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# Overview & Scrutiny Committee

## Additional Papers

### Agenda Item No. 10 Council Tax Reduction Scheme Review 2019/20

6pm  
Thursday, 5th July 2018  
Council Chamber  
Wyre Forest House  
Finepoint Way  
Kidderminster





## Overview & Scrutiny Committee

### Briefing Paper

Report of: Lucy Wright, Revenues, Benefits & Customer Services  
Manager  
Date: 5<sup>th</sup> July 2018  
Open

### COUNCIL TAX REDUCTION SCHEME REVIEW 2019/20

#### 1. Summary

1.1 This report provides information of the work undertaken by the Revenues, benefits and customer services section on the redesign of the Council Tax Reduction Scheme for implementation by 1<sup>st</sup> April 2019.

#### 2. Background

2.1 The Council Tax Reduction scheme replaced Council Tax Benefit with effect from 1 April 2013.

2.2 Under the Council Tax Reduction provisions, the scheme for pensioners is determined by Central Government and the scheme for working age applicants is determined by the Council. Pensioners broadly receive the same level of support that was previously available under the Council Tax Benefit scheme.

2.3 The current scheme for working age applicants is a means tested one, but has been amended since 2013 both to require a minimum payment from working age applicants of 20% and to update the scheme in line with changes to Housing Benefit that have occurred since its introduction.

2.4 The scheme has also been amended each year for general changes in applicable amounts (primarily in relation to disability premiums) and for non-dependant deductions.

2.5 In December 2015, Council agreed not to increase the minimum council tax contribution from working age claimants and the proposals set out in this report recommends this percentage remain at 20% for the lowest income households.

2.6 The introduction of Universal Credit in Wyre Forest from November 2018 will bring a number of challenges for the Council in terms of the administration of Council Tax Reduction Scheme as well as the collection of Council Tax.

**Council Tax Reduction and the Full Service Roll Out of Universal Credit**

- 2.7 The introduction of Universal Credit within the Wyre Forest district will, as experienced in all other areas, bring a number of challenges to both the administration of Council Tax Reduction and also the collection of Council Tax generally. Sites within Universal Credit full service areas have experienced the following:
- a. The reluctance of Universal Credit claimants to make a prompt claim for Council Tax Reduction leading to loss of entitlement;
  - b. A high number of changes to Universal Credit cases are received from the Department for Work and Pensions requiring a change to Council Tax Reduction entitlement. On average 40% of Universal Credit claimants have between eight and twelve changes in entitlement per annum. These changes result in amendments to Council Tax liability, the re-calculation of instalments, delays and the demonstrable loss in collection; and
  - c.. The increased costs of administration through multiple changes resulting in the need for additional staff resource.
- 2.8 It is clear that the existing means tested Council Tax Reduction scheme, which is too reactive to change, will not be viable once Universal Credit has been rolled out fully within the district. The move to a new more efficient scheme from 2019 is now imperative to avoid additional staffing costs and simplify the administration scheme for both the Council and applicants.

**The proposed 2019/20 Council Tax Reduction Scheme**

- 2.9 In view of the problems being experienced with Universal Credit, it is proposed that the Council Tax Reduction scheme is fundamentally redesigned to address;
- a. The problems with the introduction of full service Universal Credit; and
  - b. The inevitable increase in administration costs due to the high level of changes received in respect of Universal Credit.
- 2.10 Work has been carried out on a proposed new scheme design, the main features of which comply with the original principles of the scheme that was set up in 2013 as follows:

- Principle 1** Every household with working age claimants should pay something;
- Principle 2** The scheme should incentivise people into work;
- Principle 3** People with greater amounts of savings receive less support;

**Principle 4** Protection will be provided through a Hardship Fund to those who are least able to pay; and

**Principle 5** The scheme will be in support of the Council’s Corporate Plan Priorities of an increased supply of good quality and decent homes in which people can afford to live.

2.11 It is proposed that the current means tested scheme is replaced by a simple income grid model. An example of the approach is shown below but is **purely indicative to add context** at this early stage; actual figures Council will be asked to approve later in the year will almost certainly be different. Test profiling has been carried out on the existing Council Tax Reduction Scheme caseload with income bands which allows a greater tolerance of income levels. It should be noted that profiling will continue over the summer time to ensure that the scheme is still in line with budget expectations and also looks to minimise any losses to individual claimants.

**Table 1 – Indicative Example of potential Grid Model Approach**

Client Group		Example Weekly Income Band	Council Tax reduction %
<b>Single</b>	<b>A</b>	£0 - £74.99	<b>80%</b>
	<b>B</b>	£75 - £149.99	<b>60%</b>
	<b>C</b>	£150 - £224.99	<b>40%</b>
	<b>D</b>	£225 - £299.99	<b>20%</b>
<b>Couple</b>	<b>A</b>	£0 - £114.99	<b>80%</b>
	<b>B</b>	£115 - £189.99	<b>60%</b>
	<b>C</b>	£190 - £264.99	<b>40%</b>
	<b>D</b>	£265 - £339.99	<b>20%</b>
<b>Family + 1 child</b>	<b>A</b>	£0 - £164.99	<b>80%</b>
	<b>B</b>	£165 - £239.99	<b>60%</b>
	<b>C</b>	£240 - £314.99	<b>40%</b>
	<b>D</b>	£315 - £389.99	<b>20%</b>
<b>Family 2 or more children</b>	<b>A</b>	£0 - £214.99	<b>80%</b>
	<b>B</b>	£215 - £289.99	<b>60%</b>
	<b>C</b>	£290 - £364.99	<b>40%</b>
	<b>D</b>	£365 - £434.99	<b>20%</b>

2.12 The income levels in each grid will be based on:

- a. The overall expenditure of the scheme to remain as at present;
- b. The changes have only been made to the working age scheme as the current scheme for pensioners is prescribed by Central Government;

- c. Ensuring maximum number of applicants are protected wherever possible; and
  - d. Ensuring any losses to individual applicants are minimised.
- 2.13. Any change to the scheme will inevitably result in both winners and losers and the aim is to design a scheme that minimises both the number of losers and any financial loss incurred. As set out in paragraph 2.26 below, the Exceptional Hardship Policy will be available to minimise the impact and protect individuals where appropriate. Early indicative modelling suggests that up to around 20% of current claimants may be better off and around 10% to 15% may be worse off; further work continues on the modelling and will be included in detail in the November reports.

### **How the new scheme will address the problems of full service Universal Credit**

- 2.14 Due to the simplicity of the proposed new scheme and by taking a more 'Council Tax discount approach', it will address the problems associated with Universal Credit as follows:
- a. **The scheme will require a simplified claiming process.** In the case of Universal Credit applicants *any* Universal Credit data received from the Department for Work and Pensions (DWP) will be treated as a claim for Council Tax Reduction. Where information is received from DWP, the entitlement to Council Tax Reduction will be processed without the need to request further information from the taxpayer. This will have the following distinct advantages namely:
    - i. **Speed of processing** – claims will be able to be calculated simply and promptly without the need to request further information which inevitably leads to delays;
    - ii. **Maximising entitlement to every applicant.** As there will be no requirement for Universal Credit applicants to apply, entitlement to Council Tax Reduction will be maximised with a reduced risk of loss of discount or the need for backdating;
    - iii. **Maintenance of collection rates** – the new scheme will avoid constant changes in discount, the need for multiple changes in instalments and therefore assist in maintaining the high collection rates currently achieved.
  - b. **The income bands will be wide avoiding constant changes in discount.** The current Council Tax Reduction scheme is very reactive and will alter even if the overall change to the person's liability is small. This is leading to constant changes in Council Tax liability, the need to recalculate monthly instalments and the requirement to issue a large number of Council Tax demands. The effect of this is that Council Tax collection is reduced. The new scheme, with its simplified income banding approach, will have the following advantages:

- i. Only significant changes in income will affect the level of discount awarded;
    - ii. Council Taxpayers who receive Council Tax Reduction will not receive multiple Council Tax demands and adjustments to their instalments
  - c. **A modern approach to changes in entitlement.** The current Council Tax Reduction scheme is based on a traditional but rather old-fashioned benefit approach which alters entitlement on a weekly basis when there is a variation in income. The amount households are asked to contribute to their council tax from their income is calculated by comparing their income with their 'applicable amount'. This is the minimum income set by Government which a household sharing the same circumstances is expected to live on. A taper is then applied for every additional £1 earned resulting in frequent changes every time a household income varies. The new scheme is designed to reflect a more modern approach, notwithstanding that the number of changes will be reduced. Where discount changes it will be effective from the day of the change rather than the Monday of the following week;
  - d. **A simpler scheme** – the current Council Tax Reduction Scheme document is large, benefits based and will become unduly complex once Universal Credit is rolled out. The intention is to make the new scheme document simpler, reducing the level of complexity and making it more understandable to applicants.
- 2.15. The highest level of discount will remain at 80% and will be awarded to those in Band A of the table shown in 3.11. This will automatically apply to claimants that are in receipt of a passported benefit such as Income Support, Jobseeker's Allowance (income based) and Employment Support Allowance (income related) or the maximum award of Universal Credit.
- 2.16. The scheme allows for variation in the size of the household as the levels of income per band increase when an applicant has a partner and/or dependants.
- 2.17 The current scheme applies a deduction for non-dependants living in the household whereas the proposed scheme does not. This is a significant change which will benefit those with non-dependants living in the household while simplifying the scheme for administration purposes such as low income households with adult children living at home.
- 2.18 To encourage work the current earnings disregards which vary depending on circumstances, will be replaced with a standard £25 per week disregard for all claimants. The current range of earnings disregards is between £5.00 and £25.00 depending on the householders circumstances.
- 2.19 The current disability benefits such as Disability Living Allowance, Personal Independence Payment will continue to be disregarded for income purposes

as well as Employment Support Allowance (support component) and Carer's Allowance.

- 2.20 War pensions and war disablement pensions will continue to be disregarded.
- 2.21 Child benefit and child maintenance payments will continue to be disregarded.
- 2.22 The capital limit will be set at £6,000. Any capital below this amount will not affect a claimant's entitlement to Council Tax Reduction.
- 2.23 Extended payment and student provisions will be removed.
- 2.24 Changes will be effective from the date of change rather than the Monday of the following week.
- 2.25 Test profiling shows that there will be some existing claimants that will benefit from an income banded scheme and some who will see a reduction in their award. The consultation document will provide examples of claimant types and how they might be affected.

**Exceptional Hardship Policy**

- 2.26 The current Council Tax Reduction scheme also contains provision for taxpayers to make an application for additional discounts where they experience exceptional hardship. It is proposed that the new scheme will contain the same provisions to protect individuals who experience exceptional hardship. Where any group of person is likely to experience hardship, this will be addressed as part of the overall scheme design. The Exceptional Hardship Policy will continue to be an integral part of the scheme for the foreseeable future

**Consultation and Timeline**

- 2.27 As the proposals are a fundamental change to the current approach full consultation is required with Major Precepting Authorities and with the Public. The approach to the consultation is to be agreed but it will be extensive and last over the summer time. Overview and Scrutiny will get the opportunity to look at the consultation results in November having already reviewed the initial proposal in early July.
- 2.28 Subject to consideration of this report, the timeline is shown below:

Consideration of the proposed scheme by Overview and Scrutiny and recommendations to Cabinet	5 <sup>th</sup> July 2018
Public consultation (10 weeks)	17 <sup>th</sup> July 2018 23 <sup>rd</sup> July 2018 to 28 <sup>th</sup> September 2018
Consideration of consultation responses by Overview and Scrutiny and recommendations to Cabinet	1 <sup>st</sup> November 2018

Consideration of consultation responses by Cabinet and final recommendations to Council	13 <sup>th</sup> November 2018
Decision by Council on changes to council tax reduction scheme for 2019-20	12 <sup>th</sup> December 2018
Scheme takes effect	1 <sup>st</sup> April 2019

### **3. Options**

3.1 The Committee is invited to consider the information in this report. It is invited:

Either a) to support the proposals to undertake a consultation with Major Preceptors and the public on proposed changes to the Council Tax Reduction Scheme from 1<sup>st</sup> April 2019;

or b) to make such other recommendations to Cabinet as it considers appropriate.

