



## Appendix B - Equalities Impact Assessment

<b>Service:</b>	<b>Revenues, Benefits and Customer Services</b>
<b>Directorate:</b>	<b>Chief Operating Office</b>
<b>Title of proposal:</b>	<b>Council Tax Reduction Scheme for 2015/16</b>
<b>Lead Officer (author of the proposal):</b>	<b>Tracie Evans</b>
<b>Names of other Officers involved:</b>	<b>Carla Segel, Inno Amadi</b>

### Statement of purpose

In making this proposal, we have been mindful of our public sector equality duty to have due regard to the need to:

- a) eliminate discrimination;
- b) advance equality of opportunity between different groups and;
- c) foster good relations between groups in Haringey.

In addition we are committed to ensuring that we promote social inclusion in all council services making sure that they address the needs of those vulnerable residents who rely most heavily on them. The most socially excluded residents predominantly have the protected characteristics defined in the Equality Act 2010.

The purpose of this assessment is to:

- a) Identify whether and to what extent this proposal: could produce disadvantage or enhance opportunity for any groups with the protected characteristic defined in the Equality Act 2010;
- b) Establish whether the potential disadvantage is significant enough to call for special measures to remove or reduce the disadvantage;
- c) Identify and set out the measures that will be taken to remove or reduce the disadvantage;
- d) Where mitigation measures are not possible, to set out and explain why;
- e) To ensure that Members are fully aware of the implications the proposal may have for the Council's public sector equality duty before they decide on the proposal.

## Step One: Identify the aims of the proposal

### 1) Please state:

- **What problems the proposal is intended to address**
- **What effects it is intended to achieve**
- **Which group(s) it is intended to benefit and how**

As part of the Government's Welfare Reform Act, Council Tax Benefit was abolished and replaced with a Local Council Tax Reduction Scheme from 1 April 2013, with a reduced level of Government funding.

Haringey's scheme broadly mirrors Council Tax Benefit in terms of it being a means tested level of support with the same rules and parameters around eligibility and deductions. However, as the overall level of funding available to the Council to support Council Tax payments was reduced, it was not possible to maintain the scheme exactly as it was without the Council having to make up the shortfall in funding in other ways (for example cutting services, utilising reserves or increasing Council Tax). The Council adopted a scheme whereby all non-protected claimants of working age (i.e. all claimants other than pensioners of those in receipt of certain disability benefits) had to pay something towards their Council Tax.

Central Government prescribed that pensioners were automatically protected from any changes to Council Tax Benefit and following consultation with Haringey residents and interested groups in the autumn of 2012 the Council to extend this protection to those in receipt of certain disability benefits.

The final scheme adopted by the Council had the following key changes:

- Reduction of support to all working age claimants by 19.8% to cover the gap in funding.
- Removal of entitlement if less than £1 per week was awarded
- Removal of entitlement if savings over £10,000 were held.
- Protection for pensioners and those in receipt of certain disability benefits.

This scheme was approved by Full Council in January 2013 and the changes came into effect from 1 April 2013.

As the Council Tax Reduction Scheme needs to be approved by 31 January preceeding the 1 April implementation date, a decision on the 2014/15 scheme had to be made before a full year's worth of data was available. It was agreed to continue the scheme without any changes and consider reviewing it for 2015/16 once the Council had been able to collate and analyse data in relation to the operation of its scheme.

As per the information contained within the Full report, now that we have the required data from the operation of the scheme over the financial year 2013/2014 to conduct a full and considered review, we are proposing that the scheme continues for 2015/16 without change. This decision reflects the work conducted as part of the original design of the 2012/13 scheme which takes into account the following factors:

- Consideration of a range of issues including the Government's "Statement of Intent" issued in May 2012, the Local Government Finance Act 2012 and regulations and guidance issued by the Government relating to work incentives
- Consideration of the outcomes of the consultation exercise from 2012.
- Consideration of an equalities impact assessment

- Consideration of the reduction in funding for the Scheme and the impact on collection rates for Council Tax.

The options for changing the scheme that have been considered to date have been listed below and expanded on within the Full report. Some of these were proposed by respondents to the consultation undertaken prior to adopting the 2013/14 scheme.

