Name of the activity being assessed	Policy amendments to the C	Policy amendments to the Council Tax Support Scheme							
Directorate / Department	Finance and Customer Services	Service	Revenues and Benefits	Assessment Author	Andy Ormerod				
Is this a new or existing activity?	☐ New ⊠ Existing	Responsi assessme	ble manager / director for the ent	Andy Ormerod – Head Louise Mattinson – Dire Customer Services					
Date EIA started	15/09/2018	Implemen	ntation date of the activity	04/03/2019					

SECTION 1 - ABOUT YOUR ACTIVITY

The Revenues and Benefits service constantly monitors the issues affecting claimants of Council Tax Support. In addition, a full review of the scheme has also been undertaken to highlight potential efficiencies and budget savings for the 2019/20 financial year.

Since the roll out of Universal Credit it has become evident that the number of changes in circumstances issued by the DWP has increased significantly, this in turn has had a direct impact on Council Tax Support scheme and the amount recipients receive.

How was the need for this activity identified? i.e. Why are we doing this activity?

This impact has been reviewed and modelled for the 2019/20 financial year. It is apparent that unless changes are made to the scheme the increased number of changes in circumstances will result in higher volumes of bills and correspondence being issued to customers, which could lead to confusion for customers due to the reissue of bills on one or more occasions; this will in turn increase the costs of administrating the scheme and it is expected that this will impact on Council Tax collection rates.

The review undertaken for 2019/20 highlighted a number of areas that would simplify the scheme and assist the councils need for budget savings to be made, these include:

- The introduction of a tolerance level that would ignore changes of circumstance until a threshold figure is attained (proposed £2 per week)
- Introduction of a single non-dependent deduction;
- Band cap (proposed cap at band B);
- Minimum income level for self-employed; and,
- Abolition of 2nd adult rebate

☐ Decommissioning

☐ Commissioning

☐ New activity

☐ Other [please state here]

2

Version 2.3

apportioned.

Type of activity

☐ Budget changes

□ Change to existing activity

What resources will support in Please identify additional sources					ls; legislation etc.		
The equality analysis and impact a Customer Services department.	assessment will be undert	aken from	existing resour	ces within the Reve	enues and Benefits s	ervice and the wi	der Finance and
Who are you consulting with? F	low are you consulting v	with them?	(Please insert	t any information a	round surveys and co	onsultations unde	rtaken)
Consultation commenced on the 3	rd September 2018.						
Consultation included:							
 Mail shots to a percentage of Emails/mailshots to volunta Online survey (including info Paper questionnaire (where Member and Staff Briefings Internal Teamtalk article Request for completion of a The demographics of the Borough A weekly review of the demographic	ry sector organisations ormation explaining the sole requested) a questionnaire following Chave also been reviewed	cheme and Customer co	ontact – face to endix A at the e	end of this form.	telephone.		
	Service users	⊠ Yes	□ No	☐ Indirectly			
Who does the activity impact	Members of staff		□ No	☐ Indirectly			
upon?*	General public		□ No	☐ Indirectly			
apo	Carers or families		□ No	☐ Indirectly			
	Partner organisations		□ No	☐ Indirectly			
Does the activity impact		☐ Age	☐ Disability	☐ Gender	☐ Marriage &	☐ Pregnancy	☐ Vulnerable
positively or negatively on	Positive impact			reassignment	Civil Partnership	& maternity	groups
any of the protected	1 contro impact	☐ Race	☐ Religion	□ Sex	☐ Sexual	☐ Deprived	☐ Carers
characteristics as stated			or belief		orientation	communities	
within the Equality Act (2010)?*		⊠ Age	□ Disability	⊠ Gender		⊠ Pregnancy	
(2010):	Negative impact	J =	✓ Dolinion	reassignment	Civil Partnership ⊠ Sexual	& maternity	groups
The groups in blue are not		⊠ Race	⊠ Religion or belief	⊠ Sex	orientation	□ Deprived communities	

Blackburn with Darwen Borough Council

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protected characteristics	No impact	□ Age	☐ Disability	☐ Gender	☐ Marriage &	☐ Pregnancy	☐ Vulnerable
(please refer to p. 3 of the		□ Age		reassignment	Civil Partnership	& maternity	groups
guidance notes)		III Race I	☐ Religion	□ Sex	☐ Sexual	□ Deprived	Cororo
			or belief		orientation	communities	☐ Carers

^{*}If no impact is identified on any of the protected characteristics a full EIA may not be required. Please contact your departmental Corporate Equality & Diversity representative for further information.

the Equality Act 2010.