### **4. Consultation**

4.1 CLT

4.2 Cabinet Member for Resources and the Leader of the Council

### **5. Related Decisions**

5.1 None

### **6. Relevant Council Policies/Strategies**

6.1 Detailed information on the current council tax reduction scheme can be found at [www.wyreforestdc.gov.uk/counciltax](http://www.wyreforestdc.gov.uk/counciltax)

### **7. Implications**

#### **Financial Implications**

7.1 The financial impacts for existing claimants will continue to be profiled and the final scheme presented as per the above timetable following the consultation period. It is proposed that the overall costs of the scheme itself will remain broadly within current expenditure and therefore there will be no significant financial impact to the Council and the Major Precepting Authorities (Worcestershire County Council, Fire Authority and Police).

7.2 The estimated current level of expenditure for the Council Tax Reduction Scheme for working age claimants only is approximately £3.1m. The changes proposed are primarily designed to prevent additional administration costs that will inevitably occur with the introduction of full service Universal Credit rather than reduce the costs of the scheme or make the less financially able to



pay more council tax. The scheme will also be easier for the public to understand.

- 7.3 The income changes for claimants migrating to Universal Credit are unknown and therefore the profiling that has been carried out is based on existing legacy benefits across the current caseload. The predicted expenditure is therefore subject to change when claimants migrate from legacy benefits to Universal Credit.
- 7.4 Where an individual may suffer exceptional hardship, the scheme will include provisions to allow for additional support to be given.
- 7.5 There is a cost to upgrade the computer system in order to administer an income banded scheme. This includes a one off cost of approximately £40,000 and annual maintenance of approximately £8,000. The initial cost would be paid for from existing reserves.

**Legal and policy implications**

- 7.6 Paragraph 5 of Schedule 1A to the Local Government Finance Act 1992 as amended requires local authorities to consider the following:
- 7.7 For each financial year, each billing authority must consider whether to revise its scheme or to replace it with another scheme. This report discharges that duty.
- 7.8 The authority must make any revision to its scheme, or any replacement scheme, no later than 11<sup>th</sup> March in the financial year preceding that for which the revision or replacement scheme is to have effect.
- 7.9 In addition, where there are changes to the scheme, the authority is obliged under paragraph 5(4) of Schedule 1A if any revision to a scheme, or any replacement scheme, has the effect of reducing or removing a reduction to which any class of persons is entitled, the revision or replacement must include such transitional provision relating to that reduction or removal as the authority thinks fit.
- 7.10 The new scheme will inevitably change the amount of discount for some applicants. The initial modelling suggests that, whilst a number will have an enhanced award, where any award is reduced applicants will be able to apply for an exceptional hardship payment.

**Risk Management**

- 7.11 Any changes to the Council Tax Reduction Scheme must be consulted on. The consultation must be meaningful and allow an appropriate period of time as failure to do so could result in a challenge.
- 7.12 There is a risk of increased staffing resource requirements and/or deterioration of service levels due to increased variation/complexity in

administration processes if the scheme is not revised to take into account Universal Credit changes.

**8. Equality Impact Needs Assessment**

8.1 Under the Public Sector Equality Duty (section 149 of the Equality Act 2010) the Council must have due regard to (i) eliminating unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010, (ii) advancing equality of opportunity between people from different groups, and (iii) fostering good relations between people from different groups.

8.2 A full equality impact assessment on the proposed Council Tax Reduction scheme has been produced and can be found in **Appendix One**. This assessment will be reviewed and amended accordingly if required, following the consultation.

**9. Wards affected**

9.1 All wards

**10. Appendices**

10.1 Appendix One – Equality Impact Assessment

**11. Background Papers**

Council Tax Benefit Reform, Overview and Scrutiny Committee 8<sup>th</sup> November 2012

Council Tax Benefit Reform, Cabinet 12<sup>th</sup> November 2012

Council Tax Benefit Reform, Council 21<sup>st</sup> November 2012

Welfare Support Fund, Cabinet 23<sup>rd</sup> June 2015

Review of Council Tax Reduction Scheme, Cabinet 10<sup>th</sup> November 2015

Council Tax Reduction Scheme Review 2016-17, Council 9<sup>th</sup> December 2015

Council Tax Reduction Scheme Review 2017/18, Cabinet 4<sup>th</sup> October 2016

Council Tax Reduction Scheme Review 2017/18, Overview and Scrutiny Committee 3<sup>rd</sup> November 2016

Council Tax Reduction Scheme Review 2017/18, Cabinet 22<sup>nd</sup> November 2016

Council Tax Reduction Scheme Review 2017/18, Council 14<sup>th</sup> December 2016

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## Full Equality Impact Assessment- EIA

An EIA is a way of finding out if:

- Our services are accessible to service users and employees.

An EIA helps us to make sure that:

- Our functions and policies do not have a negative impact or discriminate in any way against any members of our local community.

**A Full EIA needs to work through the following stages:**

- ↓ **Establish clear aims & objectives-** What is the purpose? Who will benefit? What are the intended outcomes?
- ↓ **Consideration of data & information-** National & local data; service data; satisfaction/feedback data; complaints; research
- ↓ **Assessing the impact-** Who does/does not use service? Have you consulted? Does it reflect varied needs of community?
- ↓ **Reviewing/Scrutinising the impact-** Is there a differential impact on different groups? Is it adverse? Is it directly or indirectly discriminatory? *Show justification if applicable*
- ↓ **Addressing the issues-** Measures to alleviate impact; alteration to policy; action plans
- ↓ **Formal consultation-** Use appropriate methods; consult those affected or with legitimate interest; consult widely; ensure consultation is open, inclusive & accessible
- ↓ **Making a decision-** Explain decision & intended effects/benefits; monitor any actions
- ⇒ **Publication of results-** Accessible & user friendly; add website & intranet; notify consultees

<b>Name of service or policy being assessed</b>	Proposals to make changes to the Council Tax Reduction Scheme to move from a means tested assessment to an income banded reduction scheme from 2019/20.		
<b>Directorate</b>	Resources	<b>Is this a new or existing service or policy?</b>	New/ Existing
<b>Officers completing the assessment</b>	Lucy Wright-Revenues, Benefits & Customer Services Manager	<b>Director</b>	Tracey Southall – Director of Resources
<b>Date</b>	June 2018	<b>Relevant Cabinet Member</b>	Cllr Nathan Desmond - Cabinet Member for Resources

<p><b>Establish clear aims &amp; objectives</b>          What is the purpose and expected outcomes?</p>	<p>The Council Tax Reduction Scheme (CTRS) provides assistance to people on low incomes to help them pay their council tax.</p> <p>When council tax benefit was abolished and replaced by localised council tax schemes in 2013, central government protected pensioners with a view that they are unable to take advantage of employment and unable to alter their financial situation.</p> <p>The proposed alterations to the scheme will continue to protect pensioners who will get the same level of council tax support as they do now. The proposals to change the CTRS from 2019/20 are as follows:</p> <ul style="list-style-type: none"> <li>• Move to an income banded scheme instead of a means tested benefit. Claimants will fall into one of 4 bands depending on their household income. The grid has been developed to include single people, couples, families with 1 child and families with 2 or more children. Each band has 4 income brackets which entitles the claimant to either a 80%, 60%, 40% or 20% reduction in their Council Tax.</li> <li>• The scheme allows for variation in the size of the household as the levels of income per band increase when an applicant has a partner and/or dependants.</li> <li>• The proposed scheme does not apply a deduction for non-dependants living in the household. This is a significant change which will benefit those with non-dependants living in the household while simplifying the scheme for administration purposes such as low income households with adult children who live at home.</li> <li>• A standard earnings disregard will be applied across all claimants of £25. This will encourage people to move into work.</li> <li>• Current income disregards will continue such as Disability Living Allowance, Personal Independence Payments, the support component of Employment Support Allowance, Carer's Allowance, war pensions, war disablement pensions, child benefit and child maintenance payments.</li> </ul>
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	<ul style="list-style-type: none"> <li>• The capital limits before entitlement is stopped will be £6,000.</li> <li>• Extended payments and student provisions will be removed.</li> </ul>
Will there be any effect on other council procedures or strategies e.g. Corporate Plan or the <u>council's workforce</u> ?	None
Are there any statutory requirements or implications?	The Local Government Finance Act prescribes details of the scheme to be used for pension age applicants under the Council Tax Reduction Scheme (Prescribed Requirements) Regulations 2012. Certain aspects of the scheme for working age applicants are also included within those regulations.
Are there any other organisations / bodies involved?	None
<b>Consideration of data &amp; information</b> National & local data; service data; satisfaction/feedback data; complaints; research that is being used	Due to changes made by central government from 2013 all local authorities were required to create a local scheme to replace council tax benefit. If the Council wish to consider making any changes to the scheme, there is a legal requirement to undertake a consultation.  If approved by Cabinet, the Council will consult on the proposed scheme from 23 July. The consultation will run for 10 weeks and the feedback received will be presented to Overview & Scrutiny and Cabinet in November and Council in December. Any appropriate feedback will be incorporated into this equality impact assessment.
<b>Assessing the impact</b> Who does/does not use service? Have you consulted? Does it reflect varied needs of community?	All households are liable to pay council tax. However the level of financial support they receive is up to the Council to decide under their local scheme regulations.  The current scheme provides 100% support for low income pension age claimants and 80% support for low income working age claimants, meaning all working age households have to pay a minimum of 20% of their council tax bill.  The Cabinet stated that they were not minded to change the level of support for working age claimants before 2019/20 however central Government have made changes to housing

	<p>benefit, tax credits and universal credit. The proposed changes will affect some claimants – approximately 20% of households might see an increase in their entitlement while 13% may see a reduction due to their income levels. Further profiling will continue to be carried out throughout the summer and the final scheme will be presented to Council in December following public consultation.</p> <p>The current Council Tax Reduction Scheme working age caseload is approximately 4,414.</p>
<p><b>What impact does the service / policy / project have on the nine protected characteristics as defined by the Public Sector Equality Duty 2010 – for definitions, please see overleaf.</b></p>	
<p><b>Reviewing/Scrutinising the impact</b></p>	
<p>Is there a differential impact on different groups? Is it adverse? Is it directly or indirectly discriminatory? Show justification if applicable</p>	
<p><b>1. Age</b></p>	<p><b>Negative</b>  <u>Evidence:</u>                  While the changes will impact negatively on some new working age claimants the majority will be affected positively as they will receive more entitlement whereas pensioners are protected so the impact is not considered to be significant. The retention of a discretionary exceptional hardship fund that will support low income working age claimants will mitigate the impact on working age households that are unable to pay the liability or who are detrimentally affected.                  Current caseload shows that 50% of our caseload is working age and 50% are pensioners.</p>
<p><b>2. Disability</b></p>	<p><b>Positive/Negative</b>  <u>Evidence:</u>                  The proposed changes to the scheme continues to disregard disability benefits</p>
<p><b>3. Gender Reassignment</b></p>	<p><b>Positive/Negative</b>  <u>Evidence:</u>                  No impact</p>
<p><b>4. Marriage and Civil Partnership</b></p>	<p><b>Positive/Negative</b>  <u>Evidence:</u>                  No impact</p>
<p><b>5. Pregnancy and Maternity</b></p>	<p><b>Positive/Negative</b>  <u>Evidence:</u>                  No impact</p>

6. Race	<b>Positive/Negative</b> <u>Evidence:</u> No impact		
7. Religion or belief	<b>Positive/Negative</b> <u>Evidence:</u> No impact		
8. Sex	<b>Positive/Negative</b> <u>Evidence:</u> No impact		
9. Sexual orientation	<b>Positive/Negative</b> <u>Evidence:</u> No impact		
<b>Other</b> e.g. Deprivation, health inequalities, urban/rural divide, community safety.	<b>Negative</b> <u>Evidence:</u> Council Tax Reduction is a discount that is available to low income households. It is on this basis that all working age recipients would be at a socio-economic disadvantage in particular lone parents, part-time workers and carers. The retention of a discretionary exceptional hardship fund that will support low income working age claimants will mitigate the impact on working age households that are unable to pay the liability or who are detrimentally affected by the proposed changes.		
Can any differential impact be justified? (e.g. promoting equality of opportunity)	Y	N	<u>Evidence</u> When creating the local scheme, the Council have given due regard to central government’s stipulation that people of pension age must be protected. In a public consultation undertaken in 2012, the principle of ‘Every household with working age claimants should pay something’ was agreed by 84% of respondents and this became a principle embedded into our scheme. A further consultation was undertaken in 2015 and there were no objections raised to this principle which ensures a degree of fairness as it applies across all groups who are of working age. The scheme is devised to incentivise working age people to seek employment. For those who are in severe hardship or unable to increase their income, the Council manages a discretionary hardship fund to support

			them following a detailed review of the individual's and household's circumstances.	
Does any adverse impact amount to unlawful discrimination?	¥	N	<u>Evidence</u>	
<b>What alternative actions could be taken to mitigate any adverse impact?</b> <i>(add these to the action plan)</i>	Continuation of the exceptional hardship fund to support those in financial need.			
<b>Addressing the issues</b>				
<i>Measures to alleviate impact; alteration to policy; action plans</i>				
<b>ACTION PLAN</b>				
<b>Impact</b>	<b>Action required</b>	<b>Lead Officer</b>	<b>Timescale</b>	<b>Comments</b>
Financial pressure applied to low income families	Ensure all staff promote applications for the exceptional hardship fund to provide support to those in financial need	Lucy Wright	Ongoing	
	Continuously monitor the impact of the changes together with take up of the exceptional hardship fund.	Lucy Wright	Monthly	Monthly analysis of collection rates for CTRS caseload
	Report the number of applications/awards made against the exceptional hardship fund	Lucy Wright	Monthly	Data to include expenditure to date to ensure adequate financial provision is made



<b>Action Plan to be reviewed:</b>	Date November 2019
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<b>Formal Consultation</b>	
What formal consultation has been undertaken?	Public consultation held in 2012, 2015 and 2016 as detailed above. Further consultation with regard to the proposed change to an income banded scheme will take place from July 2018 for 10 weeks.
<b>Making a Decision</b>	
Explain decision & intended effects/benefits;  Can the service/policy proceed?	The Council was required to replace council tax benefit with a local scheme with the requirement that pensioners are to be protected. It is inevitable that there will be negative equality impacts. As a result however this is mitigated by the creation and continued use of an exceptional hardship fund
How will the service/policy / actions be monitored and reviewed? <i>(please give timescale)</i>	Continuous and ongoing monitoring of council tax collection rates with specific reference to CTRS claimants, numbers of reminders & summonses issued and number of exceptional hardship applications
<b>Publication of results</b>	
Accessible & user friendly; add website & intranet; notify consultees	To be published following full Council decision in December 2018
<b>Signed</b> Lucy Wright – Revenues, Benefits & Customer Services Manager	Date  13 <sup>th</sup> June 2018
<b>Agreed by Director of Service</b> Tracey Southall	Date

Prior to the Equality Act 2010, there were 3 separate public sector equality duties covering race, disability and gender. The Equality Act 2010 replaced these with a new single equality duty covering the following protected characteristics:

**Protected characteristics: definitions**

**Age** - where this is referred to, it refers to a person belonging to a particular age (e.g. 32 year olds) or range of ages (e.g. 18 - 30 year olds).

**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 that person's ability to carry out normal day-to-day activities.

**Gender reassignment** - The process of transitioning from one gender to another.

**Marriage and civil partnership** - marriage is defined as a 'union between a man and a woman'. Same-sex couples can have their relationships legally recognised as 'civil partnerships'. Civil partners must be treated the same as married couples on a wide range of legal matters.

**Pregnancy and maternity** - pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

**Race** - It refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins.

**Religion and belief** - religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism).

**Sex** - a man or a woman.

**Sexual orientation** - whether a person's sexual attraction is towards their own sex, the opposite sex or to both sexes