

Equality Impact Assessment (EIA) Template: Service Reviews/Service Changes

Title of spending review/service change/proposal	Council Tax Reduction Scheme 2017/2018
Name of division/service	Finance/ Revenues and Customer Support
Name of lead officer completing this assessment	James Rattenberry
Date EIA assessment completed	02/01/2018
Decision maker	Full Council
Date decision taken	25/01/2018

EIA sign off on completion:	Signature	Date
Lead officer		
Equalities officer		
Divisional director		

Please ensure the following:

- (a) That the document is understandable to a reader who has not read any other documents, and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy, but must be complete.

- (b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- (c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.

1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will current service users' needs continue to be met?

The CTRS is a series of discounts for council tax payers on low income that aims to ease their financial hardship. Those who claim, and are entitled for CTR, pay a reduced amount of council tax. The new scheme will include an additional exemption on council tax bills for care leavers (people who have left LCC care under the age of 25), this will ensure that LCC meets its statutory obligations under the Children and Social Care Act. It is expected that this change will help care leavers as their exemption from paying council tax may reduce any potential financial hardship they suffer from. The scheme proposed for 2017/2018 is expected to be more of the same for those not made exempt.

2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

Is this a relevant consideration? What issues could arise?

<p>Eliminate unlawful discrimination, harassment and victimisation</p> <p>How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>	<p>By exempting care leavers from council tax payments the proposal intends to aid a vulnerable group in reducing the financial gap between them and their peers.</p> <p>Those not exempt, including those with protected characteristics, will be treated equally and will be expected to pay a minimum of 20% of their council tax payment if on CTRS. The exception to this is those over state pension age, who if on low income, maintain a 100% protected council tax relief. Disabled individuals, who may need more support to pay council tax bills, can seek additional help through measures such as PIPs and</p>
<p>Advance equality of opportunity between different groups</p> <p>How does the proposal/service ensure that its intended outcomes promote equality of opportunity for users? Identify inequalities faced by those with specific protected characteristic(s).</p>	<p>Aside from the addition of an exemption for LCC care leavers the proposal makes no changes to the current system therefore, there is expected to be no impact on opportunity for users.</p> <p>Measures are already in place for disabled individuals, who may be on lower levels of income, to receive council support that will help them pay their council tax bills such as PIPs.</p>
<p>Foster good relations between different groups</p> <p>Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p>	<p>It is expected that the exemption for care leavers will represent a move towards a more cohesive community as it will help reduce the gap between care leavers and their peers by reducing the financial burden upon them. The exemption thus represents an additional level of support for a vulnerable group.</p> <p>Apart from this, the proposal will replicate the CTRS</p>

	regulations that are currently in place.
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3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include current service users and those who could benefit from but do not currently access the service.

Since April 2013, as a consequence of the Government's welfare reforms, all working age households in Leicester have been required to contribute towards their council tax bill. Our current CTRS requires working age households to pay at least 20% of their council tax bill, and sets out to ensure that the most vulnerable householders are given some relief in response to financial hardship they may experience.

NOMIS¹ figures for the city's working age population (June 2017) indicated that there are 161,000 economically active residents in the city, of whom 5.2% are unemployed. As of November 2016, there were 30,060 working age benefit claimants (12.9% of the city's working age population of 233,000) It should be noted that this does not include tax credit claimants (unless they are also in receipt of another benefit). The working age population is inclusive of all protected characteristics.

The scheme continues to exclude pensioners who were protected from the changes by law and retained the same assessment and 100% maximum award pre April 2013. The scheme now proposes to exempt care leavers from receiving council tax bills.

4. Information used to inform the equality impact assessment

What **data, research, or trend analysis** have you used? Describe how you have got your information and what it tells you. Are there any gaps or limitations in the information you currently hold, and how you have sought to address this, e.g. proxy data, national trends, etc.

¹ NOMIS is an Office for National Statistics web based service that provides free UK labour market statistics from official sources.

Internal research has been carried out (below) that calculates how much income the council will lose as a result of exempting care leavers from paying council tax. This was achieved through multiplying the average number of individuals leaving childcare per year with the council tax bill for a Band B property:

Average Number of children leaving care each year	195	
	Band B CT	Cost per Year
Total cost per year on CT exemption based on 100% of Band B CT	£1243.83	£242,547
Total cost per year on CT exemption based on 75% of Band B CT	£932.87	£181,909
Total cost per year on CT exemption based on 50% of Band B CT	£621.92	£121,274
Total cost per year on CT exemption based on 25% of Band B CT	£310.96	£60,637

Looking at young people who are eligible for leaving care services which would usually only mean those over 18 approx.

At the moment there are about 76 young persons in independent accommodation whom potentially are claiming or paying CT.

Number of young persons in independent	76
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accommodation		
	Band B CT	Cost per Year
Total cost per year on CT exemption based on 100% of Band B CT	£1243.83	£94,531
Total cost per year on CT exemption based on 75% of Band B CT	£932.87	£70,898
Total cost per year on CT exemption based on 50% of Band B CT	£621.92	£47,266
Total cost per year on CT exemption based on 25% of Band B CT	£310.96	£23,560

In addition to this internal research, external information has been utilised to inform the proposal. This includes figures from NOMIS on population and inflation rates.

5. Consultation

What **consultation** have you undertaken about the proposal with current service users, potential users and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs?
- How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

Following public consultation, the Council chose to adopt a scheme in 2013/14 with the following features:

- A maximum award of 80% of the full tax, meaning that all working-age tax payers need to pay a minimum of 20% of their bill;
- No second adult rebate for working-age customers;
- Capped awards for claimants with properties in tax band C or above, at the amounts which would be awarded if the property had been in band B;
- A de minimis award, with no CTRS being awarded if entitlement is below this level (currently £3.70 per week);
- No awards to those with capital (savings) in excess of £6,000.

Anyone who is claiming or will go onto claim CTRS has to meet these criteria in order to be eligible.

No consultation has been completed locally in respect of these new proposals, however, as there are minimal changes, besides an included exemption for care leavers, it has not deemed necessary.

6. Potential equality Impact

Based on your understanding of the service area, any specific evidence you may have on service users and potential service users, and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant that may be affected, along with their likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

	Impact of proposal: Describe the likely impact of the proposal on people because of their protected characteristic and	Risk of negative impact: How likely is it that people with this protected characteristic will be negatively affected?	Mitigating actions: For negative impacts, what mitigating actions can be taken to reduce or remove this impact?
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Protected characteristics	how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal?	How great will that impact be on their well-being? What will determine who will be negatively affected?	These should be included in the action plan at the end of this EIA.
Age²	<p>Older people are not affected by any of the changes as they maintain a protected 100% council tax relief.</p> <p>Working age people bear the impact of welfare reform reductions and may thus have greater problems paying the minimum 20% council tax expected of them. This is somewhat offset by growing employment rates however, they are still likely to have reduced disposable income.</p> <p>Some younger people however, those that are care leavers will benefit from the proposed exemption in the scheme. As they will not be required to pay council</p>	<p>No changes to CTRS outside of the added exemption for care leavers mean that working age households must continue to cope with the minimum 20% payment for council tax. This financial burden is made greater by stagnating wages, inflation and benefit freezing/reductions that have reduced the amount rewarded and limited income.</p>	<p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p> <p>Ensuring that face-to-face support, home visits, paper forms and appropriate support continues to be available to support the primary online receipt route for discretionary awards. Ensuring that vulnerable customers are able to access the service is key.</p> <p>Ensuring that Social Welfare Advice, support with jobs and skills; and, personal budgeting support is available to empower</p>

² Age: Indicate which age group is most affected, either specify general age group - children, young people working age people or older people or specific age bands

	tax, which should ameliorate any financial concerns they may possess.		customers to improve their circumstances.
Disability³	Disability benefits/support has reduced over time ensuring disabled people have less capacity to deal with financial difficulties.	Further erosion of quality of life being experienced by disabled people as their household incomes are squeezed further as a result of reduced benefits and impact of increased inflation.	<p>The council recognises the barriers disabled people face and seeks to assist them by disregarding Disability Living Allowance, Attendance Allowance, Independence Allowance and all armed forces compensation income from the Veterans and Members of the Armed Forces.</p> <p>We will continue to apply all disabled premiums within the calculation of the Applicable Amount.</p> <p>Applications for an additional exceptional hardship payment will be considered in line with our responsibilities under section 13a (1)(c) of the Local Government Finance Act 1992 for those severely disabled people who cannot afford to pay the 20%</p>

³ Disability: if specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness or health condition.

