

Equality Impact Assessment Template



Simple Guide and tips

An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment may need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**

Sections 1 to 3 need to be completed in order to make an initial assessment

Section 4 onwards need to be completed for a full assessment

Stage 1 EIA Tracking ⁱ	
Title of EIA	Council Tax Income Discount
Lead Officer	Judith Doney
Division	Digital and Service Transformation
Publication Date <i>(if applicable)</i>	November 2020

EIA Review Date <i>(only applicable when completing the full EIA)</i>	On any significant change to the local discount
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Stage 2 Details of Policy, Service or Functionⁱⁱ

Provide an overview of the policy, service or other function being introduced or reviewed.

Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.

Background:

Since the National Council Tax Benefit Scheme was abolished from 1 April 2013 Epsom & Ewell Borough Council has run its own local scheme (Council Tax Support) for those of working age, making a number of changes to deal with the year on year reduction in government funding. Since 2013 The local support scheme has been based on the means tested Council Tax Benefit scheme but with a number of local changes – such as all residents being required to pay at least 20% of the Council Tax charge.

The government's scheme for pensioners has remained in place since 2013 and is not included in the EIA.

Aim of the revised scheme:

The aim of a local support scheme, in respect of Council Tax, is to assist the most financially vulnerable residents in the community with the payment of their Council Tax liability. The move to a council tax income discount is to introduce a less complex and more understandable scheme.

Proposed changes

The main change proposed is to replace the current complex means tested support scheme with a simpler income banded discount scheme. A banded income scheme is one that looks at the total income of an applicant, less any disregarded income such as a disability related income, and then awards a fixed percentage discount that varies depending on what income band an applicant falls into.

In addition, it is proposed to make additional scheme changes that are intended to simplify the scheme as a whole. These further changes will also ease the overall administrative burden of the assessment of entitlement to support.

The significant, additional proposed changes are:

- Wherever possible, all applications are to be made on-line with a mechanism to support those that cannot do this
- The introduction of a 'minimum income floor' for the self-employed (as in Universal Credit) and Company Directors
- The introduction of a minimum weekly award of £5.00, with entitlement less than this amount not paid
- A reduction in the capital limit from £10,000 to £6,000
- The introduction of a flat rate non-dependent charge of £7.00 per week, irrespective of the actual non-dependent's income
- Backdating to be limited to one month

Potential impact

Modelling has shown that the introduction of a banded income scheme does not, by itself, have any impact on the total number of working age support recipients. However, it does slightly reduce the amount of support paid to some, but not all, residents. Positively, the most financially vulnerable within the community, those on 'passport' benefits, will not see any reduction in the amount of support they receive.

Officers have carefully considered the proposed scheme changes from an equalities perspective and have had particular regard to protected characteristics. Officers do not believe that any of these characteristics are unfavourably impacted by the proposed scheme changes.

The only areas where possible equalities issues have been identified relate to age and/or disability and these have been addressed as required.

Specifically, with regards to those with a disability, they are still treated favourably under the proposed revised support scheme. This is because it is proposed that disability related income continues to be disregarded under the new income banded support scheme.

Stage 3 Relevance Checkⁱⁱⁱ

Indicate whether the policy, function or service change etc. outlined in Stage 2 above has the potential to impact on people with a protected characteristic (covers service users, the wider community and staff).

If yes, a full EIA needs to be completed (*please go to Stage 4*).

If no, please set out your reasoning and then secure sign-off by your Head of Service and the Inclusion and Diversity Group at Stage 8.

The initial assessment of the changes identified a potential impact for some people with a protected characteristic and these are detailed in the Stage 5 below

Stage 4 Data Relevant to Full EIA^{iv}

List all data (including source) and other information relevant to the full equality impact assessment

Population & ethnicity statistics from the 2011 Census <https://www.nomisweb.co.uk/census/2011/ks201uk>

The Equality and Human Rights Commission <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty>

Specify all engagement activities undertaken

- Consultation on potential changes to the local support scheme, in respect of Council Tax, with major preceptors
- A questionnaire available to all residents on the Epsom and Ewell Council website
- Consultation via specific targeting of all current working age Council Tax Support recipients – approximately 1,700 households. Hard copies of the questionnaire were sent to all recipients
- Consultation with a random sample of current Council Tax payers – approximately 3,300 households
- Hard copies were supplied to anyone requesting a questionnaire in this format

Stage 5 Impact on Residents, Service Users and Staff with Protected Characteristics^v

Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	No Impact
<i>Age</i>	<p>As the current and proposed support schemes only apply to those of working age, there could be disparity between this group and those of pension age. This is because pensioners apply for support and are assessed under a separate support scheme with rules laid down by the Government.</p> <p>The potential impact of a change in the scheme operated is not deemed to be an equalities issue on the basis that the Government legislated to the effect that local authorities must design a local support scheme, for those of working age, within the budget available to them or meet any extra costs locally.</p>	<p>As the current and proposed support schemes only apply to those of working age, there could be disparity between this group and those of pension age. This is because pensioners apply for support and are assessed under a separate support scheme with rules laid down by the Government.</p> <p>The potential impact of a change in the scheme operated is not deemed to be an equalities issue on the basis that the Government legislated to the effect that local authorities must design a local support scheme, for those of working age, within the budget available to them or meet any extra costs locally.</p>	
<i>Disability</i>	<p>In the proposed income banded scheme, it is suggested that disability related income continues to be disregarded as it is under the current means tested scheme. This is a positive impact and will ensure that those with a disability are not adversely affected as a result of their personal circumstances and the fact that they receive additional income.</p>	<p>Some disabled households are larger as the resident may require extra accommodation space.</p> <p>A Disabled Band Reduction can be granted in certain circumstances on the Council Tax liability which reduces the charge to that of a property in the next Council Tax band down.</p>	<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. However, details are held of all customers who are disabled as well as whether they receive Carers Allowance or it is received by a third party for them.</p>



			<p>Details of applicants who receive some form of disability based benefit or Carers Allowance can be extracted according to the additional premiums awarded to them. When looking at extracted figures it would need to be borne in mind that some applicants will be entitled to one or more premium, so the total numbers would not reflect the total number of applicants that might be disabled, a carer or in receipt of Carers Allowance. This would therefore skew any report on the disability equality basis of benefit applicants.</p> <p>Positively there is no evidence to suggest that use of the service is affected by disability.</p>
<p><i>Gender Reassignment</i></p>			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. In addition, whether an individual's gender has been reassigned or not has no impact on entitlement and is not collected or recorded.</p> <p>Positively there is no evidence to suggest that use of the service is affected by gender reassignment.</p>



			<p>Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by gender reassignment.</p> <p>To assist those customers who might not be comfortable visiting the Council Offices, on the basis of having undergone gender reassignment, applications for support can also currently be made by post.</p>
<p><i>Pregnancy and Maternity</i></p>			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand.</p> <p>Positively there is no evidence to suggest that use of the service is affected by pregnancy and maternity.</p> <p>Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by whether an applicant is pregnant.</p> <p>In relation to maternity, applicants receive additional support if they have one or more children, up to a limit of two per</p>



			household. This mirrors rules introduced by the Government in relation to Housing Benefit and it is not believed these are, in of themselves, discriminatory.
<i>Race</i>			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. Consequently, the data is not collected or recorded. In addition, an individual's race has no impact on entitlement.</p> <p>Positively there is no evidence to suggest that use of the service is affected by race. Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by race.</p>
<i>Religion and Belief</i>			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. Consequently, the data is not collected or recorded. In addition, an individual's religion and/or belief has no impact on entitlement.</p> <p>Positively there is no evidence to suggest that use of the service is affected by religion</p>



			and/or belief. Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by religion and/or belief.
Sex			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. In addition, an individual's sex has no impact on entitlement. However, whilst it is a fact that the sex of all benefit applicants and, where applicable, their partner, could potentially be determined from application data collected, it is not currently possible for this information to be extracted from the benefits application software.</p> <p>Positively there is no evidence to suggest that use of the service is affected by the sex of an applicant. Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by sex.</p>
<i>Sexual Orientation</i>			The Council is not required to maintain detailed transactional information about the profile of



			<p>its customers in relation to this equality strand. Consequently, the data is not collected or recorded. In addition, an individual's sexual orientation has no impact on entitlement.</p> <p>Positively there is no evidence to suggest that use of the service is affected by sexual orientation. Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by sexual orientation.</p>
<i>Marriage and Civil Partnerships</i>			<p>The Council is not required to maintain detailed transactional information about the profile of its customers in relation to this equality strand. In addition, an individual's is married or part of a civil partnership has no impact on entitlement. However, it is a fact that whilst whether an applicant is married or part of a civil partnership could be assessed from application data collected, it is not currently possible for this information to be extracted from the benefits application software.</p> <p>Positively there is no evidence to suggest that use of the service is affected by whether</p>



			<p>an applicant is married or part of a civil partnership. Anecdotal evidence does not suggest any barriers exist as entitlement under the current and proposed support schemes is unaffected by this equality strand.</p>
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Stage 6 Decision^{vi}

Specify the full details of your decision.

Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.

Whilst no barriers to potential entitlement to financial support have been identified, the Council does take steps to be as inclusive as possible. These include:

- The use of interpretation and translation services as required.
- The provision, where requested, of application forms, notification letters etc. in alternative formats and/or print sizes

Stage 7 EIA – Action Plan^{vii}

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
Service Access - for those for cannot communicate in English and/or those for whom English is not their first language.	Continue to use of interpretation and translation services	On-going	Judith Doney
Service Access – for those who might be partially sighted or blind.	Continue to provide application forms, and/or notification letters in appropriate formats.	On-going	Judith Doney
Service Access –for those who, in general, are experiencing financial difficulties.	Continue to promote the service so that all sections of society are aware of the assistance available.	On-going	Judith Doney
Service Access – for those with physical disabilities.	Ensure that the service remains accessible to all customers,	On-going	Judith Doney

	<p>whether disabled or not, through all digital channels. The Council should continue to strive to ensure that there are no barriers preventing service access on the basis of disability.</p> <p>Positively there is no evidence to suggest that this has been or is an issue. To encourage service access by all members of the community the Council have ensured that access to Services are open to all able bodied and disabled persons.</p> <p>Where visitors need to access the Town Hall building there is an access ramp and measures are in place to assist the visually impaired. Once inside the building there are facilities for hearing impaired visitors.</p>		
<p>Stage 8 EIA Sign Off^{viii}</p>			
<p>Head of Service: Judith Doney</p>	<p>Date: 08/10/2020</p>		
<p>Inclusion & Diversity Group:</p>	<p>Date:</p>		

[Guidance on completing the Equality Impact Assessment Template](#)

- i **Stage 1 - EIA Tracking**
Insert appropriate details. A review date will only be required when completing the full equality impact assessment (Stages 1 – 8).
- ii **Stage 2 - Details of Service / Policy / Function to be assessed**
In this section you will need to provide information which explains the subject matter of the work you are undertaking. If a new policy is being developed then explain what the policy covers and what it sets out to achieve. If a policy is being reviewed, then once again explain what the policy addresses and highlight any changes that are being introduced. If the work you are undertaking involves a service change, outline what the current service provides and to whom, then discuss the changes that are proposed and what the outcome of these service changes are anticipated to be. Bear in mind when drafting this section (and the rest of the document) that a lay person, unfamiliar with the subject matter should be able to read it and understand the policy, function or service and any changes that are proposed.
- iii **Stage 3 – Relevance Check**
The relevance check asks you to complete an initial assessment of whether the new / reviewed policy, service or function proposed is anticipated to impact upon residents, service users or staff with a protected characteristic. If you consider that there will be some form of impact then you must go on to complete all other stages of the form (Stages 4 – 8 inclusive). If, however, there will be no impact, provide your justification in the space provided and seek formal sign off of your assessment (Stage 8). The form should then be kept in case you need to provide evidence at a later date that you had due regard to the three aims of the equality duty during policy development / service design. If you have any uncertainty at this stage of the process, go on to complete all sections of the Equality Impact Assessment Template (Stages 1-8).
- iv **Stage 4 - Data Relevant to Full EIA**
In order to undertake a full assessment of the equality implications associated with your project/work you will need to outline the data that you possess which will help you to understand any resultant impact. If you identify any gaps in your information, and thereby have gaps in your understanding, you will need to fill these areas of uncertainty by exploring what other sources of information there are and/or by talking to different groups/bodies. It may be possible to consult with relevant groups. If you undertake any engagement activities you will need to set them out in this section. Please speak to the Consultation Team in Policy, Performance and Governance if you are considering undertaking consultation.
- v **Stage 5 - Impact on Residents, Service Users and Staff with Protected Characteristics**
Using the information that you have set out at stage 4 you now need to consider carefully whether the new or revised policy, service or other function etc. will impact upon people with a protected characteristic in a positive or negative way. You will need to consider service users, residents and staff (as appropriate). Set out your considerations for each protected characteristic in the appropriate column. If no impact will arise, please indicate this in the appropriate box to show that you have given due regard to equality. When undertaking this assessment make sure you bear in mind the different forms of discrimination, e.g. direct and indirect discrimination, discrimination by association or perception. The protected characteristic 'marriage and civil partnership' needs only to be considered in relation to the first aim of the equality duty – the need to eliminate unlawful discrimination, harassment and victimisation...

vi **Stage 6 – Decision**
This section requires you to make and evidence your decision. Use your analysis undertaken in Stage 5 together with other relevant factors such as financial implications. The importance that you give equality considerations when making your decision should be proportionate to the significance of the policy, service or function on advancing equality of opportunity and in fostering good relations. Be mindful that your decision could be challenged, the Equality Act 2010 requires you to ‘give due regard’ to the three aims of the public sector equality duty. A strong evidence base and transparency will lead to effective decision making.

vii **Stage 7 – Action Plan**
In the Action Plan set out any actions that you plan to implement to support your policy, service delivery or change etc. You will need to set a completion date and name a responsible officer. These actions may comprise some form of positive step(s) to support the needs of a particular group or step(s) which will negate any impact on a particular group.

viii **Stage 8 – EIA Sign Off**
This section must be completed by the relevant Head of Service and a copy sent to HRAdmin@epsom-ewell.gov.uk when finishing your assessment at Stage 3 – Relevance Check or when completing the full equality impact assessment, Stages 1-8.

Further information is available from:

[‘Equality Impact Assessment Introduction and Appendices’](#) .

[‘Meeting the Equality Duty in Policy and Decision-Making England’](#)

If you need further assistance please speak to a member of the Inclusion and Diversity Group