



Blackburn with Darwen **NHS**
Teaching Care Trust Plus

Equality Analysis and Impact Assessment Tool

Localisation of Council Tax Support Scheme

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.

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

- 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
- Care Trust Plus** – send your completed Impact Assessments to the Diversity and Equality Manager for Scrutiny in line with the Trust EIA Policy
- Equality analysis** is on-going and should be carried out as part of the on-going policy review.
- All analysis decisions should be published on the Trust/Council Website**

	<ul style="list-style-type: none"> • Mail shots to current CTB recipients, 10% Sample of Council Tax Payers and other representative groups and stakeholders. • Online information, including FAQ's and Questionnaire. • Paper questionnaire (where requested) • Road shows, venues including Blackburn and Darwen Town Halls, Children's Centres, Adult centres, Libraries and Mosques. • Member and Staff Briefings. • Ward Solution meetings/Work clubs • Adhoc completion of questionnaires following Customer contact. 			
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:

- 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 31st 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

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

- 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:

BLACKBURN WITH DARWEN BC	No. claimants	% caseload
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

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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"> Have a positive impact (benefit) on any of the groups? Explain how <ul style="list-style-type: none"> Have a negative impact / exclude / discriminate against any person or group? Explain how this was identified? Evidence/ Consultation? <u>Guidance</u> Please refer to the guidance notes NB: Requires (existing or new) 	Age	Y	Y		<p>Older People of pension age</p> <p>Potential Impact 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>Passported Claimants 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>

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				<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 style="padding-left: 40px;">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 style="padding-left: 40px;">3194 are lone parents (2980 female, 214 male). 2256 Passported and 938 Means tested.</p> <p style="padding-left: 40px;">3664 couples of working age, 944 have no child dependants, 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>Passported Claimants 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>Means-tested(Standard) Claimants Claimants apply directly to the Local Authority and are means-tested on</p>
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			<p>Current weekly income £56.25 Jobseekers Allowance (Income based) £14.20 Council Tax Benefit so has no Council Tax to pay.</p> <p>Impact of proposed changes A 20% reduction in Council Tax Support would mean they would have to pay £2.84 per week towards his Council Tax (Annual £148.04) rather than nothing as at present. (5.05% of total income)</p> <p>Example 2 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);.</p> <p>Current weekly income £30.40 Earnings £30.86 Jobseekers Allowance (Income Based) £14.20 Council Tax Benefit so has no Council Tax to pay.</p> <p>Impact of proposed changes A 20% reduction in Council Tax Support would mean he would have to pay £2.84 per week towards his Council Tax (Annual £148.04) rather than none as at present. (4.63% of total income)</p> <p>Example 3 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);.</p> <p>Current weekly income £121.60 Earnings</p>

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					<p>Passported Single person aged over 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);.</p> <p>Current weekly income £30.40 Earnings £45.60 Jobseekers Allowance (Income Based) £14.20 Council Tax Benefit so has no Council Tax to pay.</p> <p>Impact of proposed changes A 20% reduction in Council Tax Support would mean he would have to pay £2.84 per week towards his Council Tax (Annual £148.04) rather than none as at present. (3.74% of total income)</p> <p>Example 3</p> <p>Means Tested Single person aged over 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);.</p> <p>Current weekly income £121.60 Earnings £5.08 Council Tax Benefit so has £9.12 Council Tax to pay (Annual £475.54).</p> <p>Impact of proposed changes A 20% reduction in Council Tax Support would mean he would have to pay £10.14 per week towards his Council Tax (Annual £528.48) rather than £9.12 as at present. (0.83% of total income)</p>
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				<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"> ▪ Disability Living Allowance ▪ Employment Support Allowance ▪ Disability Premium ▪ Severe Disability Premium ▪ Enhanced Disability Premium ▪ Disabled Child Premium ▪ Disabled Earnings Disregard ▪ Carers Allowance ▪ War Disablement Pension ▪ War Widows Pension ▪ Council Tax Disability Reduction <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</p>
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<p>Dependant deductions in the calculation of Council Tax Support. However, someone with a disability would still have something to pay under the new scheme.</p> <p>The examples below detail potential impact.</p> <p><u>Example 1</u></p> <p><i>Passported</i> 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>Current weekly income £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>Impact of proposed changes 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)</p> <p><u>Example 2</u></p> <p><i>Passported</i> Couple with no children, 1 disabled and 1 carer, with Council Tax of £18.93 per week (Band A property); no savings.</p> <p>Current weekly income £119.45 Income Support</p>																																																																					

