Community Equality Impact Assessment Form

Community Equality Impact Assessments should be carried out whenever you plan, change or remove a service, policy or function. The process should be used as a health check – a way of consolidating knowledge you have on your service. Please refer to the Community Equality Impact Assessment Guidelines to help you complete this activity.

Name of service, policy,	DRAFT Council Tax Support Scheme (April 2016)
procedure, function or project to be assessed:	This assessment is intended to form the basis for Epsom and Ewell Borough Council (EEBC) to propose changes to the local Council Tax Support scheme – as set out under section 13A(1)(a) of the Local Government Finance Act.
Is this a new or existing function or policy?	The existing local Council Tax Support scheme may be amended from 1 April 2016.
Key purpose / objective of this service, policy,	The key purpose is for EEBC to determine a Council Tax Support scheme for 2016.
procedure, function or project to be assessed:	The proposed changes are dependent on the outcome of a consultation on this scheme.
	In this document 'the new scheme' means the proposed Council Tax Support scheme from April 2016.
	In this document 'the current scheme' means the Council Tax Support scheme in place for the financial year 2015 - 2016.
	It must be noted that within this document various data and a number of statistics have been used. These figures must be understood by the reader to be fluid – for example, the number of customers in receipt of Council Tax Support will alter as entitlement ends for some and begins for others as and when their circumstances change. All information and data is provided in good faith. It is often from a 'snap-shot' in time, this representing the best methodology for providing a level of consistency. Some figures are often rounded for ease. All figures can be considered up-to-date as of 1 June 2015 unless otherwise stated.

Lead Officer– inc. contact details	Pete Wells – Benefits Manager - pwells@epsom-ewell.gov.uk - 01372 732274						
Directorate and Head of Service	Kathryn Beldon – Director of Finance and Resources Judith Doney – Head of Revenues and Benefits						
Other stakeholders– list all involved	 All EEBC residents (76,100) and households (31,575) 3,173 current Council Tax Support recipients (10.1% of households) The Equalities Forum and other associated groups <i>et al</i> [see Step 4: Consultation stage below] EEBC preceptors Surrey Police and Surrey County Council A number of front line staff. 						
Start date—The assessment should be started prior to policy/ service development and early enough to influence the decision-making process	The rate of the Minimum Payment is the proposed major change for a 2016 Council Tax Support scheme. This CEIA relates to the proposal to increase the Minimum Payment and is in place for the consultation of the same.						
End date—The assessment will need to inform decision making so the end date should take this into account	The changes to the scheme must be in place by 1 April 2016. In order to determine any new scheme, two relevant EEBC meetings are scheduled – Strategy & Resources Committee on 17 November 2015 and Full Council on 8 December 2015. This CEIA will be finalised following feedback from our consultation and before the 17 November meeting.						

Step 1: Identify why you are undertaking a Community Equality Impact Assessment

From April 2011 the previous separate equality duties on public bodies covering race, disability and gender *et al* were replaced by the present single Public Sector Equality Duty, or 'PSED' (Equality Act 2010, s.149 onwards).

At the heart of PSED is the 'general duty' which requires public authorities to have 'due regard' to the need to:

- Eliminate unlawful discrimination, harassment, victimisation
- Advance equality of opportunity between those with a protected characteristic and others
- Foster good relations between these groups.

EEBC must have 'due regard' to the community and equality impact when drafting and implementing a new Council Tax Support scheme; particularly as it may involve a potential reduction in services and / or entitlements to residents, and may impact residents considered within the 'protected characteristics'.

The Department for Communities and Local Government (DCLG) specifically state:

"The Government has been clear that, in developing local Council Tax reduction schemes, vulnerable groups should be protected. The Government Response sets out the Government's intention to put protection for applicants of state pension credit age on a statutory footing. It confirmed that the Government did not intend to prescribe the protection that local authorities should provide for other vulnerable groups, but would consider what guidance was needed to ensure local authorities were able take into account existing duties in relation to vulnerable groups in designing their schemes."