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Does the activity contribute towa A public authority must have '					fer to p.3 of the guidance for more information		
DUTY		DOES THE ACTI	DOES THE ACTIVITY MEET THIS DUTY? EXPLAIN				
Eliminate unlawful discrimination victimisation and other conduct process (i.e. the activity removes or minimis suffered by people due to their protests)	orohibited by the Act es disadvantages		As indicated throughout the EIA the changes to the Council Tax Support scheme do not specifically target or impact any of equality groups.				
Advance equality of opportunity share a protected characteristic a (i.e. the activity takes steps to meet from protected groups where these needs of other people)	and those who do not the needs of people	_	The changes to the Council Tax Support scheme do not affect the opportunity of protected or non-protected groups.				
Foster good relations between per protected characteristic and those function encourages people from proparticipate in public life or in other a participation is disproportionately lo		The changes to the Council Tax Support scheme do not affect the relationships between protected and non-protected groups.					
ASSESSMENT	s a full EIA required?	⊠ Yes	□ No				
Please explain how you have reach negates or mitigates any possible n		ck of negative impac	ts must be justified	with evidence	e and clear reasons, highlight how the activity		
The changes proposed to the Coun	cil Tax Support scheme v	will adversely impac	t all equality groups,	as a conseq	uence, a full EIA is deemed to be required.		
Author Signature	Dane			Date	22/10/2018		
Head of Service/Director Signatu	re /			Date	02/11/2018		
The above signatures signify accep	tance of the ownership o	f the Initial EIA and	the responsibility to	publish the co	ompleted Initial EIA as per the requirements of		

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Departmental E&D Lead Signature		Date	Click here to enter a date.
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FULL EQUALITY IMPACT ASSESSMENT

SECTION 3 – ANALYSIS OF IMPACT

Does the activity have the **potential** to:

- positively impact (benefit) any of the groups?
- **negatively** impact/exclude/discriminate against any group?
- disproportionately impact any of the groups?

Explain how this was identified – through evidence/consultation.

Any negative impacts that are identified within the analysis need to be captured within the action plan in Section 4

N.B. Marriage & Civil Partnership is only a protected characteristic in terms of work-related activities and NOT service provision

Characteristic	Positive	Negative	Don't know	Reasons for positive and/or negative impact Please include all the evidence you have considered as part of your analysis	Action No.
Age				The Department for Communities and Local Government did state in 2012 that pensioners must continue to receive statutory assessed amounts of Council Tax Support and are therefore not affected by these changes. In BwD we currently have 10,708 working age claims within the borough and 5,118 pensioner claims. (Figures obtained from the Northgate system as at July 2018) The changes to the scheme do not differentiate between ages and therefore can affect any age group (with the exception of pensioners). Further detail on the age profile of the borough is detailed in Appendix A.	1,2,3,5
Disability				The changes to Council Tax support will affect those claimants of Working Age irrespective of whether they are disabled. However, disabled claimants are eligible to additional premiums within the Council Tax Support scheme which does in turn provide some protection. The definition of disability that is 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. The relevant benefits/additions to benefit include:	1,2,3,4, 5

- 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

The number of Working Age Council Tax Support claimants within BwD who are in receipt of a disability premium and not passported onto full Council Tax Benefit is 3,444 (Disability Premium, Enhanced Disability Premium, Severe Disability Premium and Enhanced Disability Premium Dependents).

In respect of the specific changes to the policy, 224 disabled claims would be affected by the band cap, and 62 disabled claims by the self-employed change.

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 this category cannot be ascertained, due to the limited amount of information that the Council is required to hold on passported claims.

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.

Other welfare reforms may further impact on some members of this group, as will reductions in some of the services that members of this group receive under the Government's austerity measures.

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 a change in liability. This may lead some individuals to fall into arrears more easily.

A number of the changes do specifically affect disabled cases, these include, the introduction of Non-dependent deductions where the claimant or partner is in receipt of PiP,

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				DLA or Attendance Allowance. Currently, claimants (or partners) who are in receipt of DLA (care component), PiP, or Attendance Allowance are exempt from non-dependent deductions. Under the changes this provision will be removed and the non-dependents will be expected to contribute to the additional costs. Clearly, in some cases this may not happen, and as a consequence, the disabled recipient of Council Tax Support may be worse off. The change proposed for the self-employed and the introduction of the minimum income level was discussed widely with the Executive Member for Resources. These discussion highlighted the possible impact on the disabled, and as a consequence it was agreed that the 35 hour per week calculation would not be imposed on disabled recipients if they were unable to work full time. In such circumstances, the working hours would be reduced to 20 hours per week. Disabled Pensioners will unaffected by these changes.	
Gender reassignment				The changes to the scheme do not differentiate between those who may be included in the term gender reassignment. All working age claimants will be affected by the proposed changes. It is not possible to identify the number of gender reassignment claimants of Council Tax Support within the borough. Pensioners who may come under the term gender reassignment will unaffected by these changes.	1,2,3,5
Marriage & Civil Partnership				The changes to the scheme do not differentiate between those who are married or have a civil partnership. All working age claimants will be affected by the proposed changes Married couple and civil partnerships are recognised equally in the current Council Tax Support scheme as are people living together as if they are in such legal partnerships. Pensioners who may be married or have a civil partnership will be unaffected by these changes.	1,2,3,5
Pregnancy & Maternity			\boxtimes	The changes to the scheme do not differentiate between those who are pregnant or on maternity leave.	1,2,3,5

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			For Council Tax Support recipients that are pregnant, self-employed and not able to work the full week (due to illness), they will be able to apply for the Discretionary award. Any self-employed claimant that is on maternity leave will have their circumstances amended to state maternity allowance and be reassessed for Council Tax Support.	
Race			The proposed scheme changes will have an impact on all working age claimants irrespective of race. At the moment we consider that the impact is unlikely to be disproportionately greater on households of different ethnicity within the working age group. There will be no difference in the way ethnic groups are treated under the changes. 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 due to lower skills, including limited language skills in some cases. 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. Claimants whose first language is not English may have greater difficulty in understanding their changed level of Support. According to the 2011 census, within Blackburn with Darwen 66% of people identified themselves as White British, 28% as Asian / Asian British and 0.6% Black/African/Caribbean/Black British. Unfortunately, we do not have any data regarding race directly for Council Tax support recipients. However, we do not envisage this impact to be greater for people with a particular race.	1,2,3,5
Religion or Belief			The proposed changes will have an impact on all working age claimants regardless of religion or belief. In BwD from the Census 2011 – Christian 52.6% Buddhist 0.2% Hindu 0.4% Jewish 0% Muslim 27% Sikh 0.1% Other 0.2% No religion 13.8% Religion not stated 5.6%. Unfortunately, we do not have any data regarding the religion or beliefs directly for Council Tax support recipients. However, we do not envisage this impact to be greater for people with particular religions or beliefs.	1,2,3,5

			Аррения	
Sex			The proposed changes will have an impact on all working age claimants regardless of gender. Unfortunately, the Council Tax Support scheme does not have complete data in respect of gender as not all claims have recorded the title of a claimant and partner. The only data available on gender is from the ONS 2017. Please see appendix A for the detail.	1,2,3,5
Sexual orientation		×	The proposed scheme will have an impact on all working age, single people and couples who are recipients of Council Tax Benefit regardless of their sexual orientation. Unfortunately, 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.	1,2,3,5
Vulnerable Groups			The proposed changes to the scheme will have an impact on all working age single people and couples who are recipients of Council Tax Support. The DCLG within the statement of intent and Localising Support for Council Tax — Vulnerable People documents (2012) identified the key Local Authority duties in relation to Vulnerable Groups. In particular, the Government asked local council tax support schemes to protect, where possible, lone parents and disabled groups. The Council did consider the information supplied by the Government in respect of Vulnerable Groups. However the proposed scheme changes will affect those claimants of Working Age irrespective of whether they are considered vulnerable (Disabled/Long Term Sick/Lone Parents). Additional premiums will still be in place for certain claimants (dependent upon circumstances). The change proposed for the self-employed, and the introduction of the minimum income level, was discussed widely with the Executive Member for Resources. These discussion highlighted the possible impact on those who may be parents with carer responsibilities, or disabled. It was agreed that the 35 hour per week calculation would not be imposed on those recipients if they were unable to work full time due to carer responsibilities or disability. In such circumstances, the working hours would be reduced to 20 hours per week.	1,2,3,4,

		is as follows: Changes to self-employed income levels - 62 claims affected Changes to non-dependent deductions – 895 claims affected Introduction of a band cap – 224 claims affected For those carer claims, it is estimated that they will be affected in the following way: Changes to self-employed income levels - 47 claims affected Changes to non-dependent deductions – 523 claims affected Introduction of a band cap – 145 claims affected (Figures extracted from the Northgate system on 17th September 2018).	
Deprived Communities		The distribution of residents with live Council Tax Support claims throughout the borough mirrors the pattern of deprivation. Areas with social and private rented properties, are likely to see greater proportions of support claimants. Audley, Bastwell, Little Harwood, Queens Park and Shear Brow have the greatest concentration of Council Tax Support claimants. The 2015 Indices of Deprivation (IMD 2010) ranks BwD 12 th out of 326 local authorities in England (where 1 is the most deprived). (<i>Local authorities are ranked on the proportion of neighbourhoods in the most deprived 10 per cent nationally</i>).	1,2,3,5
Carers		The proposed scheme will have an impact on those carers of working age who are in receipt of Council Tax Support. 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. Since some of the passported claimants may also be carers, the total number above may be underestimated. The change proposed for the self-employed and the introduction of the minimum income level was discussed widely with the Executive Member for Resources. These discussion highlighted the possible impact on those who may be parents with carer responsibilities. It was agreed that the 35 hour per week calculation would not be imposed on those recipients if they were unable to work full time due to carer responsibilities. In such circumstances, the working hours would be reduced to 20 hours per week.	1,2,3,4, 5
Additional Equalities group added	\boxtimes	Following the localisation of the Council Tax Support scheme, the government included reference to vulnerable groups a reference to those on long term sickness. An additional	1,2,3,4, 5

Diackbuill With Darwell Do	nough count	C11		Appendix C	
Long Term Sick				equalities section has therefore been included for long term sickness cases. House owners or tenants of properties who are considered to be long term sick would be more likely to have applied for, and be in receipt of welfare (which could include Council Tax Support).	
Additional Equalities group added Lone Parents			\boxtimes	Following the localisation of the Council Tax Support scheme, the government included reference to vulnerable groups and specifically Lone Parents. An additional equalities section has therefore been included for lone parent cases.	

Does the activity raise any issues for community cohesion? Does the activity contribute positively towards community cohesion?	 All teams within the Revenues and Benefits service, including customer services promote take up at every opportunity however there is the potential for issues to arise which include: The effect on families with older children e.g. some claims will have an increase in the non-dependant deductions, this may put pressure on older children to move out of the family home. Larger families in large properties may have increased council tax to pay, this may result in families wishing to move to smaller properties. Asian heritage families tend to have large families and may be disproportionally affected by the band cap change.
Does the activity raise any issues in relation to human rights as set out in the Human Rights Act 1998? Details of which can be found here	No.
Does the activity support / aggravate existing departmental and/or corporate risk?	The changes do increase the overall Council Tax collectable debit which will need to be collected. This will inevitably result in additional work, including customer contact. This additional pressure will need to be considered and resourced to prevent further issues within the service.

CONCLUSIONS OF THE ANALYSIS

Action following completion of the impact assessment					
It is important that the correct option is The action plan must be completed as		ings of the analysis.			
$\hfill \square$ No major change in the activity	☐ Adjust activity	□ Continue with activity	☐ Stop and reconsider activity		
Please explain how you have reache	d your conclusion				
it is felt that the proposed changes still	need to be made to. The driver dministration and a reduction in	Director of Finance and Customer Services a rs for the proposed changes are still valid and the cost to the council. During the consultation			
include:	5 5	of Council Tax Support, a number of mitigation	ons have been considered and agreed. These		
 The extending a Discretionary I 					

• An exception to the self-employed minimum income level – whereby those will carer responsibilities and disabilities which prevent them from working full time will have the calculation reduced to 20hrs.

ACTION PLAN

Action No.	What is the negative / adverse impact identified?	Actions required to reduce / mitigate / eliminate the negative impact	Resources required	Responsible officer(s)	Target completion date
1	A failure of the communication of the changes.	Ensure a wide ranging and meaningful consultation is undertaken to include all potentially affected equality groups. Notify those affected through publicity and communications. Direct mailing to all those recipients adversely affected by the changes.	Revenues and Benefits resources	Andy Ormerod	Feb 2019
2	A failure to understand the scheme changes internally within the council – which will in turn have an impact on the residents affected.	Explain the changes fully to members and voluntary sector organisations. This will assist with the contact and explanation required for those affected.	Revenues and Benefits resources	Andy Ormerod	Mid Sept 2018
3	Adverse financial impact on those receiving Council Tax Support.	Publication of the Discretionary Hardship Fund to promote applications by those adversely affected.	Revenues and Benefits resources	Andy Ormerod	Feb 2018
4	Adverse financial impact on those self-employed recipients of Council Tax Support who have carer responsibilities or who may be disabled.	Amend the self-employed rules to reduce the number of hours those who have caring responsibilities, or disabilities.	Revenues and Benefits resources	Andy Ormerod	Feb 2018
5	Adverse impact on self-employed claimants who have recently commenced their own business	The council recognises the need for claimants who are setting up a business to be given time to establish themselves and develop their	Revenues and Benefits resources	Andy Ormerod	Feb 2018

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	business and customer base. As a consequence, the minimum income level for self-employed will only commence after 2 years has elapsed - (taking into account DWP select committee concerns)		
	The intention of the start-up period is to give claimants the breathing space they need to support themselves while running their business.		

MONITORING AND REVIEW

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.

Monitoring arrangements for the completion of EIAs will be undertaken by the Corporate Equality & Diversity Group and the oversight of the action plans will be undertaken by the Management Accountability Framework.

If applicable, where will the EIA Action Plan be monitored?	The implementation of the changes and the subsequent impact will be reviewed and monitored across a number of operational meetings. These will include team and service meetings with customer service teams, as well as Benefit assessment and Council Tax team. Impacts from the changes will be discussed with the Executive Member for Resources and the Director of Finance and Customer Services as and when required at the fortnightly Labour Resource Group meetings. The information collated and noted at all operational meetings will be considered at all management 1 to 1's and service meetings.
How often will the EIA Action Plan be reviewed?	The review will be ongoing through the structure listed above.
When will the EIA be reviewed?	The review will be ongoing through the structure listed above.

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Who is responsible for carrying out this review?

The review will be the responsibility of all of the management team within the Revenues and Benefits service.

Author Signature	AQUE	Date	Click here to enter a date.
Head of Service/Director Signature	f. Mus	Date	Click here to enter a date.
The above signatures signify acceptance of the ownership of the full EIA, the responsibility for the associated Action Plan (if applicable) and the responsibility to publish the completed full EIA as per the requirements of the Equality Act 2010.			
Departmental E&D Lead Signature		Date	Click here to enter a date.

Appendix A – Demographic and CTS award data

The current BwD Council Tax Benefit caseload is as follows:

BLACKBURN WITH DARWEN BC	No. claimants	% caseload
Total Council Tax Benefit caseload	15,826*	
Pensioners (Protected from changes)	5,118*	32.3%
Working Age (Passported)	10,708*	67.7%

^{*}Figures as at July 2018

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Total population	(2017)		
		Bla	ckburn With Darwen (Numbers)
All People			148,800
Males			74,500
Females			74,300
Source: ONS Population esti	mates - local authority based by five yea	ar age band	
view time-series	compare other areas	download (xls)	🖳 query

Population aged 16-64 (2017)

	Blackburn With Darwen (Numbers)	Blackburn With Darwen (%)
All People Aged 16-64	92,800	62.4
Males Aged 16-64	47,000	63.1
Females Aged 16-64	45,800	61.6

Source: ONS Population estimates - local authority based by five year age band Notes: % is a proportion of total population

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Labour Supply

Employment and unemployment (Apr 2017-Mar 2018)

	Blackburn With Darwen (Numbers)	Blackburn With Darwen (%)
All People		
Economically Active†	64,600	69.7
In Employment†	60,600	65.3
Employees†	52,900	57.6
Self Employed†	7,200	7.4
Unemployed (Model-Based)§	3,800	5.8
Males		
Economically Active†	35,300	75.9
In Employment†	33,000	70.7
Employees†	26,700	58.1
Self Employed†	6,000	12.0
Unemployed§	2,300	6.6
Females		
Economically Active†	29,200	63.5
In Employment†	27,600	59.9
Employees†	26,200	57.2
Self Employed†	1,200	2.7
Unemployed§	1,600	5.5

Source: ONS annual population survey

† - numbers are for those aged 16 and over, % are for those aged 16-64

§ - numbers and % are for those aged 16 and over. % is a proportion of economically active

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Religion	Blackburn with Darwen		England		
	number	%	number	%	
All categories: Religion	147,489	100.0	53,012,456	100.0	
Has religion	118,806	80.6	36,094,120	68.1	
Christian	77,599	52.6	31,479,876	59.4	
Buddhist	306	0.2	238,626	0.5	
Hindu	574	0.4	806,199	1.5	
Jewish	54	0.0	261,282	0.5	
Muslim	39,817	27.0	2,660,116	5.0	
Sikh	161	0.1	420,196	0.8	
Other religion	295	0.2	227,825	0.4	
No religion	20,374	13.8	13,114,232	24.7	
Religion not stated	8,309	5.6	3,804,104	7.2	

Source 2011 Census