

**Equality Analysis (EA) (formally Equality Impact Assessment) Record Form 2016/17**

**Department:** Revenues, Benefits and Customer Services

**Team or Service Area Leading Assessment:** Council Tax Project Team

**Title of Policy/ Service or Function:** Working Age Council Tax Reduction Scheme Equality Assessment

**Lead Officer:** Marie McRoberts

**STEP 1 - IDENTIFYING THE PURPOSE OR AIMS**

1. What type of policy, service or function is this?

New/ proposed policy

2. What is the aim and purpose of the policy, service or function?

From April 2013, as part of the government's Welfare Reform agenda, Council Tax Benefit was abolished and replaced with a locally determined Council Tax Reduction (CTR) Scheme. Pensioners continue to be protected at their existing levels of benefit under a national scheme whilst new schemes will be set up for Working Age customers at a Local Authority level. Under this system, it is billing authorities who will decide who is eligible to get support and the support will be awarded by way of a Section 13A Council Tax discount. The grant provided by the Government continues to be reduced; Local Authorities will therefore have to manage the reduction in funding in developing local Council Tax Reduction Schemes and will have to ensure that their scheme also covers the impact of any future increase in Council Tax Support recipients.

Blackpool Council will need to operate under three major constraints:

1. The cut in funding (which may in practice be higher if demand for support increases in the future).
2. The desire to protect vulnerable groups and the exhortation to do this by the Government (as set out in "Localising Support for Council Tax: Vulnerable people – key local authority duties" published by the Department of Communities and Local Government in May 2012).
3. The desire to incentivise work and not contradict the incentives to work in the forthcoming Universal Credit (as set out in "Localising Support for Council Tax: Taking work incentives into account" published by the Department of Communities and Local Government in May 2012).

The Government has stated (in the above document on vulnerable people) that they do not intend to prescribe the protection that local authorities should provide for vulnerable groups other than pensioners. Rather the guidance reminds local authorities to have due regard to how their local scheme may impact on people based on the following:

- Age

- Disability
- Sex and sexual orientation
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion or belief

The above guidance refers to specific legislation that local authorities should have due regard to when designing their local scheme. This includes:

- The Equality Act 2010 (particularly the Public Sector Equality Duty)
- The Child Poverty Act 2010 (duty to mitigate the effects of child poverty)
- The Housing Act 1996 (duty to prevent homelessness)

In addition, it advises that local authorities consider the impact under The Armed Forces covenant published in May 2011.

The local scheme will set out:

- the classes of person who are entitled to a reduction
- the reductions which are to apply to those classes
- the procedure by which a person may apply for a reduction.

The timetable for development of the original 2013/14 Equality Analysis is shown below and this document is reviewed and updated annually to consider the impact of the Scheme and any changes to it.

| Action  | Timescale           |
|---|---------------------|
|   |                     |
| Set up Working Group  | May 2012            |
| Assign Officers to EA   | May 2012            |
| Develop first draft of the proposed schemes                           | Jun 2012 -Jul 2012  |
| Start Equality Analysis based on proposed scheme                      | Jul 2012 – Oct 2012 |
| Consultation with Affected Groups/Stakeholders                        | Aug 12 – Oct 2012   |
| Post Consultation Review of EA taking consultation into account       | Oct 2012 – Nov 2012 |
| Develop EA Action Plan to mitigate impact of the changes              | Oct 2012            |
| Review EA with Equalities team  | Oct 2012            |
| Send EA with Council Report to decide the scheme                      | Nov 2012            |
| Ensure Monitoring arrangements are in place                           | Dec 2012 – Jun 2013 |
| Consultation exercise on removal of the family premium in CTRS claims | Sep 2015 – Oct 2015 |
| Post Consultation Review of EA taking consultation into account       | Oct 2015 – Nov 2015 |
| Develop EA Action Plan to mitigate impact of the changes              | Oct 2015 – Nov 2015 |
| Send EA with Council Report to decide the scheme                      | Nov 2015            |

3. Please outline any proposals being considered.

1. Continue with the existing 2015/16 scheme, ensuring the scheme is cost neutral to the Council with continued reduced support for working age claimants of 27.11%.
2. Mirror the proposed changes to the Housing Benefit scheme with effect from April 2016 whereby no family premium (an extra needs allowance) will be awarded for new CTR claims or existing claims where there are new births.

4. What outcomes do we want to achieve?

A new framework to provide Council Tax support with the following objectives:

- Introduce a scheme similar to the current national scheme in terms of eligibility criteria to determine who will receive support.
- Introduce a scheme to support work incentives and in particular, avoid disincentives to move into work.
- Introduce a scheme which achieves the required savings and allows room for future take-up of the discount.
- Introduce a scheme which is cost effective to administer.
- Introduce a scheme where the impact can be assessed and future adjustments can be made.

5. Who is the policy, service or function intended to help/ benefit?

Each billing authority in England must design a scheme specifying the reductions which are to apply to amounts of council tax support payable in respect of dwellings situated in its area by:

- Persons of working age whom the authority considers to be in financial need; or
- Persons of working age in classes consisting of persons whom the authority considers to be, in general, in financial need

The scheme is to be developed to take into account cuts in funding from Central Government.

6. Who are the main stakeholders/ customers/ communities of interest?

The main stakeholders are:

- The Preceptors e.g. Lancashire Fire & Rescue Service, Lancashire Police Authority
- Any resident who is liable to pay Council Tax
- Any current Working Age Council Tax Benefit customers
- A range of 3<sup>rd</sup> party organisations providing support and advice to a wide range of customers

7. Does the policy, service or function have any existing aims in relation to Equality/ Diversity or community cohesion?

The main scheme will continue with the aims as set out in previous year Equality Analysis but will also consider the impact on protected groups of the proposed changes to the removal of the family premium in CTR calculations with effect from April 2016.

## STEP 2 - CONSIDERING EXISTING INFORMATION AND WHAT THIS TELLS YOU

8. Please summarise the main data/ research and performance management information in the box below.

### ***Data/ information***

The main performance information to assist in the design of the Council Tax Reduction scheme will be databases and statistics held for the following purposes:

- Billing and Recovery of Council Tax
- Awarding Council Tax Reduction
- Census data including index of deprivation
- Benefits caseload data to establish trends
- Information held by the Office of National Statistics

### ***Research or comparative information***

Local authorities have clearly defined responsibilities in relation to, and awareness of, the most vulnerable groups and individuals other than pensioners in their areas. This includes responsibilities under:

- The **Child Poverty Act 2010**, which imposes a duty on local authorities to have regard to and address child poverty and their partners, to reduce and mitigate the effects of child poverty in their local areas.
- The **Disabled Persons Act 1986**, and **Chronically Sick and Disabled Persons Act 1970**, which include a range of duties relating to the welfare needs of disabled people.
- The **Housing Act 1996**, which gives local authorities a duty to prevent homelessness with special regard to vulnerable groups.

### **Local evidence:**

#### **Population**

Blackpool has a resident population of 140,500, some 28,500 (20.3%) of which are aged over 60. 64,000 households. It is a dense urban area with high levels of deprivation, unemployment, and poor health in the resident population.

#### **Deprivation**

Blackpool ranks as the most deprived local authority in England in terms of average deprivation scores. It has 94 LSOAs of which 35 (38%) rank in the most deprived nationally. Blackpool has no areas in the least deprived 20% nationally. Health deprivation is much higher than average and over half of areas are in the most deprived 10% for Health nationally.

#### **Housing**

The number of households in Blackpool was just over 64,000, with a high percentage of private rented dwellings, and slightly lower owner occupation:

- 62% - owner occupied (England: 63%)

- 26% - privately rented (England: 17%)
- 11% - social rented (England: 18%)
- 

### **Household Composition**

The households in Blackpool have a slightly higher proportion of lone parent families and lone adults (both over 65 and under 65) than England.

