



# Equality Impact Assessment

Assessment Of: Council Tax Reduction Scheme	
<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 checked="" type="checkbox"/> Already exists / review <input type="checkbox"/> Changing
Directorate: Community Services and Improvement	Assessment carried out by: Nikki Rawley
Service Area: Revenue and Benefits	Job Role: Council Tax Lead Officer
Version / Date of Sign Off by Director: 14.12.23	

## 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.*

In April 2020, we introduced significant changes to our Working Age Council Tax Reduction (WACTR) scheme by adopting an income banded and simplified scheme. It would continue to support the lowest income and vulnerable households in our district and be administered as a discount on the Council Tax account.

The scheme awards a set percentage discount, depending on the family type and where the household income sits within an income band. It disregards certain incomes including, among others, Personal Independence Payments, Disability Living Allowance, Carers Allowance, Child Benefit and Child Maintenance, and further earned income disregards for child-care costs. See CTR scheme for full list of disregarded incomes: <https://www.teignbridge.gov.uk/media/kjgok0hi/teignbridge-ctr-scheme-2023.pdf>

When the scheme was introduced with effect from 1<sup>st</sup> April 2020, we anticipated that, of the 4,408 households claiming Working Age Council Tax Reduction, 58% would be unaffected, 25% would gain and 17% would lose.

The pandemic hit at the end of March 2020 and we experienced an immediate and unprecedented increase to the number of applications as many of our residents' circumstances changed almost overnight. We were able to protect customers from losing any entitlement arising from central government increases to tax credits or universal credit income, by disregarding all the emergency welfare awards and cost of living support provided during and since.

The pandemic and ensuing Government-led schemes had a significant impact on resource and it has only been within the last few months that we have been able to reflect and reliably review the banded scheme's performance in relation to the impact on households' ability to pay council tax.

The table below illustrates the current banded scheme for 2023-24.

Income Band	Weekly net income	Household Category					
		Single person Group A	Couple Group B	Single person + 1 dependent Group C	Couple +1 dependent Group D	Single person with 2(+) dependents Group E	Couple with 2(+) dependents Group F
		% reduction					
Band 1	£0 - £86	100%	100%	100%	100%	100%	100%
Band 2	£86.01 - £166	75%	75%	100%	100%	100%	100%
Band 3	£166.01 - £248	50%	50%	75%	75%	100%	100%
Band 4	£248.01 - £331	25%	25%	50%	50%	75%	75%
Band 5	£331.01 - £413	0%	0%	25%	25%	50%	50%
Band 6	£413.01 - £496	0%	0%	0%	0%	25%	25%

We have carried out a partial review of our WACTR caseload, the findings of which are set out in Appendix A to this EIA.

## 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 checked="" type="checkbox"/> Teignbridge workforce
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## 1.3 Will the proposal 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 type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	[please select]
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No changes are proposed for the current Council Tax Reduction scheme, so no equality impacts are predicted.

## 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
LGA Research report - Basic Facts About Teignbridge <a href="http://esd.org.uk">Basic facts about your chosen area (esd.org.uk)</a>	Details the demography of the Teignbridge District in relation to: <ul style="list-style-type: none"> <li>• Population</li> <li>• Age</li> <li>• Ethnicity</li> <li>• Health</li> <li>• Employment</li> <li>• Education</li> </ul>
LGA Research Report- Demographic Report <a href="http://local.gov.uk">LGA Research Report - Demographic Report   LG Inform (local.gov.uk)</a>	Provides further detail on population changes in Teignbridge, and demographic information relating to gender and ethnicity in Teignbridge with comparisons to the percentage figures for the Southwest and all English Local authority areas in totality
Appendix B - EIA for CTR scheme review 5.12.23	This is a more detailed analysis of various sources of information including. <ul style="list-style-type: none"> <li>• A review of the caseload and information provided on their application forms.</li> <li>• A review of information gathered as part of the Exceptional Hardship application process.</li> <li>• Comparisons between the different household groups and some identified areas of concern.</li> <li>• Recovery stage information in relation to customer council tax accounts.</li> </ul>
<b>Additional comments:</b>	

### 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

Religion or Belief Sex 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.

We hold limited data on protected characteristics for council tax reduction purposes. We gather information about household composition – single person, couple, lone parents and families with children. We gather information related to disabilities, carers, and low income and welfare benefit awards.

### 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.

When we moved to an income banded scheme we carried out extensive consultation with the public, major preceptors, groups from the voluntary sector and stakeholders. Since the scheme has been in operation we have kept it under regular review by capturing customer comments, complaints, challenges, feedback from voluntary, community sector and data from all Exceptional Hardship applications.

### 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 engage with and gather information from the stakeholders mentioned above in 2.4 via the Teignbridge Welfare Reform Forum.

## 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.

<b>GENERAL COMMENTS</b> <i>(highlight any potential issues that might impact all or many groups)</i>	
As there are no changes to the existing scheme we do not anticipate any adverse impacts on people with or without any protected characteristics.	
<b>PROTECTED CHARACTERISTICS</b>	
<b>Age: Young People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The scheme applies equally to all working age claimants
Mitigations:	
<b>Age: Older People</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Persons of retirement age are outside the remit of this scheme. The government prescribed scheme applies
Mitigations:	
<b>Disability</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The scheme applies positively to persons with a disability as certain disability related payments are disregarded. Analysis of our caseload indicates the scheme is providing higher levels of support to persons with a disability and making it easier for them to meet their council tax liability
Mitigations:	
<b>Sex</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Sexual orientation</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Pregnancy / Maternity</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Gender reassignment</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Race</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Religion or Belief</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	
<b>Marriage &amp; civil partnership</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	
Mitigations:	

## OTHER RELEVANT CHARACTERISTICS

<b>Socio-Economic (deprivation)</b>	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	The scheme provides support to low income households to help them meet their council tax liabilities and therefore has positive impact
Mitigations:	
<b>Other group(s)</b> <i>Please add additional rows below to detail the impact for other</i>	

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

As no changes are proposed this does not create any benefits on the basis of protected or relevant characteristics.

The scheme awards a set percentage discount, depending on the family type and where the household income sits within an income band. It disregards disability related welfare benefit awards, for example Personal Independence Payments and Disability Living Allowance. It also disregards Carers Allowance, Child Benefit and child maintenance, £25 of net weekly wages and further earned income disregards for childcare costs.

The scheme awards 100% support to everyone who receives a legacy, income-based welfare award and the income bands are intended to be annually changed in line with CPI and DWP welfare benefit increases. This helps retain the same level of support to customers on the lowest incomes.

## 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:

There are no negative impacts, or potential for discrimination

#### Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

### 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.

<b>Improvement / action required</b>	<b>Responsible Officer</b>	<b>Timescale</b>
Continue to monitor, review, and gather feedback from the sources described in 2.4	Nikki Rawley – Council Tax Lead Officer	On going
Continue to review our caseload, Exceptional Hardship applications and examine their council tax recovery position.	Nikki Rawley	On going

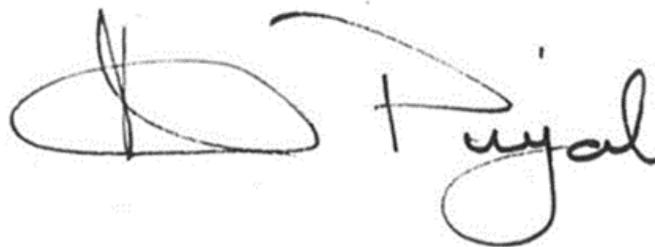
### 4.3 How will the impact of your proposal and actions be measured?

*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.*

We can compare data between the different household groups and other characteristics like disability and care responsibilities. We can also examine how a group is managing to keep up with their council tax liabilities by looking at the recovery action situation on their accounts.

### 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.*

<p><b>Reviewed by Service Manager:</b>            Yes <input checked="" type="checkbox"/> Tracey Hooper – Service Lead for Revenue, Benefits and Customer Support            No <input type="checkbox"/> Instead was reviewed by:</p>	<p><b>Strategic Leadership Team Sign-Off:</b></p> 
Date: 08.12.23	Date: 14 Dec 23