tax Support caseload data

Diversity Profile for EIAs August 2014

Demographic, Diversity and Socio-economic Profile of Havering’s Population March 2014

Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions		
<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive		<p>If the proposals are approved, disabled people who are of working age will also be negatively affected This is because they are disproportionately represented amongst working age claimants who will receive a reduction in Council Tax support.</p> <p>In addition, disabled people are less likely to have the same opportunities and access to work and employment that would improve their financial situation.</p> <p>Support is in place through the Council Tax Discretionary policy for</p>
Neutral		
Negative	✓	

	<p>those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.</p> <p>Pension age Council Tax Support claimants are not affected by these proposals.</p>
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Evidence:

In terms of Council Tax Support, disabled household are those where the claimant (or any partner, or child) receives a state disability benefit payment or is seriously sick or disabled.

Approximately 24% of working age Council Tax Support claimants meet the above definition compared with 21% of the working age population of Havering.

The Council recognizes the barriers disabled people face and seek to assist address them by disregarding Disability Living Allowance and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to. Havering has also chosen to disregard all Armed Forces compensation income from Veterans and Members of the Armed Forces.

In addition to the above, the Council seeks to maximize Council Tax Support for disabled people by increasing the applicable amount for them through premiums. Currently, there are premiums for severe disability, enhanced disability and a disabled child rate. Such premiums are granted when Council Tax Support applicants receive a relevant disability related benefit granted and administered by the Department of Work & Pensions.

Disabled people are historically disadvantaged and face greater barriers when accessing (information about) services and therefore disabled households are considered to be more vulnerable than other households. Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 15% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

Sources used:

Council Tax Support caseload data

Diversity Profile for EIAs August 2014

Demographic, Diversity and Socio-economic Profile of Havering's Population March 2014

Sex/gender: Consider both men and women

<i>Please tick (✓) the relevant box:</i>	Overall impact:
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Positive		It is difficult to fully consider the implications the proposals will have on this protected characteristic due to the fact that only one claim is submitted per household.
Neutral		
Negative	✓	

However, equalities monitoring indicates that the majority of claims (63%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers and carers are more likely to be women.

The proposals are therefore considered to have a disproportionate impact on women.

Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.

Evidence:

Council Tax Support caseload data:

Title on claim	No.	Percentage
Mr Count	2153	37%
MRS Count	1327	23%
MS/Miss Count	2346	40%
Other	8	0%

From the above table it is seen that in total 63% of the household claims are made by women.

Sources used:

Council Tax Support caseload data

Diversity Profile for EIAs August 2014

Demographic, Diversity and Socio-economic Profile of Havering's Population March 2014

Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓) the relevant box:

Overall impact:

Positive

There could be a negative impact of the proposals on people from Black and Minority Ethnic (BME) groups. As our data shows that BME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support. This could imply that BME groups

Neutral

Negative	✓	experience more difficulty in finding employment.
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Evidence:

The tables below show the projected figures for the breakdown of Havering by ethnicity/race and for Benefits claimants where they have supplied this information. The data is difficult to compare due to the different classifications of ethnicity used.

2014 (projection)	Number	Percentage of population (%)
All ethnicities	246,269	100.00
White	211,126	85.7
Black Caribbean	3,335	1.4
Black African	9,485	3.9
Black Other	4,524	1.8
Indian	5,813	2.4
Pakistani	1,820	0.7
Bangladeshi	1,205	0.5
Chinese	1,662	0.7
Other Asian	4,467	1.8
Other	2,833	1.2
<i>BAME¹ Total</i>	<i>35,144</i>	<i>14.3</i>

Council Tax Support/Housing Benefit Claimants where Equalities information provided

	Number	Percentage of claimants who provided information
White/British	4249	72.8%
White/Irish	91	1.6%
White/Other	381	6.5%
White & Black Caribbean	66	1.1%
White & Black African	43	0.7%
White & Asian	16	0.3%
Mixed/Other	43	0.8%
Asian/Asian British Indian	71	1.2%
Asian/Asian British Pakistan	69	1.2%
Asian/Asian British Bangladesh	54	0.9%
Asian/Asian British: Any Other	32	0.6%
Asian/Other	14	0.2%
Black/Black British Caribbean	154	2.6%
Black/Black British African	381	6.5%
Black/Black British Other	53	0.9%
Chinese	8	0.1%
Gypsy/Traveller	1	0.1%

¹The GLA define BAME differently to the ONS. The GLA does not include a 'White Other' Group. Instead they have one category 'White' that includes 'White British' and 'White Other'.

Other Ethnic Group	86	1.5%
Declined	22	0.4%
Total	5834	100%

From the data provided above, it would appear that there is a disproportionate impact on BME claimants. 85.7% of Havering's population are defined as White (including the 'White: Other' category such as Eastern Europeans), compared to 80.9% of benefit claimants who define themselves as White (including 'White: Other').

Sources used:

Council Tax Support caseload data

Diversity Profile for EIAs August 2014

Demographic, Diversity and Socio-economic Profile of Havering's Population March 2014 *

Religion/faith: Consider people from different religions or beliefs including those with no religion or belief

Please tick (✓) the relevant box:

Positive	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>

Overall impact:

Not known

There is no information available to make an assessment on the impact of the proposals on this protected characteristic.

Evidence:

Sources used:

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual

Please tick (✓) the relevant box:

Positive	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>

Overall impact:

Not known

There is no information available to make an assessment on the impact of the proposals on this protected characteristic.

Evidence:
Sources used:

Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	Not known
Neutral	There is no information available to make an assessment on the impact of the proposals on this protected characteristic.
Negative	
Evidence:	
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Sources used:	

Marriage/civil partnership: Consider people in a marriage or civil partnership	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	Not known
Neutral	There is insufficient information available to make an assessment on the impact of the proposals on this protected characteristic.
Negative	

Evidence:
Sources used:

Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave

<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive		<p>There is insufficient information available to make an assessment on the impact of the proposals on this protected characteristic. However, working mothers on maternity leave and women with caring responsibilities tend to have less income and/or reduced access to the labour market.</p> <p>It is perceived that there may also be equality implications for parents with young children and babies, particularly lone parents who may experience a negative impact. Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.</p>
Neutral		
Negative	✓	

Evidence:
Sources used:

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

<i>Please tick (✓) the relevant box:</i>	Overall impact:
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Positive		Council Tax Support is a means tested scheme available to households on low incomes. Therefore all recipients would be considered to be at a socio-economic disadvantage, particularly lone parents (most likely to be women), part-time workers (most likely to be women), working-age couples on low income, large households (more likely to be from BME backgrounds) and carers (most likely to be women).
Neutral		
Negative	✓	
		Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.
		Pension age Council Tax Support claimants will not be affected and will continue to receive similar levels of support with their council tax bills as they do at present.
Evidence:		
Please refer to breakdowns of Council Tax Support claimants available above.		
Sources used:		
Council Tax Support caseload data		
Diversity Profile for EIAs August 2014		
Demographic, Diversity and Socio-economic Profile of Havering's Population March 2014		

Action Plan

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
All	✓	We consulted on the proposed changes in October, November & December 2014 and will report the results to Cabinet in January 2015	Individual households will have access to formal appeal and review arrangements should they have complaints or concerns about the assessment criteria and method used to identify the Council Tax Support they need.	January 2015	Chris Henry
		All affected CTS applicants to be contacted in advance to advise of change if agreed prior to annual billing	Customers will have time to adjust and make appropriate payment arrangements	February 2015	Debbie Wheatley
		Monitor implication of change in Council Tax	We will monitor the impact of the changes and take-up of hardship funds as part of our performance	Ongoing	Debbie Wheatley

Cabinet, 20 January 2016

		<p>Support.</p> <p>The Council actively supports Apprenticeships. Meetings and events are arranged with Training Providers and Apprentices to keep them up to date with new initiatives and creating opportunities and promotion of</p>	<p>and quality checking systems. The performance data collated, including satisfaction surveys and community profile monitoring will form part of regular reporting arrangements to senior management and members.</p> <p>Citizens' Advice Bureau commissioned to assist provides debt counselling and advice.</p>		
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Cabinet, 20 January 2016

		Apprenticeships. Regeneration also work with small and medium business enterprises to encourage growth and opportunities			
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* You should include details of any future consultations you will undertake to mitigate negative impacts

** Monitoring: You should state how the negative impact will be monitored; how regularly it will be monitored; and who will be monitoring it (if this is different from the lead officer).

Review

In this section you should identify how frequently the EIA will be reviewed; the date for next review; and who will be reviewing it.

The EIA will be reviewed at bi-annual intervals or earlier if the Council Tax Support scheme is reviewed earlier than September 2016.