### **Household types:**

- 15% - lone adults over 65 years (England: 12%)
- 23% - lone adults under 65 years (England: 18%)
- 13% - lone parent families (England: 11%)
- 8% - single families with all adults over 65 (England: 8%)
- 35% - single families cohabiting/married with all adults under 65 (England: 43%)

### **Disability**

11,870 (12.8%) of working age residents claim employment support allowance/incapacity benefit and a further 1,480 claim disability living allowance (1.7%). The ESA proportion is nearly double that for England as a whole.

### **Child Poverty**

28.1% of children in Blackpool live in low income families, around 8,730 children in total.

### **Pension Credit**

Blackpool has 6,740 claimants in receipt of Pension Credit Guarantee Credit only, or both Guarantee Credit and Savings Credit, equivalent to 81% of claimants (Nationally 80%)

Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only is much lower at 1540 claimants compared, equivalent to 19% of claimants (Nationally 20%)

As a proportion of the population, 29% of the 65+ age group claim pension credit, much higher than England at 19%.

### **Blackpool Child Poverty Needs Assessment**

The child poverty framework 2011-2014 set out a series of potential indicators on poverty and surrounding issues. Information below presents a summary of all available indicators and some additional context.

The local area child poverty measure is the Children in Low-Income Families Local Measure produced by HMRC and is "children living in families in receipt of out-of-work benefits or in receipt of tax credits with a reported income which is less than 60per cent of national median income."

Data is released annually but covers a time period 2 years prior to that date e.g. the most recent data is for 2013. The reason for this delay is that the measure is based on actual reported family income rather than surveys or estimates and is available down to small areas including wards.

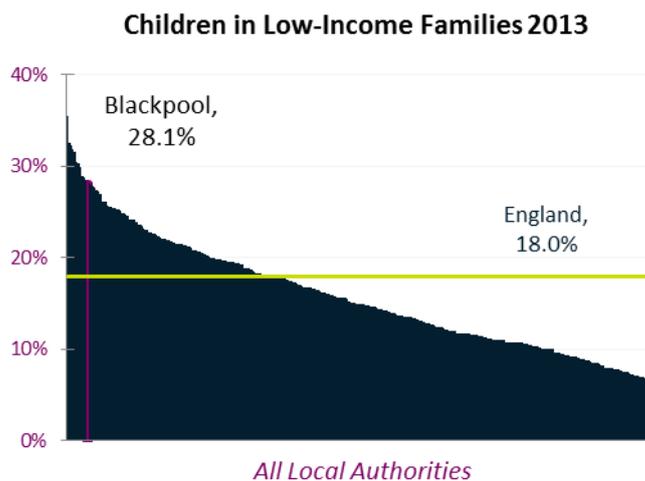
## 2013 Position

The chart right, shows the % of children in low income families in 2013, compared to all authorities in England and to the English average. It highlights

- **8,730 children** in Blackpool live in low income families
- This accounts for **28.1% of all children**
- Blackpool ranks **12th highest in England**.

## Changes since 2011

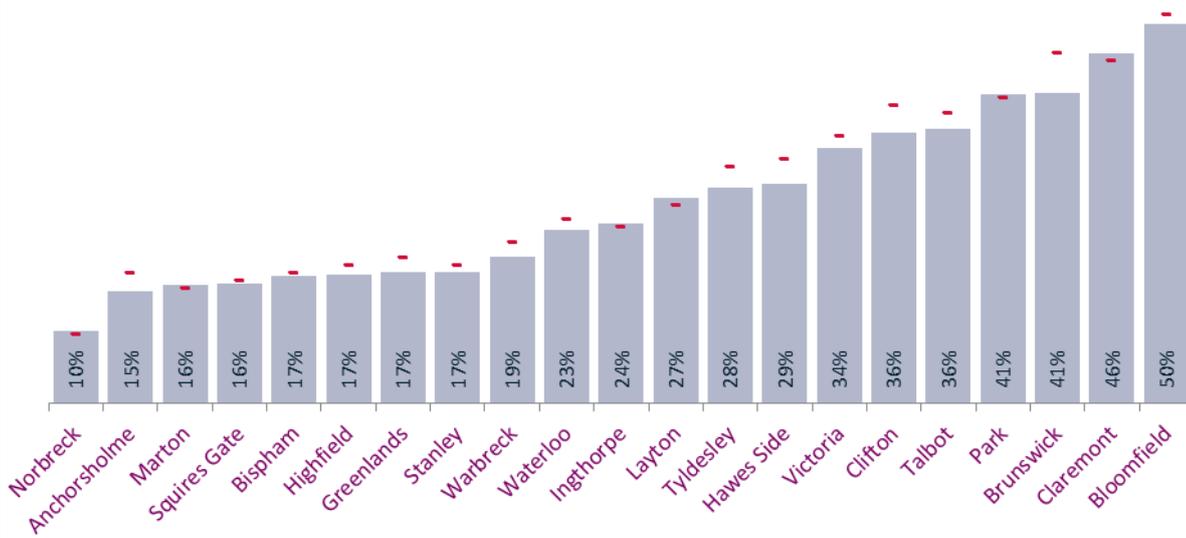
- Overall, in percentage terms Blackpool has seen a small reduction in the proportion of children in poverty between 2012 and 2013. Reducing from 9,145 (29.3%) in 2012 to 8,730 (28.1%) in 2013. This ends a trend of decline from 2008-2011.
- Despite this improvement, Blackpool ranked more poorly nationally. From 21st highest in 2011 to 14th in 2012 and most recently 12<sup>th</sup> highest in 2013. This is because while Blackpool rates have reduced by -1.1%pp the average reduction across all Local Authorities is slightly better and other areas improved at a faster rate.
- A further factor is that in 2012 the income distribution changed nationally with generally lower incomes. The low income threshold, which is 60 per cent of the median income, fell from £218 in 2011 to £204 in 2012. Other measures of welfare reform were also introduced. This might mean families previously considered to have poor incomes are no longer counted, but their circumstance may remain the same.



## Ward Distribution

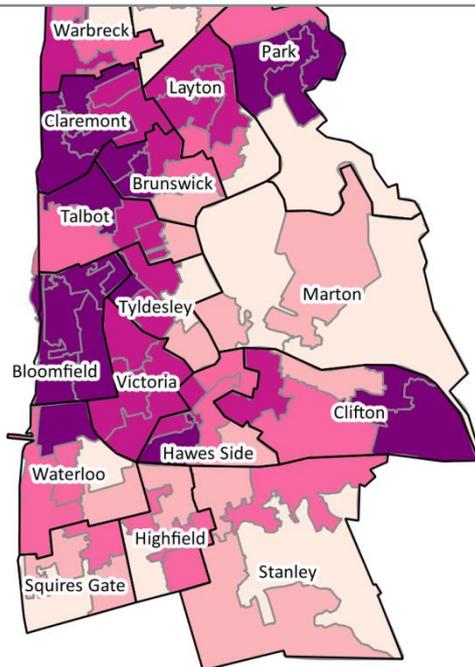
- **All wards** have some children living in poverty.
- **Bloomfield, Claremont, Brunswick, and Park** wards each have more than 40% of children in poverty.
- Bloomfield ward ranks as the 4<sup>th</sup> highest level of poverty in England

### Children in low income families by ward 2013



### Family demographics

- 83% of children in poverty live in **families claiming Income Support or Job Seekers Allowance**
- 65% of children in poverty live in **lone parent families**
- 26% are young children aged 0-4, **52% are school aged 5-15**, and 22% are dependents aged 16-19
- 56% live in 1-2 child families, 44% live in families with 3 or more children
- In total there are around **4,700 families with low incomes** in Blackpool.



Data Source: HMRC, 2015

### Detailed map of Child Poverty

The map above shows the distribution of children in low income households in Blackpool for small areas.

- The largest percentages of children in low income households are in the central areas of Blackpool.
- Bloomfield, Brunswick, Claremont, Park and Clifton have several pockets of children in poverty above 42% of all children in those areas.

The map of poverty shares many similarities with maps for:

- Child Protection Plans
- Indices of Deprivation 2010
- Free School Meals Recipients
- Out-of-work Benefit claimants

The Blackpool Child Poverty Needs Assessment also highlighted potential links (not cause and effect) between child poverty and:

- Employment
- Education & Skills
- Health outcomes
- Areas with higher Crime levels
- Areas with high Fuel poverty
- Teenage pregnancy

**National Data**

As Council Tax Reduction is a locally administered scheme, no national statistics are collated so reference must be made to old Council Tax Benefit statistics.

According to the Single Housing Benefit Extract, as at January 2011 there were 3.1 million Council Tax Benefit claimants under 65 in the United Kingdom.

According to the Family Resources 2009/10 Survey data, of these:

- 48% of households have at least 1 adult or child who is disabled
- 18% of households have at least 1 adult with caring responsibilities
- 17% of households have at least 1 adult requiring informal care

Information from administrative sources can also provide more limited information on carers and disabled people and shows the number of Council Tax Benefit claimants who are carers or households in receipt of a disability premium and not pass ported onto full Council Tax Benefit. At January 2011:

- 34,790 non-passported under 65 Council Tax Benefit claimants were carers
- 219,580 non-passported under 65 Council Tax Benefit claimants were in receipt of a disability premium

Since some of the passported claimants are also likely to be carers or receiving a disability premium this underestimates the total number that could be affected.

9. What are the impacts or effects for Key Protected Characteristics?

**Age**

**Older People of pension age**

**Potential Impact**

The Department for Communities and Local Government has stated that pensioners must receive

the same level of support under the new scheme as they currently receive under the current Council Tax Benefit scheme. They will therefore be treated more favourably than other groups under the proposed changes.

In Blackpool we currently have 22036 Council Tax Reduction recipients of who 6902 are single and of pension age. In addition we have 2050 couples over 60 in receipt of Council Tax benefit. Of those 69 have child dependents.

Eligible 'pensioners' can be divided into the three groups below:

### **PASSPORTED CLAIMANTS**

Those in receipt of Pension Credit Guarantee Credit

Pension Credit 'Guarantee Credit' acts as a passport to maximum Council Tax Benefit support. Pensioners apply to the Pension Service and if successful are prompted to apply for Council Tax Benefit. The Pension Service can take the claim on behalf of the local authority and will send an assessment direct to the relevant local authority.

### **MEANS-TESTED CLAIMANTS**

*Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only*

Pension Credit applicants may be awarded 'Savings Credit' only. This group are also prompted to apply for Council Tax Benefit, and if they do the Pension Service will send appropriate data to the relevant local authority that complete the means-testing applying nationally set rules.

*Other means-tested claimants*

Customers can also apply directly. Claimants who have attained the qualifying age for State Pension Credit are means-tested by the Local Authority on application, to determine eligibility for support. The exact amount of support needed will depend on a range of factors, such as age, income, capital, the personal circumstances of the individual and the Council Tax band their home falls into.

We currently do not have data that would allow us to break the Blackpool figures down into the categories above.

### **People of Working Age (over 25)**

#### **Potential Impact**

People under pension age will be treated less favourably under the new support scheme than pensioners. In addition it is possible that some people in this group will be affected more because of the greater difficulties they may face in finding paid employment e.g. over the age of 55.

### **People of Working Age (under 25)**

#### **Potential Impact**

Under the current Council Tax Benefit scheme the system of applicable amounts differentiate

between those under and over 25. Claimants who are under 25 have a lower applicable amount and are treated as having lower living costs than those aged 25 and over. In addition, young single people may be more at risk of becoming homeless and/or there will be pressure on these people to return or remain in the family home.

Current Welfare Reforms in Housing Benefit will affect the same group of Working Age customers.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not impact Working Age customers adversely when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

## ***Disability***

### **Potential Impact**

The definition of disability used is based on entitlement to certain state benefits or to entitlement to a Council Tax disabled band reduction. This can reflect the circumstances of any member of the claimant's household.

The relevant benefits/additions to benefit include:

- Disability Living Allowance
- Employment Support Allowance
- Personal Independence Payments
- Universal Credit
- Disability Premium
- Severe Disability Premium
- Enhanced Disability Premium
- Disabled Child Premium
- Disabled Earnings Disregard
- Carers Allowance
- War Disablement Pension
- War Widows Pension
- Council Tax Disability Reduction

It is possible that some people in this group will be affected less favourably because of the greater difficulties they may face in coping with the changes, for example by finding paid employment. This may result from their reduced capacity to work due to the nature of their disability and/or discrimination based on the perceptions of employers or the fact that the place of work has not been adapted to meet the needs of disabled people.

Other welfare reforms may further impact on some members of this group and also some of the services that members of this group receive are being reduced under austerity measures.

It should also be noted that in some cases (depending on the nature of the disability) there may be potential communication issues where information available in standard formats is not the best method of communicating with benefit recipients. This may cause greater difficulty in understanding their changed liability, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily with all the associated problems this can cause.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not adversely impact on disabled customers when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

Some individuals in this group who also receive Social Care support from Blackpool Council may be able to have the extra Council Tax they pay deducted from their income for charging purposes (unless they pay the full cost because they have capital over the current threshold). It is acknowledged that this will not help disabled people who do not receive chargeable support from Blackpool Council. However, the most severely disabled are likely to receive this support. Extensive consultation was carried out prior to the introduction of the 2013/14 scheme with specific disabled stakeholder groups i.e. the Disability Partnership Forum, the Learning Disabilities Self Advocacy Forum and the Disability First open day in order to make them aware of the changes, help them to understand the potential impact and to discuss any support mechanisms that can be built in for affected groups. As the main basis of the 2016/17 scheme is the same as 2015/16 scheme, no further specific consultation has been carried out with these groups.

It is recognised that the level of a customer's disability could mean they are more disadvantaged over another disabled customer. There may be the opportunity for a less disabled person to increase their income in order to pay for the increase in Council Tax whereas this may not be an option for a more severely disabled person. Because of this issue, the action plan will contain potential areas that could be considered to mitigate the impact of the scheme.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact.

#### **Example 1**

Single person aged 45, unable to work because of his disabilities; lives alone in a Housing Association flat costing £100 per week and with Council Tax of £17 per week (Band B property in Blackpool with the 25% Single Person Discount); no savings.

#### **Current weekly income**

|         |  |
|---------|--|
| £157.35 | Employment Support Allowance (Income-related)    |
| £51.85  | DLA (middle rate care component)                 |
| £54.05  | DLA (higher rate mobility component)             |
| £100.00 | Housing Benefit so has no rent to pay**          |
| £17.00  | Council Tax Benefit so has no Council Tax to pay |

**Impact of proposed changes**

**A 20%** reduction in Council Tax Support would mean he would have to pay **£3.40** per week towards his Council Tax rather than nothing as at present.

**A 25%** reduction in Council Tax Support would mean he would have to pay **£4.25** per week towards his Council Tax rather than nothing as at present.

**Example 2**

Couple with no children, both disabled, she works for 25 hours per week at the minimum wage, he doesn't work. Living in a 2 bedroom rented property costing £150 per week and with Council Tax of £29.14 per week (Band D property in Blackpool); no savings.

**Current weekly income**

- £105.05 His Employment Support Allowance (contributory) Support Group\*\*
- £51.85 His DLA (middle rate care component)
- £20.55 His DLA (lower rate mobility component)
- £20.55 Her DLA (lower rate care component)
- £151.29 Her net income from wages
- £70.32 Her Working Tax Credit
- £62.35 Housing Benefit so has to pay £87.65 towards the rent.
- £3.03 Council Tax Benefit so has to pay £26.11 per week towards the Council Tax.

**Impact of proposed changes**

**A 20%** reduction in Council Tax Support would mean they would have to pay an extra **£0.61** per week towards their Council Tax, i.e. £26.72 per week in total.

**A 25%** reduction in Council Tax Support would mean they would have to pay an extra **£0.76** per week towards their Council Tax, i.e. £26.87 per week in total.

*The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).*

**Gender Reassignment****Potential Impact**

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of their gender identity. No information is collected on the gender reassignment status of CTB claimants. However, it is acknowledged that transgender people experience higher levels of disadvantage and social/financial exclusion and therefore may face greater difficulties in responding to the changes, for example by finding work. We will further review this after the consultation period.

**Marriage and Civil Partnership****Potential Impact**

The latest figures show that there are 5,064 couples in receipt of Council Tax Reduction. Of these: 2,098 (41%) had child dependents, and 2,966 (59%) had no child dependents.

There are 3,014 couples in receipt of Council Tax Reduction who are of working age, with 2,029 (67%) had child dependents and 985 (33%) had no child dependents.

The main scheme will have an impact on working age families/couples whether they are living together/married or in civil partnerships but will not treat marriage or civil partnership any differently. Married couple and civil partnerships are recognised equally in the current Council Tax Reduction system as are people living together as if they are in such legal partnerships.

Families with a large number of children are more likely to live in a bigger property and therefore one with a higher Council Tax Band. Our proposed scheme would ensure that these customers would not be disadvantaged over smaller families as the Council Tax Support would be based on the actual Council Tax band for the property and the percentage reduction would be the same across all groups of claimants.

The proposed removal of the family premium to mirror Housing Benefit for new claims for Council Tax Reduction or existing claims where a child is born will not adversely impact on this protected group when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in CTRS mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact.

### **Example 1**

Couple in their 40s with 2 children (aged 9 and 13); man works 40 hours per week at the minimum wage with a net income after tax and national insurance of £214. Living in a 3 bedroom rented property costing £170 per week and with Council Tax of £29.14 per week (Band D property in Blackpool); no savings.

#### **Current weekly income**

£214.00 Net earnings

£ 40.57 Working Tax Credit

£113.68 Child Tax Credit

£33.70 Child Benefit

£116.49 Housing Benefit so has to pay £53.51 towards the rent.

£12.54 Council Tax Benefit so has to pay £16.60 per week towards the Council Tax.

#### **Impact of proposed changes**

**A 20% reduction in Council Tax Support would mean they would have to pay an extra £2.51 per**

week towards their Council Tax, i.e. £19.11 per week in total.

**A 25%** reduction in Council Tax Support would mean they would have to pay an extra **£3.14** per week towards their Council Tax, i.e. £19.74 per week in total.

### **Example 2**

Couple in their late 20s with 2 children (aged 3 and 6); man works 37 hours per week at the minimum wage with a net income after tax and national insurance of £201.62. Living in a 2 bedroom rented property costing £150 per week and with Council Tax of £25.90 per week (Band C property in Blackpool); no savings.

#### **Current weekly income**

£201.62 Net earnings

£ 47.76 Working Tax Credit

£113.68 Child Tax Credit

£ 33.70 Child Benefit

£ 99.88 Housing Benefit so has to pay £50.12 towards the rent.

£ 10.58 Council Tax Benefit so has to pay £15.32 per week towards the Council Tax.

#### **Impact of proposed changes**

**A 20%** reduction in Council Tax Support would mean they would have to pay an extra **£2.17** per week towards their Council Tax, i.e. £17.49 per week in total

**A 25%** reduction in Council Tax Support would mean they would have to pay an extra **£2.65** per week towards their Council Tax, i.e. £17.97 per week in total

*The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).*

### **Pregnancy and Maternity**

The proposed main scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of whether they are pregnant/recently given birth or not.

Whilst at this moment we consider that this impact is unlikely to be disproportionately greater on households where a member is pregnant or recently given birth, we acknowledge that they may face greater difficulties in responding to the changes, for example by finding work.

In addition, women on maternity leave may find that they now have to pay an increased amount of Council Tax Support on a reduced income with little prospect of increasing their income in the short term.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council

Tax Reduction or existing claims where a child is born will not adversely impact on customers who are pregnant or on maternity leave when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

## ***Race***

### **Potential Impact**

The proposed main scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of race or ethnicity. We do not have any data regarding the ethnicity of Council Tax benefit recipients in Blackpool. However, national data shows that 90% of households receiving Council Tax Benefit are white, and 10% are ethnic minorities. This compares to a total population of 91% white and 9% ethnic minorities.

At the moment we consider that the impact is unlikely to be disproportionately greater on households of different ethnicity within the working age group. There will be no difference in the way ethnic groups are treated under any new Council Tax Reduction scheme. However, some ethnic groups experience different levels of disadvantage and therefore they may find it more difficult to cope with the changes. This may be because they face unofficial discrimination in the job market and possibly because of access to skills including language skills are limited in some cases.

There may also be potential communication issues where English is not the benefit recipient's first language and where documents printed in Standard English is not the optimum method of communicating.

Claimants whose first language is not English may have greater difficulty in understanding their changed level of Support, particularly if they are being asked to pay some Council Tax for the first time. This may lead some to fall into arrears more easily leading to the associated problems this can cause.

A road show was held for the 2012/13 consultation with the Blackpool Equality Forum to further highlight the potential impact of this change and further work could be carried out to contact groups who have traditionally failed to engage with the community to make them aware of the changes e.g. Polish and Chinese communities and Romanians.

Contact could be made specifically with the following groups if required:

Blackpool Polish Community Association  
c/o Council for Voluntary Services  
Abingdon Street  
Blackpool

Blackpool Chinese Community Association  
64 Cookson Street

Blackpool

[Bcca.vicechairman@googlemail.com](mailto:Bcca.vicechairman@googlemail.com)

African Caribbean Friends & Relatives Association

Romanies via the Council's Diversity Learning Manager

This targeted approach could be face to face, by telephone or by utilising translation services, if appropriate.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council Tax Reduction or existing claims where a child is born will not adversely impact on customers on the grounds of race when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

### ***Religion and Belief***

#### **Potential Impact**

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Benefit regardless of religion or belief. We do not have any data regarding the religion or beliefs Council Tax benefit recipients in Blackpool. We do not envisage this impact to be greater for people with particular religions or beliefs. However, this will be reconsidered if evidence in the consultation suggests otherwise.

### ***Sex***

#### **Potential Impact**

The latest figures show that in Blackpool there are 16,972 single people in receipt of Council Tax Reduction. Of these: 10,338 (61%) are female, and 6,634 (39%) are male.

Of the 10,338 female recipients, 3,661 (36%) are lone parents and of the 6,634 male recipients, 307 (5%) are lone parents.

On the face of it we will continue to treat both men and women equally in the proposed Council Tax Reduction scheme from 1st April 2016. However, given the higher number of female recipients (61% in Blackpool), changes to the current Council Tax Reduction scheme will impact on more women than men. National data does confirm that more women than men experience financial deprivation. In addition, because many more female claimants will be lone parents, they may be treated less favourably indirectly because lone parents may face greater difficulties in responding to the changes, including by finding work.

The proposed removal of the family premium to mirror Housing Benefit for new claims to Council

Tax Reduction or existing claims where a child is born will not adversely impact on customers on the grounds of sex when compared to now as they have either not previously been in receipt of Council Tax Reduction or they have not previously been in receipt of the family premium. At this stage, the Council are not aware of Central Government plans to remove the family premium in Housing Benefit for customers with an existing family premium where another child is then born into the household. As such, if the proposed change in Council Tax Reduction mirrors the change in Housing Benefit there will be no impact. The situation will be monitored in case additional legislation is introduced, in which case the EA will be revisited.

The examples shown below are taken from the 2012/13 Equality Analysis and illustrate the potential impact in individual cases on the change in benefits. The financial impact in each case will be the same regardless of the gender of the individual.

### **Example 1**

Single person aged 28, not working and claiming Income-based Jobseekers Allowance (JSA). Living in a 1 bedroom rented flat costing £80 per week and with Council Tax of £17 per week (Band B property in Blackpool with the 25% Single Person Discount); no savings.

#### **Current weekly income**

£71.00 JSA

£65.00 Housing Benefit so has £15 to pay towards their rent\*\*

£17.00 Council Tax Benefit so has no Council Tax to pay.

#### **Impact of proposed changes**

A 20% reduction in Council Tax Support would mean they would have to pay **£3.40** per week towards his Council Tax rather than nothing as at present.

A 25% reduction in Council Tax Support would mean they would have to pay **£4.25** per week towards his Council Tax rather than nothing as at present.

\*\*As s/he is a single claimant under 35, the maximum he can claim for Housing Benefit is restricted to the shared accommodation rate which in Blackpool is £58.50 per week.

### **Example 2**

Lone parent with 1 child aged 3, not working and claiming Income Support. Living in a 2 bedroom rented property costing £110 per week and with Council Tax of £19.43 per week (Band C property in Blackpool with the 25% Single Person Discount)\* no savings.

#### **Current weekly income**

£71.00 Income Support

£62.00 Child Tax Credit

£20.30 Child Benefit

£110.00 Housing Benefit so have no rent to pay

£19.43 Council Tax Benefit so have no Council Tax to pay.

## **Impact of proposed changes**

A 20% reduction in Council Tax Benefit would mean that they would have to pay **£3.89** per week towards their Council Tax rather than nothing as at present.

A 25% reduction in Council Tax Benefit would mean that they would have to pay **£4.86** per week towards their Council Tax rather than nothing as at present.

The Single Person Discount of 25% is applied when there is only one adult living in the property; it is not means-tested

*The examples above show the impact of a 20% and 25% reduction in Council Tax Reduction and are based on benefit rates that applied during 2012/13 and estimated Council Tax Bands. They show what the difference would be if the proposals were applied now. These examples are only indicative; the effect on each individual will vary according to their particular personal circumstance and the impact of other proposed changes in benefits and allowances (see note 1 below).*

## **Sexual Orientation**

### **Potential Impact**

The proposed scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of their sexual orientation. We have no data on the sexual orientation of Council Tax Reduction claimants locally and at this moment we consider that the impact is unlikely to be disproportionately greater on recipients with different sexual orientations. However, national data demonstrates that some Lesbian, Gay or Bisexual people experience higher levels of disadvantage and financial exclusion than other groups and therefore may face greater difficulties in responding to the changes, for example by finding work. There will also be specific consultation with the Blackpool, Wyre and Fylde LGBT Forum.

## **Other Relevant Groups**

### **Potential Impact**

#### Carers

The proposed scheme will have a negative impact on those carers of working age who are in receipt of Council Tax Benefit. Whilst this impact will also be experienced by others of working age also, it is acknowledged that some carers, especially full time carers, may be affected more because of the greater difficulties they may face in responding to the changes, for example by finding work.

#### Troubled Family Programme

The 'Troubled Families' programme is a national program where families with specific circumstances are provided intensive support and advice. Further consideration of targeted communication to the Troubled Families service will be undertaken following consultation.

### Child Poverty

The impact of the proposed scheme on the Council's Child Poverty Strategy has been considered and it is believed that by continuing to disregard Child Benefit and Child Maintenance consideration of this area has been sufficiently taken into account.

### Homelessness

The impact of the proposed scheme on the Council's Homelessness Strategy has been considered and by continuing to work with financial inclusion officers within the Council and Housing Options Support workers, sufficient promotion of how the scheme will work will be available. Targeted communication to other Council Services to promote the final scheme will also be undertaken and will form part of the Council's EA action plan.

### Armed Forces Covenant

The impact of the proposed scheme on the Armed Forces has been considered and it is believed that by continuing to disregard War Disablement Pension, War Widow's Pension and War Widower's Pension consideration of this area has been sufficiently taken into account.

### **Note 1**

#### Other relevant benefit changes that apply from April 2016

*The changes to the Council Tax Reduction scheme will come in from April 2016. At the same time other proposed changes to the benefit and tax systems will continue to affect people in receipt of/potentially eligible for Council Tax Reduction. The other changes include the following:*

- 1. A reduction in the total benefit cap for people of working age. The cap is £257 for single people and £384 for couples and lone parents. The cap will not be applied to households eligible for Working Tax Credit (i.e. working over 16 hours per week) or who get certain disability benefits or War Widows/Widowers Pension.*
- 2. Working age benefit rates (Tax Credits, applicable amounts) will be frozen for four years.*
- 3. Tax Credit awards are to be reduced.*
- 5. Income Tax changes – from April 2013 the under-65 tax free allowance will be increased from April 2013 to £9,205*

10. What do you know about how the proposals could affect community cohesion?

- There may be an effect on community cohesion as pensioners are not being affected by the new Local Council Tax Reduction scheme and will continue to receive their current levels of support whilst Working Age customers will have reduced levels of help. Whilst we recognise the inequalities of the two schemes (Working Age and Elderly), we are unable to do anything about them but will monitor the impact of the scheme between age groups during consultation to ensure any comments are recorded.
- If any other protections are made within the working age group, some groups may feel they

are “shouldering the burden” of the scheme more than others.

- There may be an increase in transience, as people move to more affordable accommodation in order to be able to afford to pay for their increased contribution to Council Tax.
- There could be an increase in the number of people leaving Blackpool to move to a neighbouring authority with a more generous Council Tax Reduction scheme.

### STEP 3 - ANALYSING THE IMPACT

13. Is there any evidence of higher or lower take-up by any group or community, and if so, how is this explained?

- There was traditionally a lower take up of Council Tax Benefit from pensioners, however, as pensioner support will be delivered through a national framework of criteria & allowances and will be a discount rather than a benefit, take up is likely to increase.
- Within some other community groups there is traditionally a low take up because individuals either do not need support or do not like to claim benefit. To mitigate this, there will be a programme of marketing and communication which will include liaison to target hard to reach groups. Within Blackpool these groups are seen to be:
  - Polish Community
  - Chinese Community
  - African Caribbean Friends & Relatives Association
  - Romanies

14. Do any rules or requirements prevent any groups or communities from using or accessing the service?

There will be an initial eligibility criteria for the new Blackpool Council Tax Support scheme (in line with the existing Council Tax Benefit scheme), which will exclude the following:

- Any person who is not a Council Tax payer as they do not need to pay Council Tax
- Anyone who is not able to claim state benefits in accordance with the Central Government regulations in the Local Government Finance Bill
- If the property is a second home

Once the eligibility criteria have been established, there will be a means tested assessment of entitlement to Council Tax Support, which could mean that some people are not entitled but this is the case now also.

Other exclusions may apply, depending on the results of consultation e.g. if the final scheme includes no Council Tax Support for customers with non dependents.

15. Does the way a service is delivered/ or the policy create any additional barriers for any groups of disabled people?

## Access

The new scheme will offer the same level of access to the service as there is within the current system of Council Tax Reduction, as follows:

- Face to face access
- Telephone access
- Online access
- Home visit if required

## Policy

Disabled people may not be exempt for the purposes of calculating Council Tax Reduction. The rationale behind this is:

- The new scheme will support people on a low income and is likely to be means tested. Disabled people receive additional income for disabilities and Blackpool's preferred option allows for the continued disregard of disability incomes in the calculation.
- Disability relief, which is a reduction in the amount of Council Tax payable, applies where adaptations have been made to a property to accommodate a disabled person. Exempting disability benefits in the calculation of Council Tax Support would put those people at a financial advantage
- The new Council Tax Support Scheme must cost 10% less than the current system of Council Tax Benefit. The 10% saving would be unachievable if disabled applicants were disregarded.
- Disability Benefits are disregarded in DWP assessment therefore issues of vulnerability have been addressed prior to our calculation

However, we recognise that even within the category of disability, some people will be more affected than others in that they will be unlikely to be able to increase their income and therefore policies need to be established to mitigate the impact of the scheme.

### **STEP 4 - DEALING WITH ADVERSE OR UNLAWFUL IMPACT**

16. What can be done to improve the policy, service, function or any proposals in order to reduce or remove any adverse impact or effects identified?

See Action Plan

17. What would be needed to be able to do this? Are the resources likely to be available?

See Action Plan

18. What other support or changes would be necessary to carry out these actions?

See Action Plan

## STEP 5 - CONSULTING THOSE AFFECTED FOR THEIR VIEWS

19. What feedback or responses have you received to the findings and possible courses of action? Please give details below.

### 2013/14 Scheme

#### Removal of Backdates

Comments have been received from a Councillor as follows:

“What's being proposed is that no council tax benefit claim can be backdated however good the reason is. Claimants asking for their claims to be backdated are frequently those who lack knowledge of how the system works, they are often vulnerable, some of them have experienced trauma. If this proposal is put into practice it would lead to some claimants having housing benefit claims backdated while their simultaneous council tax benefit claims are refused. This would send out a message that Blackpool Council believed in unfairness.”

Response:

11/12 numbers of people on CTB backdates (WA and Elderly): 1488

Value of backdates in CTB: £53,145 total

Maximum backdate period: 6 months WA

Average value of CTB backdate: £35.71

Genuine cases of hardship could have a Section 13A discretionary award made to cover the Council Tax.

#### Liaison with the Lancashire Deaf Service

“Andie Vowles, a Community Development Officer for the Lancashire Deaf Service, attended the Council Tax Support road show held at Fylde Town Hall on the 27<sup>th</sup> Sept 2012. He has been approached by numerous clients who have received a copy of the survey in the post and were struggling to understand the documentation and how it would affect them. He works and supports deaf people across the Blackpool, Fylde and Wyre area. With the help of an interpreter he asked if I could run through each of the questions on the survey in fine detail so that he could clearly understand what was being asked. Due to the complex subject matter it was necessary to run through the questions more than once and in some cases detailed examples and calculations were required in order to illustrate the outcome of an option more clearly, particularly when explaining options A and B. Andie made notes throughout and in order to clarify he had understood the options correctly and he summarised each question for me in his own words before moving on to the next. Andie felt it was vital that he felt confident that he had grasped each question sufficiently before moving on so that he could successfully cascade the information to his clients. Once we had dealt with the questions Andie asked me about the potential answers. For each question he wanted me to clarify and summarise what customers would actually be suggesting they think should happen if they were to choose either agree or disagree. This helped put the possible answers in context with each specific question and helped rule out any misinterpretation. The appointment took around two hours however by the end Andie felt he was more equipped to help his clients complete the survey and was going to be able to advise them of how each option was likely to impact them if it were to be of part of the final scheme. I gave him my name as a contact should any future issues arise and the Blackpool council tax support email box should he have any further comments he would like to make. I explained that other boroughs in the Lancashire area

that he may have contact with could quite feasibly introduce a different scheme to Blackpool and Fylde which he fully understood. He is going to work on a newsletter for his clients featuring the Council Tax Support scheme and information about the survey which will be posted on their website [www.elds.org.uk](http://www.elds.org.uk).”

#### Additional Suggestions

- Progressive council tax rates

*Comment: This comment will be included in the report to be sent to Full Council for formal adoption of the scheme.*

- All money coming in should be counted as income

*Comment: Some income is provided for specific purposes e.g. disability income is provided to help meet the additional costs incurred by being disabled. The current Council Tax Benefit system already has a series of incomes that are disregarded in the interests of taking account of vulnerability and various statutory requirements e.g. the Armed Forces Covenant.*

- Means test for people struggling to pay

*Comment: The preferred option for Blackpool would ensure that the means test would continue.*

- Three customers have contacted us upon receipt of the survey to highlight that they already do not have enough money to live on even before being expected to pay more Council Tax under the scheme.

*Comment: All of these customers have been visited to ensure they have maximised the potential benefits they are receiving and that they are signposted for additional support or debt advice if applicable.*

- Reduce the rate of Single Person Discount from 25% to 20%

*Comment: Central Government have resisted Local Authority requests for the discretion to reduce the Single Person Discount. It therefore remains set by Regulations at 25% and is unable to be changed.*

- Can people who claim Single Person Discount falsely be penalised. Any fine money could then be put into the fund to reduce the impact of the scheme.

*Comment: There is legislation in place to issue a penalty for providing false information for Council Tax. The administration and collection costs for the penalties would mean that it is unlikely to produce a surplus that would be a useful amount.*

- How are people expected to cope with the loss of money?

*Comment: We will ensure that the most vulnerable people who do not have the opportunity to increase their incomes will be able to apply to the Council's Discretionary Discount Scheme and we will also ensure that Benefits maximisation is carried out.*

- Is this something that just Blackpool Council is doing or are other Council's doing it?

*Comment: All Council's who will not be operating the Government's default scheme i.e. where the Council will be finding the 10% cut, are consulting on their schemes. The schemes could all have different elements in them.*

- How is the consultation being carried out and how will people be informed about it?

*Comment: The following consultation methods have been used:*

- *All Working Age recipients of Council Tax Benefit (the people who will be affected) have been sent a survey for an opportunity for them to have their say*
  - *Press release and several articles have been placed in the Gazette*
  - *Several public road show events have been held and these have been advertised in the Gazette and on the Council's website*
  - *Area forum events have been attended*
  - *Online survey on the Council's website*
  - *A number of presentations have been given to special interest groups*
  - *An article was placed in Your Blackpool to ensure all Council Tax payers had the opportunity to respond to the survey*
  - *Large print surveys are available on request*
- If people cannot access the internet, how will they be consulted and how can their input be recorded?

*Comment: See above for how the Council have advertised the consultation. All consultation methods have also included a phone number should someone wish to ask for a paper copy of the survey.*

- Request from the Royal British Legion (letter dated 1<sup>st</sup> Nov 2012) to disregard War Widow's Pension, War Disablement Pension and payments from the Armed Forces Compensation Scheme.

*Comment: Response sent back:*

*Blackpool Council have always disregarded customers income in respect of War Disablement Pension and War Widows Pension. The value of a personal injury payment from the Armed Forces Compensation Scheme, or any payment of income from that trust, has also always been disregarded in full in accordance with the Housing and Council Tax Benefit Regulations 2006, unless that payment is in respect of a deceased relative.*

*Two elements of Blackpool Council's consultation on the proposed Council Tax Support Scheme were:*

- *that an award of Support would be based on a means tested assessment broadly similar to the existing Council Tax Benefit Regulations*
- *that the income from War Disablement Pension and War Widow's Pension should continue*

*to be disregarded in full.*

*Consultation supported both these options and will be put forward to full Council for adoption shortly. Should the scheme be approved with both these elements, the concerns raised in your letter would be addressed in full.*

### **2014/15 Scheme**

No scheme changes therefore no consultation undertaken and no comments

### **2015/16 Scheme**

No scheme changes therefore no consultation undertaken and no comments

### **2016/17 Scheme**

- Go after those who don't pay any council tax. Enforce it rather than putting everyone's up. Families are already struggling and this government making things worse with cuts to in work tax credits

*Comment: The Council uses all available powers and resources to collect Council Tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.*

- Nothing comes to mind at this present time as my children have grown up left home and have children of their own, with these changes it will make families struggle more with their finances after 2016, depending on the shortfall and their circumstances, I know the council have to make cuts, I guess this is 1 of those cut –backs

*Comment: None*

- I work hard on minimum wage as a single parent and I raise 2 children and am not entitled to discount other than single person supplement so why should people keep having kids therefore get further reductions

*Comment: None*

- Stop wasting it on daft car park schemes for a start. Cut the wages of the top 20% of council employee earners by say 3% for a 3yr period. Anyone on over £40 or £50K in Blackpool is a near millionaire and lower grades could keep their jobs and front line services for the poor and vulnerable maintained, all in it together after all. Council do a great job in general but cutting help to the poorest and most vulnerable is to be avoided at all costs, it's a hard job and just do your best, best of luck from a proud borough resident.

*Comment: Priorities of the Council are determined by elected members. The Council uses all available powers and resources to collect Council tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.*

It all well and good removing the family premium to increase the amount certain people will be liable for BUT you then have to collect that money, arrears in Blackpool are already far too high. The lack of action Blackpool Council takes non-payers is shameful. Not sending reminders or summonses because there's too many or you wouldn't be able to cope with the phone calls or visits is grossly unfair on the residents who do pay on time. Once someone has fallen into arrears and you've literally done nothing do you think that is going to inspire them to pay the following years liability? I would suggest that is a huge disincentive to pay up on time. Check out the level of un-summonsed debt you have!

*Comment: The Council uses all available powers and resources to collect Council Tax from those who are able to pay. Customers can apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. Suitable payment arrangements can be made for those who need to spread the cost of payments and Debt Advice, Budgeting Advice and Income Maximisation assistance is also available to customers.*

- Stop taking in families from other areas unless they are working, structure a sponsor scheme, so that if unemployment happens sponsors pays council tax and rent so that a claim is unnecessary, this will free up money to renovate and improve areas within the town which are in desperate need. This could be widened to lowering business rates and allowing instalment plans for licensing for encouragement of new business ventures, as competition with lower prices from China significantly impacts business locally and slows down economic growth for the area, investment this way would encourage small businesses to employ people and further lighten the burden on the local authority. I believe investment in people born here is needed, as keep allowing families to move here while on benefit is further causing long term financial burden to the local authority

*Comment:None*

- There is insufficient information given in the question to form an opinion on. For example, how many individuals/families will be impacted within the Council's jurisdiction by the changes? What is the total headline saving? What is the 'real' cost of the proposed change - i.e. what additional council/gov't funded support is likely to be required as a result of current beneficiaries losing the money - e.g. will it lead to real financial hardship, will it tip the balance of whether a job is sustainable, etc. etc. In terms of other ways the council could save money, it would seem sensible for the council to re-negotiate commercial agreements, such as those with suppliers, partners or other bodies which are in receipt of council spending or subsidies to aggressively get better deals rather than automatically thinking that saving money can only easily be obtained through cuts to services or benefits.

*Comment: It is impossible to determine how many families would be affected by the change as it relates to new claims for CTR or existing claims where another child is born into the household. It is*

*therefore impossible to determine any savings too. Customers can already apply to the Council Tax Discretionary Hardship Scheme where they find themselves in financial hardship. The Council has a robust procurement process in place award and review contracts with partners and suppliers to ensure value for money is achieved.*

20. If you have not been able to carry out any consultation, please indicate below how you intend to test out your findings and recommended actions.

N/A

**STEP 6 - ACTION PLANNING**

Please outline your proposed action plan below.

**2013/14**

| Issues/ adverse impact identified                        | Proposed action/ objectives to deal with adverse impact  | Targets/Measure   | Timeframe      | Responsibility            | Indicate whether agreed |
|--|--|---|----------------|---------------------------|-------------------------|
| Lack of awareness of proposed scheme by protected groups | Consultation plan to include a number of groups representing people with protected characteristics | 1. Set up consultation events with the following groups to ensure they have a better understanding of the scheme and it's impact on customers: <ul style="list-style-type: none"> <li>○ Faith Open Forum</li> <li>○ Disability Partnership</li> <li>○ Blackpool &amp; Fylde LGBT Forum</li> <li>○ Equalities Open Forum</li> <li>○ Homelessness Group</li> <li>○ Third Sector Groups</li> </ul> | Aug – Oct 2012 | Policy / CTS Project Team | Completed               |

| Issues/ adverse impact identified   | Proposed action/ objectives to deal with adverse impact   | Targets/Measure  | Timeframe   | Responsibility   | Indicate whether agreed                     |
|---|---|--|---|------------------|---|
| Disabled people categorised by being currently in receipt of Employment Support Allowance (Support Component) or Long Term Incapacity Benefit | This group of people are unlikely to be able to increase their income being too ill to work. It is therefore recognised that they will require additional support                     | 1. Identify affected customers<br>2. Develop a leaflet for disabled people who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with Andy Reid to tell customers that they will be affected and what assistance we can provide e.g. debt advice, support into work programme etc<br>4. Monitor results of publicity and support on collection rates. | Dec 2012<br><br>Dec 2012<br><br>Dec 2012<br>Apr 2013 – Sep 2013 | CTS Project Team | Completed<br><br>Completed<br><br>Completed |
| Disabled people in receipt of low rate Disability Living Allowance (Mobility and Care)  | There is the potential for this group to be able to work, as is the Government's proposal. Provide assistance to target these people and try to support them in the move back to work | 1. Identify affected customers<br>2. Develop a leaflet for disabled people who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with Andy Reid to tell customers that they will be affected and what assistance we can provide e.g. debt advice, support into work programme etc<br>4. Monitor results of publicity and support on collection rates. | Dec 2012<br><br>Dec 2012<br><br>Dec 2012<br>Apr 2013 – Sep 2013 | CTS Project Team | Completed<br><br>Completed<br><br>Completed |
| Full time Carers  | This group of people are unlikely to be able to increase their income as they are   | 1. Identify affected customers<br>2. Develop a leaflet for people who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with the carer's  | Dec 2012<br><br>Dec 2012  | CTS Project Team | Completed<br><br>Completed                  |

| Issues/ adverse impact identified | Proposed action/ objectives to deal with adverse impact   | Targets/Measure  | Timeframe                       | Responsibility   | Indicate whether agreed   |
|-----------------------------------|---|--|---------------------------------|------------------|---|
|                                   | unlikely to be able to go out to work. It is therefore recognised that they will require additional support   | organisation to tell customers that they will be affected and what assistance we can provide e.g. debt advice etc<br>4. Monitor results of publicity and support on collection rates.  | Dec 2012<br>Apr 2013 – Sep 2013 |                  | Completed   |
| Take Up Campaign                  | There will be a number of customers who are not claiming the other Benefits they should be doing therefore a take-up campaign is proposed to help them increase their income. | 1. Establish a joint campaign with Advice Link to promote the take-up of other unclaimed benefits.   | Jan 2013 – Mar 2014             | CTS Project Team | No specific work carried out with Advice Link but referrals to Fylde CAB for Benefits Maximisation are being made when people apply for CTRS Hardship Fund. |
| Benefits Maximisation             | Ensure existing Benefit claimants are maximising all the benefits they should be receiving  | 1. Establish referral systems to ensure income maximisation e.g. to Advice Link, debt advice etc   | Jan 2013 – Mar 2014             | CTS Project Team | Completed, referral mechanisms in place for CTR customers who are struggling to pay   |
| Customers with children under 5   | There is the possibility that some of these customers will be unable to increase  | 1. Identify affected customers<br>2. Develop a leaflet for customers who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with to tell | Dec 2012<br><br>Dec 2012        | CTS Project Team | Completed<br><br>Completed  |

| Issues/ adverse impact identified                    | Proposed action/objectives to deal with adverse impact  | Targets/Measure  | Timeframe   | Responsibility   | Indicate whether agreed                                  |
|--|---|--|---|------------------|--|
|  | their income  | customers that they will be affected and what assistance we can provide e.g. debt advice etc<br>4. Monitor results of publicity and support on collection rates.   | Dec 2012<br>Apr 2013 – Sep 2013                                 |                  | Completed<br><br>Completed                               |
| Customers with disabled children                     | There is the possibility that some of these customers will be unable to increase their income | 1. Identify affected customers<br>2. Develop a leaflet for customers who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with to tell customers that they will be affected and what assistance we can provide e.g. debt advice, etc<br>4. Monitor results of publicity and support on collection rates. | Dec 2012<br><br>Dec 2012<br><br>Dec 2012<br>Apr 2013 – Sep 2013 | CTS Project Team | Completed<br><br>Completed<br><br>Completed<br>Completed |
| Customers who are pregnant or are on maternity leave | There is the possibility that some of these customers will be unable to increase their income | 1. Identify affected customers<br>2. Develop a leaflet for customers who have received a bill showing the options for help and assistance.<br>3. Joint marketing campaign with to tell customers that they will be affected and what assistance we can provide e.g. debt advice etc<br>4. Monitor results of publicity and support on collection rates.  | Dec 2012<br><br>Dec 2012<br><br>Dec 2012<br>Apr 2013 – Sep 2013 | CTS Project Team | Completed<br><br>Completed<br><br>Completed<br>Completed |
| Customers who have learning difficulties             | There is the possibility that some of these customers will be unable to increase their income | 1. Establish referral systems to ensure income maximisation e.g. to Advice Link, debt advice etc   | Apr 2013 – Sep 2013   | CTS Project Team | Completed  |

| Issues/ adverse impact identified   | Proposed action/ objectives to deal with adverse impact   | Targets/Measure   | Timeframe           | Responsibility   | Indicate whether agreed |
|---|---|---|---------------------|------------------|-------------------------|
| Customers may struggle to make monthly payments of Council Tax over the usual 10 month period | Review Collection Policy to ensure more flexibility is built in for payment plans and recovery action                     | 1. Ensure payment periods are more flexible e.g. pay weekly, over 12 months   | Apr 2013            | CTS Project Team | Completed               |
|   |   | 2. Ensure debt referral scheme is in operation for Council Tax arrears  | Apr 2013            |                  | Completed               |
|   |   | 3. Ensure there is a clear distinction between those who can't pay and those who won't pay                                      | Apr 2013            |                  | Completed               |
| Customers may end up suffering severe financial hardship                                      | Develop Discretionary Discount Guidance for staff and provide training to staff to identify cases where there is an issue | 1. Establish if a hardship scheme can be made available   | Nov/Dec 2012        | CTS Project Team | Completed               |
|   |   | 2. Establish criteria to apply to the fund for Owner Occupiers  | Dec 2012            |                  | Completed               |
|   |   | 3. Establish criteria to apply to the fund for tenants  | Dec 2012            |                  | Completed               |
|   |   | 4. Ensure debt advice and benefit maximisation is available   | Apr 2013            |                  | Completed               |
|   |   | 5. Review and possibly reduce recovery of other Council bills e.g. Sundry Debts, Housing Benefit overpayment                    | Apr 2013            |                  | Completed               |
|   |   | 6. Review any cases in receipt of Social Care in order to ensure Council Tax is disregarded in the financial assessment process | Apr 2013            |                  | Completed               |
|   |   | 7. Ensure Disabled Parking Blue Badges have been claimed  | Apr 2013 – Mar 2014 |                  | Completed               |
|   |   | 8. Ensure Advice Link Problem Noticer training is delivered to all staff  | Apr 2013 – Mar 2014 |                  | Completed               |
|   |   | 9. Ensure a DHP award cannot be made  | Apr 2013 – Mar 2014 |                  | Completed               |

| Issues/ adverse impact identified   | Proposed action/ objectives to deal with adverse impact  | Targets/Measure   | Timeframe           | Responsibility   | Indicate whether agreed  |
|---|--|---|---------------------|------------------|--|
|   |  | 10. Ensure all available help from Housing Options has been explored  | Apr 2013 – Mar 2014 |                  | Completed  |
| Some groups may still not be aware of the changes to the scheme if we have not been able to target them | Consider additional targeted publicity to certain groups | 1. Identify contact points for potential groups including:<br>Polish Community<br>Chinese Community<br>African Caribbean Friends & Relatives Association<br>Romanies<br>Visually Impaired<br>Hearing Impaired<br>2. Ensure there is access to Language Line to assist customers who do not have English as a first language<br>Discuss access to leaflets in other languages with other Local Authorities | Jan 13 – Apr 13     | CTS Project Team | No contact points established but still have close working relationship with Disability First group should referrals be required |

**2014/15**

No change to the scheme

**2015/16**

No change to the scheme

**2016/17**

| Issues/ adverse impact identified   | Proposed action/ objectives to deal with adverse impact  | Targets/Measure   | Timeframe   | Responsibility   | Indicate whether agreed |
|---|--|---|---|------------------|-------------------------|
| Customers may end up suffering severe financial hardship  | Review Discretionary Discount Guidance for staff and provide training to staff to identify cases where there is an issue | <ol style="list-style-type: none"> <li>1.Ensure the Council’s hardship scheme is still available</li> <li>2.Review criteria to apply to the fund for Owner Occupiers</li> <li>3. Review criteria to apply to the fund for tenants</li> <li>4. Ensure debt advice and benefit maximisation is available</li> <li>5.Review and possibly reduce recovery of other Council bills e.g. Sundry Debts, Housing Benefit overpayment</li> <li>6.Ensure a DHP award cannot be made</li> <li>7. Ensure all available help from Housing team has been explored</li> </ol> | <p>Jan 16</p> <p>Jan 16</p> <p>Jan 16</p> <p>Apr 16 – Mar 17</p> | CTS Project Team |                         |
| Monitor legislation progress in case changes to the family premium affect existing CTRS customers | If this client group are impacted by the changes, contingency plans will be required                                     | <ol style="list-style-type: none"> <li>1.Review Equality Analysis in light of any legislation changes</li> <li>2.Ensure the Council’s discretionary hardship fund criteria is reviewed to consider additional support for affected customers</li> </ol>   | <p>Apr 16 – Mar 17</p> <p>Apr 16 – Mar 17</p>   | CTS Project Team |                         |

| Issues/ adverse impact identified | Proposed action/ objectives to deal with adverse impact   | Targets/Measure  | Timeframe           | Responsibility   | Indicate whether agreed |
|-----------------------------------|---|--|---------------------|------------------|-------------------------|
| Take Up Campaign                  | There will be a number of customers who are not claiming the other Benefits they should be doing therefore a take-up campaign is proposed to help them increase their income. | 1.All frontline staff are aware of the potential that customers are not claiming all the benefits they are entitled to and where to signpost customers to.<br>2. | Jan 2016 – Mar 2017 | CTS Project Team |                         |

## STEP 7 - ARRANGEMENTS FOR MONITORING AND REVIEW

Please outline your arrangements for future monitoring and review below.

| Agreed action   | Monitoring arrangements  | Timeframe                           | Responsibility   | Added to Service Plan etc. |
|---|--|-------------------------------------|------------------|----------------------------|
| Review of scheme and it's impact                                    | Establish baseline position for review<br>Review impact of scheme on protected characteristic groups<br>Review collection rates amongst affected customers<br>Consider whether discretionary policy is sufficiently robust | Apr 2016 - Mar 2017                 | CTS Project Team |                            |
| Potentially propose changes to the scheme as a result of the review | Consider consultation requirements<br>Report to Full Council to formally adopt any recommended changes to the scheme   | May 2016 – Jul 2017<br><br>Nov 2017 | CTS Project Team |                            |

Date completed:

Signed:

Name:

Position: