

Equality Impact Assessment



Assessment Of:	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Customer Experience and Transformation	Assessment carried out by: Nikki Rawley
Service Area: Customer & Digital - Revenue & Benefits	Job Role: Council Tax Lead
Version 1 - Date Signed off By Director: Amanda 28.11.24	

Step 1: What do we want to do?

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the Policy Officer early for advice.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

To inform the decision to adopt the 2024-25 Council Tax Reduction Scheme for 2025-26. The scheme was originally introduced in 2020-21 and, apart from some minor changes made to the scheme in 2021-22 to ensure it would align with emergency measures introduced by the Department for Work and Pensions, no further changes have been made to date.

1. For 2025-26 it is proposed to use the existing provisions within the scheme to protect claimants from a loss of support by increasing the income band thresholds in line with the annual uplift applied by central Government to all HMRC and DWP welfare awards. Intend to adjust the income bands by Consumer Price Index of 1.7%. This intends that no-one loses support as a direct result of the annual uprating in primary benefits for 2025-26.

We are proposing 4 new changes to the working age Council Tax Reduction (CTR) scheme.

2. **Proposal 1 – Care Leavers Discount.** This will create a class within the scheme that continues to deliver Council Tax discounts to qualifying Devon County Council Care Leavers for a reduction of 25%, 50% or 100%, depending on the number and status of the other liable residents.
3. **Proposal 2 – Flexibility for applying the Minimum Income Floor (MIF) to certain self-employed earners.** This will enable the scheme to vary the number of hours used to calculate the earned income of a self-employed person who has genuine reasons for not being able to work a minimum of 35 hours a week.
4. **Proposal 3 - Childcare costs disregards.** This will update and simplify the scheme. It will reflect approaches currently used in Universal Credit, which allows for up to 85% of approved childcare costs to be taken into account when calculating a net weekly earned income.

5. **Proposal 4 - To introduce disregards for recent government compensation schemes that haven't previously been included in the scheme.** These being payments from the Post Office Compensation Scheme, Grenfell Tower inquiry and Infected Blood Scheme. This will mirror the disregards in the statutory pension age scheme.

1.2 Who will the proposal have the potential to affect?

<input checked="" type="checkbox"/> Service users	<input checked="" type="checkbox"/> The wider community	<input type="checkbox"/> Teignbridge workforce
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1.3 Will the proposals have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by your manager.

If 'Yes' complete the rest of this assessment.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	[please select]
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1. **Uplift to income bands – no equality impact.** The aim of the Council Tax Reduction Scheme is to provide a reduction in council tax liability to households in receipt of low incomes who will find it difficult to pay their council tax either in full or in part.

The amount of relief awarded is equal to either 25%, 50%, 75%, or 100% of the household council tax liability and is based on assessable income and household composition using a discount-based, income-banded approach. See below:

Current	With increase	Single no dependants	Couple no dependants	Single with one dependant	Couple with one dependant	Single with two or more dependants	Couple with two or more dependants
£0.00 to £92.00	£0.00 to £94.00	100%	100%	100%	100%	100%	100%
£92.01 to £178.00	£94.01 to £181.00	75%	75%	100%	100%	100%	100%
£178.01 to £265.00	£181.01 to £270.00	50%	50%	75%	75%	100%	100%
£265.01 to £354.00	£270.01 to £360.00	25%	25%	50%	50%	75%	75%
£354.01 to £441.00	£360.01 to £449.00	0%	0%	25%	25%	50%	50%

£441.01 to £530.00	£449.01 to £539.00	0%	0%	0%	0%	25%	25%
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NB. Certain incomes are disregarded when calculating assessable income.

The current income-banded scheme has been in existence since 1 April 2020 and replaced the previous, fully-means tested scheme which was costly and complex to administer, as well as being difficult for claimants to understand. The current scheme retains support at 100% for passported claimants and those on the lowest household incomes. These increases will safeguard existing awards for all claimants, including those with protected characteristics. It does not have an equality impact.

2. **Care Leavers Discounts – Has a positive Equality impact.** The Council is currently delivering discounts to all qualifying care leavers. This proposal will maintain the same level of support from within the scheme and ensure a small number of Council Tax payers within a vulnerable group of young individuals is better able to afford their liabilities.
- **Flexibility for applying the Minimum Income Floor (MIF) to certain self-employed earners - Positive Equality Impact.** The Council currently uses provisions within its Discretionary Discount and Exceptional Hardship Policy to adjust the number of hours used to calculate the income of a self employed earner who cannot reasonably work 35 hours a week because of caring responsibilities or disabilities. The proposal moves this into the scheme and will affect parents of young children, carers and disabled and vulnerable customers, potentially increasing their Council Tax Reduction awards.
3. **Childcare costs disregards – Positive Equality Impact.** This will impact working parents with childcare costs for young children, regardless of any other protected characteristics.
4. **New disregards for recent government compensation schemes – Potential positive Equality Impact.** We don't anticipate many claimants will qualify for these specific payments and they may not qualify for a Council Tax Reduction award based on their other circumstances. It will include anyone with a protected characteristic.

To protect anyone from suffering financial hardship we operate a Discretionary Discount and Exceptional Hardship Policy. This acts as a safety net to the main scheme and allows for a merits-based assessment to be made and, where appropriate, for claimants to receive additional support via the Homemaker Service to improve their financial circumstances either by providing budgeting advice and/or exploring opportunities for claimants to maximise their income ensuring they access all the support available to them. The scheme requires officers to be mindful of the impacts of any protected characteristics when making any decisions.

Step 2: What information do we have?

2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics (listed in 2.2).

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data - from national research, local data or previous consultations and engagement activities.

Outline whether there are any over or under representation of equality groups within your service - don't forget to benchmark to local population where appropriate.

For workforce / management of change proposals you will need to look at the diversity of the affected team(s) using available evidence such as the employee profile data. Identify any under/over-representation compared with Teignbridge's economically active citizens for age, disability, ethnicity, gender, religion/belief and sexual orientation.

Data / Evidence Source <i>[Include a reference where known]</i>	Summary of what this tells us
Information held on Open Revenues and on CTR applications	Database of claimant demographic including age, sex, children, disabilities
Consultation responses	Customer/stakeholder views of changes to the scheme re proposed changes to scheme
Exceptional hardship applications	Characteristics of claimants requiring additional support over and above that provided by the main scheme. May inform potential further changes to the scheme. Around 50% of applicants have a disability of which 33% receive an award. Around 67% of all awards are made to single people with no children.
Customer comments/complaints	Very little as numbers are so low to date but we encourage all feedback, which helps inform potential further changes to the scheme

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps please state this clearly with a justification.

For workforce related proposals all relevant information on characteristics may need to be sought from HR (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require action to address and identify the information needed.

Data required for the assessment of Council Tax Reduction is calculated as part of the application process. Data from claims that were migrated to the new income-banded discount scheme from the outgoing fully means-tested scheme may be out of date as our response to the covid pandemic has inhibited our ability to review claims during the year. We have scheduled full reviews of claims as well as ensuring claims are accurate, which updates our equality data.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics.

Please include details of any completed engagement and consultation and how representative this has been of Teignbridge's diverse communities.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to HR for advice on how to consult and engage with employees. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups, trades unions as well as affected staff.

Local Citizens Advice and Community and Voluntary Services have been encouraged to participate in the public consultation which ends on 10.12.24, after 6 full weeks.

As at 18.11.24, the 221 consultation responses indicate

- 97% were Council Taxpayers
- 77% weren't receiving a reduction – so not considered to be on a low income
- Gender – 50% female, 34% male and 16% preferred not to say or described themselves in another way
- Age – 47% aged 16-59, 36% aged 60-74, 8% aged 75 or over (9% preferred not to say)
- Ethnicity – 20% preferred not to say, 1% Black British, 1% mixed Asian heritage, 4% other white and 74% white British.
- Religious beliefs – 24% preferred not to say, 35% Christian, 1% Muslim, 2% other and 38% none
- Sexual orientation – 27% preferred not to say, 2% bisexual, 4% lesbian or gay, 65% straight and 2% other.
- The consultation results as at 18.11.24 confirm significant support and no clear objections for each proposal. see table below

Proposal	Number of responses to this proposal	Yes	No	Don't know
1. Care Leavers discount	146	76%	14%	10%
2. Minimum Income Floor(MiF) flexibility	139	70%	18%	12%
3. Update Childcare Costs approach	133	70%	18%	12%
4. Disregards for certain payments	130	79%	13%	8%

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Consultation Officer for help in targeting particular groups.

We will continue to seek views of our customers as the consultation continues.
We monitor comments or complaints made by all parties.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or mitigate through this proposal.

3.1 Does the proposal have any potentially adverse impacts on people on the basis of their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS <i>(highlight any potential issues that might impact all or many groups)</i>	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	Only the care leaver discount as it will have disproportionate impact as one of the qualifying criteria is that they must be aged between 18 and 25.
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	None
Mitigations:	
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability. Proposal 3 - Certain disabled self employed earners will have their incomes reduced and potential increase in scheme entitlements.
Mitigations:	The proposal 3 will ensure we continue to comply with the Councils Equality Act obligations.
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Note that a higher proportion of lone parents are female. Opportunity to reduce or remit council tax liability. The proposed change to the childcare costs may impact positively impact on those that work and have child care costs.
Mitigations:	
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
Race	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Opportunity to reduce or remit council tax liability
Mitigations:	
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Positive impact on low income households - opportunity to reduce or remit council tax liability
Mitigations:	

Other group(s) Please add additional rows below to detail the impact for other relevant groups as appropriate e.g. Asylums and Refugees; Rural/Urban Communities, Homelessness, Digital Exclusion, Access To Transport	
Potential impacts:	
Mitigations:	

3.2 Does the proposal create any benefits for people on the basis of their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

The scheme itself does not confer any particular benefit based on protected characteristics but seeks to provide support based on household composition and income. Certain incomes are disregarded recognising that these are intended to provide specific support rather than general purpose e.g. child benefit, personal independence payments etc.

The Care Leaver discount proposal will only impact qualifying young people aged between 18-25. However we are already giving this support from outside the scheme.

Proposals 3 and 4 could only impact those who are working and either have childcare costs and/or are self-employed and have a disability or caring responsibilities. The proposals simplify or improve existing provisions within the scheme or associated support.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This content should be used as a summary in reports, where this full assessment is included as an appendix.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:
None
Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:
None

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Review of CTR claims to ensure changes have been reported and data is up to date	Nikki Rawley - Council Tax Lead	2025-26
Ongoing review of Exceptional Hardship applications, customer comments/complaints	Nikki Rawley Council Tax Lead Nigel Piller – Benefits Lead Officer	2025-26
Engagement with voluntary/community sector	Nikki Rawley - Council Tax Lead	2025-26

Improvement / action required	Responsible Officer	Timescale
	Nigel Piller – Benefits Lead Officer	
Review of Consultation results will finalise the proposed changes.	Nikki Rawley - Council Tax Lead	December 2024

4.3 How will the impact of your proposal and actions be measured?

How will you know if have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective and your approach is still appropriate. Include the timescale for review in your action plan above.

The banded scheme has been successfully operating since 2020, which has been demonstrated by comparable percentages between Council Taxpayers who do and those who do not receive a reduction and are up to date with their liabilities.
We use our complaints and formal dispute process to monitor the effectiveness of the scheme and these numbers are low.
The number and reasons for applications for Exceptional Hardship is another way we can benchmark the effectiveness of the scheme.

Step 5: Review & Sign-Off

EIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek review and feedback from management before requesting it to be signed off. All working drafts of EIAs and final signed-off EIAs should be saved in G:\GLOBAL\EIA. Once signed-off please add the details to the 'EIA Register' of all council EIAs saved in the same directory.

Reviewed by Service Manager: Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Instead was reviewed by:	Strategic Leadership Team Sign-Off:
Date:	Date: 28 Nov24