- Increase the level of financial support so all customers pay less
- Decrease the level of financial support so all customers pay more
- Absorb the full shortfall into the Council budget by providing financial support up to the level previously funded by Central Government as part of Council Tax Benefit.
- Protect certain vulnerable groups in addition to those in receipt of certain disability benefits, these include but are not limited to:
  - Households with children
  - Households with a child under one
  - Households with a child under five
  - Households with more than three children
  - Households with a lone parent
- Protect band A-C properties
- Protect claimants on current maximum entitlement
- Protect claimants who are working but on low income.
- Protect claimants who have been impacted by the Benefits Cap or Social Size Criteria changes
- Protect claimants in receipt of Single Person's Discount
- Increase Council Tax

As per the information contained within the full report and in Appendix D, it is not recommended that these options are taken forward.

As detailed both in this EQIA and the EQIAs for the 2013/14 and 2014/15 schemes, there is mitigation in place for those impacted by the changes, however it is recognised and understood that the reduction of Council Tax Support has had and will continue to have a negative impact on many vulnerable groups.

The Government guidelines protect pensioners whose entitlement will be maintained at their current rates, hence they are excluded from this EqIA.

### **Duty to vulnerable groups**

In "Localising Support for Council Tax: Vulnerable People – key local authority duties," the Government was clear that in addition to their public sector equality duty, there were additional duties which the Council would have to have in regards to developing its Council tax Support scheme. These are described in that document as "Vulnerable people – key local authority duties" and include the following key areas:

- **Duty under the Child Poverty Act 2010**
- **Public sector equality duty – disability**
- **Armed Forces Covenant - war pension and compensation payments**
- **Duty to prevent homelessness**

This Equalities Impact Assessment reviews each of these areas in more detail and gives statistics where they are held. Although equalities data is routinely asked for new applicants, this data is not mandatory and so the information we hold does not give a complete picture of claimants.



## Step Two: Consideration of available data, research and information

**Instruction:** You should gather all relevant quantitative and qualitative data that will help you assess whether at present, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups, etc. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The Haringey Borough Profile of Protected Characteristics (can be found on the Website) will help you to make comparisons against Haringey's population size. The most up to date information can be found in the [Joint Strategic Needs Assessment](#).

- 1) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:**
- **are significantly under/over represented in the use of the service, when compared to their population size?**
  - **have raised concerns about access to services or quality of services?**

For this EqIA, we have used available equality data on claimants on the Council's Revenues and Benefits IT system: I-World. Our records shows that as at July 2014 there are a total of 31,354 households receiving Council Tax Support (following the previously agreed changes the maximum entitlement level is 80.2%).

Approximately 47% are pensioners or in receipt of certain disability premiums and as such will continue to receive the same level of support as they did previously. Approximately 53% currently receive support for Council Tax payments capped at 80.2%

The following table shows the demographic breakdown of current claimants.

### **Unrecorded protected characteristics**

The protected characteristics of gender reassignment, sexual orientation, marriage and civil partnership, religion and belief and pregnancy and maternity are not currently recorded in the Revenues and Benefits IT system as they do not form part of the application criteria. Prior to the Equality Act 2010, these characteristics were not covered by public sector equality duty, hence there was no requirement to record them in the system and as a result, no historical data exist relating to them. This data is routinely asked for as part of the new application processes, however it is not mandatory.

Although the full extent of the impact of the proposed scheme on individuals with these characteristics is not able to be fully shown in this EqIA, we have been able to make estimates of impact and proposed mitigation.

### **Recorded unprotected characteristics**

This EqIA also covers the impact on claimants with dependents, lone parents, economically inactive claimants and a comparison of impact between the east and the west of the borough.

