

Equality Impact Assessment (EIA)

Document control

Title of activity:	The Council Tax Support Scheme 2016
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:	December 2015
Scheduled date for next 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	The Council Tax Support Scheme 2016
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 (CTS) 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 have been reducing the money to pay for the scheme since its inception in 2013. The CTS grant has been rolled into the Settlement Funding Allocation which has been reduced in-line with core funding reduction. While it is likely the core funding reduction will continue for 2016/17, there are no plans to make further savings from the CTS scheme in 2016. Therefore, a consultation of the 2016 CTS scheme is not required.</p> <p>The draft CTS scheme 2016 will continue to protect pensioners who will get the same level of council tax support as they do now.</p>
4a	Is the activity new or changing?	No
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:	December 2015

2. Equality Impact Assessment

Background/context:

The draft Council Tax Support Scheme 2016 will provide assistance to people on low incomes to help them pay their Council Tax.

The Council has a continuous need to make savings in order to balance its budget due to large reductions in government grant and changing funding regimes. The CTS Scheme was revised for 2015/16 to assist make savings. There are, therefore, no plans to revise the CTS Scheme for 2016/17.

Accordingly, the draft CTS Scheme 2016 will essentially remain the same as the CTS Scheme 2015.

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

At any one time, approximately 9,000 working-age claimants are in receipt of Council Tax Support.

Additional financial assistance continues to be provided under S13a of the Local Government Finance Act 2012 for all groups below should anyone continue to experience financial hardship in paying their remaining council tax after council tax support has been awarded.

CTS Claimants of Pensionable Age

Elderly-Passported-Severe Disability	945
Elderly-Passported-Enhanced Disability	0
Elderly-Passported-Carer	182
Elderly-Passported-Disabled Child Premium	1
Elderly-Passported-Child Under 5	3
Elderly-Passported-Family Premium - 4 Child	1
Elderly-Passported-Family Premium - 3 Child	2
Elderly-Passported-Family Premium - 2 Child	4
Elderly-Passported-Family Premium - 1 Child	27
Elderly-Passported-Family Premium	134
Elderly-Passported-Working	11

Elderly-Passported-Non Dependant	583
Elderly-Passported-Other	3015
Elderly-Non-Passported-War Pensioners	28
Elderly-Non-Passported-Severe Disability	44
Elderly-Non-Passported-Enhanced Disability	2
Elderly-Non-Passported-Carer	199
Elderly-Non-Passported-Child Under 5	2
Elderly-Non-Passported-Family Premium - 4 Child	2
Elderly-Non-Passported-Family Premium - 2 Child	3
Elderly-Non-Passported-Family Premium - 1 Child	11
Elderly-Non-Passported-Family Premium	6
Elderly-Non-Passported-Working	109
Elderly-Non-Passported-Non Dependant	429
Elderly-Non-Passported-Other	2182
Elderly Total	7925

CTS Claimants of Working Age

Working Age-Passported-War Pensioners	
Working Age-Passported-Severe Disability	702
Working Age-Passported-Enhanced Disability	1380
Working Age-Passported-Disability	251
Working Age-Passported-Carer	467
Working Age-Passported-Disabled Child Premium	39
Working Age-Passported-Lone Parent Child Under 5	1438
Working Age-Passported-Child Under 5	251
Working Age-Passported-Family Premium - 5 & A	5
Working Age-Passported-Family Premium - 4 Child	1
Working Age-Passported-Family Premium - 3 Child	121
Working Age-Passported-Family Premium - 2 Child	400
Working Age-Passported-Family Premium - 1 Child	701
Working Age-Passported-Family Premium	134
Working Age-Passported-Working	83
Working Age-Passported-Non Dependant	365
Working Age-Passported-Other	1518
Working Age-Non-Passported-War Pensioners	4
Working Age-Non-Passported-Severe Disability	156
Working Age-Non-Passported-Enhanced Disability	339
Working Age-Non-Passported-Disability	202
Working Age-Non-Passported-Carer	142
Working Age-Non-Passported-Disabled Child Premium	33
Working Age-Non-Passported-Lone Parent Child U 5	747
Working Age-Non-Passported-Child Under 5	677
Working Age-Non-Passported-Family Premium - 5 & A	14
Working Age-Non-Passported-Family Premium - 4 Child	68

Working Age-Non-Passported-Family Premium - 3 Child	264
Working Age-Non-Passported-Family Premium - 2 Child	692
Working Age-Non-Passported-Family Premium - 1 Child	1002
Working Age-Non-Passported-Family Premium	265
Working Age-Non-Passported-Working	630
Working Age-Non-Passported-Non Dependant	75
Working Age-Non-Passported-Other	316
Working Age Total	13482

Age: Consider the full range of age groups	
<i>Please tick (✓) the relevant box:</i>	
Positive	
Neutral	✓
Negative	
Overall impact:	
Working age taxpayers from age 18 can make a claim for CTS. There are exceptions and these are laid down by statute.	
Pension age claimants (currently men and women aged 62½ and over) will not be affected by the change.	
Evidence:	
At present approximately 55% of Council Tax Support claimants are working age and 45% 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%.	
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 Scheme is approved, disabled people who are of working age will 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 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>
Neutral		
Negative	✓	

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 2014

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*Please tick (✓)
the relevant box:***Positive****Overall impact:**

Only one claim is submitted per household.

