

EqIA - Full Equality Impact Assessment

Version 1

Date: 23rd October 2019

Policy or Service to be assessed:

Revenues & Benefits Service – Council Tax Reduction Scheme (CTRS)

Service and lead officers:

Revenues & Benefits sub-workstream – Andy Green

Officers involved in the EqIA:

Neil Berry & Richard Charters (Chiltern & South Bucks DC); Lorraine Marshall (Aylesbury Vale DC); Andy Green (Wycombe DC)

What are you impact assessing?

Existing

New/proposed

Changing/Update/ revision

Other, please list:

Step 2: Scoping – what are you assessing?

Q1: What is the title of your service/strategy/policy/project?

Council Tax Reduction Scheme (CTRS) harmonisation

Q2: What is the aim of your service/strategy/policy/project?

The Council Tax Reduction Scheme helps people on low incomes pay for their council tax.

Each District Council currently operates a slightly different scheme and the aim is to have a single scheme in place from 1st April 2020 that is fair and equitable for all Council Taxpayers in the County.

A public consultation exercise has taken place allowing customers and key stakeholders to have the opportunity to comment on the proposed harmonised scheme. The majority of respondents supported the proposed changes.

Protection arrangements will continue for those claimants who are classified by the Council to be vulnerable. This includes Lone Parents with children under 5 and claimants in receipt of qualifying disability benefits including: Personal independence payments, Disability Living Allowance; Attendance Allowance; Employment Support Allowance (Support component), Severe Disablement Allowance, Disabled element of Tax Credits, Incapacity Benefit (or underlying entitlement) or Industrial Disablement Benefit. Claimants in receipt of War Widows or War Disablement pension.)

Pensioners are not affected by these changes

Q3: Who does/will it have an impact on? e.g. public, visitors, staff, members, partners?

Any changes to CTRS may impact on those customers in receipt of CTRS. Any change will also apply to any potential future claimants of CTRS.

Any increase in the cost of the scheme will impact on all council taxpayers as the scheme is funded out of Council Tax revenue

There will be an impact on staff having to implement the changes and to become familiar with the scheme to ensure they are giving correct information and advice to the public.

Local support organisations, such as the CAB, will also need to understand the changes so they can advise their clients accordingly. CAB were invited to participate in the public consultation.

Q4: Are there any potential barriers to implementing changes to your service/strategy/policy/project?

The proposed changes have been the subject of public consultation and ultimately Member approval. The need for the council to deliver a balanced budget is one factor taken into consideration when deciding on the final scheme.

Q5: Who else will be involved in implementing this service/policy service/strategy/policy/project?

The staff of the Revenues & Benefits Service.

Step 3: Information gathering – what do you need to know about your customers?

Q6: What data do you already have about your service users, or the people your policy or strategy will have an impact on, that is broken down by equality strand?

Age/Disability

- As June 2019 22,000 households in Buckinghamshire receive some level of CTRS and some of these received full protection. This includes Pensioners and those who are protected because of a disability.
- It is estimated that initially 50% of claimants may be affected by the proposed changes.
- It is estimated that 42% are likely to be better off, and 8% may have to contribute more towards their Council Tax. These claimants will be able to apply for extra support in the form of a Discretionary Award

Gender re-assignment

- There is no published information regarding the number of CTRS claimants who have undergone gender re-assignment and is not relevant in assessing eligibility.

Race

- Race is not relevant in assessing eligibility.

Religion or belief

- We do not record the religion or belief of people claiming CTRS, however this is not relevant when assessing eligibility.

Sex

- Whilst we do record the sex of the person claiming CTRS the proposed changes apply regardless of sex.

Sexual orientation

- We do not record the sexual orientation of people claiming CTRS, however this is not relevant when assessing eligibility.

Pregnancy and maternity

- In some cases we may be aware that someone claiming CTRS is pregnant or on maternity leave by virtue of certain benefits they are claiming however this is not recorded as a separate factor as it is not relevant when assessing eligibility.

Marriage & Civil Partnership

- We do record whether someone claiming CTRS is either married or in a civil partnership and would be able to extract this data, however the proposed changes apply to equally to both couples and single claimants.

Q7: Do you need any further information broken down by equality strand to inform this EqIA?

Yes No

If yes, list here and add actions to gather this data to your action plan at Step 5:

Q8: Is there any potential for direct or indirect discrimination?

