

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 & Non Domestic Rate Recovery Policy</p>
<p>Name of service and Directorate</p>	<p>Revenues & Benefits, Resources Directorate</p>
<p>Lead manager</p>	<p>Robert Cutts, Service & Development Manager</p>
<p>Date of Equality Analysis (EA)</p>	<p>1st May, 2013</p>
<p>Names of those involved in the EA (Should include at least two other people)</p>	<p>Steven Ward, Operational Manager – Account Management Zafar Saleem, Community Engagement Manager</p>
<p>Aim/Scope (who the Policy /Service affects and intended outcomes if known) See page 7 of guidance step 1</p> <p>In December 2011 the Local Government Ombudsman produced a focus report entitled 'Can't Pay Won't Pay – using bankruptcy for Council Tax debts'. One of the recommendations of the report states that Local Authority's are required to review its revenues policies for the collection, recovery and enforcement of Council Tax and Non Domestic Rates and that a document should be in place outlining these policies.</p> <p>The aim of this policy is to ensure that the document conforms to the recommendations of the Local Government Ombudsman's report (see appendix 1).</p> <p>This review affects all customers who have a liability in Rotherham to pay Council Tax and Non Domestic Rates to the Local Authority.</p>	
<p>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? See page 7 of guidance step 2</p> <p>Upon reviewing the number of liability orders obtained by the Account Management Team for non/late payment of Council Tax during the period October 2011 to October 2012 it was found that just 13 of 12,500 charge payers were in receipt of Disabled Relief. This data will be further reviewed under the terms of the Debt Recovery Policy and appropriate steps taken in light of the results.</p> <p>Information is gathered at the point of registration for Council Tax and Non Domestic Rates and upon application for related benefits and discounts.</p>	

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<p>Engagement undertaken with customers. (date and group(s) consulted and key findings) See page 7 of guidance step 3</p>	<p>Annual Council Tax and Non Domestic Rates bills are despatched to customers in March and April each year with amended bills being sent on a daily basis during the year where changes have occurred to liability. The bills include a monthly statutory instalment plan and provide notice that the Council operates a strict timetable for recovery of unpaid bills. A suite of letters and SMS templates inform the customer at each stage of the recovery process.</p>
<p>Engagement undertaken with staff about the implications on service users (date and group(s) consulted and key findings) See page 7 of guidance step 3</p>	<p>There will be ongoing engagement and consultation with key officers and service users, including the Council's Senior Leadership Team. An Officer Working Party comprising representatives from across Revenues and Benefits has considered the policy.</p>
<p>The Analysis</p>	
<p>How do you think the Policy/Service meets the needs of different communities and groups? Protected characteristics of vulnerable groups accounting for age, disability, gender, gender identity, race, religion or belief, sexuality, Civil Partnerships and Marriage, Pregnancy and Maternity. Other areas to note are Financial Inclusion, Fuel Poverty, and other social economic factors. This list is not exhaustive.</p> <p>Recovery of Council Tax and Non Domestic Rates arrears is applied consistently across all groups equally following consideration of the action being fair and proportionate. Specific allowances will be considered following the gathering of sufficient evidence about the customer's circumstances from all relevant sources.</p>	
<p>Analysis of the actual or likely effect of the Policy or Service: See page 8 of guidance step 4 and 5</p> <p>Does your Policy/Service present any problems or barriers to communities or Group? Identified by the protected characteristics of vulnerable groups.</p> <p>The policy document recognises that the Council's 'firm but fair' approach to recovery may present problems to some groups but offers support through a series of measures, having regard to disabilities in order to eliminate discrimination and advance equality of opportunity. Appropriate checks are built into our policy to distinguish between those customers who are unable to pay and those who seek to intentionally avoid paying. A range of discounts and exemptions are promoted to reduce customer liability wherever possible and customers are signposted to appropriate sources of debt and benefit advice where appropriate.</p> <p>The Council's complaints procedure enables customers to challenge decisions in debt recovery where they consider that the actions taken are not lawful or we have acted unfairly.</p> <p>Throughout the recovery and enforcement process the actions taken follow the recommendations made by the Local Government Ombudsman in their focus report entitled 'Can't Pay Won't Pay – using bankruptcy for Council Tax debts' and those actions</p>	

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are reviewed by Senior Management at key stages with checks being made to identify whether the customer has any disability or vulnerability that may prohibit them from complying with the Council's requirements in payment, for example by engaging with the Council's Safeguarding Adults Team.

The Council tenders for its bailiff services and as part of the process rigorous checks are made to ensure that the companies engaged are accredited, comply with all relevant codes of practice and work to a monitored service level agreement.

Does the Service/Policy provide any improvements/remove barriers? Identified by the protected characteristics of vulnerable groups.

It is the Council's policy to offer help and support to those customers who do not pay Council Tax and Non Domestic Rates because of genuine financial hardship or other difficulties in a number of key ways.

It is our policy also to offer help and support to all customers who are experiencing difficulties paying at every stage of the collection and recovery process. We offer a range of payment dates and payment methods to enable customers to be able to easier maintain payments; we always try to resolve debt problems at the earliest opportunity by advising customers as soon as possible that instalments have been missed; we signpost customers towards relevant assistance, including advice agencies, agreeing to hold recovery action for agreed periods to enable specialist advice to be given; we give proper consideration to a customer's circumstances and financial situation; we give clear reasons when we feel that an offer of payment is too low and indicate an amount that we believe is reasonable; we respect and protect customer's rights at every stage of the recovery process; we accept that in some exceptional circumstances no payment scheme is affordable and we advise customers of their possible entitlement to any benefits, discounts or exemptions.

What affect will the Policy/Service have on community relations? Identified by the protected characteristics of vulnerable groups.

It is unlikely that there will be any impact on community relations as the policies outlined in the document are pre-existing and managed by using tried and tested methods.

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.

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Equality Analysis Action Plan

Time Period - 2012/2013

Manager: **Robert Cutts**

Service Area: **Revenues & Benefits**..... Tel:

01709 823320

Title of Equality Analysis:

If the analysis is done at the right time, i.e. early before decisions are made, changes should be built in before the policy or change is signed off. This will remove the need for remedial actions. Where this is achieved, the only action required will be to monitor the impact of the policy/service/change on communities or groups according to their protected characteristic.

List all the Actions and Equality Targets identified

Action/Target	State Protected Characteristics (A,D,RE,RoB,G,GI O, SO, PM,CPM, C or All)*	Target date (MM/YY)	
To monitor any complaints or comments regarding the policy and disaggregate by protected characteristic to see if any disproportionate outcomes are evident.	All	April 2013	
Name Of Director who approved Plan	Stuart Booth, Director of Finance	Date	1st May 2013

*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.

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

Completed equality impact assessments	Key findings	Future actions
<p>Directorate: Resources</p> <p>Function, policy or proposal name:</p> <p>Council Tax and Non Domestic Rates Recovery Policy</p> <p>Function or policy status: New (new, changing or existing)</p> <p>Name of lead officer completing the assessment:</p> <p>Robert Cutts, Revenue & Benefits Manager</p> <p>Date of assessment: 1st May 2013</p>	<p>The aim is to ensure that the Debt Recovery Policy conforms to the Local Government Ombudsman’s recent focus report ‘Can’t Pay Won’t Pay – using bankruptcy for Council Tax debts’</p>	<p>To monitor any complaints or other comments relating to the policy and disaggregate by protected characteristic to see if any disproportionate outcomes are evident.</p>