

# Equality Impact Assessment

<b>Directorate: Finance and Resources</b>	
<b>Service: Finance &amp; Audit</b>	
<b>Name of Officer/s completing assessment: Laretta Vitalis</b>	
<b>Date of Assessment: 02.12.19</b>	
<b>Name of service/function or policy being assessed: Council Tax Support Scheme 2020-21</b>	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>Implementing <u>changes</u> to the local Council Tax Support scheme for 2020-21.</p> <p>The local Council Tax Support scheme only affects customers of working age, customers of pension age are assessed under the national regulations.</p> <p>The legislation requires that all Local Authorities must approve a Council Tax Support scheme by 31<sup>st</sup> January proceeding the financial year that the scheme relates to. This year the Council has decided that changes should be made to significantly change the Council Tax Support scheme due to the introduction of Full Service Universal Credit within the Slough area.</p> <p>Members are being asked to approve a new income banded scheme.</p>
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>The policy is delivered by Slough Borough Council Benefit Service. Their job is to accept all applications, analyse them, request such supporting information as they see fit and assess how much local council tax support a person will be entitled to within the bounds of the scheme. If the customer disagrees with the assessment they have the right to ask for a review of their decision and if the decision stands the customer has a right to appeal to an independent panel managed and set up by the Valuation Office Agency (VOA).</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information).</p>

Bear in mind that people affected by the proposals may well have more than one protected characteristic.

The policy is generic and aims to provide support to all parts of the community based on their weekly household income and so all working age Council Tax Payers could be affected by this proposal as they could all potentially claim Council Tax Support.

- Age – the policy is generic and will help people of all ages but it is noted that the Government legislation has stated that those of pension age must be protected and their assessment for Council Tax Support will continue to be made under the national regulations and not under the local Council Tax Support scheme therefore they will not be affected by this policy change. In addition, those leaving care will have their Council Tax Support protected and any shortfall after CTS discount paid until they are 25 years of age or while the Council has a statutory duty to them which ever is sooner but this is done through the Care Leavers Relief scheme.
- Disability – the government legislation states that those that are considered by the local authority to be vulnerable should be protected but no definition of vulnerable is provided. We have decided to continue to protect all families where the householder and /or their partner receive a level of disability allowance or that one or more children in the household receive a level of disability allowance. This means that there will be no change to the support that they receive to assist them paying their council tax.
- Pregnancy, maternity and Sex – unlike with Housing Benefit, there is no restriction of CTS awards to meet a size criteria for the property occupied and therefore there is no negative impact for this category. We do recognise however that single parent families can be disproportionality lone women and but the analysis of the current CTS caseload shows no real difference. The claims that are worse off under the new scheme, regardless of sex, will be invited to make an application to the Council Tax Hardship Scheme (detailed in the response to 9.)

As there is limited data available on the categories listed below, we are unable to accurately quantify the affected numbers in each one. We have however made an assumption that minority groups and members of the same religion and belief may be over-represented in the beneficiary profile of this discount. Council Tax Support provision is generically designed to help all those on very low incomes, and accordingly, regardless of their categorisation, the council will mitigate any losses in CTS by inviting an application to Council Tax Hardship.

- Marriage and Civil Partnership
- Gender Reassignment
- Race -

	<ul style="list-style-type: none"> <li>• Religion and Belief</li> <li>• Sexual orientation</li> <li>• Other</li> </ul>
4.	<p>What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.</p> <p>All pensioners and all households who have a member of the household in receipt of a disability premium/allowance are identified within the protected groups and this will ensure that they can claim up to 100% Council Tax Support.</p> <p>For working age residents the introduction of a banded income scheme will mean that they are subject to fewer changes in the discount on their council tax and this will make it easier for them to budget.</p>
5.	<p>What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?</p> <p>The scheme remains an income based scheme but it has been designed to have minimal impact. We have modelled that 139 households will be worse off and 26 households will completely lose their entitlement.</p>
6.	<p>Have the impacts indentified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).</p> <p>If the proposal is accepted as it stands there will be minimal impact on the current people claiming Council Tax Support, we have modelled the scheme so that the budget for the scheme does not change and therefore has no impact on the council's overall finances.. This has been measured by using a company called Entitledto and Datatank to carry out a comparison exercise on the awards based on the current scheme against those achievable on the new proposed scheme. We have established that the majority of the households that will be better off are where claimant and/or partner are working. The intention has been to keep the level of Council Tax Support received by claimants at a comparatively similar level to the previous scheme.</p>
7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results, e.g. have the staff forums/unions/ community groups been involved?</p>

	<p>A full consultation was carried out with all members of the public via a questionnaire on the Council's website between 7 October 2019 and 17 November 2019.</p> <p>We also publicised the consultation to local groups via a press release and Twitter announcements to raise awareness amongst the residents of the borough as well as businesses who may work with residents and a drop in session was held at Landmark Place to answer any questions about the proposed scheme.</p> <p>Consultation has also taken place with our major preceptors Police &amp; Crime Commissioner of Thames Valley and Royal Berks Fire &amp; Rescue.</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>n/a</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>The council proposes to support people who are most vulnerable by continuing to offer a Council Tax Hardship Scheme. This is a discretionary discount policy to help those in severe financial difficulty to reduce their Council Tax liability if they are struggling to pay. It is therefore clear that any person negatively affected by this change would meet these criteria and would therefore be signposted in this direction and prioritised for help.</p>
10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <p>Once the proposals are accepted they must stay in place for one year. Each subsequent year Cabinet are legally obliged to consider the Council Tax Support Scheme for working age households for the following year and then decide whether the authority wishes to review the scheme and obtain Member agreement once more. During the year the scheme will be evaluated by for example using complaints monitoring to assess the impact it is having on our customers and consideration given to amending the scheme.</p>

<b>What course of action does this EIA suggest you take? More than one of the following may apply</b>	✓
<b>Outcome 1: No major change required.</b> The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	<b>X</b>
<b>Outcome 2: Adjust the policy</b> to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
<b>Outcome 3: Continue the policy</b> despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
<b>Outcome 4: Stop and rethink</b> the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

### Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date

<b>Name:</b> <b>Signed:</b> .....Lauretta Vitalis .....(Person completing the EIA)
<b>Name:</b> .....Neil Wilcox... .. <b>Signed:</b> .....( Policy Lead if not same as above)
<b>Date:</b> 07.01.2020