**Equality Impact Assessment / Equality Analysis**

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| **Title of service or policy**  | Council Tax Support Scheme Options |
| Name of directorate and service | Revenues and Benefits |
| **Name and role of officers completing the EIA** | Matt Thomas, Rob Brunton, Louise Murphy and Sean Graham |
| Date of assessment  | 23rd July 2012 |

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community.  The primary concern is to identify any discriminatory or negative consequences for a particular group or sector of the community.  Equality impact Assessments (EIAs) can be carried out in relation to service delivery as well as employment policies and strategies.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis on a policy, service or function. It is intended that this is used as a working document throughout the process, with a final version including the action plan section being published on the Council’s and NHS Bath and North East Somerset’s websites.

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| **1.**  | **Identify the aims of the policy or service and how it is implemented.** |
|  | **Key questions** | **Answers / Notes** |
| **1.1** | Briefly describe purpose of the service/policy including* How the service/policy is delivered and by whom
* If responsibility for its implementation is shared with other departments or organisations
* Intended outcomes
 | The new Council tax support scheme is the intended replacement of Council Tax Benefit which is due to be phased out in April 2013. This change will be delivered by the Revenues and Benefits team who have designed the new scheme themselves based on Government guidelines and targets.The intended outcome is to be able to continue to provide support for those on low incomes whilst also making the required savings.  |
| **1.2** | Provide brief details of the scope of the policy or service being reviewed, for example:* Is it a new service/policy or review of an existing one?
* Is it a national requirement?).
* How much room for review is there?
 | This is a brand new scheme as part of the localisation of Council Tax proposed by the Coalition Government. The savings it is required to make leave little room for manoeuvre on our part. |
| **1.3** | Do the aims of this policy link to or conflict with any other policies of the Council? | No |
| **2. Consideration of available data, research and information** |
| Monitoring data and other information should be used to help you analyse whether you are delivering a fair and equal service. Please consider the availability of the following as potential sources: * **Demographic** data and other statistics, including census findings
* Recent **research** findings (local and national)
* Results from **consultation or engagement** you have undertaken
* Service user **monitoring data** (including ethnicity, gender, disability, religion/belief, sexual orientation and age)
* Information from **relevant groups** or agencies, for example trade unions and voluntary/community organisations
* Analysis of records of enquiries about your service, or **complaints** or **compliments** about them
* Recommendations of **external inspections** or audit reports
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|  | **Key questions** | **Data, research and information that you can refer to**  |
| **2.1** | What is the equalities profile of the team delivering the service/policy?  | There are currently 127 staff employed within Revenues and Benefits.  Two thirds of these are female, which is in proportion to the numbers within the workforce as a whole.  Of those who have declared their ethnicity, 2.5% are from Black and Minority Ethnic (BME) groups, which is also roughly in proportion to the BME representation in the workforce as a whole (but lower than the proportion of BME people in the B&NES area, estimated to have grown to around 3.8% according to the 2011 Census.  The workforce is fairly well spread across all age groupings.  No staff members have declared themselves disabled, and none have identified themselves as lesbian or gay.   |
| **2.2** | What equalities training have staff received? | Staff have been trained on Equalities in Customer Service, some on the Equality Act 2010 and some in conducting Equality Impact Assessments. All managers are also due to attend Equalities in the Workplace training in the coming months. |
| **2.3** | What is the equalities profile of service users?  | The new Council Tax Support scheme will affect any benefit claimant of working age, not part of a vulnerable group. The Council has decided that a vulnerable group is defined as those in receipt of the following:* Support Component for Employment and Support Allowance (ESA)
* Enhanced Disability Premium,
* Enhanced Disability Premium for Dependent s,
* Disability premium for dependents,
* Severe Disability Premium.

