



Equality Impact Assessment

Part 1: Screening

When reviewing, planning or providing services Northampton Borough Council needs to assess the impacts on people. Both residents and staff, of how it works - or is planning to – work (in relation to things like disability). It has to take steps to remove/minimise any harm it identifies. It has to help people to participate in its services and public life. “**Equality Impact Assessments**” (EIAs) prompt people to think things through, considering people’s different needs in relation to the law on equalities. The first stage of the process is known as ‘screening’ and is used to come to a decision about whether and why further analysis is – or is not – required. EIAs are published in line with transparency requirements.

A helpful guide to equalities law is available at: www.northampton.gov.uk/equality. A few notes about the laws that need to be considered are included at the end of this document. Helpful questions are provided as prompts throughout the form.

1 Name of policy/activity/project/practice	This is:
Local Council Tax Reduction Scheme (CTRS)	New policy/activity/practice

2. Screening undertaken (please complete as appropriate)	
Director or Head of Service	Isabell Procter
Lead Officer for developing the policy/activity/practice	Robin Bates
Other people involved in the screening (this may be people who work for NBC or a related service or people outside NBC)	Revs/Bens Management Team Localisation Programme Board Finance

3. Brief description of policy/activity/project/practice: including its main purpose, aims, objectives and projected outcomes, and how these fit in with the wider aims of the organisation.

From April 2013, the Government is abolishing the Council Tax Benefit (CTB) scheme and legislatively requiring each Local Authority to design a own local scheme. The Government funding less money to pay for the local scheme than previously for CTB. We will have around 10% less to spend on help towards Council Tax than before.

Localising financial support for council tax is part of a wider central Government policy to give councils increased financial interest and a greater stake in the economic future of their local area. This is part of the Government's wider agenda to enable stronger, balanced economic growth across the country.

Northampton Borough Council (NBC) has existing policies which details the Council commitment to safeguarding vulnerable people. These policies consider wider issues of poverty and debt within the community. This review will consider documentation that is currently in place within other departments to ensure that a consistent approach to Council Strategy is maintained.

4 Relevance to Equality and Diversity Duties

Anyone who is currently claiming CTB and is of working age will be affected by the changes and is likely to see their rate of benefit change.

In localising support for council tax, the Government believes that local schemes should provide support for the most vulnerable, including vulnerable pensioners.

5 Evidence Base for Screening

List the evidence sources you have used to make this assessment (i.e. the *known evidence*) (e.g. Index of Multiple Deprivation, workforce data, population statistics, any relevant reports, customer surveys, equality monitoring data for the service area.)

- [CLG Localising Council Tax Equality Impact Assessment and update](#)
- NOMIS Labour Market Profile
- Northampton Council tax database
- Council Tax Benefit database
- EIA's from other NBC departments that are relevant for this assessment.

Currently the Benefit data includes details of age, gender, receipt of disability award/benefit and relevant household composition.

6 Requirements of the equality duties:

(remember there's a note to remind you what they are at the end of this form and more detailed information at)

Will there be/has there been consultation with all interested parties?

Please explain:

Yes-full consultation with all council tax payers and key agencies and networks through presentations, surveys and workshops.

The consultation ran between 10th September and 22nd October 2012.

Are proposed actions necessary and proportionate to the desired outcomes?

Please explain:

Yes-This is a Government legislative reform and NBC has no scope for not applying this change.

Where appropriate, will there be scope for prompt, independent reviews and appeals against decisions arising from the proposed policy/practice/activity?

Please explain:

Yes-All decisions and determinations in relation to CTRS will be subject to an independent appeals process.

Does the proposed policy/practice/activity have the ability to be tailored to fit different individual circumstances?

Please explain:

No-Through the role of consultation NBC have devised many options available to ensure

that groups of people will not be adversely affected more than any other.

Where appropriate, can the policy/practice/activity exceed the minimum legal equality and human rights requirements, rather than merely complying with them? Please explain:

Yes-Whilst most working age people who qualify for CTRS will have to pay something or more than they do now we propose to set up a fund to give additional support to people who are in exceptional hardship or who are particularly vulnerable.

From the evidence you have and strategic thinking, what are the key risks (the harm or 'adverse impacts') and opportunities (benefits and opportunities to promote equality) this policy/practice/activity might present?

The DWP have published the following statistics regarding the national picture upon CTRS.

Passported Claimants are those who receive a qualifying benefit such as they are entitled to a council tax benefit award equal to 100% of their council tax liability. Without further means testing. Non-passported Claimants are means tested to determine their CTB award, but may still receive 100% support.

As of January 2011, in England, there are 4.9m Claimants receiving about 4.2bn in CTB. Over 60% of Claimants are aged under 65, accounting for a similar share of the total expenditure. Passported Claimants account for 66% of the Claimants and over 70% of expenditure.

With this in mind, the below table illustrates the potential financial impact on CTB Claimants in NBC.

Cat Description	No. Of Claims	Average week ent.	Total CTB per week	Annual Cost (£)
A Pensioner Income Support	4,595	16.80	77,196.00	4,014,192
B Pensioner Non Income Support	2,685	13.06	35,066.10	1,823,437
C Working Age Income Support	7,795	15.98	124,564.10	6,477,333
D Working Age Non-Income Support (vulnerable Status)	702	13.61	9,554.22	496,819
E Working Age Non-Income Support (All remaining Customers)	3,109	13.61	42,313.49	2,200,301
Total	18,886		288,693.91	15,012,083

Given that pensioners will be protected from CTRS, this leaves those claimants in category C – E to share the 10% saving. Applying this on an even basis across category C - E would see a reduction of approximately 16.35% in the claimants benefit.

It is likely that claimants who are already viewed as vulnerable would need to be protected (Category D). For the purpose of this illustrative example the vulnerable claimant group represents those claimants of working age, who are not in receipt of Income Support and who have a disability, or have a dependent child with a disability. Protecting this group from reductions in support for council tax would increase the saving required across category C & E to approximately 17.29%.

There are other implications to consider in respect of claimants in category C & E beyond the fact that they are already on low incomes and face a potential financial loss. There will be vulnerable families amongst these categories who may, for example, have young children or medical conditions.

The Government has therefore indicated that they wish to work closely with local authorities to ensure that they understand their existing responsibilities in relation to vulnerable groups. This work may see the number of claimants categorised as vulnerable increase resulting in the reduction for

other claimants rising above 17.29%.

Many of the customers who receive CTB may also be affected by other changes to the welfare benefit system, including changes to housing benefit announced in 2011. There are approximately 10,000 working age claimants currently in receipt of both CTB and Housing Benefit (HB) in NBC.

The 2011 Census results for Northamptonshire reveal a noticeable increase in the under 5 population (19%) and the over 85 population (33% increase) since the 2001 census. It is anticipated that the number of pensioners in receipt of CTB will continue to increase in the coming years. It is also anticipated that any system where CTB becomes a discount is likely to increase take-up, particularly among pensioners. Any significant increase in pensioner take up will inevitably force heavier reductions in support on some working age groups. Consequently, contingency arrangements may need to be built into a local scheme to provide a cushion against any unexpectedly high levels of demand for support. This will also inevitably lead to a further reduction in available support levels.

Clearly, the requirement to achieve a 10% saving while managing spending within lower limits and protecting the most vulnerable could increase the burden on those least able to pay and in so doing could compromise the council's revenue streams.

	Risks (Negative)	Opportunities (Positive)
Race	It is not intended that this policy will disproportionately affect any particular ethnicity. Consideration should be given to how the scheme is communicated; as it feasible that there are higher levels of unemployment within differing sectors of the community.	Consultation with communities, will give a greater understanding to those needs within our diverse community.
Disability	Disabled people may experience a shortfall in their budget. Consideration should be given to how the scheme is communicated; as it feasible that there are higher levels of unemployment within differing sectors of the community.	Scope within the local scheme is to protect 'vulnerable' people. Should a disability premium be allocated by the DWP in respect of a person's needs, then the policy can look to protect these people from the negative shortfall in entitlement.
Gender or Gender Identity/Gender Assignment	There are a greater proportion of female claimants than male within the current claiming population. This will therefore affect more women than men of working age.	None identified so far through this review
Pregnancy and Maternity (including breastfeeding)	People may be on reduced level of earnings whilst in receipt of Statutory Maternity Pay or Maternity Allowance and therefore will be affected by reductions.	None identified so far through this review
Sexual Orientation	None identified so far through this review	None identified so far through this review
Age (including children, youth, midlife and older people)	The impact of this policy will be felt by people of working age. This will also affect families in receipt of CTRS as there will be less excess income to spend on children as it will be used to meet financial commitments.	The Government has recognised that low-income pensioners cannot be expected to increase their income through paid work and therefore are to be protected from any reform or reduction in their entitlements
Religion, Faith and Belief	None identified so far through this review	None identified so far through this review
Human Rights	None identified so far through this review	None identified so far through this review

Comments made through consultation and the opportunity for these views to be used in designing the scheme.

Comments	Opportunity to Include in scheme
Extend time for many disabled households unable to access the net, use the phone, etc.	NBC can write in own scheme, how long information is required to be provided to determine entitlement to a reduction
Consider looking into the savings/properties owned by household members this doesn't seem to be done currently and many large family groups living with elderly parents my own numerous other properties with incomes.	Consideration can be given to the local scheme to include this
Remove many of the exemptions that allow landlords to pay little or no council tax on their properties	Consideration can be given to the local scheme to include this
Those with long-life illnesses, disability, not able to work.....how will they be supported?	Consideration can be given to the local scheme to include this
My husband is currently on ESA for a long term back problem so perhaps these people and other disabled groups should also have their council tax benefit protected like the pensioners.	Consideration can be given to the local scheme to include this
If you're single, regardless of size of house, you should continue to receive at least 25% off. There is no way one could afford to lose this with everything else going up in price - the whole economic crisis needs to be taken into consideration to see that people are at the end of their budgets !!	Consideration can be given to the local scheme to include this
The size of property shouldn't necessarily affect the benefit but the value of the property combined with the household income - a two faceted approach.	Consideration can be given to the local scheme to include this
People have different size properties for all sorts of reasons and this does not mean they are well off financial, often it is the reverse as the property is costly to maintain and heat.	Consideration can be given to the local scheme to include this
Changes should be tapered so that those in Council Band F upwards are paying a higher percentage. It is more likely that these properties are for the wealthier, but the income also needs to be taken into consideration.	Consideration can be given to the local scheme to include this
Low paid families	Consideration can be given to the local scheme to include this
What about those unable to handle their own personal affairs cope?	Consideration can be given to the local scheme to include this
As a single mother of 2 young children who worked for 15 years before becoming unemployed last year, I think it is fair that those of us who rely on state benefits should pay £5 per week towards council tax.	Consideration can be given to the local scheme to include this

<p>The only ones who are likely to complain about it are the minority who 'have no money' yet manage to be able afford 20 cigarettes a day and drink alcohol most nights! However not all of us on benefits are like that and any more than £5 a week would cause a big impact on our ability to feed and clothe our children.</p>	
<p>A total revamp of the Property Banding for Council Tax needs to take place. All properties should be revalued as the current scheme does not reflect today's market. Some large town houses are worth less than a property of similar size on the outskirts of town and the state of the area, i.e. Ward demographics, crime etc. needs to be reflected. Some town properties have a much higher Council Tax than should be applied as the property has a low value. Also there are many instances where houses in the same street with the same configuration are charged different rates!!!!</p>	<p>This is a national decision to be taken by the Department for Communities and Local Government and NBC is not able to amend or influence this decision.</p>
<p>Consider removing the disabled restriction. Just because somebody receives DLA / AA doesn't mean that their non-deps should automatically be disregarded. They may have large incomes/savings or own properties</p>	<p>Consideration can be given to the local scheme to include this</p>
<p>7 Proportionality</p> <p>The reduced central government funding will undoubtedly leave the council facing some significant service and financial pressures. In particular, it is anticipated that debt collection efforts will be impacted.</p> <p>Many claimants will also be facing reductions in their other welfare benefits, including Housing Benefit and consequently it is anticipated that many will face financial hardship and/or debt.</p>	

8 Decision date: 1st November 2012

We propose to carry out the following actions and review our assessment as appropriate:

Actions to be taken

- Review scheme after implementation
- Review of Benefit Claimant profiling data
- Review of forthcoming analysis of changes and impact that the CTRS scheme has on the wider picture for citizens of Northampton.
- Consider Communication with the public, to mitigate poverty and promote other Council option available to reduce financial burden in the community.
- Communication of the scheme, when agreed at Full Council to these people who will be affected most.
- Evaluation of 2012-2013 scheme for following years, in particular when impact arising from Universal Credit is known