

Equality Impact Assessment – Changes to the Working Age Council Tax Reduction Scheme from 2024/25

Name of policy/ procedure/ practice to be assessed	Changes to the Working Age Council Tax Reduction Scheme		Date of Assessment	November 2023	
Is this a new or existing policy/ procedure/ practice?	Existing	Officer responsible for the Assessment	Michael Buckland Head of Revenues & Benefits	Department	Revenues and Benefits
1. Briefly describe the aims, objectives, and purpose of the policy/ procedure/ practice?	<p>The Council is required to review its scheme for working age each year. There are a number of issues with the current scheme that need addressing if the system is to continue to provide effective support to low-income taxpayers and also if the Council is able to provide the service in an efficient manner. The main issues are as follows:</p> <ul style="list-style-type: none"> • The need to assist low-income households and assist in the collection of Council Tax; • The introduction of Universal Credit for working age applicants; and • The need for a simplification of the scheme. <p>In view of the problems being experienced with the current scheme, it is proposed that an alternative approach be taken from 2024/25. The approach has been to fundamentally redesign the scheme to address all of the issues with the current scheme and in particular;</p> <ol style="list-style-type: none"> (a) The level of support available to the poorest households; (b) The problems with the introduction of full-service Universal Credit; and (c) The significant increase in administration costs due to the high level of changes received in respect of Universal Credit. <p>Pension age applicants for CTR will not be affected by this change</p>				
2. Are there any associated policy/ procedure/ practice which should be considered whilst carrying out this equality impact assessment?	<p>The Council's Council Tax Reduction policy under Section 13A 1A of the Local Government Act 1992 will be re-written to reflect the changes made in the Council Tax Reduction Scheme for working age applicants.</p> <p>Working procedures and practices undertaken by the Revenues and Benefits Service will be</p>				

	revised to reflect the new approach once the scheme has been approved at full Council.
3. Who is intended to benefit from this policy/ procedure/ practice and in what way?	<p>Low income working age households who apply and qualify for Council Tax Reduction. The revised scheme will:</p> <ul style="list-style-type: none"> (a) Provide more support to those on the lowest income (up to 100% of the Council Tax payable); (b) Be easier to understand and claim; and (c) Address the administration issues caused by the introduction of Universal Credit within the area.
4. What are the desired outcomes from this policy/ procedure/ practice?	The intention is to introduce a more supportive, modern, future proofed Council Tax Reduction scheme which is fit for purpose.
5. What factors/ forces could contribute/ detract from the outcomes?	<p>The following factors could have a bearing on the introduction of the new working age Council Tax Reduction scheme:</p> <p>Detractions</p> <ul style="list-style-type: none"> • Failure of the Council to agree to the change - if this occurred then the existing scheme would continue; • Failure to agree the increase in costs to allow increased support to those applicants on the lowest income; • Failure to implement the changes on time. <p>Contribution</p> <ul style="list-style-type: none"> • Agreement by the Council to provide additional support to low-income households which is particularly important given the cost of living crisis; • The improvement in Council Tax collection; and • The reduction in administration costs (which are solely borne by the Borough Council and not by the Precepting Authorities, who receive the majority of the Council Tax funding).
6. Who are the main stakeholders in relation to	External Stakeholders

<p>the policy/ procedure/ practice?</p>	<ul style="list-style-type: none"> • Major Precepting Authorities – County Council, Police & Crime Commissioner Authority and Fire and Rescue Authority; • Working age Council Tax Reduction applicants • Council Tax payers generally • Interested Groups such as Citizens Advice etc. <p>Internal Stakeholders</p> <ul style="list-style-type: none"> • Council Members and • Council Staff
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<p>7. Which individuals/ groups have been/ will be consulted with on this policy/ procedure/ practice?</p>	<p>In line with the statutory requirements, the following will be consulted:</p> <ul style="list-style-type: none"> • Major Precepting Authorities (County Council, Fire and Rescue Authority & The Police and Crime Commissioner Authority; • The Public; <p>The consultation process was comprehensive and encouraged a full response to the proposed scheme. Interested groups such as Citizens Advice were asked for their views.</p>	
<p>8. Are there concerns that the policy/ procedure/ practice could have a differential impact on racial groups?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact due to race.</p>
<p>9. Are there concerns that the policy/ procedure/ practice could have a differential impact due to gender?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact due to gender.</p>

<p>10. Are there concerns that the policy/ procedure/ practice could have a differential impact due to them being transgender or transsexual?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact due to a person being transgender or transsexual.</p>
<p>11. Are there concerns that the policy/ procedure/ practice could have a differential impact due to disability?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact due to disability, the proposed scheme is designed to continue to protect the disabled by disregarding disability benefits such as Disability Living Allowance and Personal Independence Payments.</p> <p>The scheme will also further protect disabled applicants as it will provide a further income disregard of £40 per week which will reduce the level of income taken into account when calculating any support.</p>
<p>12. Are there concerns that the policy/ procedure/ practice could have a differential impact due to sexual orientation?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact due to sexual orientation.</p>
<p>13. Are there concerns that the policy/ procedure/ practice could have a differential impact due to age?</p>	<p>N</p>	<p>The proposed changes will affect working age applicants only. Pension age applicants will not be affected as their scheme is prescribed by Government. The level of support to be provided will increase and the majority of working age applicants will see an increase in support or maintain the same level of support. Inevitably with any change in scheme there may be some losers.</p> <p>Where this occurs a transitional protection scheme will be applied for large losers and the applicant may apply for additional support under the Council's Exceptional Hardship scheme.</p>

<p>14. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to religious belief?</p>		<p>N The proposed change to the scheme will have no differential impact due to religious belief.</p>
<p>15. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact on Gypsies/ Travellers?</p>		<p>N The proposed change to the scheme will have no differential impact to gypsies or travellers.</p>
<p>16. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to dependant/caring responsibilities?</p>		<p>N The proposed changes to the scheme provide additional support to those with caring responsibilities. Carer's Allowance is fully disregarded under the new scheme which is an enhancement to the existing scheme.</p>
<p>17. Are there concerns that the policy/ procedure/ practice <u>could</u> have a differential impact due to them having an offending past?</p>		<p>N The proposed change to the scheme will have no differential impact due having an offending past.</p>

<p>18. Are there concerns that the policy/ procedure/ practice could have an impact on children or vulnerable adults?</p>	<p>N</p>	<p>The proposed change to the scheme provides protections for families and vulnerable adults in the following ways:</p> <p>Families</p> <ul style="list-style-type: none"> • the scheme allows additional income levels (for the same level of support) depending on whether there is one or two (or more) dependants; • the scheme disregards child benefit and child maintenance. <p>Vulnerable adults</p> <ul style="list-style-type: none"> • the scheme (as previously indicated), disregards Personal Independence Payments, Disability Living Allowance and the support component of Employment and Support Allowance; • When any household has a disabled applicant, partner or dependant and additional income disregard of up to £40 will be given against income, thereby potentially increasing the level of support available. <p>Carers</p> <ul style="list-style-type: none"> • Potential additional support is available to carers as the scheme disregards Carer's Allowance in full.
<p>19. Does any of the differential impact identified cut across the equality strands (e.g., elder BME groups)?</p>	<p>N</p>	<p>The proposed change to the scheme will have no differential impact identified that cut across equality strands.</p>
<p>20. Could the differential impact identified in 8 – 19 amount to there being the potential for adverse impact in this policy/ procedure/ practice?</p>	<p>N</p>	<p>The proposed scheme increases the potential level of support available to all working age applicants.</p>

<p>21. Can this adverse impact be justified:</p> <ul style="list-style-type: none"> • on the grounds of promoting equality of opportunity for one group? • For any other reason? 	Y	<p>The scheme will provide additional support to working age applicants in general as up to 100% reduction can be obtained subject to the circumstances of the applicant.</p> <p>Whilst the majority of applicants will either have the same level of support or have increased support, it is inevitable that any change to schemes may result in some applicants losing. A transitional protection scheme will be applied for large losers and where these households experience exceptional hardship, the applicant may apply for additional support through the Council's Exceptional Hardship Scheme.</p>
<p>22. As a result of carrying out the equality impact assessment is there a requirement for further consultation?</p>	Y	<p>Statutory Consultation has been undertaken with both Major Preceptors and with the Public.</p>
<p>23. As a result of this EIA should this policy/ procedure/ practice be recommended for implementation in its current state?</p>	Y	<p>Subject to the statutory consultation, the Council is of the opinion that the scheme represents a significant improvement in support for all working age Council Tax Reduction applicants.</p>

PLEASE COMPLETE THE FOLLOWING ACTION PLAN FOR ALL IMPACT ASSESSMENTS

Equality Impact Assessment Action Plan

Complete the action plan demonstrating the changes required in order to meet TBC's commitment to equality and diversity. The action plan must contain monitoring arrangements, the publishing of results and the review period required for this policy.

ACTION/ ACTIVITY	RESPONSIBILITY	TARGET	PROGRESS
Implementation of the revised Council Tax Reduction Scheme for working age applicants.	M Buckland	1 April 2024	Ongoing
Monitoring arrangements:		Data collected quarterly	
Full monitoring of scheme implementation on a monthly basis in line with the accepted project plan	M Buckland	Monthly and quarterly collection of data to be undertaken by the Benefits Service	Ongoing
Publication:			
The revised Council Tax Reduction scheme is to be published by the Council by April 2024, after consideration at Cabinet and then full Council in December 2023.	M Buckland		Ongoing
Review Period:		Reviewed 12 monthly unless otherwise stated	
The scheme will be reviewed annually by both Central Government and the Borough Council	M Buckland		Ongoing

Expand as appropriate.

Signed
(Completing Officer).....

Date

Signed
(Head of Department)

Date

Signed
Corporate Diversity/ Equality

Date

DRAFT

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