

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

<p>Under the Equality Act 2010 Protected characteristics are age, disability, gender, gender identity, race, religion or belief, sexuality, civil partnerships and marriage, pregnancy and maternity. Page 6 of guidance. Other areas to note see guidance appendix 1</p>	
<p>Name of policy, service or function. If a policy, list any associated policies:</p>	<p>Council Tax Reduction Scheme</p>
<p>Name of service and Directorate</p>	<p>Benefits Assessment, Revenues, Benefits and Payments, Finance and Customer Services</p>
<p>Lead manager</p>	<p>Andrew Sheldon (Benefits Assessment Operational Manager).</p>
<p>Date of Equality Analysis (EA)</p>	<p>24th November, 2017</p>
<p>Names of those involved in the EA (Should include at least two other people)</p>	<p>Andrew Sheldon (Benefits Assessment Operational Manager). Robert Cutts (Service and Development Manager) Zafar Saleem (Neighbourhoods Partnership Manager).</p>
<p>Aim/Scope</p> <p><u>Council Tax Reduction Scheme 2018/19</u></p> <p>In April 2013, the Government abolished the national Council Tax Benefit (CTB) scheme for working age claimants and asked local authorities to set up their own local schemes to meet the needs of their local area. Pensioner claimants are protected and must be assessed under prescribed rules set by Government.</p> <p>Our local scheme is known as Council Tax Support (CTS). In making this change the Coalition Government cut the amount that Rotherham Council had to provide Council Tax Support by 10%.</p> <p>The Council introduced their scheme in April 2013 and decided that the maximum amount of help a working age applicant can receive would be 91.5% of their Council Tax liability. This means all working age claimants currently have a minimum of 8.5% to pay irrespective of their income (some have more to pay due to the means test that is also undertaken or as a result of non-dependent deductions).</p> <p>It is expected that Rotherham MBC will award £21.1 million to 25,500 claimants in the current year, 2017/18.</p> <p>The amount the Council receives in respect of CTS is no longer separately identified and is included in the Revenue Support Grant that the Council receives from the Government. This has reduced year on year since 2013 and as a consequence there has been a need to consider the viability of continuing with the current scheme. Any reduction in the cost of the scheme would help the Council with its funding shortfall.</p> <p>A consultation exercise was undertaken by the Council which included retaining the current scheme and a number of options for changing the scheme. The results of the consultation can be found in Appendix A of the report that will be presented to the full</p>	

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Council on the 24th January 2018.

The recommended options to change the scheme from 01/04/2018 are detailed below. The rationale as to why the other options have not been recommended can be found in the report that will be presented to the full Council on the 24th January 2018.

- Increase the taper rate at which CTS is withdrawn at from 20% to 30%
- Change non-dependent deductions to £5 per week for non-dependents not in employment and £10 for those in employment. This results in most non-dependent deductions being increased and non-dependent deductions being applied where one currently does not apply due to the non-dependents income such as those on income support and income based job-seekers allowance.
- Care leavers under 21 years of age and those who are 22 to 25 in full time education will have their Council Tax covered in full as part of the Councils Council Tax Reduction Scheme from 2018/19 (this has been applied in 2017/18 as a discount under the discretionary powers the Council has).
- Introduce discretion to limit the number of assessments for claimants in receipt of universal credit where there are only small changes.

It should be noted that the remainder of this document only covers the first two of these options as these changes reduce the level of CTS claimants will receive. The third option will benefit those affected by approximately £13,000 per annum and the fourth option is an administration change.

The aim of the policy is:

- To mitigate cuts to Council Tax Support of Rotherham residents with the lowest income, to ensure that the most vulnerable are not disadvantaged and Council Tax is proportionately paid by those most able to pay.
- To ensure the cost of the scheme is within the available funds ensuring that additional burdens are not put on the general fund at further cost to the local tax payer.
- To protect the most vulnerable as far as possible by taking into account guidance issued by the Secretary of State and giving due consideration to the Equality Act 2010.

What equality information is available? Include any engagement undertaken and identify any information gaps you are aware of. What monitoring arrangements have you made to monitor the impact of the policy or service on communities/groups according to their protected characteristics?

Age

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Of our current Council Tax Support, 57.98% of claimants are working age and 42.02% are pensionable age.