			<p>element of their council tax charge.</p> <p>We consider a claimant is also regarded as financially vulnerable for CTDR if the claimant is a disabled adult living in supported living accommodation who has carers and is unable to work due to their health.</p> <p>We will promote the CTDR scheme through communications activity, advice agencies and organisations.</p> <p>We consider that Council Tax Discretionary Relief will be available to any vulnerable applicant based on personal and financial circumstances.</p> <p>Our CTDR scheme regards as financially vulnerable the claimant or partner when they are in receipt of Employment Support Allowance (ESA), and get the support component.</p> <p>A claimant whose property is adapted for the wellbeing of a</p>
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			<p>disabled person living in that property can have their council tax reduced through a disabled persons reduction by one band below that which the property falls under. For Band A properties the charge is reduced by 1/9th of the band D value.</p> <p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p> <p>Ensuring that Social Welfare Advice, support with jobs and skills; and, personal budgeting support is available to empower customers to improve their circumstances.</p>
Gender Reassignment⁴	No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A

⁴ Gender reassignment: indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected.

Marriage and Civil Partnership	Couples receive benefits if in need, irrespective of their legal marriage or civil partnership status. No disproportionate impact is attributable specifically to this characteristic.	N/A	N/A
Pregnancy and Maternity	May be facing reduced income due to maternity leave.	The cumulative impact of CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing (for instance limitations to other benefits) could result in increased financial hardship for the household.	<p>Promote pregnant and nursing women being aware of and accessing Council Tax Discretionary Relief scheme through advice agencies, GP surgeries and maternity wards.</p> <p>The Council's recovery and enforcement policies provide for door-step collection from pregnant women, including actions to be taken to not place women under any additional stress.</p> <p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p> <p>Ensuring that Social Welfare Advice, support with jobs and</p>

			skills; and, personal budgeting support is available to empower customers to improve their circumstances.
Race⁵	Information on the ethnicity of claimants has only been recorded in 47% of cases; the majority of respondents were white. Individuals of Asian and Afro-Caribbean descent were also prevalent. This data comes from the latest benefit live caseload (November 2017).	<p>The cumulative impact of additional CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing could result in increased financial hardship for the household.</p> <p>Risk of indirect discrimination, potentially as a result of language difficulties or lack of awareness of the schemes involved within their communities.</p> <p>The issues in relation to enforcement of unpaid tax for households in which there is limited understanding of English.</p>	<p>Increased engagement with advice agencies who offer direct language translation.</p> <p>Improved engagement with community support groups will expand awareness of the Council Tax Discretionary Relief Scheme among the city's different BME communities.</p> <p>Employment of the Council's Recovery and Enforcement policies and procedures.</p> <p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p>

⁵ Race: given the city's racial diversity it is useful that we collect information on which racial groups are affected by the proposal. Our equalities monitoring form follows ONS general census categories and uses broad categories in the first instance with the opportunity to identify more specific racial groups such as Gypsies/Travellers. Use the most relevant classification for the proposal.

			Ensuring that Social Welfare Advice, support with jobs and skills; and, personal budgeting support is available to empower customers to improve their circumstances.
Religion or Belief ⁶	No disproportionate impact is attributable specifically to this characteristic	N/A	N/A
Sex ⁷	The latest caseload demonstrates that 52% of CTRS claimants are women.	<p>National research indicates the financial vulnerability of women in relation to economic and welfare reform impacts, particularly female lone parent households.</p> <p>The cumulative impact of additional CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing could result in increased financial hardship for</p>	<p>The Council's Recovery and Enforcement policies and procedures describe actions which are and are not acceptable for collection of tax from single women. The procedures include processes for identifying and managing recovery from vulnerable women or women who may be at risk of violence in the event of collection of tax due.</p> <p>Council Tax Discretionary Relief Scheme notes that financially</p>

⁶ Religion or Belief: If specific religious or faith groups are affected by the proposal, our equalities monitoring form sets out categories reflective of the city's population. Given the diversity of the city there is always scope to include any group that is not listed.

⁷ Sex: Indicate whether this has potential impact on either males or females

		the household.	<p>vulnerable groups include households where the claimant or a household member has suffered domestic violence, and is being supported by accredited local schemes to remain in permanent accommodation or move into permanent accommodation (inclusive of forced marriages).</p> <p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p> <p>Ensuring that Social Welfare Advice, support with jobs and skills; and, personal budgeting support is available to empower customers to improve their circumstances.</p>
Sexual Orientation⁸	No disproportionate impact is attributable specifically to this	N/A	N/A

⁸ Sexual Orientation: It is important to remember when considering the potential impact of the proposal on LGBT communities, that they are each separate communities with differing needs. Lesbian, gay, bisexual and transgender people should be considered separately and not as one group. The gender reassignment category above considers the needs of trans men and trans women.

	characteristic.		
<p>Summarise why the protected characteristics you have commented on, are relevant to the proposal?</p> <p>As outlined above, the key protected characteristics with relevance to the proposal are age, sex, race, pregnancy and maternity and disability – resulting from the cumulative impact of CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing (for instance limitations to other benefits).</p> <p>Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?</p> <p>As no impacts relating to sexual orientation, religion and belief and gender reassignment have been identified.</p>			

Other groups	<p>Impact of proposal: Describe the likely impact of the proposal on children in poverty or any other people who we consider to be vulnerable. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?</p>	<p>Risk of negative impact: How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?</p>	<p>Mitigating actions: For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA.</p>
Children in poverty	<p>As care leavers by definition cannot be children the proposed exemption should have no real effect on children in poverty.</p> <p>However, as the CTRS will still require claimants to pay a minimum 20% of their council tax</p>	<p>The cumulative impact of CTRS costs to be met by an individual household alongside any other financial limitations they may be experiencing could result in increased financial hardship for the household. This may directly lead to a worse standard of life</p>	<p>Access to council discretionary funds for individual financial crises; access to council and partner support for food; and advice on better managing household budgets.</p> <p>Ensuring that Social Welfare</p>

	there is a chance that growing external financial pressures such as inflation and benefit freezes will result in reduced disposable income for households in poverty.	for children present in the household and in severe cases could lead to increase child poverty rates. The institute for Fiscal Studies notes that it predicts 400,000 children to slip into poverty as a result of recent benefit reforms.	Advice, support with jobs and skills; and, personal budgeting support is available to empower customers to improve their circumstances.
Other vulnerable groups	Care Leavers – Will be made exempt from having to pay council tax.	Around 200 looked after children leave the care system in Leicester each year. On average 60 of these are liable for council tax in independent accommodation at any one time. It is anticipated that exempting this 60 will relieve the hardship experienced by this vulnerable group. There will thus be no negative impact on care leavers themselves.	No risk of negative impact to vulnerable group
Other (describe)			
<p>7. Other sources of potential negative impacts</p> <p>Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include: other proposed changes to council services that would affect the same group of service users; Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents; external economic impacts such as an economic downturn.</p> <p>The government has implemented a number of reforms that have reduced/frozen benefit support, this has occurred at a time when inflation is reasonably high (3.1%) and income growth relatively low (2.2% weekly earnings increase per annum).</p>			

Resultantly, even though the proposals do not increase the minimum council tax payment expected with CTRS there may be an increased negative impact as disposable income is continually squeezed by various factors.

8. Human Rights Implications

Are there any human rights implications which need to be considered (please see the list at the end of the template), if so please complete the Human Rights Template and list the main implications below:

No impacts identified

9. Monitoring Impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

10. EIA action plan

Please list all the equality objectives, actions and targets that result from this Assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

Equality Outcome	Action	Officer Responsible	Completion date
Establish and augment monitoring data and methods on care leavers to ensure they are given new exemption they are entitled to	To gather and monitor new data in regards to establishing if claimants are classified as care leavers and thus entitled to council tax exemption		
Raise awareness for exemption with staff and relevant stakeholders on new council tax exemption available to care leavers	To inform and train staff (if necessary) on changes to CTRS		

Human Rights Articles:

Part 1: The Convention Rights and Freedoms

- Article 2:** Right to Life
- Article 3:** Right not to be tortured or treated in an inhuman or degrading way
- Article 4:** Right not to be subjected to slavery/forced labour
- Article 5:** Right to liberty and security
- Article 6:** Right to a fair trial
- Article 7:** No punishment without law
- Article 8:** Right to respect for private and family life
- Article 9:** Right to freedom of thought, conscience and religion
- Article 10:** Right to freedom of expression
- Article 11:** Right to freedom of assembly and association
- Article 12:** Right to marry
- Article 14:** Right not to be discriminated against

Part 2: First Protocol

- Article 1:** Protection of property/peaceful enjoyment

Article 2: Right to education

Article 3: Right to free elections