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					<p>Disabled people will not be exempt from the proposed reduction for working age customers. The rationale behind this is:</p> <ul style="list-style-type: none"> • 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. • 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 • 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. • 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. <p>Severely Mentally Impaired</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"> • Incapacity Benefit • Severe Disablement Allowance • Unemployment Supplement
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In BwD there are 3664 couples in receipt of Council Tax benefit who are of working age. Of these: 2720 have child dependents, and 944 had no child dependents. (1829 Passported and 1835 means tested).

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**)

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					<p>Current weekly income £172.65 Net earnings £ 65.23 Working Tax Credit £113.68 Child Tax Credit £33.70 Child Benefit £5.80 Council Tax Benefit so has to pay £13.13 towards the Council Tax (Annual £684.43)</p> <p>Impact of proposed changes</p> <p>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)</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><u>Exceptional Hardship Fund</u></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>
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						<p>£71.00 Employment and Support Allowance (Contributions based)</p> <p>£20.55 Disability Living Allowance Care (Lower)</p> <p>£20.55 Disability Living Allowance Mobility (Lower)</p> <p>£140.69 Statutory Maternity Pay</p> <p>£7.02 Working Tax Credit</p> <p>£20.30 Child Benefit</p> <p>£18.93 Council Tax Benefit so has no Council Tax to pay</p>
						<p>Impact of proposed changes</p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay £3.79 per week (Annual 197.39) towards their Council Tax. (1.20% of total income).</p>
						<p><u>Exceptional Hardship Fund</u></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>Potential Impact</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>Race</p>
						<p>N</p>
						<p>Y</p>

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					<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 relation to the types of cases that may qualify.</p>
<p>Religion or belief</p>		<p style="text-align: center;">N</p>	<p style="text-align: center;">Y</p>		<p>Potential Impact</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><u>Exceptional Hardship Fund</u></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>Potential Impact</p>

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					<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>
	N	Y	N	Y	<p>Potential Impact 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><u>Exceptional Hardship Fund</u></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	N	Y	<p>Potential Impact 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>

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				<p>the public sector Equality Duty (<i>The Equality Act 2010</i>);</p> <p>the duty to mitigate effects of child poverty (<i>The Child Poverty Act 2010</i>); and</p> <p>the duty to prevent homelessness (<i>The Housing Act 1996</i>).</p> <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><u>Long Term Sickness</u></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>
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	<p>Current weekly income £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> <p>Impact of proposed changes</p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay £2.84 per week (£148.09 Annually) towards their Council Tax rather than nothing as at present. (1.15% of total income)</p>
	<p>Example 2</p> <p>Means tested Couple with no children, Claimant receiving Incapacity Benefit and Partner receiving Earnings with Council Tax of £18.93 per week (Band A property), savings of £13,615.42.</p>
	<p>Current weekly income £99.15 Incapacity Benefit £100.60 Earnings £31.00 Tariff Income £7.72 Council Tax Benefit so has to pay £11.21 per week towards the Council Tax (Annual £584.47)</p> <p>Impact of proposed changes</p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay £12.75 per week (Annual 664.92) towards their Council Tax, a change of £1.54 per week (0.66% of total income).</p>

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						<p>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.</p> <p>Current weekly income £71.00 Income Support £62.09 Child Tax Credit £20.30 Child Benefit £14.20 Council Tax Benefit so have no Council Tax to pay.</p> <p>Impact of proposed changes</p> <p>A 20% reduction in Council Tax Benefit would mean that they would have to pay £2.84 per week towards their Council Tax rather than nothing as at present. (1.85% of total income)</p> <p>Example 2</p> <p>Passported 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>Current weekly income £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>Impact of proposed changes</p>
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<p>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).</p> <p><u>Exceptional Hardship Fund</u></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>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 17th out of 326</p>	Y	N	Deprived Communities	

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<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>Example</p> <p>Means tested</p> <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>Current weekly income</p> <p>£90.00 Net earnings</p> <p>£58.45 Carers Allowance</p> <p>£105.44 Incapacity Benefit (Long Term)</p> <p>£54.05 Disability Living Allowance Mobility</p> <p>£51.85 Disability Living Allowance Care (Higher)</p> <p>£9.80 Council Tax Benefit so has to pay £9.32 per week towards the Council Tax (Annual £485.87)</p>					
<p>Impact of proposed changes</p> <p>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)</p>					
<p><i>The example above show the impact of a 20% reduction in Council Tax</i></p>					

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													<p>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 towards their Council Tax liability.</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><u>Homelessness</u></p> <p>The DCLG within the 'Localising Support for Council Tax Vulnerable people – key local authority duties' document specifically mention the duty to prevent homelessness.</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>
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					<p><u>Note 1</u></p> <p><u>Other relevant benefit changes that will apply from April 2013</u></p> <p>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:</p> <ol style="list-style-type: none"> 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. 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) 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. 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.
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<p>Does the 'activity' raise any issues in relation to Human Rights as set out in the Human Rights Act 1998?</p>	<p>No</p>	<p>Guidance</p> <p>See the Guidance Notes</p> <p>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> <p>Where it is a Limited or Qualified Right the decision needs to be proportional and legal.</p>
<p>What is the overall cost of implementing the 'activity'?</p>	<p>Cost & Source(s) of funding</p> <p>The Council Tax Support project has a number of milestones that have incurred costs, including;</p> <p>Consultation – printing and postage £5500</p> <p>Software/System enhancements £62,500</p> <p>All of these costs have been met by the additional Government Grant.</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>For example National Indicators</p>	<p>Benefit</p> <p>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 31st 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,</p>	<p>Indicator</p> <p>Scheme adopted by 31st January 2013</p> <p>Scheme live on 1st April 2013.</p> <p>Default Scheme not imposed by Government</p> <p>Council Budget</p> <p>Scheme design</p>

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<p><u>Guidance</u></p> <p>See page 4 above.</p> <p><i>It is important that the correct option is chosen depending on the findings of the analysis.</i></p> <p><i>The action plan and risk assessment must be completed as required.</i></p>	Adjust policy	
	Continue policy	Continue activity due to Legislative requirements.
	Stop and reconsider policy	

Section 4: Action Plan						
What is the negative/adverse impact?	Risk Score		Actions required to reduce/eliminate the negative impact	Resources required* (see guidance note below)	Who will lead on action?	Target completion date
	Current	target				
Working Age – Scheme will affect all working age people who currently receive CTB and transition	20	10	Define scheme to ensure that Government legislative requirements are met and ensure scheme is adopted by	Project Team	Liz Hall/Andy Ormerod	31/1/2013

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<p>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</p>	20	10		<p>Exceptional Hardship Fund development for those claimants suffering genuine financial hardship.</p>	Project Team	Liz Hall/Andy Ormerod	31/1/2013
<p>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</p>	20	10		<p>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</p>	Project Team	Liz Hall/Andy Ormerod	31/1/2013

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

<p>References (websites, journals, reports etc)</p>	<p>CTS BwD Joint_Impact_Assessment_Tool_-_BwD_Council_.doc</p> <p>DCLG Documents:</p> <ul style="list-style-type: none"> a) Localising Support for Council Tax – A Statement of Intent b) Localising Support for Council Tax – Vulnerable People – key Local Authority duties c) Localising Support for Council Tax – Taking work incentives into account d) Localising Support for Council Tax – Funding arrangements consultation e) Localising Support for Council Tax – Q & A f) Local Government Finance Bill: Localising Support for Council Tax – updated impact assessment. g) Localising Support for Council tax – Transitional Grant scheme h) Localising Support for Council tax – Transitional Grant scheme FAQ's <p>These documents may be accessed on the following website: http://www.communities.gov.uk/localgovernment/localgovernmentfinance/counciltax/counciltaxsupport/</p> <p>Northgate CTS Financial Modelling Tool (Data @ 31st December 2012)</p> <p>BwD Council Tax Support Scheme document BwD Exceptional Hardship policy document BwD Consultation results report</p>
<p>Please identify additional sources of information you have accessed to complete the EIA.</p>	

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

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