



# Equality Analysis and Impact Assessment Tool

*Localisation of Council Tax Support Scheme*

## What is equality analysis?

Staff in the Care Trust Plus and the Council are responsible for making a wide range of decisions. This spans decisions about overarching policies and setting budgets to day-to-day decisions which affect specific individuals. Equality analysis is a way of considering the effect on different groups protected from discrimination by the Equality Act 2010, such as people of different ages.

There are two reasons for this:

- to consider if there are any unintended consequences for some groups
- to consider if the policy will be fully effective for all target groups.

The equality analysis and impact assessment involves using equality information, and the results of engagement with protected groups and others, to understand the actual effect or the potential effect of your functions, policies or decisions. It can help you to identify practical steps to tackle any negative effects or discrimination, to advance equality and to foster good relations.

Case law under the race, disability and gender equality duties established that equality impact assessments are an important way that public authorities can be sure that they are meeting their general duty legal obligations. Equality impact assessments should be completed **PRIOR** to a policy decision being made and should be clearly documented as they are a useful means for demonstrating compliance to a Court.

Like the previous duties, the new equality duty means taking a proportionate approach to equality analysis. This means taking an approach that is suitable to your size, resources and functions and to the importance of the policy to equality and good relations.

Under the new equality duty, public authorities such as the Care Trust Plus and Council need to be able to show that they have had **due regard** to the aims set out in the general equality duty:

- Aim 1** Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
- Aim 2** Advance equality of opportunity between people who share a protected characteristic and those who do not
- Aim 3** Foster good relations between people who share protected characteristics and those who do not

## What should be analysed?

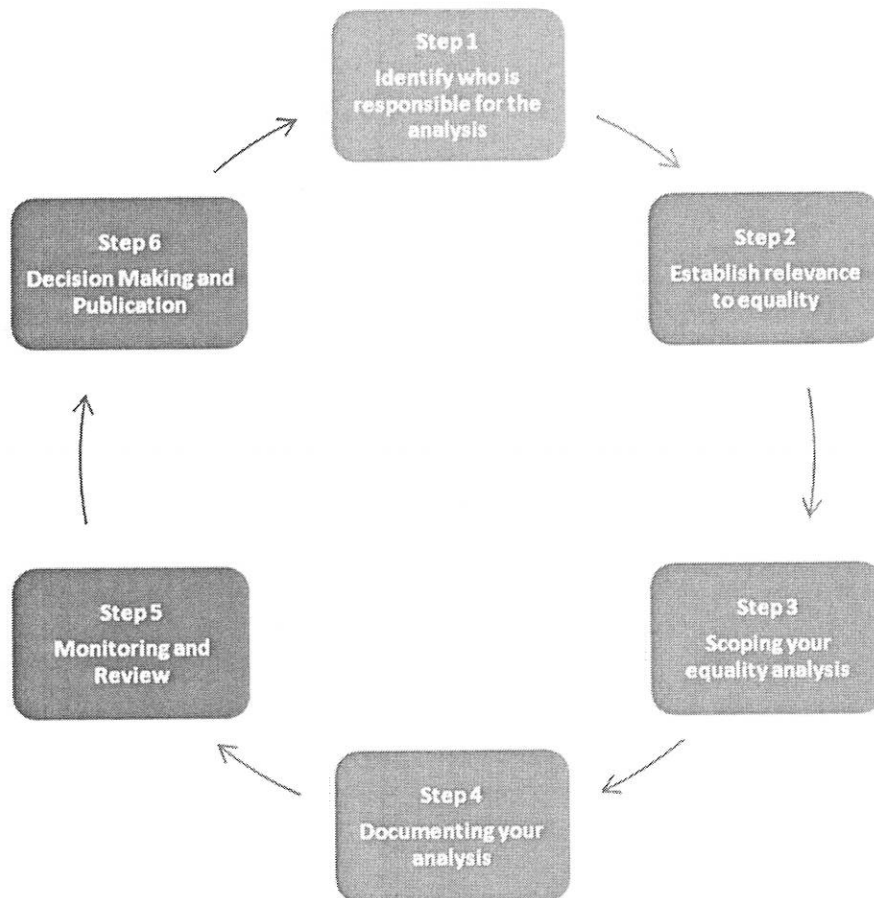
The term 'policy' is used throughout as shorthand for what needs to be analysed. Policy needs to be understood broadly to embrace the full range of your policies, practices, activities and decisions: essentially everything you do, whether it is formally written down or whether it is informal custom and practice. This includes your existing policies and any new policies under development. Any key policy decision that alters the service needs to have an equality impact assessment completed.

As employees of the Care Trust Plus and Council you will also need to analyse the effect on equality of how a policy is implemented by your organisation when it has originally been developed outside of your organisation. This could mean a policy or strategy developed by a government department e.g. Department of Health, Department of Education, Department of Work and Pensions, The Strategic Health Authority, a Local Authority, another NHS Trust which the Care Trust Plus is adopting or an executive agency.

This principle also applies when implementing a decision over which you have no direct control. For example, when implementing cuts to funding decided elsewhere, you will still be able to consider mitigating measures or alternative ways of doing things to minimise the impact on services and equality/protected groups. **(The Astraea Protocol set out on page 13 of the Guidance document is useful for this purpose).**

**Remember that having due regard across all of our functions may also involve analysing the effect on equality of a number of decisions that are made together, for example when conducting a major review of services, developing Commissioning Policies and Principles. This would mean ensuring that you have sufficient relevant information to understand the cumulative effect of all of these decisions.**

## Six Steps to carrying out Equality Analysis and Impact Assessment



### Steps 1 & 2 - Establish the relevance to equality and protected groups

- **Complete section 1** – ensure you consult the right people, identify how you have consulted with them and document which protected groups you have consulted with.
- **Complete Section 2** – identifying the aims and objectives of the analysis and assessment

### Step 3 - Scope your equality analysis and impact assessment

- **Identify what equality data is available** to support you and if there are any gaps e.g. service user data, demographic data, public health prevalence, workforce profiles, health needs assessments, complaints and comments, other equality analysis and impact assessment, judicial review findings etc.
- **Do your Human Rights Screening**
- **Consider community cohesion**



## Step 4 - Analysing your equality information

- **Complete section 3** – ensure you include and reference all the evidence you have considered as part of the analysis
- **Ask – what will happen, or not happen if we do things this way?**  
Remember that equality analysis is not just about identifying and removing any negative effects or discriminatory decisions or practice but is about demonstrating **DUE REGARD** to advancing equality of opportunity and fostering good relations.
- **Ensure your decision regarding the extent of the impact includes:**
  - i. how you arrived at that decision and
  - ii. how you have shown **DUE REGARD** to the equality duty aims

## Step 4 - Document the findings of the analysis

- **No change** – the analysis shows the policy is robust and evidence shows no potential for discrimination
- **Adjust the policy** – take steps to remove barriers or to better advance equality – **complete the action plan**
- **Continue the policy** – adopt your proposals despite any adverse effect or missed opportunities – **DOCUMENT the RISK ASSESSMENT** (CTP goes on risk register and to IGC for assurance. BwD Council goes to MAF, SMT and Corporate Equality & Diversity Group). **Complete the action plan.**
- **Stop and remove the policy** – the adverse effects and risk are not justified and cannot be mitigated.

## Step 5 - Monitoring and review – identify

- **How you will measure** the effects of the policy once it is implemented
- **When the policy will be reviewed** and what might trigger an earlier review e.g. policy change
- **Who will be responsible** for monitoring and reviewing the policy and the equality analysis action plan if in place
- **What type of information** is needed to undertake the monitoring and review and how often will it be analysed
- **How will you engage stakeholders** in implementing, monitoring and reviewing the policy?

## Step 6 - Decision making and publication

- a. **Borough Council** - Send your completed Impact Assessment to the Cohesion and Equalities Manager in line with corporate protocol which is available on the BwD Council's online Policy Hub
- b. **Care Trust Plus** – send your completed Impact Assessments to the Diversity and Equality Manager for Scrutiny in line with the Trust EIA Policy
- c. **Equality analysis** is on-going and should be carried out as part of the on-going policy review.
- d. **All analysis decisions should be published on the Trust/Council Website**

## Section 1: Details

Please provide as much information as possible

Manager or Sponsoring Directors Name:	Elizabeth Hall
Department/Directorate:	Finance
Service:	Revenues, Benefits and Customer Services
Assessment Lead:	Andrew Ormerod
Telephone:	07900 980739
E-mail:	Andrew.Ormerod@capita.co.uk
Who else will be involved in undertaking the equality analysis and impact assessment:	Jem Piper/Jodene Bibby
Who are you involving and consulting with?	<p>The local council tax benefit support scheme will be a new policy for the Council. In developing this new policy the Council must undertake public consultation and follow the recommendations contained within the DCLG Statement of Intent published in May 2012, and the Best Value Statutory Guidance (September 2011) and the Government's Code of Practice on Consultation. In reflection of the complexity of this matter, Public consultation across Blackburn with Darwen Borough Council took place over a period of 12 weeks ending 31<sup>st</sup> October 2012.</p> <p>The programme of consultation and engagement has been designed as part of the development of the scheme. The Council will use all of the channels open to it including direct communications, a survey, roadshows and bespoke briefing sessions for key stakeholders. Publicity will be co-ordinated to support all of the activity. All feedback will be taken into consideration as the scheme is finalised with a focus on mitigating negative impacts where possible. Upon the conclusion of consultation, the review period will be utilised to evaluate responses with a view to developing a final scheme which can be formally adopted by the Council.</p>

How are you consulting with people from different Protected Characteristics?	Consultation commenced on the 7 <sup>th</sup> August 2012. The demographics of the Borough have been reviewed, Consultation included:
--	---

	<ul style="list-style-type: none"> <li>• Mail shots to current CTB recipients, 10% Sample of Council Tax Payers and other representative groups and stakeholders.</li> <li>• Online information, including FAQ's and Questionnaire.</li> <li>• Paper questionnaire (where requested)</li> <li>• Road shows, venues including Blackburn and Darwen Town Halls, Children's Centres, Adult centres, Libraries and Mosques.</li> <li>• Member and Staff Briefings.</li> <li>• Ward Solution meetings/Work clubs</li> <li>• Adhoc completion of questionnaires following Customer contact.</li> </ul>			
Who does the policy or decision being made impact upon?	Service Users	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
	Carers or family	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
	General Public	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
	Staff	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
	Partner organisations	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Indirectly
Signature:	Date:			

## Section 2: What is being analysed and assessed?

**Name of 'activity': Localisation of Council Tax Support Scheme**

From April 2013, as part of the government's welfare reform agenda, Council Tax Benefit will be abolished and replaced with a locally determined Council Tax Support Scheme. Pensioners will continue to be protected at their existing levels of benefit under a national scheme whilst new schemes will be set up for Working Age customers at a Local Authority level. Under this system, it is billing authorities who will decide who is eligible to get support and the support will be awarded by way of a Section 13A Council Tax discount. The Government will provide cash limited grant equivalent to 90% of estimated Council Tax Benefit spending for 2013/14; Local Authorities will therefore have to manage a 10% reduction in funding in developing local Council Tax Support Schemes and will have to ensure that their scheme covers the impact of any future increase in Council Tax Support recipients.

Blackburn with Darwen Borough Council will need to operate under three major constraints:

1. The 10% cut in funding (which may in practice be higher if demand for support increases in the future).

2. The desire to protect vulnerable groups and the exhortation to do this by the Government (as set out in "Localising Support for Council Tax: Vulnerable people – key local authority duties" published by the Department of Communities and Local Government in May 2012).

3. The desire to incentivise work and not contradict the incentives to work in the forthcoming Universal Credit (as set out in "Localising Support for Council Tax: Taking work incentives into account" published by the Department of Communities and Local Government in May 2012).

The Government announced on the 12<sup>th</sup> October 2012 a Transitional grant scheme making available an additional £100m for one year to support local authorities in developing well-designed council tax support schemes and maintain positive incentives to work. Blackburn with Darwen share would be for £302,128 with Lancashire Police £35,627 and Lancashire Fire £15,125. The announcement was followed by the publication of the DCLG Transitional Grant scheme document and FAQ's on the 16<sup>th</sup> October 2012. The grant will be payable in March 2013 to those authorities who adopt schemes that comply with criteria set by Government to ensure that low Income households do not face an extensive increase in their council tax liability in 2013-14. This funding will enable councils to explore more sustainable approaches to managing the funding reduction that minimise the impact on vulnerable taxpayers. To qualify for a grant local authorities must adopt schemes which ensure that:

- **Those who would be entitled to 100% support under current council tax benefit arrangements pay between zero and no more than 8.5% of their net council tax liability;**
- **The taper rate does not increase above 25%;**
- **There is no sharp reduction in support for those entering work.**

Blackburn with Darwen must apply for the funding and provide a written indication that its scheme is compliant with the criteria set out above. This must be signed by the Section 151 Officer with the deadline for applications on Friday 15 February 2013.

Further details are set out in an FAQ document which accompanied the transitional grant scheme publication.

The Government announced on the 19<sup>th</sup> December 2012 the Revenue Support Grant settlement for 2013/14. The amount allocated for Council Tax Support for BwD is £12,747,890 allocated as follows:

- BwD £10,874,975
- Parishes £39,488
- Lancashire Fire £546,388 (for the County as a whole)
- Lancashire Police £1,287,039 \*calculated (for the County as a whole)

Council Tax Benefit Expenditure for 2012/13 is currently estimated at £14.3m – 14.6m, with Working Age Expenditure is estimated to be £9.1m – 9.2m.

The Government has stated (in the document on vulnerable people) that they do not intend to prescribe the protection that local authorities should provide for vulnerable groups other than pensioners. Rather the guidance reminds local authorities to have due regard to how their local scheme may impact on people based on the following:

- Age
- Disability
- Marriage and Civil Partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation
- Gender reassignment

- Vulnerable
- Deprived Communities
- Carers
- Others

The above guidance refers to specific legislation that local authorities should have due regard to when designing their local scheme. This includes:

- The Equality Act 2010 (particularly the Public Sector Equality Duty)
- The Child Poverty Act 2010 (duty to mitigate the effects of child poverty)
- The Housing Act 1996 (duty to prevent homelessness)

In addition, it advises that local authorities consider the impact under The Armed Forces covenant published in May 2011.

The local scheme will set out:

- the classes of person who are entitled to a reduction;
- the reductions which are to apply to those classes, and;
- the procedure by which a person may apply for a reduction.

The scheme must be formally adopted by Full Council and in place by 31<sup>st</sup> January 2013 or the Government default scheme will be imposed and the local authority will be required to find the 10% shortfall in funding itself.

#### **What do we want to achieve:**

A new framework to provide Council Tax support with the following objectives:

- Introduce a scheme similar to the current national scheme in terms of eligibility criteria to determine who will receive support;
- Introduce a scheme Support work incentives and in particular, avoid disincentives to move into work;
- Introduce a scheme which achieves the required savings and allows room for future take-up of the discount;
- Introduce a scheme which is cost effective to administer, and;
- Introduce a scheme where the impact can be assessed and future adjustments can be made.

#### **Who is the policy; service or function intended to help/benefit?**

Each billing authority in England must design a scheme specifying the reductions which are to apply to amounts of council tax support payable in respect of dwellings situated in its area by:

- Persons of working age whom the authority considers to be in financial need or
- Persons of working age in classes consisting of persons whom the authority considers to be, in general, in financial need

#### **Who are the main stakeholders/customers/communities of interest?**

- The Preceptors e.g. Lancashire Fire & Rescue Service, Lancashire Police Authority
- Any resident who is liable to pay Council Tax
- All Council Tax Benefit customers especially those of Working Age who are directly affected.

#### **Proposals considered:**

1. Do nothing
  - Accept the imposition of the Government Default Scheme, incurring the costs of this



- scheme, although this would be offset in year 1 due to the Transitional Grant scheme.
- Find the 10% reduction in funding through reduced spending in other areas. The default scheme is likely to be more generous than a scheme developed by the Council requiring savings > 10%.
  - Utilise technical amendments to Council Tax to offset some of the savings required
2. Continue with current level of support by adopting the Government Default scheme, incurring the costs of this scheme, although this would be offset in year 1 due to the Transitional Grant scheme.
    - Find the 10% reduction in funding through reduced spending in other areas. The default scheme is likely to be more generous than any scheme developed by the Council requiring savings > 10%.
    - Utilise technical amendments to Council Tax to offset some of the savings required.
  3. Develop a new Local Council Tax Support Scheme to fund the 10% reduction in funding in full, a range of options have been considered including:
    - Top slicing the award e.g. Council Tax Support is calculated on the same basis as the current Council Tax Benefit Scheme and following on from this calculation a reduction in the award will be made. The reduction will require to be 20% of the award for all (11586) Working Age claimants.
    - Calculating award based upon % of Maximum Eligible Council Tax (80%)
    - Capping awards at a certain Council Tax band i.e. Band B
    - Non-dependants e.g. increasing deductions, change to the bandings, tariff cap
    - Capital – tariff income increase or Capital limits.
    - Disregarded Income – examining what is taken into account in the calculation for support, Child Benefit/Disability Living Allowance/Maintenance/Sub-Tenants and Boarders Income.
    - Calculation of entitlement – amending tapers.
    - More options or a combination of options may also be considered
    - Have a work incentive in the form of a 4 week run on when someone starts working
    - Continue to have a local scheme for Working Age war veterans where 100% of their income from War Disablement Pension, War Widow's Pension and War Widower's Pension is disregarded
  4. Develop a new Local Council Tax Support Scheme to fund the 10% reduction in funding, but restrict any changes to ensure compliance with the terms of the Transitional Grant scheme.
    - Find the balance of funding through reduced spending in other areas or
    - Utilise technical amendments to Council Tax to offset some of the savings required.

The preferred option for the Council is 3) to develop a new Local Council Tax Support Scheme to fund the 10% reduction in funding in full, by:

- Top slicing the award e.g. Council Tax Support is calculated on the same basis as the current Council Tax Benefit Scheme and following on from this calculation a reduction in the award will be made. The reduction will require to be 20% of the award for all (11586) Working Age claimants.
- Include a work incentive based upon the current Council Tax Benefit Extended payment rules in the form of a 4 week run on when someone starts work following a period on Income Related Benefits.
- Continue to have a local scheme for Working Age war veterans where 100% of their income from War Disablement Pension, War Widow's Pension and War Widower's Pension is disregarded.



The Transitional Grant will not be claimed.

## Considering existing information and what this tells you:

### Existing Council Tax Benefit Scheme

The main Council Tax Benefit scheme is a means-tested benefit. There are different rules for Pensioners and Working Age claimants, in general the calculation is based on:

- Household
- Income - subject to certain disregards i.e. Disability Living Allowance is disregarded in the calculation of income.
- Capital (Savings) – Capital limits and tariff income.
- Non-dependants are taken into account – deductions are made from calculated benefit based upon Non-dependants income. Where the Claimant or partners are in receipt of Disability Living Allowance no deductions are made.
- Applicable amount calculated (what the government says a person or family needs to live on) which includes personal allowances and additional premiums depending upon circumstances i.e.. disability, lone parents, carers

Household Income is then compared to Applicable Amount.

If household income is the same or less than the Applicable Amount or the claimant or partner are in receipt of a passported benefit – full Council Tax Benefit is awarded (subject to Non-dependant deductions).

If household income is more than the Applicable Amount – they have 'excess income'. The excess income is multiplied by the taper (currently 20%) with the resulting amount deducted from the Maximum Council Tax Benefit. (Subject to Non-dependant deductions).

Alternative Maximum Council Tax Benefit (Second Adult Rebate) is to help those who would have received a discount if other people of 18 years or over were not living in their home - 'second adults'. Awards are based upon the income of the 'second adult':

Second Adult(s) receiving IS, JSA(IB) or PC	25%
Gross Income less than £144 per week	15%
Gross Income between £144 and £185.99 per week	7.5%
Gross Income above £186 per week	nil

### Data/Information:

The main performance information to assist in the design of the Council Tax Support scheme will be databases already held for the following purposes:

- Billing and Recovery of Council Tax
- Awarding Council Tax Benefit
- Census data including index of deprivation

To establish the affect of the preferred scheme on the current Council Tax Benefit caseload, the financial modelling tool supplied by Northgate (Revs & Bens software supplier) has been populated by data as at 31/12/2012. This data has then been manipulated to establish the no. of cases within the relevant client groups that are affected.

### Research or comparative information:

**Local authorities have clearly defined responsibilities** in relation to, and awareness of, the most vulnerable groups and individuals other than pensioners in their areas. This includes responsibilities

under:

- The **Child Poverty Act 2010**, which imposes a duty on local authorities to have regard to and address child poverty and their partners, to reduce and mitigate the effects of child poverty in their local areas
- The **Disabled Persons Act 1986**, and **Chronically Sick and Disabled Persons Act 1970**, which include a range of duties relating to the welfare needs of disabled people
- The **Housing Act 1996**, which gives local authorities a duty to prevent homelessness with special regard to vulnerable groups

**Local evidence: (refer to Draft Blackburn with Darwen Borough Poverty Strategy)**

### **Child Poverty**

Work by the Institute for Fiscal Studies identifies the types of children most and least likely to be in poverty (children from households with the very lowest incomes do not necessarily have the lowest living standards – the lowest standards are found in households with income around £100-200wk)

***The measure for Child Poverty is the proportion of children living in families which are either receiving means-tested benefits, or tax credits where the family has an income less than 60% of median income.***

### **Characteristics increasing the risk of poverty:**

- Being in a couple rather than a lone parent (if comparing workless couples to workless lone parents: or couples where one or both parents work to working lone parents)
- Having more children in the family
- Having a youngest child aged over 10
- Having adults who are self-employed (rather than employed)
- Having no working adults in the family
- For couples, having 1 worker (rather than 2)
- Having parents with low levels of education
- Being from a non-white ethnic group
- *Not* having a health problem

Blackburn with Darwen Borough has a population of approximately 140,000 of which just over 30.4% (40,000) is aged under 19 - this is the highest percentage of youth population within England and Wales.

- 30% of children in Blackburn with Darwen Borough live in poverty - the fourth highest percentage in the North West and No ward within the borough is free from children living in poverty
- Nationally, over two thirds of children living in poverty are in lone-parent households. In Blackburn with Darwen nearly half of children living in poverty live in two parent households. This reflects the local low wage economy, low skill-base and the higher proportion of one earner households, with one parent choosing to stay at home to look after the family.
- Nearly a fifth of Blackburn with Darwen working age resident's claims out of work benefits – 50% higher than the national average; and 20% higher than the regional. The proportion of these adults known to have children is also 50% higher than the national norm and a third higher than the average for the North West.
- Three quarters of children living in Blackburn with Darwen Borough live in families in receipt of either out of work or in-work benefits and for those working there has been a shift towards lower incomes and greater eligibility over the past 5 years.
- The number of children living in out of work families receiving child tax credit has stayed steady over the last four years (9,000 children in April 2010).
- The number of children living in families receiving higher levels of child tax credit has increased from 17,700 in 2004 to 20,900 in 2010.

- The number of children living in families receiving the minimum or low levels of child tax credit has decreased from 6,200 in 2004 to 4,500 in 2010.
- Large numbers of families in the borough have little cushioning in their lives to protect them from potential shocks liable to cascade them and their children into poverty.

Geographically, two clear trends emerge from Child Poverty Needs Analysis – firstly, the deprived White/UK heritage areas are becoming more deprived still and so are the deprived Asian heritage areas; and secondly, areas in Blackburn that are experiencing growth in their Asian heritage population having previously been mainly White/UK (principally areas in North Blackburn) have become more deprived on the IMD 2007 index than was previously the case in 2004.

Analysis of out of work and in work benefits, together with housing benefit (and housing) information indicates the following:

- There is a greater prevalence of low income families within the borough
- There is a shift to more families in receipt of lower income combinations of benefits
- The prevalence of families already in receipt of ‘in-work’ benefits suggests a considerable vulnerability to further economic shocks or downturns
- There is a relatively great dependence on the benefit system; and therefore
- Greater vulnerability to intended and unintended consequences deriving from changes in the rules and administration of the benefits system which is undergoing significant reform under the Welfare Reform Bill.
- Substantial numbers of families are experiencing the effects of poverty, in terms of living in poor quality housing and its associated health risks
- The employability process enables individuals into work but the threshold of minimum wage and low paid employment within the Borough is so great that even with both parents employed their combined income and outgoings is such that they are unable to lead a quality of life comparable to other higher earner working couples.

The current BwD Council Tax Benefit caseload is as follows:

<b>BLACKBURN WITH DARWEN BC</b>		
	<b>No. claimants</b>	<b>% caseload</b>
Total Council Tax Benefit caseload	18195	100%
Pensioners (Protected from changes)	6685	36.7%
Working Age (Passported)	7529	41.4%
Working Age (Other)	3981	21.9%

According to the Family Resources 2009/10 Survey data, of those nationally claiming CTB:

- 48% of households have at least 1 adult or child who is disabled
- 18% of households have at least 1 adult with caring responsibilities
- 17% of households have at least 1 adult requiring informal care

Within the BwD Borough of the Working Age population 29,300 are Economically inactive (34.7% of Working Age population), 9,400 are Long Term sick (11.1% of Working Age population), 9870 are receiving Employment and Support Allowance and Incapacity Benefits (11.7% of Working Age population), 1,370 are Disabled (1.3% of Working Age population) and 1790 are Carers claiming ‘key’ out of work benefits (1.8% of Working Age population).

The number of Council Tax Benefit claimants within BwD who are in receipt of carers or disability premium and not passported onto full Council Tax Benefit:

- 187 Working Age non-passported Council Tax Benefit claimants were in receipt of a carer’s premium.

- 897 Working Age non-passported Council Tax Benefit claimants were in receipt of a disability premium. (Disability Premium 578, Enhanced Disability Premium 152, Severe Disability Premium 132, Enhanced Disability Premium Dependents 35)

Since some of the passported claimants are also likely to be carers or receiving a disability premium this underestimates the total number that could be affected.

**Recommendations following change in service:**

The preferred option for the Council is a combination of some of the above, namely:

- Top slicing the award e.g. Council Tax Support is calculated on the same basis as the current Council Tax Benefit Scheme and following on from this calculation a reduction in the award will be made. The reduction will require to be 20% of the award for all (11586) Working Age claimants.
- Include a work incentive based upon the current Council Tax Benefit Extended payment rules in the form of a 4 week run on when someone starts work following a period on Income Related Benefits.
- Continue to have a local scheme for Working Age war veterans where 100% of their income from War Disablement Pension, War Widow's Pension and War Widower's Pension is disregarded.

The Transitional Grant will not be claimed.

# Appendix D Council Tax Support Scheme EIA final version

## Section 3: Equality Analysis and Impact Assessment

Does the 'activity' have the potential to:	Group	Positive (Y/N)	Negative (Y/N)	Don't know	Reasons for positive / negative impact – (Please include all evidence you have considered as part of your analysis)
<ul style="list-style-type: none"> <li>Have a <b>positive</b> impact (benefit) on any of the groups? <b>Explain how</b></li> <li>Have a <b>negative</b> impact / exclude / discriminate against any person or group? <b>Explain how this was identified? Evidence/ Consultation?</b></li> </ul> <p><b>Guidance</b></p> <p><i>Please refer to the guidance notes</i></p> <p><b>NB: Requires (existing or new) consultation with</b></p>	Age	Y	Y		<p><b>Older People of pension age</b></p> <p><b>Potential Impact</b> The Department for Communities and Local Government has stated that pensioners must receive the same level of support under the new scheme as they currently receive under the current Council Tax Benefit scheme. They will therefore be treated more favourably than other groups under the proposed changes.</p> <p>In BwD we currently have 6685 Council Tax Benefit recipients of pension age: 4658 are single (3085 female, 1572 male). Of those, 37 are lone parents (25 female, 12 male). In addition, we have 2027 couples; of those 83 have child dependents.</p> <p>Eligible 'pensioners' can be divided into the three groups below:</p> <p><b>Passported Claimants</b> Those in receipt of Pension Credit Guarantee Credit (4653)</p> <p>Pension Credit 'Guarantee Credit' acts as a passport to maximum Council Tax Benefit support. Pensioners apply to the Pension Service and if successful are prompted to apply for Council Tax Benefit. The Pension Service can take the claim on behalf of the local authority and will send an assessment direct to the relevant local authority.</p>



# Appendix D Council Tax Support Scheme EIA final version

<p><b>'relevant' people who are from these groups or who have knowledge insight into these groups.</b></p> <p><b>N.B. Marriage &amp; CP is only protected in terms of work-related activities NOT service provision (please refer to guidance notes)</b></p>					<p><b>Means-tested(Standard) Claimants</b>  <i>Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only (962)</i></p> <p>Pension Credit applicants may be awarded 'Savings Credit' only. This group are also prompted to apply for Council Tax Benefit, and if they do the Pension Service will send appropriate data to the relevant local authority that complete the means-testing applying nationally set rules.</p> <p><i>Other means-tested claimants (1070)</i></p> <p>Customers can also apply directly. Claimants who have attained the qualifying age for State Pension Credit are means-tested by the Local Authority on application, to determine eligibility for support. The exact amount of support needed will depend on a range of factors, such as age, income, capital, the personal circumstances of the individual and the Council Tax band their home falls into.</p> <p>There is traditionally a lower take up of Council Tax Benefit from pensioners, however, as pensioner support will be delivered through a national framework of criteria and allowances and will be a discount rather than a benefit, take up is likely to increase.</p> <p><b><u>Working Age Claimants</u></b></p> <p><b>Potential Impact</b>          People under pension age will be treated less favourably under the new support scheme than pensioners. In addition it is possible that some people in this group will be affected more because of the greater difficulties they may face in finding paid employment e.g. over the age of 55.</p>
--	--	--	--	--	---



## Appendix D Council Tax Support Scheme EIA final version

			<p>In BwD we currently have: 11510 Council Tax Benefit recipients of working age 6392(55.5%) female and 5118 (44.5%) male), split as follows:</p> <p>4652 who are single and of working age with no dependants, (1913 female, 2739 male) and this is further split into 274 under 25 and 4378 over 25.</p> <p>3194 are lone parents (2980 female, 214 male). 2256 Passported and 938 Means tested.</p> <p>3664 couples of working age, 944 have no child dependents, 2720 have child dependants. 1829 Passported and 1835 means tested</p> <p>'Working age' claimants can be divided into the two main groups below:</p> <p><b>Passported Claimants</b>          Those in receipt of Income related means tested benefits:              Income Support              Jobseekers Allowance (Income Based)              Employment and Support Allowance (Income Related)</p> <p>These benefits act as a passport to maximum Council Tax Benefit, subject to any applicable Non Dependant deductions. Applications to Council Tax Benefit are normally made via the Department for Work and Pensions Offices with the claims forwarded to the relevant Local Authority.</p> <p><b>Means-tested(Standard) Claimants</b>          Claimants apply directly to the Local Authority and are means-tested on</p>

# Appendix D Council Tax Support Scheme EIA final version

<p>application, to determine eligibility for support. The exact amount of support needed will depend on a range of factors, such as age, income, capital, the personal circumstances of the individual and the Council Tax band their home falls into. The Council will assess their income against the Applicable Amount (total of Personal Allowances and premiums allowable) that are set within the Council Tax Benefit Legislation and will also be subject to any applicable Non Dependant deductions.</p>					
<p><b><u>Single People of Working Age (under 25, No dependants)</u></b></p>					
<p><b>Potential Impact</b>          Under the current Council Tax Benefit scheme the system of applicable amounts differentiate between those under and over 25. Single Claimants who are under 25 are treated as having lower living costs than those aged 25 and over and as such have a lower personal allowance and therefore a lower applicable amount irrespective of whether they are disabled or carers. In addition, young single people may be more at risk of becoming homeless and/or there will be pressure on these people to return or remain in the family home.</p>					
<p>There is the potential that other current and planned Welfare Reforms in Housing Benefit will affect the same group of Working Age customers. BwD have 274 Claimants in this category. This can be further split into 232 passported and 42 means tested claimants.</p> <p><b><u>Example 1</u></b>          Single person aged under 25, receiving Jobseekers Allowance (Income Based) with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount):.</p>					

## Appendix D Council Tax Support Scheme EIA final version

<b>Current weekly income</b>	£56.25	Jobseekers Allowance (Income based)	£14.20	Council Tax Benefit so has no Council Tax to pay.																																																															
<b>Impact of proposed changes</b>	A 20% reduction in Council Tax Support would mean they would have to pay <b>£2.84</b> per week towards his Council Tax (Annual <b>£148.04</b> ) rather than nothing as at present. (5.05% of total income)																																																																		
<b>Example 2</b>	Single person aged under 25, claiming Jobseekers Allowance (Income Based) and working 5 hours at National Minimum Wage (£6.08); with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount);																																																																		
<b>Current weekly income</b>	£30.40	Earnings	£30.86	Jobseekers Allowance (Income Based)	£14.20	Council Tax Benefit so has no Council Tax to pay.																																																													
<b>Impact of proposed changes</b>	A 20% reduction in Council Tax Support would mean he would have to pay <b>£2.84</b> per week towards his Council Tax (Annual <b>£148.04</b> ) rather than none as at present. (4.63% of total income)																																																																		
<b>Example 3</b>	Single person aged under 25, working 20 hours at National Minimum Wage (£6.08); with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount);																																																																		

## Appendix D Council Tax Support Scheme EIA final version

					<p>£2.13 Council Tax Benefit so has <b>£12.07</b> Council Tax to pay (Annual <b>£629.36</b>).</p> <p><b>Impact of proposed changes</b>  A 20% reduction in Council Tax Support would mean he would have to pay <b>£12.50</b> per week towards his Council Tax (Annual <b>£651.53</b>) rather than <b>£12.07</b> as at present. (0.35% of total income)</p> <p><b><u>Single People of Working Age (over 25, No dependants)</u></b></p> <p>BwD have 4378 Claimants in this category. This can be further split into 3212 passported and 1166 means tested claimants.</p> <p><b><u>Example 1</u></b></p> <p><b><i>Passported</i></b>  Single person aged over 25, receiving Jobseekers Allowance (Income Based); with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount);</p> <p><b>Current weekly income</b>  £71.00 Jobseekers Allowance (Income based)  £14.20 Council Tax Benefit so has no Council Tax to pay.</p> <p><b>Impact of proposed changes</b>  A 20% reduction in Council Tax Support would mean he would have to pay <b>£2.84</b> per week towards his Council Tax (Annual <b>£148.04</b>) rather than nothing as at present. (4% of total income)</p> <p><b><u>Example 2</u></b></p> <p><b><i>Passported</i></b></p>
--	--	--	--	--	--

## Appendix D Council Tax Support Scheme EIA final version

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

## Appendix D Council Tax Support Scheme EIA final version

				<p><i>Tax Support and are based on current benefit rates that have applied since April 2012. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances. (note 1 below).</i></p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
		N	Disability	<p><b>Potential Impact</b></p> <p>The Department for Communities and Local Government has stated that pensioners must receive the same level of support under the new scheme as they currently receive under the current Council Tax Benefit scheme. They will therefore be treated more favourably than other groups under the proposed changes. Therefore the change to Council Tax support will affect those claimants of Working Age irrespective of whether they are disabled.</p> <p>However, Disabled claimants are eligible (dependant upon circumstances) to additional premiums and exemption from Non Dependant deductions within the current Council Tax Benefit calculation and to ensure disability groups are still protected we have included these key elements in the new scheme.</p>



## Appendix D Council Tax Support Scheme EIA final version

<p>The definition of disability used is based on entitlement to certain state benefits or to entitlement to a Council Tax disabled band reduction. This can reflect the circumstances of any member of the claimant's household.</p>					
<p>The relevant benefits/additions to benefit include:</p> <ul style="list-style-type: none"> <li>▪ Disability Living Allowance</li> <li>▪ Employment Support Allowance</li> <li>▪ Disability Premium</li> <li>▪ Severe Disability Premium</li> <li>▪ Enhanced Disability Premium</li> <li>▪ Disabled Child Premium</li> <li>▪ Disabled Earnings Disregard</li> <li>▪ Carers Allowance</li> <li>▪ War Disablement Pension</li> <li>▪ War Widows Pension</li> <li>▪ Council Tax Disability Reduction</li> </ul>					
<p>Nationally, 18% of households in receipt of Council Tax Benefit aged under 65 may have at least one adult or child who is disabled in the household.</p>					
<p>The number of Working Age Council Tax Benefit claimants within BwD who are in receipt of a disability premium and not passported onto full Council Tax Benefit is 897 (Disability Premium 578, Enhanced Disability Premium 152, Severe Disability Premium 132, Enhanced Disability Premium Dependents 35)</p>					
<p>Since some of the passported claimants are also likely to be receiving a disability premium this underestimates the total number that could be affected. It should be noted that the number of cases that would fall into</p>					

## Appendix D Council Tax Support Scheme EIA final version

					<p>this category cannot be ascertained, due to the limited amount of information required to be held on passported claims.</p> <p>It is possible that some people in this group will be affected less favourably because of the greater difficulties they may face in coping with the changes, for example by finding paid employment. This may result from their reduced capacity to work due to the nature of their disability and/or discrimination based on the perceptions of employers or the fact that the place of work has not been adapted to meet the needs of disabled people.</p> <p>Other welfare reforms may further impact on some members of this group and also some of the services that members of this group receive are being reduced under austerity measures.</p> <p>It should also be noted that in some cases (depending on the nature of the disability) there may be potential communication issues where information available in standard formats is not the best method of communicating with benefit recipients. This may cause greater difficulty in understanding their changed liability, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily with all the associated problems this can cause</p> <p>BwD's preferred option is a top slice i.e. maintaining the current benefit rules but reducing the level of council tax support, which will be fairer across the board.</p> <p>This would enable additional premiums to be allowed, disability benefits to continue to be disregarded and in some cases exemption from Non Dependant deductions in the calculation of Council Tax Support. However, someone with a disability would still have something to pay</p>
--	--	--	--	--	---

# Appendix D Council Tax Support Scheme EIA final version

					<p>under the new scheme.</p> <p><b>The examples below detail potential impact.</b></p> <p><b><u>Example 1</u></b></p> <p><b><i>Passported</i></b>          Single person aged 45, unable to work because of his disabilities; with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount); no savings.</p> <p><b>Current weekly income</b>          £157.35 Employment Support Allowance (Income-related)          £51.85 Disability Living Allowance (middle rate care component)          £54.05 Disability Living Allowance (higher rate mobility component)          £14.20 Council Tax Benefit so has no Council Tax to pay</p> <p><b>Impact of proposed changes</b>  <b>A 20% reduction in Council Tax Support would mean he would have to pay £2.84 per week towards his Council Tax rather than nothing as at present. (1.08% of total income)</b></p> <p><b><u>Example 2</u></b></p> <p><b><i>Passported</i></b>          Couple with no children, 1 disabled and 1 carer, with Council Tax of £18.93 per week (Band A property); no savings.</p> <p><b>Current weekly income</b>          £119.45 Income Support          £70.35 His Disability Living Allowance (higher rate care component)          £49.10 His Disability Living Allowance (higher rate mobility</p>
--	--	--	--	--	---

# Appendix D Council Tax Support Scheme EIA final version

	<p>component)            £58.45 Her Carers Allowance            £18.93 Council Tax Benefit so has nothing to pay towards the Council Tax.</p>	<p><b>Impact of proposed changes</b>            A 20% reduction in Council Tax Support would mean they would have to pay an extra <b>£3.79</b> per week towards their Council Tax, i.e. £197.39 annual total. (1.27% of total income)</p>	<p><i>The examples above show the impact of a 20% reduction in Council Tax Support and are based on current benefit rates that have applied since April 2012. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances. (note 1 below).</i></p>	<p>There will be no additional barriers for any groups of disabled people.</p>	<p><b>Access</b>            The new scheme will offer the same level of access to the service as there is within the current system of Council Tax Benefit, as follows:</p>	<ul style="list-style-type: none"> <li>• Face to face access</li> <li>• Telephone access</li> <li>• Home visit if required</li> </ul>	<p><b>Policy</b>            Disabled people will not be exempt from the proposed reduction for working age customers. The rationale behind this is:</p>
--	---	---	--	--	---	---	---

## Appendix D Council Tax Support Scheme EIA final version

					<ul style="list-style-type: none"> <li>• The new scheme will support people on a low income and is means tested. Disabled people receive additional income for disabilities that may or may not be disregarded; they will also receive additional premiums in the applicable amount calculation within the proposed means test.</li> <li>• Disability relief, which is a reduction in the amount of Council Tax payable, applies where adaptations have been made to a property to accommodate a disabled person. Exempting disability benefits from the proposed reduction would put those people at a further financial advantage</li> <li>• The new Council Tax Support Scheme must cost 10% less than the current system of Council Tax Benefit. The 10% saving would be unachievable if the income of disabled applicants was disregarded.</li> <li>• Disability Benefits are already disregarded in the current calculation of main Council Tax Benefit therefore issues of vulnerability have been addressed prior to our calculation.</li> </ul> <p><b>Severely Mentally Impaired</b></p> <p>Someone who has a severe mental disability or mental illness (however it is caused), which appears to be permanent, is said to be severely mentally impaired. They should also be entitled to one of the benefits listed below (or would have qualified for one of them if they had not already reached State Pension age).</p> <ul style="list-style-type: none"> <li>• Incapacity Benefit</li> <li>• Severe Disablement Allowance</li> <li>• Unemployment Supplement</li> <li>• Unemployment Allowance</li> <li>• Attendance Allowance</li> <li>• An increase in the rate of Disablement Pension</li> <li>• Constant Attendance Allowance</li> </ul>
--	--	--	--	--	---





# Appendix D Council Tax Support Scheme EIA final version

No. of children	No. of two parent Households	% of two parent Households
1	681	25.0%
2	804	29.6%
3	713	26.2%
4	363	13.3%
5	106	3.9%
6	32	1.2%
7	10	0.4%
8	9	0.3%
9	2	0.1%

**Example 1**

**Passported**  
 Couple with no children on Jobseekers Allowance (Income Based) with Council Tax of £18.93 per week (Band A property); no savings.

**Current weekly income**  
 £111.45 Jobseekers Allowance (Income Based)  
 £18.93 Council Tax Benefit so has no Council Tax to pay.

**Impact of proposed changes**

**A 20% reduction in Council Tax Support would mean they would have to pay £3.79 per week towards their Council Tax, (Annual £197.39) rather than none as at present. (3.40% of total income)**

**Example 2**

**Passported**

# Appendix D Council Tax Support Scheme EIA final version

<p>Couple with 1 child on Jobseekers Allowance (Income Based) and Child Tax Credit (CTC) with Council Tax of £18.93 per week (Band A property): no savings.</p>													<p>Couple with 1 child on Jobseekers Allowance (Income Based) and Child Tax Credit (CTC) with Council Tax of £18.93 per week (Band A property): no savings.</p>

## Appendix D Council Tax Support Scheme EIA final version

Tax (Annual £684.43)					<p><b>Impact of proposed changes</b></p> <p><b>A 20% reduction in Council Tax Support would mean they would have to pay an extra £1.16 per week towards their Council Tax (Annual £744.93). (0.30% of total income)</b></p> <p><i>The examples above show the impact of a 20% reduction in Council Tax Support and are based on current benefit rates that have applied since April 2012. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances. (note 1 below).</i></p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
					<p><b>Potential Impact</b></p> <p>The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of whether they are pregnant/recently given birth or not.</p> <p>In BwD we currently have 37 claims (0.3% of Working Age claims)</p>
				N	
			Y		Pregnancy and maternity

## Appendix D Council Tax Support Scheme EIA final version

	<p>include Statutory Maternity Pay/Statutory Maternity Allowance as income. This may not be representative, in some cases Statutory Maternity Pay will be input as earnings and passported claims with Statutory Maternity Pay cannot be identified.</p>														
	<p>Whilst at this moment we consider that this impact is unlikely to be disproportionately greater on households where a member is pregnant or recently given birth, we acknowledge that they may face greater difficulties in responding to the changes, for example by finding work.</p>														
	<p>The preferred option will be the fairest across the board. This would ensure that Child Benefit would continue to be disregarded in the calculation of Council Tax Support and additional child allowances may be added for any new children.</p>														
	<p><b>Example</b></p> <p><b>Means tested</b>          Couple with 1 child under 16, Claimant receiving ESA © and (s), Disability Living Allowance Care (Lower) and Disability Living Allowance Mobility (Lower), Partner receiving Statutory Maternity Pay, Working Tax Credit and Child Benefit with Council Tax of £18.93 per week (Band A property), no savings.</p> <p><b>Current weekly income</b></p> <table border="0"> <tr> <td>£34.05</td> <td>Employment and Support Allowance (Support component)</td> </tr> <tr> <td>£71.00</td> <td>Employment and Support Allowance (Contributions based)</td> </tr> <tr> <td>£20.55</td> <td>Disability Living Allowance Care (Lower)</td> </tr> <tr> <td>£20.55</td> <td>Disability Living Allowance Mobility (Lower)</td> </tr> <tr> <td>£140.69</td> <td>Statutory Maternity Pay</td> </tr> <tr> <td>£7.02</td> <td>Working Tax Credit</td> </tr> <tr> <td>£20.30</td> <td>Child Benefit</td> </tr> </table>	£34.05	Employment and Support Allowance (Support component)	£71.00	Employment and Support Allowance (Contributions based)	£20.55	Disability Living Allowance Care (Lower)	£20.55	Disability Living Allowance Mobility (Lower)	£140.69	Statutory Maternity Pay	£7.02	Working Tax Credit	£20.30	Child Benefit
£34.05	Employment and Support Allowance (Support component)														
£71.00	Employment and Support Allowance (Contributions based)														
£20.55	Disability Living Allowance Care (Lower)														
£20.55	Disability Living Allowance Mobility (Lower)														
£140.69	Statutory Maternity Pay														
£7.02	Working Tax Credit														
£20.30	Child Benefit														

## Appendix D Council Tax Support Scheme EIA final version

<p>£18.93 Council Tax Benefit so has no Council Tax to pay</p>				<p><b>Impact of proposed changes</b></p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay <b>£3.79</b> per week (Annual 197.39) towards their Council Tax. (1.20% of total income).</p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
	N	Y		<p><b>Potential Impact</b></p> <p>The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of race or ethnicity. In BwD the total population is 139,900 – White (76.7%), Mixed (1.4%), Asian or Asian British (20%), Black or Black British (1%), Chinese or other (0.9%). Within the CTB Caseload 19,062 (at the time of research) 4,774 (25%) were identified as South Asian.</p> <p>BwD has the highest percentage (23.2%) of Black or Minority ethnic population within the Lancashire area and it is made up of equally of Indian or Pakistani heritage.</p> <p>At the moment we consider that the impact is unlikely to be disproportionately greater on households of different ethnicity within the</p>
			Race	

## Appendix D Council Tax Support Scheme EIA final version

<p>working age group. There will be no difference in the way ethnic groups are treated under any new Council Tax Support scheme. However, some ethnic groups experience different levels of disadvantage and tend to be resident in deprived wards, therefore they may find it more difficult to cope with the changes. This may be because they face unofficial discrimination in the job market and possibly because of access to skills including language skills are limited in some cases.</p>		
<p>There may also be potential communication issues where English is not the benefit recipient's first language and where documents printed in Standard English is not the optimum method of communicating.</p>		
<p>Claimants whose first language is not English may have greater difficulty in understanding their changed level of Support, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily leading to the associated problems this can cause.</p>		
<p>During the consultation period road shows have been held in Higher Croft, Bangor Street, Shadsworth, Mill Hill, Audley and the Masjid e-sajadeen and Jaame Ghosia Mosques. In addition briefings were given to Community Officers to communicate to their relevant Ward Solutions meetings, Representative Groups were also consulted to further highlight the potential impact of this change.</p>		
<p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in</p>		



## Appendix D Council Tax Support Scheme EIA final version

				relation to the types of cases that may qualify.	
		N	Y		<p><b>Potential Impact</b></p> <p>The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of religion or belief. In BwD from the Census 2001 – Christian 63.3% Buddhist 0.1% Hindu 0.3% Jewish 0% (53) Muslim 19.4% Sikh 0.1% Other 0.1% No religion 8% Religion not stated 8.6% We do not however have any data regarding the religion or beliefs directly for Council Tax benefit recipients. We do not envisage this impact to be greater for people with particular religions or beliefs.</p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
Religion or belief		N	Y		<p><b>Potential Impact</b></p> <p>The latest available figures show that in BwD there are 7846 single people of working age in receipt of Council Tax Benefit. Of these: 4893 (62.4%) are female, and 2953 (37.6%) are male. Nationally the breakdown is 68% female and 32% male.</p> <p>Of the 4,893 single female recipients, 2980 (60.9%) are lone parents</p>
Sex		N	Y		



## Appendix D Council Tax Support Scheme EIA final version

			Y	<p><b>Potential Impact</b> The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of their sexual orientation. We have no data on the sexual orientation of Council Tax Benefit claimants locally and at this moment we consider that the impact is unlikely to be disproportionately greater on recipients with different sexual orientations.</p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
Sexual orientation	N		Y	<p><b>Potential Impact</b> The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of their gender identity. No information is collected on the gender reassignment status of CTB claimants. However, it is assumed that Transgender people experience higher levels of disadvantage and social/financial exclusion and therefore may face greater difficulties in responding to the changes, for example by finding work.</p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional</p>
Gender reassignment	N		Y	

## Appendix D Council Tax Support Scheme EIA final version

					<p>Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
<p>Vulnerable Groups</p>		<p>N</p>	<p>Y</p>		<p><b>Potential Impact</b></p> <p>The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit.</p> <p>The DCLG within the statement of intent and Localising Support for Council Tax – Vulnerable People documents identified the key Local Authority duties in relation to Vulnerable Groups. In particular, The Government has been clear that, in developing local council tax reduction schemes, vulnerable groups should be protected. The Government Response sets out the Government’s intention to put protection for applicants of state pension credit age on a statutory footing. It confirmed that the Government did not intend to prescribe the protection that local authorities should provide for other vulnerable groups, but would consider what guidance was needed to ensure local authorities were able to take into account existing duties in relation to vulnerable groups in designing their schemes.</p> <p>The guidance note is intended to address this requirement, helping practitioners to understand the statutory framework and develop approaches tailored to the needs of their particular communities. It covers the following duties:</p> <ul style="list-style-type: none"> <li>the public sector Equality Duty (<i>The Equality Act 2010</i>);</li> <li>the duty to mitigate effects of child poverty (<i>The Child Poverty Act 2010</i>); and</li> <li>the duty to prevent homelessness (<i>The Housing Act 1996</i>).</li> </ul>

## Appendix D Council Tax Support Scheme EIA final version

<p>The Council did consider the definition and the additional protection of Vulnerable Groups. However the proposed scheme will affect those claimants of Working Age irrespective of whether they are considered vulnerable (Disabled/Long Term Sick/Lone Parents). These groups of claimants are eligible (dependant upon circumstances) to additional premiums and in some cases exemptions from Non Dependant deductions within the current CTB calculation and to ensure they are still protected we have included these key elements in the new scheme.</p> <p>Disabled residents and Carers are discussed in there individual categories, however, Long Term Sickness and Lone Parents may also be considered vulnerable.</p>			
<p><b><u>Long Term Sickness</u></b></p> <p>In addition to Disabled Claimants, some Claimants who are eligible for disability premiums may be those that are classed as Long term sickness (i.e. no Disability Living Allowance payable)</p>			
<p>The number of Working Age Council Tax Benefit claimants within BwD who are in receipt of a disability premium and not passported onto full Council Tax Benefit is 897 (Disability Premium 578, Enhanced Disability Premium 152, Severe Disability Premium 132, Enhanced Disability Premium Dependents 35), the number that may be considered as Long Term Sick are 320.</p>			
<p>Since some of the passported claimants are also likely to be receiving a disability premium this underestimates the total number that could be affected.</p> <p>It is possible that some people in this group will be affected less favourably because of the greater difficulties they may face in coping</p>			

# Appendix D Council Tax Support Scheme EIA final version

<p>with the changes, for example by finding paid employment. This may result from their reduced capacity to work due to the nature of their illness and/or discrimination based on the perceptions of employers or the fact that the place of work has not been adapted to meet their needs.</p> <p>Other welfare reforms may further impact on some members of this group.</p> <p>It should also be noted that in some cases (depending on the nature of the illness) there may be potential communication issues where information available in standard formats is not the best method of communicating with benefit recipients. This may cause greater difficulty in understanding their changed liability, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily with all the associated problems this can cause</p>				
<p><b><u>Example 1</u></b></p> <p><b><u>Passported</u></b> Lone parent with 2 children aged 15 and 14, claiming Employment Support Allowance (Income Related) with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount), no savings.</p> <p><b>Current weekly income</b> £ 99.15 Employment Support Allowance (Income Related) £113.68 Child Tax Credit £33.70 Child Benefit £14.20 Council Tax Benefit so has no Council Tax to pay.</p>				





# Appendix D Council Tax Support Scheme EIA final version

and 938 means tested.

The number of children within Lone Parent households range from 1 through to 7.

No. of children	No. of Lone Parent Households	% of Lone Parent Households
1	1486	46.5
2	1021	32.0
3	458	14.3
4	169	5.3
5	41	1.3
6	18	0.6
7	1	0.0

National data does confirm that more women than men experience financial deprivation. In addition, because many more female claimants will be lone parents, they may be treated less favourably indirectly because lone parents may face greater difficulties in responding to the changes, including by finding work.

### Example 1

#### **Passported**

Lone parent with 1 child aged 3, not working and claiming Income Support with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount), no savings.

**Current weekly income**  
£71.00 Income Support

## Appendix D Council Tax Support Scheme EIA final version

			<p>£62.09 Child Tax Credit                  £20.30 Child Benefit                  £14.20 Council Tax Benefit so have no Council Tax to pay.</p> <p><b>Impact of proposed changes</b></p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay <b>£2.84</b> per week towards their Council Tax rather than nothing as at present. (1.85% of total income)</p> <p><b>Example 2</b></p> <p><b>Passported</b>                  Lone parent with 3 children all aged under 16, not working and claiming Income Support with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount), no savings.</p> <p><b>Current weekly income</b>                  £71.00 Income Support                  £165.27 Child Tax Credit                  £47.10 Child Benefit                  £14.20 Council Tax Benefit so have no Council Tax to pay.</p> <p><b>Impact of proposed changes</b></p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay <b>£2.84</b> per week towards their Council Tax rather than nothing as at present. (1% of total income)</p> <p><b>Example 3</b></p> <p><b>Means tested</b></p>

## Appendix D Council Tax Support Scheme EIA final version

	<p>Lone parent with 2 children all aged under 16, working and claiming Working Tax Credit with Council Tax of £14.20 per week (Band A property with the 25% Single Person Discount), no savings.</p>
	<p><b>Current weekly income</b>          £129.00 Earnings          £74.54 Working Tax Credit          £113.99 Child Tax Credit          £33.70 Child Benefit</p>
	<p>£3.75 Council Tax Benefit so has to pay £10.45 per week towards the Council Tax (Annual £544.89)</p>
	<p><b>Impact of proposed changes</b></p>
	<p>A 20% reduction in Council Tax Benefit would mean that they would have to pay <b>£11.20</b> per week (Annual 583.96) towards their Council Tax rather than £10.45 as at present. (0.21% of total income)</p>
	<p>In general, the higher number of dependant children the less % of total income is used to pay towards their Council Tax as a result of the change.</p>
	<p>The Single Person Discount of 25% is applied when there is only one adult living in the property; it is <u>not</u> means-tested.</p>
	<p><i>The examples above show the impact of a 20% reduction in Council Tax Support and are based on current benefit rates that have applied since April 2012. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances. (note 1 below).</i></p>

## Appendix D Council Tax Support Scheme EIA final version

					<p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>
Deprived Communities		N	Y		<p>The proposed scheme will have a negative impact on all working age people who currently receive CTB and transition to/claim Council Tax Support. Each Working Age claimant will receive 20% less support towards their Council Tax liability.</p> <p>The distribution of residents with live CTB claims throughout the borough mirrors the pattern of deprivation. Areas classified as, Asian Communities, Older Workers, Public Housing, Senior Communities, Younger Blue Collar are likely to see greater proportions of benefit claimants. Audley, Bastwell, Little Harwood, Queens Park and Shear Brow have the greatest concentration of CTB Claimants.</p> <p>The 2010 Indices of Deprivation (IMD 2010) ranks BwD 17<sup>th</sup> out of 326 local authorities in England (where 1 is the most deprived). 58% of BwD population live in 25% most deprived Lower Super Output Areas in the country. Most deprived Lower Super Output Areas are concentrated in the centre and north east corner of BwD and includes areas with the highest concentration of Black and Minority Ethnic (BME) residents. However, it is not confined to BME communities; Wensley Fold, Mill Hill, Shadsworth with Whitebirk are wards with high white populations. Regionally: BwD remains the 6th most deprived LA in 2010.</p>

## Appendix D Council Tax Support Scheme EIA final version

<p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>				
<p><b>Potential Impact</b></p> <p>The proposed scheme will have a negative impact on those carers of working age who are in receipt of Council Tax Benefit. Whilst this impact will also be experienced by others of working age also, it is acknowledged that some carers may be affected more because of the greater difficulties they may face in responding to the changes, for example by finding work.</p> <p>In the Working Age population of BwD – 1790 Carers claim 'key' out of work benefits (1.8% of Working Age population).</p> <p>The number of Working Age Council Tax Benefit claimants within BwD who are in receipt of carers premium and not passported onto full Council Tax Benefit is 187.</p> <p>Since some of the passported claimants are also likely to be carers this underestimates the total number that could be affected.</p> <p><b>Example</b></p> <p><b>Means tested</b></p>	Y	N	Carers	



## Appendix D Council Tax Support Scheme EIA final version

<p>Couple in their 40s with no children; Claimant receives Incapacity Benefit (Long term rate), Disability Living Allowance Care (Middle) and Disability Living Allowance Mobility (Higher), Partner receives Carers Allowance and earns 90.00 per week with Council Tax of £19.12 per week (Band A property) no savings.</p> <p><b>Current weekly income</b></p> <p>£90.00 Net earnings          £58.45 Carers Allowance          £105.44 Incapacity Benefit (Long Term)          £54.05 Disability Living Allowance Mobility          £51.85 Disability Living Allowance Care (Higher)          £9.80 Council Tax Benefit so has to pay £9.32 per week towards the Council Tax (Annual £485.87)</p> <p><b>Impact of proposed changes</b></p> <p><b>A 20% reduction in Council Tax Support would mean they would have to pay an extra £1.96 per week towards their Council Tax (Annual £588.06). (0.54% of total income)</b></p> <p><i>The example above show the impact of a 20% reduction in Council Tax Support and is based on current benefit rates that have applied since April 2012. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances. (note 1 below).</i></p> <p><b><u>Exceptional Hardship Fund</u></b></p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship</p>				
--	--	--	--	--

## Appendix D Council Tax Support Scheme EIA final version

<p>Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p>	<p><u>Child Poverty</u>  The DCLG within the 'Localising Support for Council Tax Vulnerable people – key local authority duties' document specifically mention the key duty to mitigate the affects of child poverty.</p> <p>The definition of Child Poverty is the percentage of children living in a household where the household income is below 60% of the median equivalised household income. In real terms this equates to £202 per week for single parent families / £288 per week for 2-parent households.</p> <p>In BwD 30% of children live in poverty. No ward is free from child poverty, with the highest concentration in Shadsworth with Whitebirk, Sudell, Wensley Fold and Audley The areas with highest proportions of children living in poverty are the most deprived in the borough.</p> <p>Nearly half of children living in poverty live in two parent households  Nearly a fifth of working age resident's claim out of work benefits, the proportion of these adults known to have children is 50% higher than the national norm.</p> <p>The proposed scheme will have a negative impact on all working age people who currently receive CTB and transition to/claim Council Tax Support. Each Working Age claimant will receive 20% less support</p>
<p>Other (please state)</p>	



## Appendix D Council Tax Support Scheme EIA final version

					<p>cases this will require special consideration, especially for those who have given the most such as those who are injured, disabled and bereaved as a result of service.</p> <p>Under the existing Council Tax Benefit Regulations, local authorities have been required to disregard the first £10 per week of War Pension Scheme and Armed Forces Compensation Scheme payments when assessing entitlement to council tax benefit. In addition, local authorities have discretion to top-up the disregard to the full amount, and have been encouraged to do so in line with Armed Forces Covenant Principles.</p> <p>BwD will continue to fully disregard War Pension Scheme and Armed Forces Compensation Scheme payments in line with the Armed Forces Covenant Principles.</p> <p>To mitigate the effects of the new scheme, the Exceptional Hardship Fund will be available to all Council Tax Support recipients where there is a shortfall between the amount of the Council Tax Support award and the Council Tax liability. The Council has a comprehensive Exceptional Hardship Policy which provides the necessary framework and guidance in relation to the types of cases that may qualify.</p> <p><b><u>Note 1</u></b></p> <p><i>Other relevant benefit changes that will apply from April 2013</i></p> <p><i>The changes to the Council Tax Benefit scheme will come in from April 2013. At the same time there will be other changes to the benefit and tax systems that may affect people in receipt of/potentially eligible for Council Tax support. The other changes include the following:</i></p>
--	--	--	--	--	---

## Appendix D Council Tax Support Scheme EIA final version

					<p>1. A total benefit cap will be introduced for people of working age. The cap is expected to be £350 for single people and £500 for couples and lone parents. The cap will <u>not</u> be applied to households eligible for Working Tax Credit (i.e. working over 16 hours per week) or who get certain disability benefits or War Widows/Widowers Pension.</p> <p>2. The maximum amounts allowed for Housing Benefit will increase only by the Consumer Price Index (CPI) so it is possible rents will increase to a level greater than that covered by Housing Benefit (in many cases rents are already above the level covered by Housing Benefit)</p> <p>3. People living in a local authority or housing association property may see their Housing Benefit reduced if they live in a property larger than they need, considering the size of their family. These size-related restrictions already apply to private sector rentals.</p> <p>4. Changes to Disability Living Allowance (Disability Living Allowance) will start to be phased in. This benefit will be replaced by a new benefit to be called the Personal Independence Payment. (PIP). Transfer to the new benefit will <u>not</u> be automatic.</p> <p>5. Income Tax changes – from April 2013 the under-65 tax free allowance will be increased from April 2013 to £9,205</p>	<p>If no negative impacts have been identified -please explain why</p>		<p><b>Guidance</b>  A lack of negative impacts must be justified with evidence and clear reasons. Highlight how the policy negates any possible negative impacts.</p>
--	--	--	--	--	---	--	--	---

## Appendix D Council Tax Support Scheme EIA final version

<p>Does the 'activity' raise any issues for <b>Community Cohesion</b>?</p> <p>Does the 'activity' contribute positively to <b>Community Cohesion</b>?</p>	<p>There is the potential for issues arising:</p> <ul style="list-style-type: none"> <li>• Increases in transience, as people move to more affordable accommodation.</li> <li>• An increase in people leaving Blackburn with Darwen to move to an area with a more generous Council Tax Support scheme.</li> <li>• An effect on families with older children e.g. if the scheme includes an increase in non-dependant deductions or a cap for non-dependants earning above a certain level, this may put pressure on older children to move out of the family home.</li> <li>• Working Age customers affected may feel aggrieved at the prescribed protected groups (Pensioners) and having to pay (pay more) Council Tax</li> <li>• Within some community groups there is traditionally a low take up because individuals either don't need support or don't like to claim benefit. To mitigate this, there will be a programme of marketing and communication which will include information targeted at hard to reach groups.</li> <li>• No groups or communities will be prevented from accessing the scheme.</li> </ul>	<p><b>Guidance</b> See the Guidance notes If the policy positively impacts some groups and negatively impacts or overlooks other sections of the community, what effect will this have on the relationship between these groups? How will you manage this relationship?</p> <p>If the policy will make a positive contribution to relations between sections of the community please outline them.</p>
<p>Does the 'activity' raise any issues in relation to Human Rights as set out in the <b>Human Rights Act 1998</b>?</p>	<p>No</p>	<p><b>Guidance</b> See the Guidance Notes It is important to note that if the decision removes or engages a persons absolute rights the policy/decision will need to be changed.</p>



## Appendix D Council Tax Support Scheme EIA final version

<p>What is the overall cost of implementing the 'activity'?</p>	<p><b>Cost &amp; Source(s) of funding</b>          The Council Tax Support project has a number of milestones that have incurred costs, including;          Consultation – printing and postage £5500          Software/System enhancements £62,500</p> <p>All of these costs have been met by the additional Government Grant.</p>	<p>Where it is a Limited or Qualified Right the decision needs to be proportional and legal.</p> <p><i>Input cost e.g. Financial investment, HR, to realise and achieve benefits of the activity</i></p> <p><i>Source – e.g. specific funding stream, pooled budget or mainstream budget</i></p>
<p>What are the benefits?</p> <p>What targets/indicators will be used to measure these?</p> <p><i>For example</i></p> <ul style="list-style-type: none"> <li>❖ <i>National Indicators</i></li> <li>❖ <i>Equality Framework - LA</i></li> <li>❖ <i>Local Indicators</i></li> <li>❖ <i>BVPI's</i></li> <li>❖ <i>EPIT – Equality Tool for NHS</i></li> </ul> <p><i>Care Quality Commission (CQC) Outcomes</i></p>	<p><b>Benefit</b>          New scheme designed and adopted as required by the Welfare Reform Act 2012 and Local Government Finance Act 1992 as amended.</p> <p>New Scheme adopted by 31<sup>st</sup> January 2013</p> <p>The Government's 10% saving requirement is fulfilled by the new scheme (estimated £1.6m -1.8m).</p> <p>The Government's requirements for Pensioner protection, additional Vulnerable Groups and work incentives to be considered have been satisfied.</p> <p>Scheme has referenced obligations under Child Poverty Act 2010, Disabled Persons Act 1979 and Housing Act 1996.</p>	<p><b>Indicator</b>          Scheme adopted by 31<sup>st</sup> January 2013          Scheme live on 1<sup>st</sup> April 2013.</p> <p>Default Scheme not imposed by Government</p> <p>Council Budget</p> <p>Scheme design</p> <p>Scheme design</p>

## Appendix D Council Tax Support Scheme EIA final version

<p>Impact Assessment Risk Score See Appendix 1</p>	<p><b>Score: 20</b> <b>Red Risk</b></p>	<p><b>Actions to minimise risk:</b> Localised Council Tax Support scheme Design and Implementation Project Plan</p> <p>Major Consultation exercise taking place for the period 7<sup>th</sup> August 2012 to 31<sup>st</sup> October 2012.</p> <p>Results of consultation and adopted scheme are communicated to all affected.</p> <p>Considerations for the inclusion of an Exceptional Hardship fund.</p> <p>The actions listed above will minimise the risk significantly and move the score to minor.</p>
<p>Action following analysis: <b><u>Guidance</u></b> <b>See page 4 above.</b> <b><i>It is important that the correct option is chosen depending on the findings of the analysis.</i></b> <b><i>The action plan</i></b></p>	<p><i>No major change in policy</i></p> <p><i>Adjust policy</i></p> <p><i>Continue policy</i></p>	<p><b>Continue activity due to Legislative requirements.</b></p>

## Appendix D Council Tax Support Scheme EIA final version

<p><b>and risk assessment must be completed as required.</b></p>	<p><i>Stop and reconsider policy</i></p>	
--	--	--

<b>Section 4: Action Plan</b>						
<b>What is the negative/adverse impact?</b>	<b>Risk Score</b>		<b>Actions required to reduce/eliminate the negative impact</b>	<b>Resources required* (see guidance note below)</b>	<b>Who will lead on action?</b>	<b>Target completion date</b>
	<b>Current</b>	<b>target</b>				
<p>Working Age – Scheme will affect all working age people who currently receive CTB and transition to the New Council Tax Support Scheme.</p>	20	10	<p>Define scheme to ensure that Government legislative requirements are met and ensure scheme is adopted by full council on or before 31<sup>st</sup> January 2013.</p>	Project Team	Liz Hall/Andy Ormerod	31/1/2013
<p>Working Age – Scheme will affect all working age people who currently receive CTB and transition to the New Council Tax Support Scheme.</p>	20	10	<p>Ensure a wide ranging and meaningful consultation is undertaken to include all potentially affected equality groups.</p>	Project Team	Liz Hall/Andy Ormerod	31/1/2013



## Appendix D Council Tax Support Scheme EIA final version

	20	10	Disabled claimants are eligible (dependant upon circumstances) to additional premiums and exemption from Non Dependant deductions within the current Council Tax Benefit calculation and to ensure disability groups are still protected include these key elements in the new scheme	Project Team	Liz Hall/Andy Ormerod	31/1/2013
Vulnerable Groups – Scheme will affect all working age people (including those within a defined Vulnerable Group) who currently receive CTB and transition to the New Council Tax Support Scheme						

\* 'resources required' is asking for a summary of the costs that are needed to implement the changes to mitigate the negative impacts identified.

## Section 5: Monitoring and Review

### Monitoring

The responsibility for establishing and maintaining the monitoring arrangements of the EIA action plan lies with the service completing the EIA. These arrangements should be built into the performance management framework.

The Impact Assessment action plan will also be visible at a corporate level through the scrutiny and sign off of the EIA summary by the Equality and Cohesion Manager.

Monitoring arrangements for Impact Assessments and there subsequent action plans will be achieved at a strategic level, through the Management Accountability Framework (MAF), carried out by all Heads of Service in the Borough Council and through the Strategic Equality and Diversity Group in the Care Trust Plus.

Please describe briefly, how the action plan will be monitored?

E.g.  
Via MAF,  
Monitored by departmental E&D group  
Strategic D&E Group – NHS

Localised Council Tax Support Scheme Project Board  
MAF

### Review

The responsibility for establishing and maintaining the review arrangements of the Impact Assessment and the action plan lies with the service completing the Impact Assessment.

Date of the next review of the Impact Assessment?

It should be reviewed at least every three years to meet legislative requirements

This Equalities Impact Assessment will be reviewed and updated on a quarterly basis.

How often will the EIA action plan be reviewed?

E.g. Quarterly as part of MAF or as part of D&E Strategy Group in NHS

Quarterly:

- 1) Throughout the life of the Localised Council Tax Support Scheme Project by the Project Board.
- 2) Following the implementation of the scheme on an ongoing basis.

Who will carry out this review?

Andrew Ormerod







**Blackburn with Darwen**  
Teaching Care Trust Plus

**Impact Assessment**

**Signature of Head of Service / Directorate Lead:**

**Signature of Diversity & Equality Manager:**

**Date Completed:**

**Date received:**

**Appendix I - Impact Assessment Risk Grading  
Impact (severity) score**

Score	Description	Example Descriptors
5	Catastrophic	<ul style="list-style-type: none"> <li>• Inability to deliver a number of corporate objectives</li> <li>• Major disruption to a number of critical services</li> <li>• Huge financial loss &gt;£500K</li> </ul>
4	Major	<ul style="list-style-type: none"> <li>• Inability to deliver one of the corporate objectives</li> <li>• Major disruption to important services</li> <li>• Major financial loss £100K – £500K</li> </ul>
3	Moderate	<ul style="list-style-type: none"> <li>• Severe problems in delivering corporate objectives</li> <li>• Significant disruption to important services</li> <li>• Moderate financial loss £25K – £100K</li> </ul>
2	Minor	<ul style="list-style-type: none"> <li>• Minor problems in delivering corporate objectives</li> <li>• Minor disruption to delivery of service</li> <li>• Some financial loss £10k – £25K</li> </ul>
1	Negligible	<ul style="list-style-type: none"> <li>• Minor problems in delivering corporate objectives</li> <li>• Very little disruption to normal service</li> <li>• Very little financial loss &lt;£10K</li> </ul>

## 2 – Likelihood score

Score	Description	Example Descriptors
5	Almost certain	<ul style="list-style-type: none"> <li>Happens frequently in the organisation</li> <li>Almost certain to occur in the next 12 months</li> </ul>
4	Likely	<ul style="list-style-type: none"> <li>Occurs at least annually</li> <li>There is a strong possibility that it will happen in the next 12 months</li> </ul>
3	Possible	<ul style="list-style-type: none"> <li>Occurs once a year in the organisation</li> <li>There is a possibility that it will occur in the future</li> </ul>
2	Unlikely	<ul style="list-style-type: none"> <li>Do not expect it to happen in the near future</li> <li>Has occurred in the past</li> </ul>
1	Very Unlikely	<ul style="list-style-type: none"> <li>Do not believe it will happen in the short / medium term</li> <li>Has never occurred in the past</li> </ul>

## Impact x Likelihood = Total risk score and rating

	IMPACT				
	Negligible 1	Minor 2	Moderate 3	Major 4	Catastrophic 5
Almost Certain 5	5	10	15	20	25
Likely 4	4	8	12	16	20
Possible 3	3	6	9	12	15
Unlikely 2	2	4	6	8	10
Very Unlikely 1	1	2	3	4	5