Pensioners are protected from any changes in their benefit.  |
|  | What other data do you have in terms of service users or staff? (e.g. results of customer satisfaction surveys, consultation findings). Are there any gaps?  | There has been no major survey of customer satisfaction in some time although improvements in service delivery have resulted in reduced complaints and an increase in compliments. |
| **2.5** | What engagement or consultation has been undertaken as part of this EIA and with whom?What were the results? | Our consultation began in August 2012. The Consultation had two parts : (i) the Benefit Consultation, which was online and by paper, was with those already in receipt of Council Tax Benefit and (ii) the Public Consultation, which was online, which presented the proposals for Council Tax Support to the wider community  |
| **2.6** | If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?  | Consultation was accessible online and the public were advised of this by post and adverts in the press. The consultation documents were available in different languages and formats on request and displayed in our Customer Service offices as well.The Consultation had the standard Equality questionnaire attached allowing us to pin point any vulnerable groups who may be affected more than most. |
| **3. Assessment of impact: ‘Equality analysis’** |
|  | Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:* Meets any particular needs of equalities groups or helps promote equality in some way.
* Could have a negative or adverse impact for any of the equalities groups
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|  |  | **Examples of what the service has done to promote equality** | **Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this** |
|  | All people affected irrespective of protected characteristics | The Council has a well-developed Labour market action plan includes ‘wordlessness support’ through a job brokering programme.A food bank has been set up in Bath and we are actively exploring food banks in outlying areas of North East SomersetWe are carrying out a review of Customer Access with reference to the Universal Credit pilot being run in this area and working closely with government agencies and third sector groups.A programme of awareness raising is underway regarding the Council tax support review and Housing Benefit.Revenues and benefits team are carrying out research into debt management which will include the profiling of ‘non payers.’The Council continues to commission advice services including the Citizen’s Advice Bureau and South Wansdyke Advice Network.Funding from central government to replace Social Fund will be used to target some of our most vulnerable residents. | Welfare Reform will affect many people in B&NES:Child Benefit (2,740) reductions for high earnersIncapacity benefit changes – becomes ESA (4,900 to be re-assessed – at present 34% found fit to work)Council tax support reduces for all except the most vulnerable (5,676 will see a reduction of which 350 will receive no benefit)Social fund (crisis loans etc.) budget delegated to local authority Social Housing under-occupancy (1,100 currently estimated, will increase)Tax credit eligibility criteria changes – unknown volume, currently 10,400 claimants of working and child tax credits)Disability Living Allowance Re-assessed (6,555 residents currently claiming) Benefits Cap (up to 70 households) |
| **3.1** | **Gender** – identify the impact/potential impact of the policy on women and men. (Are there any issues regarding pregnancy and maternity?) | Removal of non- dependent deductions will have a positive impact upon all groups. War widows/widowers are protected | Women will be disproportionately be affected by the new Council Tax Support scheme assessing Child Benefit/child maintenance as income. We can presume there will be a disproportionate impact upon single mothers (though we cannot discern single families from couples). There are 1253 claimants affected by this, of which 81.6% (1023) are female. (It may appear that this would be a high figure as a total of 65% of the affected claimants are women, however, when looking into it further we see the following results; 26% of the total women affected will be impacted by this particular cut opposed to just 11% of men. Removal of second adult rebate may also cause greater effect on single parents.The council will seek to refer those affected to the CAB, who have an experienced debt counselling service. CAB also run outreach advice sessions at all the Children's Centres across Bath and North East Somerset to provide parents and carers with benefits and financial advice. The Council will use their discretion to extend the time limit to pay council tax liability e.g. extending the period to pay from the existing 10 months to 12 months and it will use every opportunity to work with both internal and external partners to deliver services around the life event that has occurred.There is concern of an increase in domestic violence and abuse due to increased stress upon families. Organisations such as the Southside Family Project can support people and families experiencing domestic abuse. However, research shows that victims do not tend to report DVA until many instances have occurred (e.g. women report after an average of 35 instances)  |
| **3.3** | **Disability** - identify the impact/potential impact of the policy on disabled people   | Those who receive Enhanced Disability Premium, Severe Disability Premium, and families who have a disabled child (and are in receipt of the Enhanced Disability Premium for Dependent s or disability premium for dependents), will be classed as vulnerable groups and therefore protected. Our consultation will be made accessible to disabled people and we will make sure it can be received in different ways to suit individual needs. We can provide communication about the consultation in various formats if needed. | People may be more at risk of mental ill health and depression due to financial hardship. There are also some people with mental health diagnosis who are increasingly more likely to be assessed as fit to work and not included in the vulnerable group. People in this situation could experience financial hardship & also worsening mental health. Delays in payments from 3rd parties (e.g. DWP) could lead to some disabled people missing out on backdates. This could be a contentious issue as some disabled people could miss out on receiving CTS through no fault of their own. The Council will seek to liaise with the relevant agencies to ensure that everyone affected is informed of the changes and provided with the same advice and help as other groups |
| **3.4** | **Age** – identify the impact/potential impact of the policy on different age groups | Pensioners are protected (Age 60 plus)Students of all ages are disregarded for Council Tax purposes.Families who have a disabled child are considered a vulnerable group and therefore protected. | All working age people are affected. Children of people on lower incomes and those who are disadvantaged but not in one of the identified vulnerable groups will be at risk. There is likely to be an increase of children in poverty due to the welfare reforms, although it is essential that parents are made aware of what is available and we will be seeking to improve awareness and accessibility of support by working closely with internal and external providers. |
| **3.5** | **Race** – identify the impact/potential impact on different black and minority ethnic groups  | No ethnicity data is collected in respect of benefit claimants. Our policy was determined without any regard to ethnicity. The consultation will be accessible to those who have English as additional language.  | Communication of the issues to those affected is a key priority. Staff ensure that information is provided in alternative languages on request, and/or interpreters are used where necessary.  |
| **3.6** | **Sexual orientation -** identify the impact/potential impact of the policy on lesbians, gay, bisexual & heterosexual people | No data is collected in respect of sexual orientation. Same sex partners are treated the same as opposite sex partners for the purposes of Council Tax Benefit.  | No adverse issues identified |
| **3.7** | **Religion/belief;**  |  No data is collected in respect of religion/belief.  | No Adverse impact identified |
|  | **Transgender**  | No data is collected in respect of gender identity.  | No adverse impact identified |
| **3.8** | **Socio-economically disadvantaged** – identify the impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances | We are contacting, on a one to one basis, people who will experience the most dramatic effects on their finances. Will use telephone, press, internet and correspondence to alert those who will be affected by LCTS. Will work with relevant agencies to reach those who will be affected by LCTS, to inform and prepare them of the changes in April 2013. Will also view this change in conjunction with legislation regarding under-accommodation and the social fund, which may also impact on people in this group. | The LCTS will require a financial contribution from groups who may not have previously made a contribution to their council tax. There may be an effect on those on lower incomes and those who are disadvantaged but not in one of the identified vulnerable groups. From April there will also probably be an increase in rent for Curo Housing tenants. The council will seek to refer those affected to the CAB and other agencies, who have experienced debt counselling service. It is also working closely across departments to better join up services and procedures to help manage the various funds available for our most disadvantaged and vulnerable residents. The Council may also use their discretion to extend the time limit to pay their council tax liability e.g. extending the period to pay from the existing 10 months to 12 months. |
| **3.9** | **Rural communities** – identify the impact / potential impact on people living in rural communities | Council has always enables payment via local post offices as well as access to internet payment and advice. We are contacting all people affected to explain the impacts of these changes by telephone and we can arrange for visiting officers to call where necessary. | For those in need of Debt advice within their own home, the Council Commissions the CAB to deliver a service called Income Max (advice on benefits and basic debt advice to residents in the whole of the local authority area) . Clients are referred by the Social Services team and visited by a caseworker in their own home.  |

**4. Bath and North East Somerset Council & NHS B&NES**

**Equality Impact Assessment Improvement Plan**

Please list actions that you plan to take as a result of this assessment. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

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| **Issues identified** | **Actions required** | **Progress milestones** | **Officer responsible** | **By when** |
| Certain customers who are in receipt of a passported benefit, but receive premiums or components which would enable them to be considered as vulnerable in accordance with Council’s definition | To interrogate the present system, and contact those customers who seem likely to be included in this group | Monthly updates of progress on this issue | Sean Graham | January 2013 |
| Groups such as single parents who will be affected by the changes | The Council has set up a project group to focus on those groups, who will be disadvantaged by the changes. It will utilise a communication plan to contact all those affected to ensure that they are aware of the changes and relevant help is provided i.e. debt counselling advice etc. the Council will also seek to liaise with the relevant agencies to ensure that everyone affected is similarly informed of the changes and provided with the same level of advice and support.  | Monthly updates of progress on this issue | Sean Graham | January 2013 |

**5. Sign off and publishing**

Once you have completed this form, it needs to be ‘approved’ by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council’s and/or NHS B&NES’ website. Keep a copy for your own records.

**Signed off by**:Ian Savigar (Divisional Director)

**Date:**January 2013