

Full Equalities Analysis Assessment

1. Proposal Summary Information

EAA Title	Draft Council Tax Discount scheme April 2020 ongoing
Please describe your proposal?	The Council is preparing to consult on a replacement of the Council Tax Support Scheme with an Income banded Council Tax Discount scheme from April 2020
Is it HR Related?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Corporate Purpose	Full council decision

1. What is the Scheme looking to achieve? Who will be affected?

Background and Context

Council Tax Benefit was abolished under the welfare Reform Act 2012 and councils were required to develop their own local Council Tax Support schemes to help people on low incomes and benefits to pay their council tax. Pensioners eligible for Council Tax Support are protected from any loss of support under local schemes.

Ealing Council created its own local Council Tax Support Scheme (CTS Scheme) which is now in its seventh year. The scheme has been modified on four previous occasions. Once in April 2015, April 2016, April 2018 and again in April 2019.

The Council proposes to consult on the replacement of the current CTS Scheme with a Council Tax Discount scheme (CTD scheme), the alternative being to leave the current CTS Scheme unchanged.

What is the Scheme Looking to Achieve?

Proposed change

The council is considering replacing the current CTS scheme with a CTD scheme that is designed around 4 key features and refreshed principles.

The council's CTD scheme for working age residents will continue to keep the 100% discount for applicants who fall into the protected category (formerly the vulnerable categories) and 75% for all others.

Applicants in receipt of passported benefits such as Employment Support Allowance (Income related) and Universal Credit with no other source(s) of income will automatically be entitled to a maximum award (100% or 75%) less any non-dependant deductions if appropriate.

Applicants who do not receive a passported benefit or Universal Credit only, will receive a discount depending upon their level of net income. Incomes taken into will be earnings,

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pensions, and any other non-benefit related income. All state benefits including tax credits, charitable and support payments detailed within the scheme will be disregarded.

This change will simplify the calculation process for applicants, council staff, landlords and benefits advisers. The change will reduce the administration costs of the Council Tax Support Scheme which without the change, would require a customer's Council Tax Support award to be recalculated more frequently for changes in the customer's income, particularly those whose income is subject to monthly recalculation by the DWP if they are in receipt of UC. Implementing this change would reduce the number of reassessments of Council Tax Support awards that would be required. This will prevent customers from getting a revised council tax bill and installments caused by the adjustments that the DWP may make when they recalculate UC awards every month.

- **Key feature 1:** This is an **income banded scheme** which will assess the maximum level of Council Tax Discount based on the net income of the applicant and their partner (if they have one).

Applicants getting passported benefits (for the purposes of the scheme these are income-based Jobseeker's Allowance, Income Support, Employment Support) and Universal Credit with no other source(s) of income will automatically be entitled to a maximum award (100% or 75%), less any non-dependant deductions if appropriate. They will not therefore be affected by this change.

Applicants who do not receive a passported benefit or have additional income as well as Universal Credit, will receive a discount based upon their level of net income. Income taken into account will be earnings, pensions, and any other non-benefit related income. All state benefits including tax credits will be disregarded.

- **Key feature 2:** It is proposed to reduce the current 5 levels of non-dependant deductions to 2. One level for those in work and one for those not. There are no proposed changes to those who are currently exempt from non-dependant deductions or non-dependants who are full time students.

This simplification similarly to key change 1 will reduce the need for reassessing an applicant's discount as the income of a non-dependant varies, again reducing administration costs and preventing the need for revised bills and instalments and associated costs.

- **Key feature 3:** Under the proposal 5 earning disregards are replaced with 1 universal earning disregard of £30 for couples and households with children. The earnings disregard does not apply to single persons as the income bands under the proposed scheme are more generous to single people than the means test under the current scheme.
- **Key feature 4:** Introduces a minimum entitlement to weekly discount under the scheme of £2 per week. There will be no entitlement to a discount if the entitlement calculated is less than £2 per week. The current scheme requires the council to maintain claims where the entitlement is minimal – as low as £0.01 per week. This will save time and resources.

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The council has prepared its draft scheme based around the 4 key features. The likely positive and negative impacts are detailed below.

Pensioners are not affected by the proposed change and they will receive the same level of support they do now as required by law.

Key feature 1. The scheme will be easier for residents to understand and will reduce the frequency that they need to report changes in the circumstances of their household. This will lead to a reduced workload and administration for the council making the scheme more efficient.

The Benefits Service currently assess Housing Benefit and Council Tax Support as one claim which provides significant efficiencies. The move from Housing Benefit to Universal Credit means that the dual processing of Housing Benefit with Council Tax Support is being lost and the Benefits Service will deal with increased numbers of Council Tax Support only claims. This means increased costs of administration in real terms

The DWP have just started a pilot scheme elsewhere of managed migration of Housing Benefit claims to UC. It is the government's intention to migrate all working age customers from Housing Benefit to UC by December 2023. The implementation of the new scheme will reduce the workload associated with the migration to UC.

Positive outcomes:

- The income banded approach under the proposal moves away from complex means testing and is easier for applicants to understand – it is more like a discount than a means tested benefit. Customers will be able to see at a glance how much discount they could be entitled to.
- A simplified scheme will lead to a better take up of support reducing arrears of council tax and poverty overall.
- Reduces the frequency with which discounts claims will need to be reassessed significantly reducing the cost to the council of administering the scheme.
- Gives stability to those whose wages fluctuate each month and reduces discount recipients' need to report changes, only those that would change their income band will have to be reported.
- Customers would be able to budget more easily as their net Council Tax liability would not change as often.
- Some customers whose award would have reduced by any amount up to £4.00 per week will not have their Council Tax award reduced if they have a change in their income which does not cause a change in the income band used to calculate their discount.
- The council will have to collect less council tax from some customers.

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Negative outcomes

- Moving customers from the current scheme onto an income banded scheme will not affect recipients of passported benefits. Non passported cases may see their entitlement increasing or reducing as a result.
- Some customers whose award under the existing Council Tax Support scheme Would have seen an increase in entitlement if their income reduced, would not receive an increase in their discount under the new scheme if the total of their net income did not move them from one income band to another.
- Extra council tax will have to be collected from some customers.

Key feature 2 is the introduction of two non-dependant deductions to replace the current 5 levels of deduction. £18 per week for those in work and £6.50 for those not in work. The need for applicants to report change in their non-dependant(s) circumstances will be minimised.

Positive Outcomes:

- Easier for customers, staff and benefit advisers to understand as there will only be two levels of non-dependant deductions.
- Reduction in workload for the council.
- There will only be a need to report a change when a non-dependant starts or stops work for CTD claims.
- Many applicants will see a reduction in the level of the non-dependant deduction taken when their entitlement is assessed, and they will have less council tax to pay.

Negative Outcomes:

- Some customers will see an increase in the non-dependant deduction used to calculate their entitlement and this may lead to an increase in the council tax they have to pay.

Key feature 3: The proposal replaces 5 earning disregards with 1 earnings disregard of £30 per week for couples and households with children. The earnings disregard does not apply to single persons.

Positive Outcomes:

- Easier for customers, staff and benefit advisers to understand as there will only be one level of earnings disregard for all applicants except for single applicants who will not get an earning disregard.

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- The proposed change has a higher earnings disregard than the disregards under the current scheme, with the exception of lone parents who will have a slightly smaller reduction in the earnings disregards used to calculate their award and single applicants with no children for whom there will be no earnings disregard. Most applicants will consequently have a smaller level of net earnings taken into account when their entitlement is calculated.

Negative outcomes:

- Lone parents will have their earnings disregard reduced by £2.56 (uprated value for 2020) and single applicants will lose all of their £10.85 (uprated value for 2020). This is mitigated by the replacement of the typical means tested calculation approach with a banded approach where no reduction in entitlement occurs until an applicant's income exceeds £119.99 which is much more generous than the existing scheme which starts to reduce entitlement for 18-24-year olds once their income exceeds £63.65 per week and for those 25 or older from £80.32 per week.

Key feature 4: The introduction of a minimum amount of weekly discount of £2 under the scheme. This means that people with an entitlement of less than £2 per week will not be entitled to a discount.

Positive outcomes:

- Reduced administration costs associated with the reassessment of entitlement for changes as little as £0.01 per week and the associated revised billing, instalments and direct debits for the council and customers.
- Customers under the existing CTS scheme often make enquiries following notification of small adjustments to their CTS awards caused by small changes. These will reduce under the proposal.

Negative outcomes:

- Those applicant with an entitlement of less than £2 per week will lose their entitlement to CTS/CTD.

Who will be affected by the proposal to implement the changes?

In the region of 22,205 claimants currently receive CTS in the borough (May 2019 Northgate report).

No pensioners (37.5% of those claiming CTS) would be affected by the proposed change to introduce a banded income scheme as only working age customers are impacted. Some 5901 customers claiming CTS (26.6%) are in receipt of passported benefits and have no non-dependant deductions – they will not be affected by the proposed scheme. The remaining 7969 may be affected by the proposed scheme, 5055 will receive more CTD, 2029 less and 885 will see no change to their award.

It should be noted that customers' entitlement will be impacted on in different ways under the proposal – some will not be impacted by any of the 4 key features and other will be impacted

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by 1 or more. The overall cumulative impact of the changes is detailed in the above paragraph.

2. What will the impact of your proposal be?

Key feature 1. Introducing an income banded calculation process will only affect those working age customers. Those in receipt of passported benefits or have UC as their only income will not be affected.

Customers whose net income made up of any earnings, pensions, and other non-benefit related income that exceeds £119.99 will not receive maximum discount. Their entitlement will be a % of their council tax liability determined by the income band they fall into. All state benefits including tax credits will be disregarded.

Key feature 2. The introduction of two non-dependant deductions instead of the current 5 levels of deduction could impact positively or negatively on any working age claimant where a non-dependant deduction is made when calculating their entitlement.

This change will significantly reduce the amount of administration required in maintaining the CTR caseload as customers will now only have to report when someone starts or stops work. This will remove the need for customers to report changes in the amount of a non-dependant's earnings. Many customers under the proposal to reduce the number of non-dependant charges, would see a reduction in the amount of the non-dependant deduction used in the calculation of their council tax discount which would increase their discount. Some would see an increase in the amount of non-dependant deductions.

Key feature 3. This will make the scheme easier to understand as there will only be one level of earnings disregard for all applicants except for single applicants who will not get an earning disregard.

Most applicants will benefit from this change as a smaller level of net earnings taken will be taken into account when their entitlement is calculated.

Key feature 4. Customers with an entitlement of less than £2 will not receive any discount. The introduction of a £2 per week minimum discount level, will result in reduced administration costs for the council associated with the reassessment of entitlement due to income changes and the associated revised billing, instalments and direct debits for the council and customers. Under the current scheme the council reassess entitlement when a customer's income changes by as little as £0.01 per week.

All residents will still be able to apply for a Discretionary Council Tax Discount if they are able to show that they are having difficulty paying their Council Tax.

2. Impact on Groups having a Protected Characteristic

AGE: *A person of a particular age or being within an age group.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

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Pension age claimants (8,335) are protected by statute from any amendments under a local scheme and the proposal would have a neutral impact upon them. For couples both members of the couple have to be pensioners to not be affected.

The minimum age for receiving Council Tax Support is linked to the minimum age for being liable for council tax which is 18 so residents younger than this will not be affected.

13870 working age customers (and partners if they have one) could be affected by the proposal. Those in receipt of a passporting benefit or whose only income is UC and have no non-dependants will not be affected.

For the remainder of the working age caseload any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or the reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

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Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2020. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

DISABILITY: *A person has a disability if s/he has a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities¹.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

The current scheme allows for maximum Council Tax Support of up to 100% for claimants who are classified as falling into the Vulnerable Household and Vulnerable schemes.