DCLG produced further detailed guidance, and reminded Local Authorities of their duties under:

- The public sector Equality Duty (The Equality Act 2010)
- The welfare needs of disabled people (The Disabled Persons Act 1986)
- The duty to mitigate effects of child poverty (The Child Poverty Act 2010)
- The duty to prevent homelessness (The Housing Act 1996).

Furthermore, the Local Government Finance Act specifies that, before adopting a scheme, the billing authority must:

- a) Consult any major precepting authority which has power to issue a precept to it
- b) Publish a draft scheme in such a manner as it thinks fit
- c) Consult such other persons as it considers are likely to have an interest in the operation of the scheme.

three stipulations were completed by 20 September 2015.

This proposed 2016 Council Tax Support scheme comes at a time when other radical changes and developments are taking place within the welfare system. Managing these changes in a way that reduces the impact on the most vulnerable is a part of the Council's 'Safer and Stronger Communities' key priority. In preparation for the 2016 Council Tax Support scheme, EEBC must undertake a Community Equality Impact Assessment (CEIA) to gauge the impact on those who are likely to be affected. If the CEIA contains insufficient data or evidence on the impact of the proposal, it runs the risk of being subject to legal challenge. The CEIA must also:

- Inform the policy formulation process
- Be undertaken prior to actual implementation
- Make use of existing equalities monitoring data
- Make use of consultation feedback
- Be sufficiently robust
- Be considered by Members as part of the final decision
- Be appended to the final decision report.

Finally, it is clear that this proposal will affect a number of EEBC residents (if not potentially all residents, to a small degree) and so it is vital for EEBC to gauge the views of those affected / potentially affected.

Step 2: Identify the proposed changes to your service

Describe the possible changes your proposal will have on your service. Also outline the possible affect(s) it may have on the **protected characteristics**. Following your initial assessment if it is absolutely obvious that your changes will not have any effect on any of the **protected characteristics**, no further analysis or action is necessary. In this event, you must clearly record how you came to this conclusion.

As a result of ongoing reductions in funding from central government, EEBC is proposing changes to the existing local Council Tax Support scheme from April 2016

In overall terms, the awards of Council Tax Support in the Borough for 2014 were in the order of £3.2 million (out of total Council Tax revenue of £53 million). Around £1.8 million was awarded to approximately 1,800 'Working Age' households, whilst £1.5 million was awarded to approximately 1,300 'Elderly' residents. ('Working Age' is defined as those who have not reached the age for state pension credit. 'Elderly' is defined as those of state pension credit age. 'Elderly' residents are protected from the features within a localised Council Tax Support scheme and their entitlement must be calculated in accordance with DCLG prescribed regulations.)

Funding from central government was reduced by approximately 12% in 2014/15 and 2015/16 (in addition to the initial 10% reduction in 2013/14) and a further cut of approximately 12% is expected in 2016/17.

One option open to EEBC is to continue to award the same amounts of Support. If EEBC choose this option, the funding cut will fall on other areas within the Council, County Council and Police (e.g. cutting or reducing other services and / or charging all residents more Council Tax). Instead, EEBC has made a proposal to revise the existing scheme with adjustments in entitlements to contribute towards the reduced funding from Central Government.

The proposal is:

Increase the Minimum Payment from 20% to either 25% or 30%

The proposal would affect all of the 1,724 Working Age households by reducing the maximum amount of Council Tax Support they can receive towards their Council Tax.

Step 3: Assessment of data and research

Identify what data and research is available to inform the impact of your proposals on service users and/ or staff. Where there are data gaps you should include this as an action within your **Community Impact Assessment Action Plan – Step 7.**

EEBC propose to use existing national data alongside localised data as we go through this assessment.

The Joseph Rowntree Foundation

The Joseph Rowntree Foundation produced an analysis of national trends in Council Tax Support schemes¹:

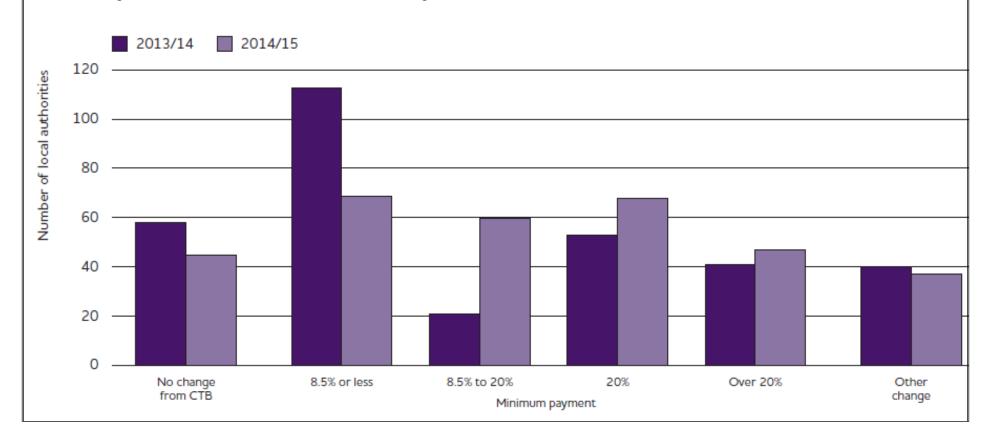
- 58 councils (18%) maintained schemes equivalent to Council Tax Benefit in 2013/14 (Council Tax Benefit was the national scheme which preceded Council Tax Support schemes). In 2014/15 this had reduced to 45 councils (14%)
- In 2013/14 around 2.4 million households paid on average £138 more per annum under Council Tax Support than under Council Tax Benefit. In 2014/15 that increased to £149 on average
- Levels of Council Tax arrears and bailiff referrals linked to non-payment of Council Tax increased in 2013/14; the largest increases in arrears were in those areas which introduced a Minimum Payment scheme
- Council Tax collection rates fell in 2013/14
- Around 70,000 households had their support cut for the first time in 2014/15, and a further 580,000 households saw their second successive cut
- Of around 2.34 million households affected in 2014/15, 1.8 million (77%) were workless households, and 1.5 million (64%) were defined as being in poverty² before the changes
- 229 councils (70%) operated a Minimum Payment Council Tax Support scheme in 2013/14. This increased to 244 (75%) in 2014/15
- In 2013/14 113 councils (49%) had a Minimum Payment scheme of 8.5% or less. This decreased to 69 councils (28%) in 2014/15

¹ http://www.jrf.org.uk/publications/low-income-families-changes-council-tax

² Poverty is defined as being in a household with less than 60% of the median national income, after housing costs.

- In 2014/15 47 councils (19%) have a Minimum Payment scheme in excess of 20%
- 35 councils (11%) reduced the level of support for a family, generally by treating Child Benefit or maintenance as income. As a result of this, lone parents have seen an above average drop in support (the EEBC scheme does not make such reductions)
- 74 councils (23%) introduced a band restriction, which also tends to have a larger effect on families (it is proposed that the band restriction within EEBC's current scheme be removed for 2015).

The following chart summarises the Foundation's findings:



Children's Charities

Action for children, the NSPCC and the Children's Society predicts that 'vulnerable families' could be £3,000 a year worse off by 2015, as a result of public spending cuts. The third sector groups estimate that the number of children living in 'extremely vulnerable families', currently less than 50,000, will almost double to 96,000 by 2015.

The Department for Work and Pensions (DWP)

The DWP undertook an Equality Impact Assessment – with consultation – in relation to Universal Credit [www.dwp.gov.uk/consultations/2010/21st-century-welfare/] where some parallels can be drawn:

- The current system of benefits is of particular importance to people who are covered by equality legislation. This may be due to:
 - Having characteristics that make someone more or less likely to take up a particular benefit (such as a greater likelihood of being out of work)
 - o The length of time they stay on benefit and destinations after leaving benefit
 - o The evolving benefits system and policy change
 - The effects of the economy (for example when in downturn)
 - Take up and differential outcomes
- Barriers to employment can mean that some groups are out of work for longer and may have greater need to rely on the benefits system. For example data on employment rates show that:
 - Women's employment rates are below those of men (68.8% compared to 75.4%)
 - Ethnic minority groups have a lower employment rate than white groups (60.2% compared to 73.9%)
 - Employment rates are lower for disabled than non-disabled people (48.4% compared to 77.5%)

- Associated with this, poverty affects certain groups disproportionately. For example:
 - The risk of a disabled adult living in poverty is higher than for adults with no disability and is particularly high for workless disabled adults
 - o Individuals of Pakistani / Bangladeshi ethnic background have a significantly higher risk of being in poverty when they are in work than any other group
- The structure of the current welfare system has developed piecemeal to meet the needs, and reflect the changes in, society (for example, support for children, for extra disability-related costs, and lone parents). These categories do not necessarily read across to equality groups:
 - The definition of disability under the Equality Act does not coincide with eligibility for disability related benefits, but the
 vast majority of people receiving those benefits would be likely to fall under the Equality Act definition
 - As a result, complexity may affect certain groups because of the range of overlapping payments that might be available to meet needs
- The way the current system works can also be a disincentive to work. For example:
 - Complexity can be a particular problem for some people from ethnic minority groups (for example those whose first language is not English)
- In headline terms, making work pay and improving the prospects of these groups with lower employment rates is one of the most important things the Government could do to promote equal opportunity.

<u>Surreyi</u>

Surreyi analysed data from the 2011 Census to present demographic statistics for EEBC.

The following statistics were found for the proportion of ethnicities and religions in the borough:

Ethnicity	Number	Percentage
White British	59,049	78.60%
All Other White	5,453	7.30%
All Multiple / Mixed	1,922	2.60%
Asian / Asian British: Indian	1,828	2.40%
Asian / Asian British: Pakistani	667	0.90%
All Other Asian / Asian British	3,989	5.30%
All Black / African / Caribbean / Black British	1,128	1.50%
All Other Ethnic Groups	1,066	1.40%

Religion	Number	Percentage
Christian	46,222	61.55%
Hindu	1,913	2.55%
Muslim	2,277	3.03%
All Other	1,109	1.48%
No Religion	18,254	24.31%
Not Stated	5,327	7.09%

Detailed modelling has taken place to assess what affects the 2016 proposal may have on a current Council Tax Support recipient. Furthermore, we have undertaken analysis to best inform the proposal. Some local statistics of relevance are:

Epsom & Ewell Borough Council data (snapshot taken in July 2015)

Of 31,575 EEBC households:	3,010 households receive Council Tax Support (9.5%)
Of the 3,010 households	1,286 are 'Elderly' and thus protected from any change within the proposal (43%)
Of the remaining 1,724 Working Age households:	1,311 are single customers (76%) 416 are couples ³ (24%)
Of these 1,724 Working Age households:	678 are single parents (39%) 630 are single (37%) 326 are couples with children (19%) 90 are couples (5%)
Of 1005 Working Age households with children:	649 households have no child / children under five years of age 456 households contain at least one child under five years of age
Of 678 single parent customers:	650 are female (96%) 28 are male (4%)
Of 630 single customers:	330 are male (52%) 300 are female (48%)
Of 1,724 Working Age households:	None receive an award of benefit that fully covers the cost of their Council Tax bill for the financial year 2015/16

³ 'Couple' means those who live with a partner (EEBC does not differentiate between a married person, a civil partner or a person who lives with another as if married or as if civil partners)

Of 1,724 Working Age households:	1,051 (61%) are not employed
	673 (39%) are employed
Of the 673 households with somebody who works:	261 (39%) work 24 hours per week or more
Of 911 Working Age households receiving Jobseeker's Allowance (Income Based), Income Support or Employment and Support Allowance (Income Related):	DCLG suggest nationally, around 48% of those in receipt of a these benefits may also have a disability. ⁴ Nationally, statistics suggest that disabled people are no less likely to take up benefits to which they are entitled than those who are not disabled. ⁵ This equates to 437 customers out of this 911.
	Exact figures cannot be supplied because disability information is not always held by this authority where a customer is in receipt of a these benefits. (NB – Such customer will be unemployed or working minimal hours and have income and savings at or below the Government's assessment of their household's need. They receive a maximum Council Tax Support award without the need for the Local Authority to collect or verify their income and capital. EEBC therefore does not hold complete information relating to such customers and thus the number that have a disability is unknown).

⁴ Taken from DCLG 'Localising Council Tax Equality Impact Assessment', January 2012 ⁵ Taken from DWP 'Equality Impact Assessment Universal Credit: welfare that works', November 2010

Of the remaining	813	Working	Age
households:			

83 (10%) receive a disablement premium within the assessment of their Council Tax Support entitlement

46 (6%) include a disabled child premium within the assessment of their Council Tax Support entitlement

(Generally speaking, the above premiums are awarded where Disability Living Allowance is in payment. However, it should be noted that the definition of disability for equality legislation is wider than an everyday notion of disability or eligibility for disability related benefits. For example, people are protected against discrimination from the point of diagnosis for certain conditions (such as cancer or HIV), but this is not necessarily the point at which people would gain eligibility for disability related benefits).

Step 4: Consultation

Identify what relevant consultation could inform your Impact assessment. If you have recent relevant consultation data you could use this. If not, you will have to undertake new consultation; this should be included as an action within your **Community Impact Assessment Action Plan – Step 7**. Make sure the extent of your consultation is in proportion to the proposed change that is being made. Have you consulted the Equalities Forum?

The proposal, along with demographic information (such as questions around benefit entitlement / household composition) and equalities data were developed into the form of a structured Council Tax Support Consultation Questionnaire.

The Council Tax Support Questionnaire and a draft of the proposed scheme were made available to all residents on the EEBC web site as part of the formal public consultation which runs from 27 July to 20 September 2015.

Furthermore, EEBC directly promoted the consultation as widely as possible through a number of ways. For example:

- Alteration to the EEBC Council Tax Support web page providing links to the Council Tax Support draft scheme and Questionnaire
- Introducing a front page link on the EEBC web site
- Posters and paper copies available at the Town Hall and other EEBC buildings
- Specific targeting of the 1,724 current Working Age Council Tax Support recipients who were each posted Questionnaires and a subsequent reminder letter
- Specific targeting of the 1,302 Citizens Panel members with a mix of posted and emailed Questionnaires, including multiple reminders
- Information made available at the Council Tax enquiry counter with flyers posted with outgoing Council Tax notices
- Requesting input from the Equalities Forum
- Requesting input from the Citizens Advice Bureau
- Requesting feedback from our local Housing Associations
- Requesting feedback from other local support organisations such as:
 - Swail House
 - Local Ethnic Minority Groups
 - And other Community Groups

- Producing a media release
- Promoting the consultation on social media including Facebook and Twitter
- Issuing information in eBorough Insight in August 2015.

All of the feedback received will be analysed and a Council Tax Support Consultation Overview document will be produced.

Step 5: Impact Assessment

Use the data, research and consultation results to consider the protected characteristics of the Equality Duty and the positive and negative impacts of the proposals in respect of the https://example.com/the-protected-characteristics of the Equality Duty and the positive and negative impacts of the proposals in respect of the https://example.com/the-protected-characteristics of the Equality Duty and the positive and negative impacts of the proposals in respect of the https://example.com/the-protected-characteristics of the Equality Duty and the positive and negative impacts of the proposals in respect of the https://example.com/the-protected-characteristics of the Equality Duty and the positive and https://example.com/the-protected-characteristics of the Equality Duty and the protected characteristics of the https://example.com/the-protected-characteristics of the Equality Duty and the protected characteristics of the https://example.com/the-protected-characteristics of the Equality Duty and the protected characteristics of the https://example.com/the-protected-characteristics of the Equality Duty and the protected characteristics of the https://example.com/the-protected-characteristics of the https://example.com/the-protected-characteristics of the https://example.com/the-protected-characteristics of the <a href="https:

- Eliminate unlawful discrimination, harassment and victimisation
- Advance equality of opportunity
- Foster good relations.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Age – Older People			None	'Elderly' residents are protected from the features within a localised Council Tax Support scheme and their entitlement must be calculated in accordance with DCLG prescribed regulations. Thus this group should not be affected.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Age – Younger People	Yes			EEBC has chosen to retain the earnings disregards for those that work. This encourages employment.
(age 17 to 25)		Yes		This group could be imported due to reduced beyonded expendeble
		(high)		This group could be impacted due to reduced household expendable income through the need to pay increased Council Tax.
				EEBC has chosen to carry forward the Government set lower applicable amounts for under 25s and so this group could find it more difficult when compared to those who have higher applicable amounts.
				It may also be the case that younger people (at the start of their career) could find it more difficult to increase their income, than, for example, those with more experience of work. ⁶
				EEBC statistics show that only 1.4% of the CTS caseload are single people aged under 25, with one third of these in employment.

⁶ DWP research found that: 58% of 18 to 24 year olds are employed compared to 80% of 25 to 49 year olds. Taken from DWP 'Equality Impact Assessment Universal Credit: welfare that works', November 2010

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Age – Children ⁷	Yes			EEBC has chosen to retain a number of advantageous aspects in the existing scheme such as providing higher applicable amounts (needs assessment) through specific child allowance(s), whilst Child Benefit and Child Maintenance remain fully disregarded as an income.
				Furthermore, child care costs will be used to positively affect a calculation, and working lone parents will also receive a higher disregard of their earnings encouraging employment.
				This is consistent with the Council's duty to safeguard and promote the welfare of children.

⁷ EEBC stats (see page 10-11) show that: 1,005 of 1,724 (58%) Working Age claims include a child in the household. 678 of these households are single parents. 456 of these households contain at least one child under five years old

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Disability ⁸ (Long-term health impairment could include mental health problems, asthma, heart conditions, chronic fatigue etc.)	Yes			EEBC has chosen to retain a number of advantageous aspects in the existing scheme such as applying higher disregards and higher applicable amounts for those who receive a disability related benefit or Carers Allowance, in recognition of their potentially higher living costs. EEBC has also chosen to retain higher earnings disregards for disabled people who work. This is consistent with the Council's duty to protect and promote the welfare needs of disabled people.
		Yes (high)		This group could be impacted due to reduced household expendable income through the need to pay more Council Tax, and may find it more difficult to increase their income through undertaking work / increased hours.9
Gender ¹⁰ (male, female)			None	No negative impact specific to characteristic has been identified.

⁸ EEBC stats (see page 10-11) show that: Of 813 Working Age claimants not in receipt of Jobseekers Allowance (Income Based), Income Support or Employment and Support Allowance (Income Related): 83 (10%) receive a disablement premium and 46 (6%) include a disabled child. Of the remaining 911 Working Age claimants in receipt of one of these benefits, around 48% of households are likely to include someone with a disability

⁹ DWP research found that: employment rates for those defined as disabled under equality law (48%) are substantially below the average employment rates (72%). Taken from DWP 'Equality Impact Assessment Universal Credit: welfare that works', November 2010

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Race (Minority ethnic communities e.g. colour, ethnic or national origin, nationality. This includes travellers and gypsies)			None	No negative impact specific to characteristic has been identified.
Religion or Belief (Believing faiths / religions e.g. Christians, Hindus, Muslims, people with no faith/religion)			None	No negative impact specific to characteristic has been identified.

¹⁰ EEBC stats (see page 10-11) show that: Of 630 Working Age single person claims: 330 (52%) are made by a male. Of 678 Working Age single parent claims: 650 (96%) are made by a female

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Sexual orientation (heterosexuals, lesbians, gay men and bisexual men or women)			None	No negative impact specific to characteristic has been identified.
Gender re- assignment (people who intend, are in the process of or have undergone gender reassignment)			None	No negative impact specific to characteristic has been identified.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Marriage and Civil Partnership (only in respect of eliminating unlawful discrimination)			None	No negative impact specific to characteristic has been identified.
Pregnancy and Maternity		Yes (high)		This group could be impacted due to reduced household expendable income through the need to pay more Council Tax at a time when they may find it more difficult to increase their income through, for example, undertaking work or increasing their working hours.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
			Non-st	atutory Group Consideration
Socio- Economically Disadvantaged ¹⁷ (e.g. factors such as family background, educational attainment, neighbourhood, employment status)	Yes			EEBC has chosen to retain a number of advantageous aspects of the existing scheme such as providing earnings and income disregards, and premiums in a customers' needs assessment.

¹¹ EEBC stats (see page 13-14) show that: 1,270 of 2,000 (64%) Working Age households receive an award that fully covers the cost of the Council Tax bill. 1,255 of 2,000 (63%) do not work.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
		Yes (high)		By its very nature (i.e. a scheme that exists to help those on low incomes), a reduction in Council Tax Support entitlement will adversely affect the lowest income households in the borough.
				All 1,724 Working Age households are affected by the Minimum Payment. Increasing the Minimum Payment by 5% would currently leave the 1,724 households with an average additional reduction in their Support of £64.40 a year / £1.24 per week. Increasing the Minimum Payment by 10% would currently leave the 1,724 households with an average additional reduction in their Support of £128.81 a year / £2.48 per week. Those in receipt of 'out-of-work benefits such as Income Support, Jobseekers Allowance (Income Based) and Employment Support
				Allowance (Income Related) will find it very difficult to increase their income to meet additional expenditure. Any increase in the Minimum Payment will result in additional expenditure for them.
				Those with Caring responsibilities (for Support purposes this would ordinarily mean somebody in receipt of Carer's Allowance) might have limited resources through no or low pay for their caring duties. They may also find it difficult to increase their income (e.g. increase other paid employment) because of their caring commitments. Thus they may have difficulty meeting any additional Council Tax charge as a consequence of an increase in the Minimum Payment.

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
EEBC Staff / Administration		Yes (low)		EEBC are aware that reductions in the amount of financial help that residents receive, and the wider implication of other welfare cuts and general austerity measures, could well adversely affect the behaviour and attitude of customers towards those they see as responsible for such cuts EEBC Front Line Staff could face: • Greater difficulty dealing with customers (due to lower / nil awards, the increased likelihood of Council Tax arrears possibly combined with an increased inability / difficulty in meeting this debt, and the subsequent collection and recovery procedures) • Change in working practices (a change to the CTS scheme, increased complexity from requiring knowledge of CTB, our 2013-15, 2015 and 2016 working age schemes and the scheme for elderly CTS recipients) • Increased customer contact (queries, complaints and appeals) • Uncertain future (expectation that Council Tax Support will be remodelled within several years to simplify and to save costs) Increased recovery workload (especially from those residents with less / no means to pay due to reduced awards)

Equality Strand	Positive It could benefit Yes/No	Negative Yes(High/ Low)/No	None - No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive	
				 EEBC Team Leaders, Managers and HR team could face: A need to increase support for Front Line Staff An increase in complaints and appeals Extra considerations around discretionary areas A need to manage stress / sick leave 	

Step 6: Decision/Result

Following your analysis, you should make a decision as to whether or not your proposal will negatively or positively impact any protected characteristics. You should take into account all factors such as finance and legal in your decision. Include information about whether stakeholders agree with your findings and proposed response (action plan).

	Summary of Impact by Characteristic						
Option	Age – Younger People	Age – Children	Disability	Gender	Race	Pregnancy & Maternity	Socio- