

APPENDIX 1

Equality Assessment Record



Bromsgrove
District Council

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Title of Service, Policy, Procedure, Spending Review being Proposed	Council Tax Reduction Scheme 2021/22
Name of Service Area	Revenues and Benefits
Name of Officer completing this assessment	Lisa Devey
Date Assessment Started	19th August 2020
Name of Decision Maker (in relation to the change)	
Date Decision Made	

Overview

Provide a clear overview of the aims of the service/policy/procedure and the proposed changes being made. Will the current service users' needs continue to be met? Why is the change being proposed? What needs or duties is it designed to meet?

To introduce a simplified Council Tax Reduction scheme with effect from 1st April 2021 and to increase the level of support to the poorest households.

In addition, the implementation of Universal Credit within the area requires the Council to change its approach to Council Tax Reduction, given the high administrative burden of monthly changes and alterations to applicants' income.

There is a requirement to introduce a simplified, more supportive scheme which can be easily administered without significant additional costs being placed on the Council. The current scheme is too reactive to minor changes in applicant's income leading to constant changes in Council Tax liability.

The scheme changes will only apply to working age applicants, pension age applicants are covered by the Prescribed Requirement Regulations determined by Central Government.

The move to an income-based scheme (without the complexities of a full means tested as required by the current scheme).

The changes will provide the following:

- An increased level of support to households with the lowest income;
- Simplified claiming arrangements for all working age applicants;
- Certainty, at present, multiple changes are leading to some taxpayer's receiving a large number of Council Tax bills per year as their Council Tax Reduction is constantly amended;
- The maximisation of applicant's entitlement with clear straightforward messages to claim;
- Speed of processing - applications will be dealt with more efficiently and without the need for significant levels of evidence; and
- Reduced administration costs. The changes will prevent the administration costs from rising year on year which would be inevitable under the current scheme.

It should be noted that the overall costs of the scheme will increase however the overall level of Council Tax Reduction as a proportion of the overall Council Tax base, will be less than when Council Tax Reduction was introduced in 2013. The costs to the District Council will be in proportion to the Council's share of Council Tax.

Who is the proposal likely to affect?	Yes	No
All residents	<input type="checkbox"/>	<input type="checkbox"/>
Specific group(s)	<input checked="" type="checkbox"/>	<input type="checkbox"/>
All Council employees	<input type="checkbox"/>	<input type="checkbox"/>
Specific group(s) of employees	<input type="checkbox"/>	<input type="checkbox"/>
Other – Provide more details below	<input type="checkbox"/>	<input type="checkbox"/>

Details

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.

Working age applicants who are currently in receipt of Council Tax Reduction or those who apply on or after 1st April 2021. Pension age applicants will not be affected as their scheme remains unchanged.

Evidence and data used to inform your equality impact assessment

What data, research, or trend analysis have you used? Describe how you have got your information and what it tells you.

Modelling of the new scheme has been undertaken throughout and will continue to be undertaken until such time as the 2021/22 scheme is approved.

The indicative modelling data based on a snapshot of cases in February 2021 is shown below:

	Existing Scheme			New Scheme			Average Weekly Gain / (Loss)
	Numbers	Expenditure	Average Weekly Amount	Numbers	Expenditure	Average Weekly Amount	
Single Person	1164	£958,474.66	£16.76	1051	£1,017,184.48	£19.63	£2.87
Couple no children	213	£236,411.86	£22.82	183	£229,783.82	£25.69	£2.87
Single person with one child	347	£279,376.77	£16.80	338	£296,709.74	£18.52	£1.72
Single person two or more children	436	£339,480.48	£16.77	382	£327,227.36	£18.37	£1.60
Couple with one child	92	£88,521.43	£21.07	81	£91,417.24	£24.43	£3.36
Couple with two or more children	165	£162,541.35	£22.44	138	£162,503.32	£26.74	£4.30
Applicant Gender – Male	887	£779,420.35	£18.10	793	£803,544.80	£20.78	£2.68
Applicant Gender - Female	1563	£1,309,230.84	£17.66	1380	£1,321,281.16	£20.15	£2.49
		£2,088,651.19			£2,124,825.96		

- The scheme is designed to protect the households with the lowest incomes and will redistribute the levels of support available in a fairer manner. The overall costs of the scheme are marginally higher, and this will allow up to 100% support to those applicants on the lowest incomes and those who receive DWP legacy benefits including Income Support, Job Seeker's Allowance (Income Based), Employment and Support Allowance (Income Related).
- The scheme will protect applicants who are disabled or where any member of their household is disabled;
- The scheme will be more generous to carers and those who have non dependants;
- The scheme will however limit the maximum capital allowable to £6,000 and restrict the calculation to a maximum of two dependants in line with the changes to Universal Credits, Tax Credits and Housing Benefit; and
- All existing income and capital disregards will apply in the new scheme; and
- **All** applicants, if they are detrimentally affected by the new scheme, will be able to apply for an Exceptional Hardship Fund payment from the Council's new Exceptional Hardship Fund which will be effective from 1st April 2021.

Engagement and Consultation

Consultation has taken place with the Major Preceptors (Fire and Rescue, Police and the County Council). Details of their responses are shown within Appendix 3 of the report.

A full public consultation was undertaken in the period to 9th November 2020 and the results of which are shown within Appendix 2 of the report

It can be seen that the consultation has received an overall positive response.

Public Sector Equality Duty

Equality Duty Aims	Evidence
<p>Eliminate unlawful discrimination, harassment and victimisation How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic</p>	<ul style="list-style-type: none"> • The new scheme has been designed to support all low-income taxpayers and has been created strictly in accordance with the legislative requirements. • The new scheme provides more support to those on the lowest incomes • Existing 'protected' categories or persons who are currently determined as vulnerable within the existing scheme, will continue to be protected in the new scheme. • A new Exceptional Hardship Scheme has been created to assist any applicant who feels that they require additional support.
<p>Advance equality of opportunity between different groups 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>	<ul style="list-style-type: none"> • All working age are covered by the scheme and any taxpayer who meets the criteria will be able to apply for support. • The scheme will allow easier access to support; maximisation of assistance whilst at the same time maintaining the protections from the current scheme; • There will be some applicants with higher levels of capital or higher levels of available income that may receive less support through the new scheme.
<p>Foster good relations between different groups Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p>	<ul style="list-style-type: none"> • Yes, the scheme is designed to: <ul style="list-style-type: none"> ○ Be easily accessible by all applicants; ○ Avoid multiple changes to entitlement (and Council Tax) throughout the year; ○ Be less complicated and more easily understood.

Is there evidence of actual or potential unfairness for the following equality groups?

- Does the proposal target or exclude a specific equality group or community?
 - **No, all working age applicants are treated in the same way;**

- Does it affect some equality groups or communities differently and can this be justified?
 - **No**
- Is the proposal likely to be equally accessed by all equality groups and communities? If not, can this be justified? (It may be useful to consider other groups, not included in the Equality Act, especially if the proposal is specifically for them e.g. lone parents, refugees, unemployed people, carers)
 - **Yes**

Impact of proposal

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. How likely is it that people with this protected characteristic will be negatively affected? What are the barriers that might make access difficult or stop different groups or communities accessing the proposal? How great will that impact be on their well-being? Could the proposal promote equality and good relations between different groups? How?

- **Details of the impact of the change have been provided above**

If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?

What mitigating actions can be taken to reduce or remove this impact? (Include these in the action plan at the end of the assessment) Equal treatment does not always produce equal outcomes; sometimes you will have to take specific steps for particular groups to address an existing disadvantage or to meet differing needs.

Protected Group	Impact of proposal	Justification for any actual or potential unfairness identified	If you have identified any area of actual or potential unfairness that cannot be justified, can you eliminate or minimise this?
Age	Affects working age applicants only (pension age applicants are dealt with under Central Government Prescribed Scheme)		

Disability	Protected		
Transgender	N/A		
Marriage and Civil Partnership	N/A		
Pregnancy and Maternity	N/A		
Race	N/A		
Religion or Belief	N/A		
Sex (Male/ Female)		The scheme provides a higher level of support to both male and female applicants. As with the existing scheme, more female applicants will be in receipt of Council Tax Reduction	
Sexual Orientation	N/A		

How will you monitor any changes identified?

The scheme will be constantly monitored by the service throughout 2021 /22 to ensure that its objectives are met.

The actions required to address these findings are set out below.

Action Required	By Whom	By When	Completion Date
Recommended – It is recommended that the new proposed Council Tax Reduction scheme be implemented from 1 st April 2021			

Sign off on completion	Name	Signature	Date
Lead Officer completing assessment			
Equalities Officer			

When you have completed this assessment, retain a copy and send an electronic copy to the Policy Team (Equalities) attaching any supporting evidence used to carry out the assessment.