Neutral

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.

Negative

✓

The scheme therefore is 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	
Neutral	✓
Negative	

Our data shows that BME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support. This could imply that BME groups experience more difficulty in finding employment.

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

Grouping	Number	Percentage of claimants who provided information %
White/British	5700	69.2
White/Irish	118	1.4
White/Other	582	7.0
White & Black Caribbean	57	0.7
White & Black African	108	1.3
White & Asian	29	0.4
Mixed/Other	112	1.4
Asian/Asian British Indian	106	1.3
Asian/Asian British Pakistan	122	1.5
Asian/Asian British	102	1.2

¹ The 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'.

Bangladesh		
Asian/Asian British: Any Other	69	0.8
Asian/Other	14	0.3
Black/Black British Caribbean	218	2.6
Black/Black British African	615	7.5
Black/Black British Other	87	1.0
Chinese	14	0.3
Gypsy/Traveller	6	0
Other Ethnic Group	126	1.5
Arab	13	0.3
Declined	29	0.3
Total	8227	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% of benefit claimants who define themselves as White (including 'White: Other').

Sources used:

Council Tax Support caseload data 2015

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

Neutral

Negative

Overall impact:

Not known

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

Evidence:

Sources used:

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

Please tick (✓) the relevant box:

Positive

Overall impact:

Not known

Neutral		There is no information available to make an assessment on the impact of the scheme on this protected characteristic.
Negative		
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		From the data that we hold currently, we do not have sufficient evidence to determine the impact on this protected characteristic
Negative		However, people considering or undergoing the process of gender reassignment are a hard to reach groups. At present gender reassignment will not be a factor in any part of the assessment of Council Tax Support and it is not considered to be a characteristic which requires a higher applicable amount when assessing benefit. For these reasons, it is expected that Council Tax Support will not adversely affect transgendered people as a specific group.
Evidence:		

Sources used:

Marriage/civil partnership: Consider people in a marriage or civil partnership

<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive	<input type="checkbox"/>	Not known
Neutral	<input type="checkbox"/>	There is insufficient information available to make an assessment on the impact of the scheme on this protected characteristic.
Negative	<input type="checkbox"/>	

Evidence:

People considering or undergoing the process of gender reassignment are a hard to reach groups. At present gender reassignment will not be a factor in any part of the assessment of Council Tax Support and it is not considered to be a characteristic which requires a higher applicable amount when assessing benefit. For these reasons, it is expected that Council Tax Support will not adversely affect transgendered people as a specific group.

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	<input type="checkbox"/>	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.
Neutral	<input type="checkbox"/>	
Negative	<input type="checkbox"/>	However, the Equality Act 2010 provides for protection against maternity discrimination for 26 weeks after giving birth, including as a result of breastfeeding. Pregnancy and maternity should be considered as two separate characteristics as while the claimant is pregnant, her applicable amounts and personal allowances are lower Pregnancy is not a factor

	<p>in the current assessment of Council Tax Benefit and will not be a factor in the assessment of Council Tax Support. It is therefore expected that pregnant women will not be adversely affected by Council Tax Support. Once a child is born, it becomes part of the household composition and increased allowances apply</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>
<p>Evidence:</p>	
<p>Sources used:</p>	

Socio-economic status: Consider those who are from low income or financially excluded backgrounds	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	
Neutral	<input checked="" type="checkbox"/>
Negative	<p>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).</p> <p>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> <p>Pension age Council Tax Support claimants will continue to receive similar levels of support with their council tax bills as they do at present.</p>

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.	In place for April 2016	Chris Henry
		All affected CTS applicants to be contacted in advance to advise of change if agreed prior to annual billing	Customers have been given time to adjust and make appropriate payment arrangements	In place for April 2016	Ian Johnson
		Monitor implication of change in Council Tax	We are monitoring the impact of the changes and take-up of hardship funds as part of our	In place for April 2016	Debbie Wheatley

Cabinet, dd mmmm yyyy

		<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 Apprenticeships.</p> <p>Regeneration also work with small and medium business enterprises to encourage growth and opportunities</p>	<p>performance and quality checking systems.</p>	<p>Ongoing</p> <p>Ongoing</p>	
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Ethnicity/Race	<i>Whilst there is no negative impact identified there is some action that is required to ensure that communities are made aware of their entitlements under the scheme .The figures indicate that BME communities are overrepresented in the claimant figures</i>	A range of targeted outreach and communication methods will be used to promulgate these messages which include but are not limited to outreach at places of worship ,schools and media streams or social interaction sites	BME communities that are able to access benefits to which they are entitled. Uptake will be monitored through our current E+D monitoring processes	Ongoing	
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The CTS scheme will be reviewed every year along with the EIA.

Review

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

