

Appendix 2b: Equality Analysis (EA) (formally Equality Impact Assessment) Record Form 2022/23

Department: Revenues, 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 2022/23 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 2021 -Jul 2021
Start Equality Analysis based on proposed scheme	Jul 2021 – Oct 2021
Develop EA Action Plan to mitigate impact of the changes	Oct 2021
Send EA with Council Report to decide the scheme	Nov 2021

3. Please outline any proposals being considered.

Continue with the existing 21/22 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.
- Where the applicant or their partner receives Income Support, or Income-Based Jobseekers Allowance, or Income-Related Employment Support Allowance.
- Ensure that applicants who are protected under the current Scheme continue to be protected when they move to Universal Credit
- Extension of the group of customers who pay 13.56% to claimants or partners who are:
 - in receipt of Jobseeker's Allowance Contribution Based
 - in receipt of Main Phase Employment and Support Allowance and are in the Work Related Activity Group
 - in receipt of Maximum Universal Credit and neither employed, self-employed or in receipt of any other income which is taken into account when calculating their Universal Credit award (such as an Occupational Pension or other unearned income)
 - in receipt of Universal Credit which includes either the limited capability for work and or/work related activity

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 as no changes are proposed for 2022-23.

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 Oct 21):

Population

Blackpool has a resident population of 138,381, some 37,372 (27%) of which are aged 60 and over. There are 70,522 dwellings in Blackpool. It is a dense urban area with high levels of deprivation, workless households, and poor health in the resident population.

Deprivation

Blackpool ranks as the most deprived local authority in England in terms of average deprivation scores. 39 (41.5%) of the 94 LSOAs in the local authority rank in the most deprived nationally. Health deprivation is much higher than average and over half of areas are in the most deprived 10% for health nationally.

Housing

There is a high percentage of private rented dwellings in Blackpool and a slightly lower owner-occupier rate than seen nationally:

- 63.8% - owner occupied (England: 65.7%)
- 25.9% - privately rented (England: 17.9%)
- 10.3% - social rented (England: 16.4%)

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: 13.9%)
- 23% - lone adults under 65 years (England: 14.4%)
- 13% - lone parent families (England: 9.8%)
- 8% - single families with all adults over 65 (England: 8%)
- 35% - single families cohabiting/married with all adults under 65 (England: 43%)

Disability

As of February 2021, 7,393 (8.8%) of working age residents claim employment support allowance and a further 1,155 of working age residents claim disability living allowance (1.4%). The ESA proportion is over double that for England as a whole.

Universal Credit

As of August 2021, 21,917 (26.1%) of working age residents are on universal credit. With 13,186 not in employment (60.2% of the total number of people on universal credit) and 8,731 in employment (39.8% of the total number of people on universal credit). The number of people on universal credit is over 10 percentage points higher than England as a whole.

Child Poverty

24.9% of all children aged under 16 in Blackpool live in relative low income families, around 6,522 children in total.

19.8% of all children aged under 16 in Blackpool live in absolute low income families, around 5,205 children in total.

Overall, 8,935 (34.1%) of children aged under 16 in Blackpool are living in households below 60% median income after housing costs. Which is higher than the national figure of 30.4% and North West figure of 30.8%.

Pension Credit

Blackpool has 2,864 claimants in receipt of Pension Credit Guarantee Credit only, and 1,976 claimants in receipt of both Guarantee Credit and Savings Credit, equivalent to 84.7% of claimants (in line with the national rate).

Means-tested claimants in receipt of Pension Credit 'Savings Credit' Only is much lower at 876 claimants compared, equivalent to 15.3% of claimants (again in line with the national rate)

As a proportion of the population, 20.1% of the 65+ age group claim pension credit, much higher than England at 11.7%.

Blackpool Child Poverty Needs Assessment

The child poverty framework 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 60% national median income."

2015 position (latest release)

8,235 children in Blackpool live in low income families.

This accounts for **26.8% of all children**

Blackpool ranks equal **6th highest in England**.

Changes since 2013

Overall, in percentage terms, Blackpool has seen a small reduction in the proportion of children in poverty between 2013 and 2015. Reducing from 8,730 (28.1%) in 2013 to 8,235 (28.1%) in 2015. Despite this improvement, Blackpool ranked more poorly nationally. From 21st highest in 2011 to 14th in 2012, 12th highest in 2013 to equal 6th in 2015. This is because while Blackpool rates have reduced at a smaller rate than the average reduction across all Local Authorities so other areas have improved at a faster rate.

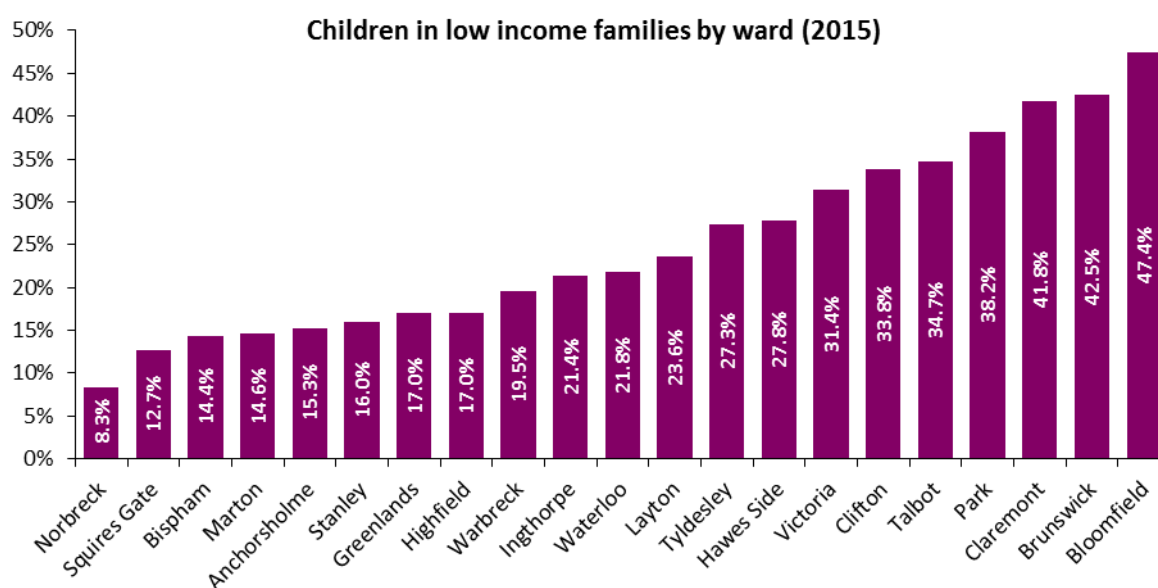
Ward Distribution

All wards have some children living in poverty.

Bloomfield, Claremont and Brunswick wards each have more than 40% of children in poverty.

Bloomfield ward ranks as having the 3rd highest level of children in poverty in England.

The following table outlines the proportion of children in low-income families by ward.



Family demographics

80.4% of children in poverty live in **families claiming Income Support or Job Seekers Allowance**.

64.7% of children in poverty live in **lone parent families**.

31.9% are young children aged 0-4, **55.5% are school aged 5-15**, and 12.6% are dependents aged 16-19.

54.3% live in **1-2 child families**, 45.7% live in families with 3 or more children

In total, **25.7%** of the working age population are deprived due to having a low income.

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 passed 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 Ministry of Housing, Communities and Local Government's (formerly 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 20,868 Council Tax Reduction recipients of whom 5,416 are single and of pension age. In addition we have 1,533 couples over 60 in receipt of Council Tax Reduction. Of those 46 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 affect the same group of Working Age customers.

There is a recognition that Working Age customers in receipt of Council Tax Reduction have been, and continue to be, adversely impacted by the COVID-19 pandemic e.g. working reduced hours, their businesses have closed, been furloughed etc.. Whilst financial assistance was provided to all Working Age recipients of Council Tax Reduction in 2020/21 by way of a grant of up to £150, this will not be available for 2022/23. If residents find themselves in financial difficulty, they could be assisted through the Council Tax Reduction hardship fund.

It is not anticipated that the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of these benefits will be paying less Council Tax.

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 the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

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 2022/23 scheme is the same as 2021/22 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.

Gender Reassignment

Potential Impact

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.

Marriage and Civil Partnership

Potential Impact

The latest figures show that there are 3,946 couples in receipt of Council Tax Reduction. Of these: 1,539 (39%) had child dependents, and 2,407 (61%) had no child dependents.

There are 2,413 couples in receipt of Council Tax Reduction who are of working age, with 1,493 (62%) had child dependents and 920 (38%) had no child dependents.

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.

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.

It is not anticipated that the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

Pregnancy and Maternity

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.

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.

It is not anticipated that the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

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 of the proposed changes 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.

It is not anticipated that the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

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 proposal for 2022/23 will adversely impact people with particular religions or beliefs.

Sex

Potential Impact

The latest figures show that in Blackpool there are 16,922 single people in receipt of Council Tax Reduction. Of these: 10,129 (60%) are female, and 6,793 (40%) are male.

Of the 10,129 female recipients, 3,620 (36%) are lone parents and of the 6,793 male recipients, 357 (5%) are lone parents.

If we look only at those of working age, 36% of all single working age female recipients are lone parents. Of the male recipients 5% of all single working age male recipients are lone parents. Of all working age lone parents in Blackpool in receipt of Council Tax Reduction, 91% are female and 9% 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 2022. However, given the higher number of female recipients (60%) in Blackpool, continuation of 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 the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

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.

Other Relevant Groups

Potential Impact

Carers

It is not anticipated that the continuation of the scheme will have any other adverse effect on this group as any Working Age claimant in receipt of certain benefits will be paying less Council Tax.

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.

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 2022

The 2022/23 Council Tax Reduction scheme will come in from 1st April 2022. At the same time continued and planned 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.
2. The continued rollout of Universal Credit full service in Blackpool
3. The continued impact of the reduction in Universal Credit awards by £20 per week

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 2022/23 proposed scheme

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.

2019/20 Scheme

Comments on whether the current scheme should continue

- As a single parent it is a big help as it pays for travel and meals
- Scheme needs reforming to get people off benefits
- People need pushing to work and not giving every penny they need. They should receive a percentage discount on hours over 16 at work. This would push more people into work and less into their armchairs
- I think from personal experience years ago me and my husband were on tax family's credit and we never applied for housing benefits or council tax benefits cause we could still afford to live and afford food and still pay rent and out council tax. We lived in social housing so yes the rents cheaper than private housing. We both worked my husband 40 hrs and me 20 hrs. I work with a girl who is on 16hrs and they can afford more luxury than I could ever and they are always splashing the cash. I also see these girls working the rest of the hours cash in hand! They should be questioned why they are only working 20 hrs or below. So for this reason I think this area needs looking at. If I could afford to do it with 2 children at the time why can't they.
- As someone who is currently on universal credit I feel like I always have been disadvantaged as my council tax reduction is always increasing because of universal credit but it never decreases, which makes it harder for me as a single parent with a child in DLA.

- The council should continue to protect low income families & those on universal credit
- Council should ensure that it's CTR scheme keeps aligned with Housing Benefit Scheme

Response:

- 1) *The current scheme does mirror the Housing Benefit scheme as much as possible but the introduction of Universal Credit will see this alignment ended in future years.*
- 2) *In terms of the proposed 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.*
- 3) *The Council is unable to comment on working practices of employers*
- 4) *Government policies are in place to assist customers back to work.*

Comments disagreeing with the proposal to ensure that all applicants who are 'protected' under the current scheme continue to be protected when they move to Universal Credit

- Reducing the groups which get benefits

Response: Comment noted

- So long as the CTR scheme continues to align with Housing Benefit Scheme

Response: The current scheme does mirror the Housing Benefit scheme as much as possible but the introduction of Universal Credit will see this alignment ended in future years.

Comments disagreeing with the proposal to extend the protected group to include where the applicant, or their partner, is in receipt of Jobseeker's Allowance Contribution Based; where the applicant, or their partner, is in receipt of Main Phase Employment and Support Allowance and are in the Work Related Activity Group; where the applicant is in receipt of Maximum Universal Credit and is neither employed, self-employed or in receipt of any other income which is taken into account when calculating their Universal Credit award (such as an Occupational Pension or other unearned income); and where the applicant is in receipt of Universal Credit which includes the limited capability for work element or the limited capability for work & work related activity

- Helps avoid recently unemployed people getting behind with paying bills
- Agree to temporary help for unemployed
- Finite period for receiving benefit to encourage people to work

Response: Comments noted

- Extend the benefits to other vulnerable groups

Response: Considerable protection has been added into the scheme in previous years.

- Leave it as it is
- Leave it as it is currently
- None, other than keeping it the same as now
- Bill for this needs to be paid somehow so keep the scheme as it is
- Worried about the cost

Response: Additional costs are incurred by trying to recover small amounts of money from customers on low income. By providing this additional protection the administration costs will reduce.

- I agree with the widowers and partly with the disabled and carers. I do not agree that JSA should be protected or a lot of disability cases as they can work and earn a lot of money already.

Response: Customers who are in receipt of Job Seekers Allowance are more likely to be unable to afford their Council Tax and were previously in receipt of full Council Tax Benefit under the old national scheme. Customers with disability income can have a higher level of disability related expenditure.

- Does this not include children who receive DLA especially when it is single parent families.

Response: Families with any disability component in their income , including children, are already protected

Other Comments

- Would like council to give cleaning streets a higher priority
- Extend hours in which people can contact council with council tax queries , as 3-5pm is inadequate
- Consider lower business rates to keep shops and businesses in the town centre
- Not happy with charge for green bins
- If there is money to play with then fund more police
- Would like to see help for FIN , the families in need group, which is charity funded

Response: Comments noted but they are not directly related to the Council Tax Reduction Scheme

- Consider full 100% reductions for specific groups
- Reduce the availability of protection and reduction from council tax
- Happy as long as it is a means-tested scheme

Response: The Council Tax Benefit scheme allowed fully funded means tested assessments enabling 100% protection for low income groups. However, the reduction in Government funding that accompanied the transfer of Council Tax Reduction schemes to Local Authorities has not enabled 100% reductions to be applied. Council Tax Reduction continues to be a means tested benefit with some additional protection for low income and vulnerable groups.

2020/21 Scheme

No changes to scheme therefore no consultation required.

2021/22 Scheme

No changes to scheme therefore no consultation required.

2022/23 Scheme

No changes to scheme therefore no consultation required.

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.

2022/23

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"> 1.Ensure the Council’s hardship scheme is still available 2.Review criteria to apply to the fund for Owner Occupiers 3. Review criteria to apply to 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 	<p>Jan 22</p> <p>Jan 22</p> <p>Jan 22</p> <p>Apr 22 – Mar 23</p> <p>Apr 22 – Mar 23</p> <p>Apr 22 – Mar 23</p> <p>Apr 22 – Mar 23</p>	Benefits Service Discretionary Team Advice team	Agreed
Monitor legislation progress in case there are changes to the proposed amendments to Housing Benefit, in which case alignment to HB rules may not apply	If this client group is no longer impacted by the changes the EA will need to be revisited	<ol style="list-style-type: none"> 1.Review Equality Analysis in light of any legislation changes 	Apr 22 – Mar 23	Benefits Service	Agreed


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.	<ol style="list-style-type: none"> 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 by proactively working with other agencies and groups e.g. Job Centre Plus to ensure take up of all benefits is maximised 	Jan 2022 – Mar 2023	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 2022 - Mar 2023	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 2022 – Jul 2023 Nov 2022	Benefits Service	

Date completed: 11th October 2021

Signed: 

Name: Louise Jones

Position: Head of Revenues, Benefits and Customer Services