

Equality Analysis (EA) (formally Equality Impact Assessment) Record Form 2018/19**Department:** Benefits and Customer Services**Team or Service Area Leading Assessment:** Benefits**Title of Policy/ Service or Function:** Working Age Council Tax Reduction Scheme Equality Assessment**Lead Officer:** Louise Jones**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 were set up for Working Age customers at a Local Authority level. Under this system, it is billing authorities who 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 continues 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 2018/19 Equality Analysis is shown below and is updated to consider the impact of the Scheme and any changes to it.

Action	Timescale
Develop first draft of the scheme	Jun 2017 -Jul 2017
Start Equality Analysis based on proposed scheme	Jul 2017 – Oct 2017
Consultation exercise on additional support for low income groups and alignment of CTR with the Housing Benefit scheme	Sep 2017 – Oct 2017
Post consultation review of EA taking consultation into account	Oct 2017
Develop EA Action Plan to mitigate impact of the changes	Oct 2017
Send EA with Council Report to decide the scheme	Nov 2017

3. Please outline any proposals being considered.

Continue with the existing 2017/18 scheme, ensuring the scheme is cost neutral to the Council with continued reduced support for working age claimants of 27.11% except for people in the following categories, who have reduced support of 13.56%:

- Where someone in the household receives Disability Living Allowance or Personal Independence Payments.
- Where the applicant is a lone parent and who is responsible and resides with a child under 5 years old.
- Where the applicant or their partner receives Carer's Allowance.
- Where the applicant or their partner is in receipt of a war pension, war widows pension, war disablement pension or equivalent.

And also:

Provide additional support to low income groups where the applicant or their partner receives Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance.

Mirror the proposed changes to the Housing Benefit scheme with effect from April 2018 in the following areas:

- The disregard of Bereavement Support payments, which replaced all the previous social security

benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment

- The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London.

4. What outcomes do we want to achieve?

A framework to provide Council Tax Reduction with the following objectives:

- Continue with a scheme similar to the current 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

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 3rd 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 years Equality Analysis but will also consider the impact on protected groups of the proposed changes:

- Provide additional support to low income groups where the applicant or their partner receives Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance.
- The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment

- The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London.

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 (as at Sep 16):

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

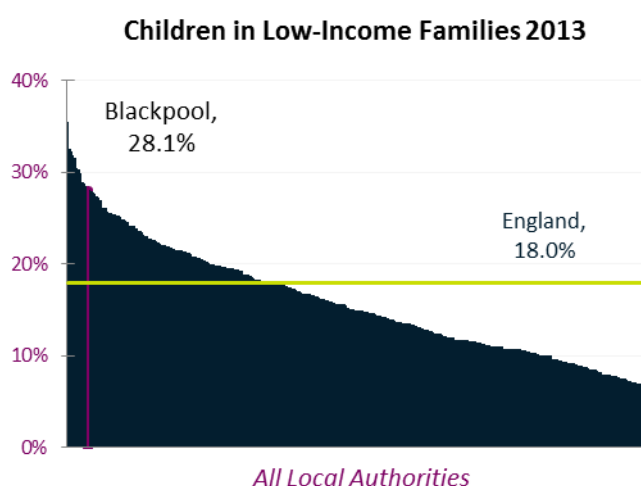
The child poverty framework 2011-2014 set out a series of potential indicators on poverty and surrounding issues. Information below presents a summary of all available indicators and some additional context.