Pension Age – Those who are state pension credit age (currently 64 years and older) will continue to have their support assessed under national rules and will not be affected by this policy and the proposed changes.

The council collects claimant’s dates of birth as part of the application process. The breakdown of work- age claimants ages can be categorised as follows;

Age	%
Under 20	0.43%
20 - 29	16.98%
30 - 39	24.15%
40 - 49	23.05%
50 - 59	24.20%
60 to pension credit age	11.19%

The means tested scheme is based on income and household circumstances. The applicable amount used to calculate a claimant’s support can vary due to age with single people under 25 having a lower applicable amount than those over 25 and couples where both the claimant and partner are under 18 also having a lower applicable amount than couples over 18.

However, these differences are part of the current scheme and whether the proposed changes apply to an applicant is not influenced by age. The policy and proposed changes does not impact any one group differently on age grounds.

Disability

There is no specific disability indicator on the benefits system however, according to our data 32% of claimants are receiving benefit to help with care/mobility. This figure is likely to be understated as the service are not required to collect this data for assessment purposes in respect of pass-ported claims.

The means tested scheme is based on income and household circumstances. Those who are disabled generally have a higher applicable amount than those who are not disabled which allows them to keep more of their income before their support is reduced. This reflects the extra demand on finances for people with disabilities.

Additionally, claimants in receipt of disability living allowance care component or personal independence payment daily living component are not subject to non-dependent deductions irrespective of the non-dependent income. This reflects that the non-dependent could be helping with the households care needs. Our current data shows that 30% of work-age claimants receive one of these benefits.

As can be noted the current means test provides protection for those who are disabled

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

and these will continue. Whether the proposed changes apply to a claimant is not influenced by disability. The policy and proposed changes does not impact any one group differently on disability grounds.

Gender

Overall claimants tend to be predominantly female with 62% compared with 38% male, however in the case of couples it depends which partner completes the form.

The breakdown of gender of the applicant for different household types is shown in the table below.

Single and Lone Parent claims account for 72% of the current caseload and of those 66% are female.

Couple (10% of claims)		
	Female	42%
	Male	58%
Couple with Children (18% of claims)		
	Female	55%
	Male	45%
Lone Parent (30% of claims)		
	Female	91%
	Male	9%
Single (without children) (42% of claims)		
	Female	46%
	Male	54%
Overall		
	Female	62%
	Male	38%

The means tested scheme is based on income and household circumstances and is not influenced by gender. The policy and proposed changes does not impact any one group differently on gender grounds.

Gender Identity

Data is not available for this characteristic

The means tested scheme is based on income and household circumstances and is not influenced by gender identity. The policy and proposed changes does not impact any one group differently on gender identity grounds.

Race

Our data indicates that White British make up a larger percentage of the current caseload at 96.46% than is shown by the wider borough analysis of 91.9% while others make up a smaller percentage of our caseload than the overall borough figure.

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Data is only known where this has been provided by claimants at the time the claim is made and is therefore only held for a small percentage of the current caseload

	%
White British	96.46%
Asian or Asian British: Pakistani	0.92%
Black or Black British: African	0.65%
White Other Background	0.54%
Asian or Asian British: any other Asian background	0.31%
White Irish	0.27%
Black or Black British: Caribbean	0.15%
Chinese	0.15%
Mixed background: White and Black Caribbean	0.12%
Mixed background: Any other mixed background	0.12%
Asian or Asian British: Bangladeshi	0.08%
Asian or Asian British: Indian	0.08%
Mixed background: White and Asian	0.08%
Black or Black British: Any other Black background	0.04%
Mixed background: White and Black African	0.04%
Grand Total	100.00%

The means tested scheme is based on income and household circumstances that are not influenced by race. The policy and proposed changes does not impact any one group differently on race grounds.

Religion or belief

Data is not available for this characteristic

The means tested scheme is based on income and household circumstances and is not influenced by religion or belief. The policy and proposed changes does not impact any one group differently on religion or belief grounds.

Sexual Orientation

Data is not available for this characteristic

The means tested scheme is based on income and household circumstances and is not influenced by religion or belief. The policy and proposed changes does not impact any one group differently on religion or belief grounds.

Marriage and Civil Partnership

Of the current caseload, 73% are single claimants with no partner while 27% are living together as couples either with or without children. We have no data to indicate if couples are married or in a civil relationship.

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Of the 75% of claimants who are single, 58% have no dependent children while 42% have dependent children.

The means tested scheme is based on income and household circumstances that are not influenced by whether someone is married or in a civil partnership. The policy and proposed changes does not impact any one group differently on marriage or civil partnership grounds.

Maternity and pregnancy

Data is not available for this characteristic

The means tested scheme is based on income and household circumstances and is not influenced by religion or belief. The policy and proposed changes does not impact any one differently on religion or belief grounds.

Other data

The Council has undertaken a modelling exercise to assess the impact the suggested changes would have on the current working age CTS scheme caseload.

3,149 (21%) of working age claimants would be affected by the suggested changes to the scheme and on average they would see the CTS they receive reduced by an average of £3.26 per week.

11,912 (79%) would not be affected because they have been assessed as having income below the amount they are expected to live on and therefore not subject to the taper deduction or they do not have any non-dependents that would be affected by the changes to non-dependent charges. These claimants would continue to have 91.5% of their Council Tax covered by the scheme leaving them with 8.5% to pay.

The Councils CTS financial system categorises caseload into 4 groups. The table below shows the impact on each work age category. It should be noted that claimants who fall into more than one category will be included in the first category that they meet for example; someone in work with a disability premium will be in the vulnerable group rather than the employed group.

	Vulnerable (those that receive a disability premium in the calculation of their CTS)	Household Vulnerable (those with a child under 5)	Employed (Those employed not in the previous groups)	Other	Total
Number of claimants affected	560	703	993	892	3,149
Average weekly Ctax increase	£3.32	£3.22	£3.50	£3.01	£3.26
Average annual Ctax increase	£173	£168	£183	£157	£170
Total annual reduction in scheme cost	£97k	£118k	£181k	£140k	£536k
% reduction in CTS cost	18%	22%	34%	26%	100%

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Whilst the amount that each group is affected by varies the variations are not that significant to conclude that one particular group will be disadvantaged more than another group by the proposed changes.

Engagement undertaken with customers (date and group(s) consulted and key findings)

The Council entered into a public consultation exercise from 9th October 2017 to 20th November 2017 which covered eight options for change.

Consultation programme

The consultation programme comprised a wide variety of consultation methods with the aim to ensure the approach was inclusive of all groups affected, including those currently in receipt of Council Tax Support and the general Council Tax payer. The consultation methods consisted of the following:

Press

- A press release was issued to Rotherham Advertiser which appeared on their website.

Partner agencies

- Letters were issued to the three local MP's advising of the consultation and a meeting was held with one of those MP's office.
- Emails were issued to a number of partner agencies such as Citizens Advice, Voluntary Action Rotherham etc. A separate meeting was held with the CEO of Citizens Advice.
- Parish Councils were made aware of the consultation and officers of the Council attended the Parish Council meeting.
- The major preceptors (Fire and Police) were also contacted for their representations.

Public

- Promotion of the on-line consultation was undertaken by letter, SMS and email. Additionally, promotional flyers were issued with some benefit notifications and Council Tax bills
- A total of 20,830 letters/flyers, 7,757 emails and 36,333 SMS were sent promoting the consultation.
- A promotional message was played on the main

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

	<p>Council Tax and Benefits phone lines and was heard by 18,105 customers.</p> <p><u>Summary of Consultation findings</u></p> <p>There were 401 responses to the consultation and analysis shows the following;</p> <ul style="list-style-type: none"> • Those who are not in receipt of CTS (227 of the respondents) generally supported the options of reducing the level of CTS. • Those who are in receipt of CTS (174 of the respondents) supported retaining the current scheme. Analysis of their answers to the individual options that would reduce support was varied with some being supported and some not. However, it is considered that this variance is due to respondents supporting the option that would not affect them and vice versa. <p>A detailed breakdown of responses to each question is available in Appendix A of the report that will be presented to the full Council on the 24th January 2018.</p>
<p>Engagement undertaken with staff about the implications on service users (date and group(s) consulted and key findings)</p>	<p>Internal consultation with key officers and senior managers including the Council’s Senior Leadership Team and Elected Members was conducted. Internal communications issued to all staff advising of consultation process.</p>
<p>The Analysis</p>	
<p>How do you think the Policy/Service meets the needs of different communities and groups?</p> <p>The Council Tax Support scheme for working age claimants is a means tested scheme.</p> <p>The means test recognises the needs of different groups by:-</p> <ul style="list-style-type: none"> • Disregarding certain disability benefits and not applying non-dependent deductions for those in receipt of certain disability benefits. • Disregarding some amounts from earnings, disregarding some child care costs and child benefit. • Disregard of war widows and war disablement pensions. • The applicable amounts that are used in the means test take account of the size of the household and provide additional amounts for the disabled. 	

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

At the present time 81% of the working age caseload receive the maximum 91.5% amount of support allowed under the Councils scheme and have 8.5% of their Council Tax liability to pay. These families have been assessed as having income below their applicable amount which is believed to reflect the basic living needs of the claimant and their family or have no non-dependents'. If the recommended changes are implemented this reduces by 2% to 79%.

The policy and changes would continue to meet the needs of the community and the aim of the Council by protecting the most vulnerable with the lowest incomes. Whilst 21% of the caseload would see a reduction in the amount of CTS, the affected households are considered to be those more able to pay. Their income has been assessed as being above their applicable amount or has non-dependents who could be expected to contribute to the household expenditure.

If the recommendations are adopted those directly affected will be contacted and information will be cascaded to partner agencies etc.

Analysis of the actual or likely effect of the Policy or Service:

The impact on the claimant and the council would include

- Those affected would see an increase in the amount of Council Tax they have to pay creating an additional burden on the household budget.
- Increase in amount of Council Tax debit which has to be collected. Possible increase in Council Tax arrears and recovery action should those affected not pay.
- Possible increase in customer contact querying the assessment of their CTS for 2018/19 year.

In mitigation

- The Council has a number of payment options to help customer's budget and meet their Council Tax payments. These include weekly, fortnightly, four weekly and monthly payment plans.
- The Council have a flexible approach to recovery and will make a payment arrangement that the taxpayer can afford where arrears arise.
- The changes to the scheme will be published on the Council's website and shared with key stakeholders. Claimants who will be affected will also be contacted directly.

Wider implications

- Possible increase in those seeking help from local advice agencies in respect of meeting their Council Tax.
- The recommended changes could impact on the household's health/wellbeing, increase crime and risk of fire as they will have less disposable income to meet their other household expenditure. It is not possible to assess the likely impact in these areas however, due to low numbers affected by the recommended changes it

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

is considered that any impact would be of a very marginal nature.

What affect will the Policy/Service have on community relations?

It is not anticipated that there will be any adverse impact on community relations.

Please list any **actions and targets** by Protected Characteristic that need to be taken as a consequence of this assessment and ensure that they are added into your service plan.

Website Key Findings Summary: To meet legislative requirements a summary of the Equality Analysis needs to be completed and published.

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Equality Analysis Action Plan

Time Period: 2017/18

Manager: Robert Cutts

Service Area: Revenues and Benefits, Benefits Assessment Tel: 23320

Title of Equality Analysis: Review of Council Tax Reduction Scheme

Action/Target	State Protected Characteristics (A,D,RE,RoB,G,GI O, SO, PM,CPM, C or All)*	Target date (MM/YY)
Name Of Assistant Director who approved Plan		Date

*A = Age, C= Carers D= Disability, G = Gender, GI Gender Identity, O= other groups, RE= Race/ Ethnicity, RoB= Religion or Belief, SO= Sexual Orientation, PM= Pregnancy/Maternity, CPM = Civil Partnership or Marriage.

Website Summary – Please complete for publishing on our website and append to any reports to Elected Members, SLT or Directorate Management Teams

RMBC - Equality Analysis Form for Commissioning, Decommissioning, Decision making, Projects, Policies, Services, Strategies or Functions (CDDPPSSF)

Completed equality analysis	Key findings	Future actions
<p>Directorate: Finance and Customer Services</p> <p>Function, policy or proposal name: Council Tax Reduction Scheme</p> <p>Function or policy status: Changing (new, changing or existing)</p> <p>Name of lead officer completing the assessment:</p> <p>Andrew Sheldon.....</p> <p>Date of assessment: 24th November, 2017</p>	<p>The impact of implementing the recommended changes would not disadvantage any particular group.</p>	<p>None</p>