Persons who fall into these schemes are those who are:

- Entitled to a disability premium, severe disability premium, enhanced disability premium or carer premium when their award is calculated
- Entitled to a disabled earnings disregard, a disabled person's reduction for Council Tax purposes, war disablement pension or war widow's pension
- Classified as a Care Leaver under the age of 25 (under Option 1)
- Lone parents with a child under five years of age.

The maximum Council Tax Support for claimants who fall into one of the above categories will continue to be 100% but will be called protected categories under the proposed CTD scheme.

The key feature changes proposed under the scheme, do not impact specifically those customers who are disabled but impact all customers.

Many of the customers who are classified as vulnerable under the council's Council Tax Support scheme will fall into the protected disability characteristic and a lot will not be able to work.

¹ Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

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Those in receipt of a passporting benefit or whose only income is UC and have no non-dependants will not be affected.

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively.

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passport benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive. The existing exemptions from non-dependant deductions for disabled applicants/partners will continue to apply.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or the reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

The existing exemptions from non-dependant deductions for disabled applicants/partners will continue to apply.

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Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2019. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

GENDER REASSIGNMENT: *This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Neither the current or proposed scheme is specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTS.

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

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Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2019. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

RACE: *A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Neither the current or proposed scheme is specifically targeted at this group. There is no data relating to how the proposed scheme will impact those falling under the protected characteristic of race. The impact will be the same for all irrespective of race:

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are

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disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

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The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

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RELIGION & BELIEF: *Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

The proposed change to the CTR scheme will potentially affect all working age customers irrespective of religious beliefs or none. The changes are not targeted at anyone holding a specific belief.

Neither the current or proposed scheme is specifically targeted at this group. There is no data relating to how the proposed scheme will impact those falling under the protected characteristic of race. The impact will be the same for all irrespective of religion and belief:

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

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The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

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The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

SEX: *Someone being a man or a woman.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Sex is not a factor that is determinative of the amount of Council Tax Support or Discount that an applicant is entitled to. The changes proposed in the proposed CTD Scheme will apply to men and women equally. Gender details extracted from the council's records are as follows (business Objects from Northgate August 2019)

Neither the current or proposed scheme is specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTS.

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

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Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

The breakdown for the number of working age claimants for whom we have gender details (Northgate report August 2019) is as follows:

Female 8443 (58.78%)

Male 5921 (41.12%)

For working age partners, the figures are as follows:

Female 2904 (70%)

Male 1247 (30%)

The positive or negative impacts associated with the changes to customers Council Tax Support awards will affect more women than men. This reflects the fact that the caseload comprises more women as a proportion of the claimants or partners, than men. The intended change is uniform in the impact for both genders. Some men and women will receive more Council Tax Support and some less as a consequence of the proposed CTD scheme.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2019. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

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SEXUAL ORIENTATION: *A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Neither the current or proposed scheme is specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTS.

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

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Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2019. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

PREGNANCY & MATERNITY: *Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

All of the proposed changes under the proposal could impact a woman who falls within this protected group.

There is no data for customers protected by this characteristic. Those customers with this protected characteristic will be affected as follows:

Neither the current or proposed scheme is specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTS.

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is working and is not a lone parent or a single applicant for CTS

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purposes. The Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax. If the customer currently has no dependent children, they will not be impacted negatively by the change in the earnings disregards as the earnings disregards are higher under the proposal than those for the current scheme except for single applicants. If the customer is single they will benefit from the £30 earnings disregard once the child, they are expecting is born.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

Women during late pregnancy and subsequently whilst on maternity leave are less likely to have changes to their UC award as any income from an employer will be less likely to vary during this time. This will reduce the number of reassessments that the DWP would make to a customer's UC award and this in turn would reduce the positive and negative possibilities that would result from reducing the number of Council Tax Support reassessments for a customer.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed scheme is chosen.

In recognition that some customers will receive less discount under the new scheme in comparison to their Council Tax Support entitlement on 31/03/2020 under the current scheme, transitional capping will be introduced from 01/04/2019. This capping will ensure that at the point of transfer to the new scheme no customer will gain or lose more than £2 per week unless their entitlement is less than £2 per week in which case they will receive no discount. The capping will continue to apply to customers until they have a change in their circumstances that requires a reassessment of their entitlement which results in a different level of discount.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

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MARRIAGE & CIVIL PARTNERSHIP: *Marriage: A union between a man and a woman, or of the same sex, which is legally recognised in the UK as a marriage*

Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact

Neither the current or proposed scheme is specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTS.

Couples who claim Council Tax Support are treated the same irrespective of whether they are:

- A man and woman who are married to each other and are members of the same household
- A man and woman who are not married to each other but are living together as husband and wife
- Two people of the same sex who are civil partners/married to each other and are members of the same household
- Two people of the same sex who are not civil partners/married to each other but are living together as if they were civil partners/married.

The proposed CTD will not alter the way that couples are treated.

There are 14383 working age claimants in the Council Tax Support caseload, 4154 of which have partners.

Customers for Council Tax Support purposes will be impacted in the same way irrespective of whether they are married have a partner or are single. Customers with partners will be affected as follows:

Any of the changes in the 4 key features could affect people with this protected characteristic positively or negatively:

The replacement of the current means tested method of income calculation could affect them positively or negatively depending upon the types of income they receive. Passported benefits are disregarded under the proposal as is UC, so if this is their sole income they will not be affected. For all other types of income, it is the net total that will determine what income band they are placed in together with whether they also fall into a protected CTD category.

The replacement of the 5 non-dependant deductions with 2 could have a positive or negative impact. The level of deduction could be higher or lower than that used in the current scheme depending on their financial circumstances or type of benefit they receive.

The replacement of 5 earnings disregard with 1 will be beneficial if the person with this protected characteristic is not a lone parent or a single applicant for CTS purposes. The

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Proposed earnings disregard of £30 is higher for all other applicants for assistance with council tax.

The introduction of a £2 per week minimum discount amount will affect people with this protected characteristic if they are entitled to less than £2 per week under the proposed scheme.

Some customers will be affected by more than one of the key feature changes and the overall impact will be determined by the interaction of those features. Some negative impacts for an individual may be more than offset by a positive impact on them by one or more of the other key features under the proposal or reverse may be true.

Alternatives and mitigating actions which have been considered in order to reduce negative effect: The alternative to the proposal is to leave the current CTS scheme in place. The proposal to introduce a CTD scheme would reduce expenditure on administering the Council Tax Support Scheme. This is an important consideration as the majority of residents in the borough do not receive support towards their council Tax liability. Not implementing the proposal would likely result in increased costs of administering the scheme.

Describe the Mitigating Action

The proposal to introduce a CTD scheme simplifies the assessment process for customers and will be beneficial for some and not for others. However, many Council Tax Support recipients will be able to budget more easily as their Council Tax Support awards will be subject to fewer reassessments and therefore less frequent issuing of revised bills and standing order alterations.

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The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

3. Human Rights²

4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?

Yes ☐ No ☐

4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

² For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

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Yes ☐ No ☐

4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?

Yes ☐ No ☐

(If yes, please describe the effect and any mitigating action you have considered.)

4. Conclusion

(Please provide a brief overview/summary of your analysis in light of the protected characteristics. Please describe the overall impact of your proposal where possible and mitigating actions undertaken by other areas of the Council or by local partners)

4a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

(Please list all sources here: i.e. local consultation, residents' survey, census etc.)

5. Action Planning: *(What are the next steps for the proposal please list i.e. what it comes into effect, when migrating actions³ will take place, how you will measure impact etc.)*

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)

Additional Comments:

³ Linked to the protected characteristics above

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6. Sign off: (All EAA's must be signed off once completed)

Completing Officer Sign Off:	Service Director Sign Off:	<i>HR related proposal (Signed off by directorate HR officer)</i>
Signed:	Signed:	Signed:
Name (Block Capitals):	Name (Block Capitals):	Name (Block Capitals):
Date:	Date:	Date:
For EA's relating to Cabinet decisions: received by Committee Section for publication by (date):		

Appendix 1: Legal obligations under Section 149 of the Equality Act 2010:

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- As a public authority we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.