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

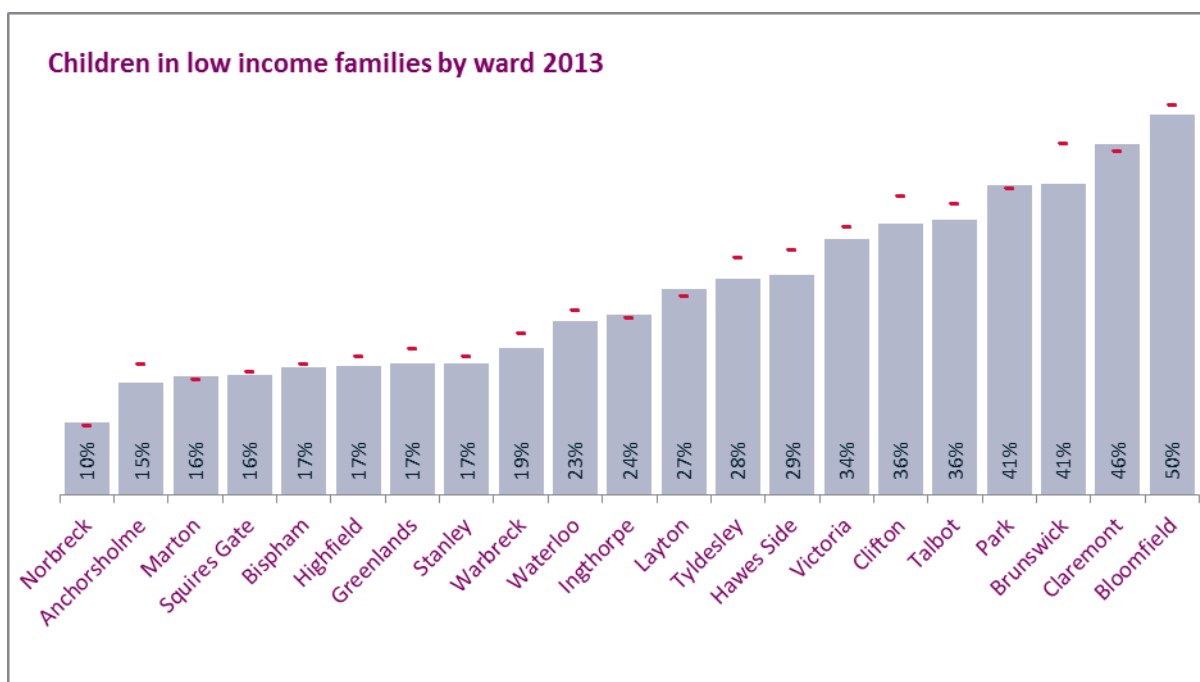
- This accounts for **28.1% of all children**
- Blackpool ranks **12th highest in England**.

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 12th 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 4th highest level of poverty in England



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.

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.

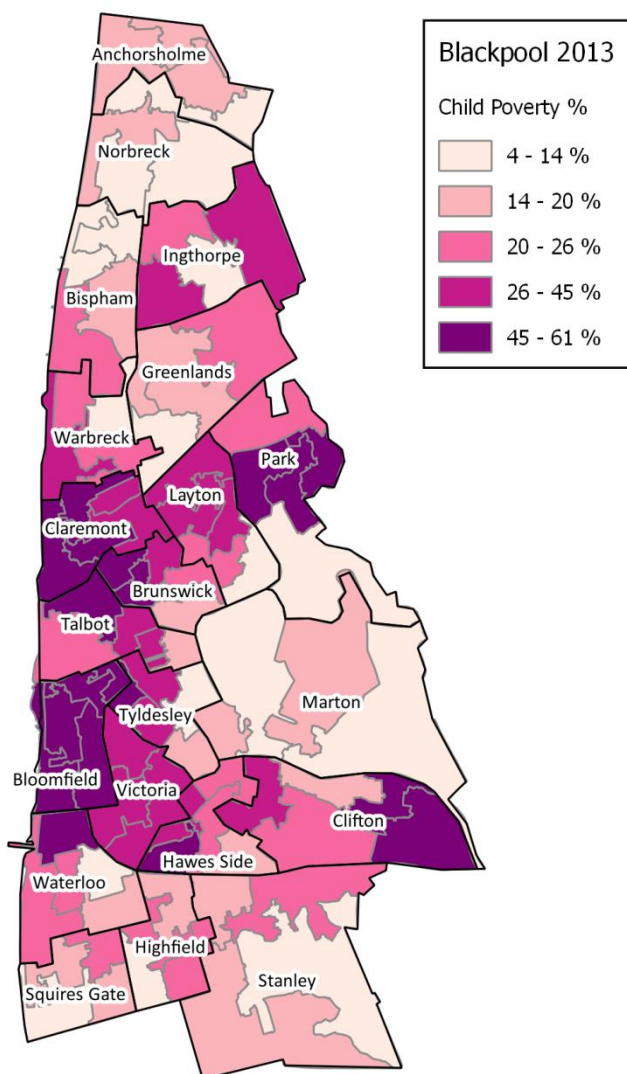
The map of poverty shares many similarities with maps for:

- 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

Children in Low Income Families



Data Source: HMRC, 2015

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 any new scheme as they received under the Council Tax Benefit scheme. They will therefore be treated more favourably than other groups under the proposed changes.

In Blackpool we currently have 20569 Council Tax Reduction recipients of whom 6703 are single and of pension age. In addition we have 1883 couples over 60 in receipt of Council Tax benefit. Of those 137 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 Reduction support. Pensioners apply to the Pension Service and if successful are prompted to apply for Council Tax Reduction. 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 Reduction, 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 Reduction scheme the system of applicable amounts differentiate between those under and over 25. Claimants who are under 25 have a lower applicable amount as they 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.

It is not expected that additional support for low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance would have an adverse effect on this group as any Working Age claimant in receipt of these benefits will be paying less Council Tax.

The disregard of Bereavement Support Payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

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. This may lead some to fall into arrears more easily with all the associated problems this can cause.

It is not anticipated that provision of additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance will have an adverse effect on this group as they will be required to pay less Council Tax.

The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

Some individuals will receive Social Care support from Blackpool Council may be able to have any 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 2018/19 scheme is the same as 2017/18 scheme and increased Council Tax Reduction awards can be expected from the changes being considered, 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.

<i>Gender Reassignment</i>
<p>Potential Impact</p> <p>No information is collected on the gender reassignment status of Council Tax Reduction 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. It is not thought that the proposed changes will have a negative impact on working age single people and couples who are recipients of Council Tax Reduction regardless of their gender identity.</p>
<i>Marriage and Civil Partnership</i>
<p>Potential Impact</p> <p>The latest figures show that there are 4478 couples in receipt of Council Tax Reduction. Of these: 1752 (39%) had child dependents, and 2726 (61%) had no child dependents.</p> <p>There are 2595 couples in receipt of Council Tax Reduction who are of working age, with 1692 (65%) had child dependents and 903 (35%) had no child dependents.</p> <p>The main scheme impacts 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 scheme as are people living together as if they are in such legal partnerships.</p> <p>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. The current scheme ensures that these customers would not be disadvantaged over smaller families as the Council Tax Reduction 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.</p> <p>It is not anticipated that provision of additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance will have an adverse effect on this group as they will be required to pay less Council Tax.</p> <p>The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.</p> <p>The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.</p>
<i>Pregnancy and Maternity</i>
<p>The 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.</p> <p>Whilst at this moment we consider that this impact is unlikely to be disproportionately greater on</p>

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.

It is not anticipated that provision of additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance will have an adverse effect on this group as they will be required to pay less Council Tax.

The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

Race

Potential Impact

The current scheme will have a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of race or ethnicity. We do not have any data regarding the ethnicity of Council Tax Reduction recipients in Blackpool. However, national data shows that 90% of households who received Council Tax Benefit were white, and 10% were 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 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

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.

Religion and Belief

Potential Impact

The current scheme has a negative impact on all working age single people and couples who are recipients of Council Tax Reduction regardless of religion or belief. We do not have any data regarding the religion or beliefs Council Tax Reduction recipients in Blackpool. We do not envisage the scheme or the proposals for 2018/19 will adversely impact people with particular religions or beliefs.

Sex

Potential Impact

The latest figures show that in Blackpool there are 16,091 single people in receipt of Council Tax Reduction. Of these: 9,692 (60%) are female, and 6,399 (40%) are male.

Of the 9,692 female recipients, 3,336 (34%) are lone parents and of the 6,399 male recipients, 302 (5%) are lone parents.

If we look only at those of working age, 59% of all single working age female recipients are lone parents. Of the male recipients 4% of all single working age male recipients are lone parents. Of all working age lone parents in Blackpool in receipt of Council Tax Reduction, 92% are female and 8% are male.

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 2018. However, given the higher number of female recipients (60%) 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.

It is not anticipated that provision of additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance will have an adverse effect on this group as they will be required to pay less Council Tax.

The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

Sexual Orientation

Potential Impact

The proposed scheme will have the same level of 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. For the 2013/14 scheme, specific consultation was carried out with the Blackpool, Wyre and Fylde LGBT Forum.

Other Relevant Groups

Potential Impact

Carers

It is not anticipated that provision of additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance will have an adverse effect on this group as they will be required to pay less Council Tax.

The disregard of Bereavement Support payments, which replaced all the previous social security benefits such as Bereavement Allowance, Widow's Pension, Widowed Mother's Allowance, Widowed Parent's Allowance and Bereavement Payment would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

The disregard of certain Charitable Fund payments, such as those made following recent incidents in Manchester and London would not have an adverse effect on claimants as their Council Tax Reduction award would increase.

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, if required.

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.

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.

Other relevant benefit changes that apply from April 2018

The 2018/19 Council Tax Reduction scheme will come in from 1st April 2018. 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. *Working age benefit rates (Tax Credits, applicable amounts) continue to be frozen.*

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 Council Tax Reduction scheme and will continue to receive the current levels of support as defined by Central Government 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 to change 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 continued marketing and communication which will include liaison to target hard to reach groups.

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 Blackpool Council Tax Reduction scheme (in line with the 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 Reduction, which could mean that some people are not entitled but this is the case now also.

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 scheme will support people on a low income and is 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 Reduction would put those people at a financial advantage.
- The Council Tax Reduction Scheme must cost less than the Council Tax Benefit regime. The 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. The Council Tax Reduction Hardship Fund would provide a mechanism for additional support for disabled people.

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?

No adverse impact has been identified for 2018/19 proposed scheme changes

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

Not applicable

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

Not applicable

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.

2018/19 Scheme

Comments on whether the current scheme should continue

I think supporting pensioners and those who unfortunately or by choice single parents or disabled should have some form of reduction but those that 'flaunt' the system should be excluded.

The council struggles for money as it is and to implement changes which will include even more people who will then be entitled to a reduction which in turn will affect the residents of the town who pay full council tax.

I think a new, more streamlined system could be brought in so that all low income households were included.

The current scheme protects those in need and the case for change seems to be based on making Council administration easier. This is not justified.

Response:

- 1) *No pensioners on Council Tax Reduction have a reduction applied to their award. The 17/18 scheme has already introduced additional support for disabled people and lone parents so they do not have a full 27.11% deduction applied to their award.*
- 2) *The application process makes every effort to stop fraud entering the system but where evidence of fraudulent activity is uncovered at a later date, this is investigated.*
- 3) *The numbers affected by the two changes to align with Housing Benefit will be minimal. In terms of providing additional support to low income groups, this will assist the Revenues team as they will not be trying to recover small debts from people who are struggling to pay and this will allow them to concentrate recovery efforts on people who should and are able to pay but choose not to.*
- 4) *The Council is considering a streamlined process for future years.*

Comments disagreeing with the proposal to provide additional support to low income groups where the applicant or their partner receive Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance

There are more and more people falling into this category in Blackpool so surely eventually this protected category will outnumber those that are non-protected.

Response: It is difficult to predict the demographics of the town moving forward.

There are a lot of single parent, young house holds out there that are not entitled to a lot of benefit and find it difficult to live, this would help those. I also think that the PIP and DLA option should be open to anyone that has that as at the moment not everyone is entitled to the help. So if the scheme incorporated the JSA etc. then surely it should include those too?

Response: The scheme already provides additional support to people in receipt of PIP and DLA, their award is only reduced by 13.56% instead of 27.11%

Only employed persons on low incomes or receiving employment support allowance should be included.

Response: The low income categories have been picked as generally people placed on Income Support, Job Seeker's Allowance (Income based) or Employment and Support Allowance (Income Based) are unable to work. Additional disregards are given in the Council Tax Reduction calculation where a claimant is working already and low income claimants can apply to the Council's Hardship scheme for additional help.

By giving more benefits out to people they are less inclined to help themselves to pay for themselves. It will make it less attractive to find work because work will not pay the same as benefits.

Response: Comment note, no impact from an equalities perspective.

The current system protects the vulnerable in society. The proposed changes will include people who are able-bodied, and able to work, such as Income-based job seekers allowance people - these should continue to be excluded otherwise the Council is increasing the incentive for these people to remain unemployed. I don't agree with any increase in the cost of the scheme. I'd rather see the £0.4 million spent on job creation schemes.

Response: Comment noted

Comments disagreeing with the alignment with Housing Benefit rules to disregard the Bereavement Support Allowance

I don't understand why people would get money for a lost loved one? especially if they are working.

If the payments are disregarded for other benefits, then the person who receives it benefits from it. I don't see that disregarding it for council tax benefit will be in the interests of the working community of the area.

Response: The Department for Work and Pensions would consider a Bereavement Support Allowance award to a widow, widower or civil partner if the deceased had paid National Insurance contributions for at least 25 weeks or died because of an accident at work or a disease caused by work. Central Government have decided not to include these payments as income for the purposes of Housing Benefit and the intention was only to mirror how this income was treated for Council Tax Reduction awards.

Comments disagreeing with the alignment with Housing Benefit rules to disregard the We Love Manchester and London Emergency Fund payments

Council tax is a tax. It should apply to everyone. All income should be viewed as income.

The monies from these tragedies ensure that beneficiaries receive financial support to either re-build their lives completely, like the Grenfell victims or make seriously well needed adaptations to homes like those of the Manchester arena attack. These monies are also used within the families to provide a holiday or much needed respite days where they can forget about their problems or what they have just been through. These payments are made and given by members of the UK wide community and further afield. They are

donations made as a gift to help those in extreme need and circumstances. They are not "entitled" to the monies in a benefits situation, this money is gifted.

Payments from emergency funds should only be disregarded up to a set limit. This could be quite generous but there ought to be some limit on the amount people can receive while still receiving council tax reduction otherwise who knows how much people might receive and still have their council tax subsidised by the ever shrinking number of council tax payers? Also how many schemes will be included? Will every charitable scheme be included or only London and Manchester?

Response: Central Government have decided not to include these payments as income for the purposes of Housing Benefit and the intention was only to mirror how this income was treated for Council Tax Reduction awards. Only the Manchester and London schemes are included in the proposals. There will be no adverse impact on a particular protected group from an equalities perspective.

Other Comments

The information is unclear i'm sure the reduction is not EVERYONE who claims DLA or PIP only certain aspects of it i.e. mental health?? i.e. my husband has cancer received high rate PIP and gets no reduction... information not accurate

Response: Anyone who is in receipt of DLA or PIP has a higher award of Council Tax Reduction than someone not on these incomes; a deduction of 13.56% is applied to the final Council Tax Reduction calculation rather than 27.11%. It may be that the comment has been made by someone who is in receipt of DLA or PIP but their income is such that they do not qualify for Council Tax Reduction.

I think the priority should absolutely be to maximise the help available to less well-off households, not offer Council Tax reductions.

Response: Council Tax Reduction is a way of offering further assistance to less well-off households as it reduces the amount of Council tax they have to pay.

ensure all properties are registered to pay council tax i.e. in block that the council are aware of ALL properties in that block as I know of blocks where say 2a is not on council....

Response: Regular checks are made on properties to ensure that anyone liable for Council Tax is registered to pay.

PLEASE use the money saved to provide more rubbish bins around the town and empty them more regularly, especially dog poo bins and especially through the season.

Response: Comment note, there will be no adverse impact on a particular protected group from an equalities perspective.

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.

2018/19

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	1.Ensure the Council's hardship scheme is still available 2.Review criteria to apply the fund for Owner Occupiers 3. Review criteria to apply the fund for tenants 4.Ensure debt advice and benefit maximisation assistance is available 5.Review and possibly reduce recovery of other Council bills e.g. Sundry Debts, Housing Benefit overpayment 6.Ensure a DHP award cannot be made 7.Ensure all available help from Housing team has been explored	Jan 18 Jan 18 Jan 18 Apr 18 – Mar 19 Apr 18 – Mar 19 Apr 18 – Mar 19 Apr 18 – Mar 19	Benefits Service Discretionary Team Advice team	Agreed
Monitor legislation progress in case there are changes to the proposed amendments to Housing Benefit,	If this client group is no longer impacted by the changes the EA will need to be revisited	1.Review Equality Analysis in light of any legislation changes	Apr 18 – Mar 19	Benefits Service	Agreed

Issues/ adverse impact identified	Proposed action/ objectives to deal with adverse impact	Targets/Measure	Timeframe	Responsibility	Indicate whether agreed
in which case alignment to HB rules may not apply					
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. 2. The Advice Team maximise the take up of Council Tax reduction when they see a client 3. Increased take up of Council Tax Reduction by Universal Credit customers proactively work with other agencies and groups to ensure take up of all benefits is maximised	Jan 2018 – Mar 2019	Benefits Service	Agreed

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 Review impact of scheme on protected characteristic groups Review collection rates amongst affected customers Consider whether discretionary policy is sufficiently robust	Apr 2018 - Mar 2019	Benefits Service	
Potentially propose changes to the scheme as a result of the review	Consider consultation requirements Report to Full Council to formally adopt any recommended changes to the scheme	May 2018 – Jul 2018 Nov 2018	Benefits Service	

Date completed: 20th October 2017

Signed: 

Name: Louise Jones

Position: Head of Benefits and Customer Services