Yes No Don't know

If yes, please explain how you are going to change this?

Under the proposed changes, and indeed the existing scheme, customers of working age, who are not protected, will receive less Council Tax Reduction than those of pensionable age, or those with a disability. This could be argued to be positive discrimination on the grounds of age and/or disability, however it is national government policy and is covered by legislation. (The Council Tax Reductions Schemes (Amendment) (England) Regulations 2017).

Step 4: Making a judgement about impact of CTRS

Age:

Claimants of CTRS who have reached state pension credit qualifying age are not affected by any of the proposed changes.

Sexual Orientation:

Regardless of sexual orientation anyone of working age who is not protected will be impacted by these changes.

Religion or belief:

Regardless of religion or belief anyone of working age who is not protected will be impacted by these changes.

Disability:

Claimants of CTRS who due to their disability receive one of the benefits listed in Q3 continue to be protected and will not be impacted by any of these changes.

Pregnancy and Maternity:

Regardless of whether someone is pregnant anyone of working age who is not protected will be impacted by these changes.

Marriage and Civil Partnerships:

Regardless of whether someone is married or in a civil partnership anyone of working age who is not protected will be impacted by these changes.

Sex: Regardless of sex anyone of working age who is not protected will be impacted by these changes. It is likely however that the number of female single parents claiming CTRS significantly outweighs the number of male single parents and consequently there is likely to be a higher number of females affected than there are males.

Race: Race is not relevant in assessing eligibility

Regardless of race anyone of working age who is not protected may be impacted by these changes.

Gender re-assignment:

Regardless of whether someone has undergone gender re-assignment anyone of working age who is not protected will be impacted by these changes.

Step 5: Action planning

Next steps are to report customer feedback from consultation to Shadow Executive in November for a recommendation on the final CTRS scheme to be formally adopted to take effect from 1st April 2020

Conclusion:

The main impact of the proposed changes will be small changes (positive and negative) to the amount of CTRS awarded which impacts on the Council Tax payable. The impact will vary based on current District Council areas. Broadly the impacts are as follows:

Wycombe/South Bucks

- The recommended scheme is very similar to the existing South Bucks/Wycombe schemes.
- A standard £5 non-dependant deduction will create some small variations in award (+ & -). (as opposed to variable rates where non-dependants income has to be established).

Chiltern

- Protected groups will no longer be required to make a contribution towards their Council Tax
- Currently Chiltern have Council Tax Support restricted to a Band D charge. The modelled schemes remove this restriction.

Aylesbury

- The proposed scheme will have a positive impact on protected claimants as they will no longer be required to make a 10% contribution towards their Council Tax.
- A standard £5 non-dependant deduction will create some small variations in award (+ & -). (as opposed to variable rates where non-dependants income has to be established).
- Working age customers will see a 5% increase in Council Tax payable as the amount payable for this group will increase from 15% to 20%
- Households with children under 5 may see an increase as they are no longer categorised as vulnerable (lone parents with children under 5 remain categorised as vulnerable)

Current financial modelling suggests the impacts on existing claimants is likely to be as follows:

Weekly change	More to pay			Less to pay		
	Number	Average weekly change	Average annual change	Number	Average weekly change	Average annual change
<£1.50	557	£0.56	£29.26	8,034	£0.24	£12.66
£1.51 - £5.00	498	£2.19	£113.75	4,322	£2.29	£118.95
£5.01 - £10.00	244	£4.43	£230.23	522	£5.43	£282.23
>£10.00	159	£5.06	262.99	430	£11.94	£620.75

Note: CTRS caseload varies on a daily basis.

The CTRS scheme includes a Discretionary Award fund that will be used to offer extra support to claimants adversely affected by the changes.

Step 5: Improvement plan – what are you going to change?

Expand boxes as necessary

Issue	Action	Performance Target (what difference will it make)	Lead Officers	Achieved
Making people aware of the changes	Ensure any agreed changes to the scheme are publicised	The people likely to be affected by the changes are made aware	Revenues & Benefits sub-workstream	
Answering queries	Ensure Customer service teams are briefed on new schemes	The people affected will be able to find out answers to their questions	Revenues & Benefits sub-workstream	

approved by:

Date:

Review date:

Check with your equality officer for the EqlA signing-off process and for posting the EqlA on the web