Category	All Council Tax Reduction Scheme claimants	Impacted by Scheme (excluding pensioners and those in receipt of certain disability premiums)	% All Council Tax Reduction Scheme claimants	% Impacted by Scheme (excluding pensioners and those in receipt of certain disability premiums)	Borough of Haringey (where applicable)
<b>Households</b>	31,354	16,670	100%	53%	101,900
<b>Claimant Age</b>					Mid-yr estimate 2012
18-24	640	604	2%	4%	9%
25-44	10,027	8,532	32%	51%	39%
45-59	9,708	6,845	31%	41%	17%
60-64	2,097	673	7%	4%	4%
65+	8,882	16	28%	0%	9%
<b>Dependents Age</b>					Mid-yr estimate 2012
Those with dependants aged 1 and under	1,451	1,358	5%	8%	
Those with dependants aged 5 and under	4,631	4,245	15%	25%	
Those with dependants aged under 16	10,402	8,975	33%	54%	21%
Those with more than 3 dependants	1,120	962	4%	6%	
Count of all lone parents with dependants	7,015	6,167	22%	37%	10% (Census 2001)
<b>Disability (based on modelling tool which counts claimants who had been awarded a disability premium as at September 2013)</b>					Nomis (Feb 2012)
No	26,388	16,670	84%	100%	92%
Yes	4,966	0	16%		8%
<b>Gender</b>					Mid-yr estimate 2012
Male	12,547	6,057	40%	36%	50%
Female	18,219	10,235	58%	61%	50%
Unknown	588	378	excluded	excluded	
<b>Ethnicity</b>	12,000 records had an ethnicity recorded in the 2011 Census				Census 2011
White British	909	481	21%	18%	35%
Other White	1,399	905	33%	34%	23%
Non White	1,978	1,311	46%	48%	42%
Unknown	27,068	13,973	excluded	excluded	

\* Source: i-World (Revenue and Benefits IT system) July 2014

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Our analysis shows that of the claimants most likely to be impacted by the continuation of the scheme:

- 51% are in the 25-44 age group
- 41% are in the 45-59 age group
- 4% have 3 or more dependents
- 54% of claimants' have children aged 0-16
- 37% are lone parents
- 61% are women
- 48% of those with ethnicity recorded are non white and 52% other white

## 2) What factors / barriers might account for this under/over representation?

As shown in the impact table above, there are certain groups who are over-represented among claimants who are likely to be affected by the scheme. The reasons for this over representation are multiple and complex and are extensively described in the Council's various key strategic documents and summarised in the [Corporate Equality Objectives](#) 2012 – 16. The key factors are:

- **Unemployment** – especially in the east of the borough and within some groups including women, especially lone female parents and minority ethnic communities.
- **Deprivation** – with a disproportionately high concentration in the east and within minority ethnic communities.
- **Child poverty** –with disproportionate incidence in the east and within minority ethnic communities and lone female parents.
- **Disability** –A range of benefits and allowances (e.g. Incapacity Benefit, Severe Disablement Allowance) are claimed by a large number of disabled people of working age. It is recognised that people claiming these benefits are effectively economically inactive and is why it is recommended that they continue to be protected from any changes to their original entitlement.
- **Homelessness** – This may prevent people from working. The homeless register shows an over representation of lone female parents; young people aged 16-24; and; Black or Black British people – three times their size in the local population.

It is recognised and understood that the Government's intent is to lift the poorest off benefits by supporting them into work and various initiative and incentives are in place to move towards this. However it is not anticipated that the above barriers would be immediately removed and claimants achieve self reliance as a result of this scheme. Their removal will form part of longer term plans and programmes aimed at assisting claimants so they become less reliant on benefit support.

## 3) What other evidence or data will you need to support your conclusions and how do you propose to fill the gap?

Additional evidence/data came from the consultation held in preparation for the 2013/14 scheme and is used to support the recommendation to continue to protect those in receipt of certain disability premiums. Collection data from 2013/14 has also been used to understand the impact of the scheme on those now affected by the changes.

## Step Three: Assessment of Impact

**Instruction:** Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect any of the existing barriers facing people who have any of the characteristics protected under the Equality Act 2010. State what actions you will take to address any potential negative effects your proposal may have on them.

### 1) How will your proposal affect existing barriers? (Please tick below as appropriate and use the space to explain why)

Increase barriers? **X**

Reduce barriers?

No change?

For explanation of the impact see table below.

### 2) What specific actions are you proposing in order to reduce the existing barriers and imbalances you have identified in Step 2?

The actions are set out in the Mitigation column in the impact table below. When developing their local schemes, authorities were given the power to amend benefit disregards, deduction levels and applicable amounts. Haringey has made a positive choice to continue to protect as many people as we are able to within the confines of the Council's available funding.

1) Impact	2) Mitigation
<b>Protected characteristic: Age</b>	
<ul style="list-style-type: none"> <li>51% of claimants (excluding pensioners and those in receipt of certain disability premiums) are aged 25-44</li> <li>41% of claimants (excluding pensioners and those in receipt of certain disability premiums) are aged 45-59</li> <li>54% of people who will be affected by the continuation of the scheme have children under the age of 16. If unemployed or on low income their households would be exposed to additional financial pressures as a result to the changes. It could also impact adversely on child poverty</li> </ul>	<ul style="list-style-type: none"> <li>Pensioners are protected from these changes so will not see any amendment in their current entitlement</li> <li>When calculating entitlement, all premiums, disregards and applicable amounts remain the same:               <ul style="list-style-type: none"> <li>➤ Premiums are included in the Applicable Amount for all claimants where there are dependent children or qualifying young persons in the household.</li> <li>➤ Capital belonging to a child or qualifying young person is fully disregarded</li> <li>➤ Child Benefit and maintenance payments in respect of a child or qualifying young person are fully disregarded</li> <li>➤ Child care costs are disregarded where appropriate</li> <li>➤ More generous Applicable Amounts for 'non-passported', working-age and pensioner lone parents are given</li> <li>➤ There is no change to the level of non-dependant deduction amounts.</li> <li>➤ There is no change to the application of the deduction exemption for non-dependant students</li> <li>➤ There is no change to Second Adult Rebate</li> </ul> </li> <li>It is recognised that certain people may find it difficult to find work due to their age; they will continue to be signposted to employment and re-skilling programmes that provide targeted support to find work. These include focused training provided by Haringey Adult Learning Services, CONEL and other Haringey based providers.</li> <li>Where people have been affected by multiple welfare reform changes (such as the CAP and the Support Fund) they will continue to receive individual assistance including 121 interviews with colleagues from Housing Services and JobCentrePlus and</li> </ul>



1) Impact	2) Mitigation
	direct referrals to support providers such as Money Advice Service or the Quaker Social Action Group.
<b>Protected characteristic: Sex (formerly gender)</b>	
<ul style="list-style-type: none"> <li>Both sexes will continue to be subject to the same rate of reduction in support and to the same rule changes.</li> <li>However the majority of claimants who will be affected are female.</li> </ul>	<p>Female claimants will continue to be signposted to the various appropriate women specific employment and skills development initiatives in the borough, in addition to generic programmes to help people into work e.g. Haringey Adult Learning Services (HALS) and the College of North East London (CONEL)</p> <p>Where appropriate there will continue to be targeted signposting in place for local groups offering support that is gender specific such as Missionaries of Charity which have separate groups for women (Home of Peace) and men (The Gift of Love).</p>
<b>Protected characteristic: Disability</b> (includes people in receipt of Disability Living Allowance, Severe Disablement Allowance and Higher Rate Incapacity Benefit and <b>Chronically Sick Disabled Persons Act duty</b> )	
<ul style="list-style-type: none"> <li>16% of claimants are receiving a disabled related benefit.</li> </ul>	<p>During the consultation period for the 2013/14 scheme, respondents were asked if there was any group that they felt should be protected in addition to pensioners. The majority wanted disabled claimants to be protected and this was agreed by Full Council for the 2013/14 and 2014/15 schemes. It is recommended that this protection continue for the 2015/16 scheme.</p> <p>Those in receipt of one or more of the following disability premiums will have their entitlement maintained at its current rate:</p> <ul style="list-style-type: none"> <li>Attendance Allowance</li> <li>Constant Attendance Allowance</li> <li>PIP - Care component (lower or middle or higher rate)</li> <li>PIP – Mobility component</li> <li>Exceptionally Severe Disablement Allowance</li> <li>Long Term Rate Incapacity Benefit</li> <li>Mobility Allowance</li> <li>Mobility Supplement</li> <li>Severe Disablement Allowance</li> <li>WTC – Disability element</li> </ul>
<b>Protected characteristic: Race (formerly ethnicity)</b>	
<ul style="list-style-type: none"> <li>Of those who declared their ethnicity, 48% are Black and Minority Ethnic groups combined; 52% are Other White category</li> </ul>	<p>Claimants will continue to be signposted to employment and skills training programmes to enhance employment opportunities, especially in the east of the Borough where there is a high concentration of BMEs and high levels of deprivation.</p> <p>Relationships have been built with local JobCentrePlus sites where claimants can receive information about opportunities relating to both employment and skills development. There is also access to budgeting loans to help with any work related costs (such as clothing or equipment). These will continue going forward.</p>
<b>Protected characteristic: Pregnancy and maternity</b>	
<p>We do not collect information about claimants' maternity status so the full impact on this characteristic is not known, however we have used the data we hold to make an estimate of the impact.</p>	<ul style="list-style-type: none"> <li>In support of the Government's initiative to promote working, provisions will continue to apply for 'non-passported' working-age claimants to delay/reduce the impact of stopping work as a result of pregnancy, maternity or paternity leave.</li> <li>Child care cost disregards will continue to apply where appropriate.</li> <li>The Government's "Healthy Start" scheme provides vouchers to</li> </ul>

1) Impact	2) Mitigation
<p>Our records show that 1,451 claimants (5%) have children under one, as such we can assume this group of people will have been impacted by maternity leave.</p>	<p>pregnant women and those with children under four which can be exchanged for food, fruit and formula milk.</p> <ul style="list-style-type: none"> <li>• Haringey has 17 Children Centres located across the borough bringing together a range of services such as childcare, family support, health and education and information on local services.</li> <li>• Women who are pregnant or on maternity leave are unable to work for a set period of time and are likely to be in receipt of statutory maternity pay which may help to supplement their income.</li> </ul> <p>Where appropriate there will continue to be targeted signposting in place for those needing support with children such as the Child Poverty Action Group (CPAG), Family Action Group and referrals to the Sure Start Maternity Grant department of the DWP.</p>
<b>Child poverty</b>	
<ul style="list-style-type: none"> <li>• Approximately 34% of Haringey children are living in poverty (DWP 2010).</li> <li>• High risk groups include children in workless families; children in families with 4 or more children; children in single parent families; children of teenage mothers and BME children (national data shows that poverty rates are higher for all BME groups than for white families)</li> <li>• Our records show that 4,631 CTRS claimants (15%) have children under five</li> </ul>	<p>Child Poverty will be addressed through the Child Poverty Strategy and Haringey 54,000 Programme with outcomes which include:</p> <ul style="list-style-type: none"> <li>• Ensuring all children in Haringey are safe and that they thrive and achieve.</li> <li>• Ensuring families can access a high quality educational offer.</li> <li>• Promoting resilient families by acting as a catalyst for a wide selection of high quality universal or targeted borough-based child and family activities.</li> <li>• Providing high quality safeguarding.</li> </ul> <p>It is recognised that there is a need to focus efforts on addressing child needs in a different way and across Haringey departments are working on inclusive strategies that look to address this.</p>
<b>Households with dependent children</b>	

1) Impact	2) Mitigation
<ul style="list-style-type: none"> <li>• Over 50% of households have at least one child.</li> <li>• 4% of claimants have 3 or more dependents</li> <li>• Approximately 37% of affected claimant households are lone parents, most of whom tend to be female.</li> </ul>	<p>In addition to the Child Poverty mitigation set out above, when calculating entitlement, all premiums, disregards and applicable amounts remain the same:</p> <ul style="list-style-type: none"> <li>➤ Premiums are included in the Applicable Amount for all claimants where there are dependent children or qualifying young persons in the household.</li> <li>➤ There will be no change to the applicable amount for 'non-passported' working-age (and pensioner) claimants which includes Premiums based on household composition as well as an additional Family Premium with more generous rates for lone parents and the disabled</li> <li>➤ Capital belonging to a child or qualifying young person is fully disregarded</li> <li>➤ Child Benefit and maintenance payments in respect of a child or qualifying young person are fully disregarded</li> <li>➤ Child care costs are disregarded where appropriate</li> <li>➤ More generous Applicable Amounts for 'non-passported', working-age and pensioner lone parents are given</li> <li>➤ There is no change to the level of non-dependant deduction amounts.</li> <li>➤ There is no change to the application of the deduction exemption for non-dependant students</li> <li>➤ Protection from non-dependant deductions where Attendance Allowance and the Care Component of PIP are received by the claimant/partner(s) will continue.</li> <li>➤ There is no change to Second Adult Rebate</li> <li>➤ In support of the Government's initiative to promote working, provisions will continue to apply for 'non-passported' working-age claimants to delay/reduce the impact of stopping work as a result of pregnancy, maternity or paternity leave.</li> </ul>
<b>Unemployed (on maximum CTR entitlement)</b>	
<p>The continuation of the scheme will impact more on claimants who are currently not in work and claim maximum CTRS, this constitutes approximately 65%.</p>	<p>Assistance for the unemployed and people on low income will continue to be addressed through various employment and regeneration strategies and plans. The Tottenham Regeneration Programme is one of the core focuses of the Corporate Plan. It has people as its main objective focusing on job creation and the skilling of local people to enable them take up job opportunities.</p> <p>Claimants will continue to be signposted to employment and skills training programmes to enhance their employment opportunities.</p>
<b>Claimants by area of residence (east/west of the borough)</b>	

1) Impact	2) Mitigation
<ul style="list-style-type: none"> <li>• Census records show 67% of affected claimants reside in the east of the borough.</li> <li>• The high levels of claimants in the east correlate strongly with areas of multiple deprivation, most acute in the north-east of the borough.</li> </ul>	<p>Assistance for the unemployed and people on low income will continue to be addressed through various employment and regeneration strategies and plans. The Tottenham Regeneration Programme is one of the core focuses of the Haringey Corporate Plan. It has people as its main objective, focusing on job creation and the skilling of local people to enable them take up job opportunities. Through these strategies and plans the Council aims to tackle unemployment and worklessness especially in the more deprived east of the borough.</p>
<b>Homelessness</b>	
<p>Of those accepted as being unintentionally homeless and being in priority housing need in 2011/12:</p> <ul style="list-style-type: none"> <li>• 30% were young people aged 16 – 24;</li> <li>• 49% were Black or Black British;</li> <li>• Just over 50% were lone female parents</li> </ul> <p>Source: Haringey Council P1E returns</p>	<p>The requirement to pay Council Tax and therefore the ability to be eligible for Council Tax support is less prominent with this vulnerable group. However, it is recognised that this group will be disadvantaged by the other Welfare Reform changes.</p> <p>Haringey's Corporate Plan has the reduction and prevention of homelessness as a key priority objective with targets set against temporary accommodation placements and homelessness acceptances.</p> <p>Where appropriate there will continue to be targeted signposting in place for those presenting as homeless including organisations such as Crisis, No Second Night Out, Centrepoint, Alone in London, Causeway and CARIS (Christian Action and Response in Society). There has also been close working with the local Foodbanks in terms of physical support (assisting with shifts / managing donations) and claimant referrals, this will continue going forward.</p>
<b>Armed Forces Covenant - war pension and Armed Forces Compensation payment</b>	
<ul style="list-style-type: none"> <li>• 18 people in Haringey are in receipt of war disablement pension and are protected under the scheme.</li> </ul>	<p>In addition to the mandatory legislation that exists regarding the treatment of Armed Forces personnel (including Territorial Army personnel), Haringey are working with other boroughs on the development of an Armed Forces Community Covenant which targets support at those falling into this group. This could be in terms of housing, education, benefit entitlement, health and employment.</p> <ul style="list-style-type: none"> <li>• Income received from a war pension will continue to be disregarded when calculating entitlement</li> </ul>

**3) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?**

It is recognised and understood that the Government's intent is to lift the poorest off benefits by supporting them into work and various initiative and incentives are in place to move towards this. However the barriers in place relating to unemployment, deprivation, disability and homelessness prevent this move to self reliance and self support.

it is not anticipated that these barriers would be immediately removed and claimants achieve self reliance as a result of this scheme. Their removal will form part of longer term plans and programmes aimed at assisting claimants so they become less reliant on benefit support.

It is recognised and understood that these changes will have a detrimental affect on individuals and where possible signposting and targeted support will be offered to those in need.

## Step Four: Consult on the proposal

**Instruction:** Consultation is an essential part of an impact assessment. If there has been recent consultation, which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment.

Make sure you reach all those who are likely to be affected by the proposal. Potentially these will be people who have some or all of the characteristics listed below and mentioned in the Equality Act 2010:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race, Religion or Belief
- Sex (formerly Gender) and
- Sexual Orientation

Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

### **1) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?**

Prior to the scheme being approved by Full Council in January 2013, public consultation took place between 22 August and 19 November 2012 asking respondents about the following key areas:

- Whether they agreed with the four key proposals in the Council's draft Local Scheme
- Whether there were any groups that should be protected by the Scheme
- Whether there were any other comments they wanted to make about the proposed Scheme

The outcomes of this consultation were fed into the approved scheme and led to the recommendation to protect claimants in receipt of certain disability premiums.

As the scheme is not changing for 2015/16 there is no requirement to re-consult.

### **2) How, in your proposal have you responded to the issues and concerns from consultation?**

The feedback from the original consultation, including a full breakdown of all the individual comments, was included in the Full Council report in January 2013. The points made in that consultation have been taken into account.

**3) How have you informed the public and the people you consulted about the results of the consultation and what actions you are proposing in order to address the concerns raised?**

As the scheme is not changing for 2015/16 there is no requirement to re-consult. Claimants will be informed that the scheme is continuing without change with their annual Council Tax bill which will also include information about the different ways to pay and advice about what to do if they think they will have difficulty paying.

## Step Five: Addressing Training

**Instruction:** The equalities issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

**1) Do you envisage the need to train staff or raise awareness of the equalities issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?**

All Revenues, Benefits and Customer Services staff who deal with claimants either face to face, on the phone or in the Back Office when processing applications have been trained and made aware of the changes and likely impact to claimants. Scripts and IT systems have been appropriately updated.

Refresher briefings will be given and will incorporate any other appropriate Welfare Reform updates.

## Step Six: Monitoring Arrangements

**Instruction:** If the proposal is adopted, there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the protected characteristics detailed in Step 4 above. The purpose of equalities monitoring is to see how the proposal is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address those effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and reported quarterly, in the first instance to your DMT and then to the Corporate Equality Board.

**1) What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?**

- **Who will be responsible for monitoring?**
- **What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?**
- **Are there monitoring procedures already in place which will generate this information?**
- **Where will this information be reported and how often?**

All data connected to the Council Tax Reduction Scheme, including collection levels, is reviewed and monitored on a regular basis.

The Scheme has to be reviewed each year and monitoring data will always be used to assess whether it should be amended or not.



## Step Seven: SUMMARY OF IMPACT

**Instruction:** In the table below, summarise for each diversity strand the impacts you have identified in your assessment.

Age	Disability	Race (Ethnicity)	Sex (Gender)	Religion or Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
<p>Pensioners will be protected.</p> <p>Working age claimants will be affected, mostly within the age range 25-44 with 54%, followed by the age range 45 – 59, with 41%</p>	<p>16% of those affected are disabled.</p> <p>It is proposed that they will be continue to be protected from the changes if they are in receipt of certain disability related benefits.</p>	<p>Of the information we hold, it appears that white groups as a whole would be most affected (52%)</p>	<p>More women (61%) will be affected than men.</p>	<p>No data is available as this information is not collected as part of the CTRS application process.</p>	<p>No data is available as this information is not collected as part of the CTRS application process.</p>	<p>No data is available as this information is not collected as part of the CTRS application process.</p>	<p>No data is available as this information is not collected as part of the CTRS application process.</p>	<p>Although this data is not collected as part of the CTRS application process, we have used the information we hold to make an estimate of the likely impact.</p>

## Step Eight: Summarise the actions to be implemented

**Instruction:** Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications
Protection of vulnerable groups	<p>In addition to protection for pensioners, it is recommended that the scheme continues to protect claimants in receipt of certain disability premiums.</p> <p>Actions to reduce possible hardship to working age claimants and families with dependents are in the various employment initiatives as laid out in the Corporate Plan.</p>	<p>Assistant Director of Customer Services</p> <p>Director of Regeneration, Planning and Development</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Within existing resources</p> <p>As set out in the Corporate Plan</p>
Monitoring of impact of the scheme	Monitor the impact of the scheme in terms of individual hardship and collection rates.	Assistant Director of Customer Services	Ongoing	Within existing resources

## Step Nine: Publishing results of this EqlA

**Instruction:** It is standard practice to publish the results of impact assessments. There is also a specific duty to provide as much relevant equality information as possible to enable the public to judge how well we are doing on our public sector equality duty. EqlA results are published not simply to comply with the law but also to make the whole process and its outcome transparent and have a wider community ownership. You should summarise the results of the assessment and intended actions and publish them. You should consider in what formats you will publish in order to ensure that you reach all sections of the community.

### 1) When and where do you intend to publish the results of your assessment, and in what formats?

The results will be published along with the Full Council report in November 2014 on the Council's website.

**Assessed by (Author of the proposal):**

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Designation: Assistant Head of Revenues, Benefits and Customer Services

Signature:

Date:

**Quality checked by (Policy and Equalities Team):**

Name: Inno Amadi

Designation: Senior Policy Officer (Equalities)

Signature:

Date:

**Sign off by Directorate Management Team:**

Name:

Designation:

Signature:

Date: