Bromsgrove District Council
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# Equality Impact Assessment

Redditch Borough Council
Working together for our communities

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| Title of Service, Policy, Procedure, Spending Review being Proposed | **Council Tax Section 13A(1)(C) Policy** |
| Name of Service Area | **Revenue Services** |
| Name of Officer completing this assessment | **David Riley** |
| Date Assessment Started | **1st November 2025** |
| Name of Decision Maker (in relation to the change) | **Redditch Borough Council – Full Council**<br>**Bromsgrove District Council – Full Council** |
| Date Decision Made | **Redditch**<br>**Bromsgrove** |

**Please ensure the following:**

- That the document is understandable to a reader who has not read any other documents and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete.
- That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people

| Overview<br><br>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? |
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| This impact assessment considers the changes to the council's policy for reduction of council tax under Section 13A(1)(C) of the Local Government Finance Act 1992. The act gives the council power to reduce the amount of council tax payable on a case-by-case basis, or by defining a class of case where a reduction shall apply. The policy sets a framework for officers to determine applications for support.<br><br>In cases of where the taxpayer can demonstrate hardship a reduction of council tax will be made, or in specific types of cases e.g. where the Government has activated the flood recovery framework, officers will have discretion to apply appropriate discounts.<br><br>The policy is reviewed to include provision for reduction to be made where a person has a terminal illness.<br><br>The policy is broadly intended as a framework for officers to determine reductions for residents with vulnerabilities because of financial hardship, flooding, care leaver status, or terminal illness, and is intended to support vulnerable residents. |

| Who is the proposal likely to affect? | Yes | No |
| --- | --- | --- |
| All residents | ☒ | ☐ |
| Specific group(s) | ☒ | ☐ |
| All Council employees | ☐ | ☒ |
| Specific group(s) of employees | ☐ | ☒ |
| Other – Provide more details below | ☐ | ☒ |

| Details<br><br>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. |
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| Changes to the policy allow for support to be applied where a person has a terminal illness, and it is appropriate to provide support having regard to the financial position of the household. The change will principally be target at support for terminally ill residents. |

The policy provides a mechanism for support to be provided to household impacted by flooding events, and to provide support to young care leavers under the age of 25, and people experiencing financial hardship.

## 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.

Specific local datasets have been reviewed, including:

- **OHID Datasets:** OHID data provides information on mortality within the districts. Cancer remains a leading cause of death within the districts, and this coupled with national data that indicates 70% of deaths occur in hospital or home, provides insight that a significant proportion of people living with terminal illness will remain in their home and accruing a council tax liability.

- **Council Tax records** showing the number of households applying for discretionary hardship relief and the circumstances under which reductions have previously been granted. This provides insight into patterns of vulnerability linked to financial hardship.

- **Council Tax records for care leaver discount awards.** Identifying the number of young people aged under 25 who have benefited from discretionary discounts.

The data collectively demonstrates that the groups most likely to require support under Section 13A(1)(c) include

- Individuals with terminal illness (covered under disability)
- Young adults aged under 25 (care leavers)
- Low-income households
- Households affected by external events such as flooding, who are temporarily financially vulnerable

A gap has been identified in the availability of breakdowns by **race**, **sex**, and **religion**, as these are not routinely captured alongside Council Tax data. Further work will be undertaken to improve voluntary data collection to better understand differential impacts.

## Engagement and Consultation

| What engagement and consultation have you undertaken about the proposal with current service users, potential users and other stakeholders? What is important to them regarding the current service? How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)? Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs? |
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| While no formal public consultation was required for the discretionary relief framework, the following engagement informed the assessment:<br><br>• **Discussions with frontline Revenues staff**, who provided insight into the barriers residents face when applying for hardship relief, including digital exclusion, literacy challenges, and difficulties for terminally ill residents in completing forms.<br><br>• **Engagement with County Council**, on the adoption of discounts for care leavers<br><br>• **Review of previous applicants**, gathered through routine customer contact and complaints monitoring, which identified the need for clearer guidance.<br><br>The engagement emphasised the importance of:<br><br>• flexible, compassionate assessment processes;<br>• multiple routes for application (phone, online, assisted support); and<br>• timely decision-making for residents with deteriorating health.<br><br>This feedback has shaped proposed mitigations and monitoring plans. |

**Public Sector Equality Duty**

Due regard must be given to the three aims of the Equality Duty. This means that you must consciously think about the three aims as part of the process of decision-making.  Consider the current service and any proposed changes, thinking about what issues may arise.

| Equality Duty Aims | |
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| **Eliminate unlawful discrimination, harassment and victimisation**<br>How does the proposal/service ensure that there is no barrier or disproportionate impact for anyone with a particular protected characteristic | The policy provides a structured and transparent mechanism for assessing hardship-related reductions, ensuring consistent treatment across all protected groups. By explicitly including residents with terminal illness and care leavers, the policy seeks to remove barriers that these groups experience when engaging with statutory services. The discretionary nature of the policy enables officers to make reasonable adjustments, such as accepting third-party representation or fast-tracking applications for terminally ill residents |
| **Advance equality of opportunity between different groups**<br>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). | Residents with disabilities, long-term health conditions, or terminal illnesses are more likely to experience financial hardship.<br><br>The policy provides targeted support that directly addresses these inequalities. Care leavers, who are disproportionately young and often economically disadvantaged, also benefit from tailored relief. The policy therefore contributes to reducing financial inequality between vulnerable and non-vulnerable groups |
| **Foster good relations between different groups**<br>Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim? | No applicable |

**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?
- Does it affect some equality groups or communities differently and can this be justified?
- 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)

**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?

**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? |
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| Age | Positive impact for care leavers under 25 | LA has statutory parental responsibility for young care leavers, who may face known financial vulnerability; tailored support is appropriate. | |
| Disability | The policy is expected to have a significant positive impact on disabled people, particularly residents with terminal illnesses and long-term health conditions who may face increased living costs, reduced income and barriers to employment. | Policy explicitly includes terminally ill applicants and disabilities often correlate with financial hardship. | |

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| Transgender | No specific impacts identified | | |
| Marriage and Civil Partnership | No specific impacts identified | | |
| Pregnancy and Maternity | Potential minor positive impact through access to discretionary support where financial hardship arises. | | |
| Race | No specific impacts identified | | |
| Religion or Belief | No specific impacts identified | | |
| Sex (Male/ Female) | No specific impacts identified | | |
| Sexual Orientation | No specific impacts identified | | |

| How will you monitor any changes identified? |
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| Monitoring will include:<br><br>• quarterly analysis of Section 13A(1)(c) applications, approvals, refusals and reasons for refusal;<br>• identification of potential adverse impacts through complaint themes, staff feedback and case reviews;<br>• reviewing any applications from protected groups to identify barriers, delays, or unmet needs; |

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

| Action Required | By Whom | By When | Completion Date |
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| Monitor applications and report outcomes annually | Revenue Services Manager | March 2027 | |

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| Review policy after first year of operation | Revenue Services Manager | March 2027 | |
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| Sign off on completion | Name | Signature | Date |
|---|---|---|---|
| Lead Officer completing assessment | David Riley | | 1 November 2025 |
| Equality 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.**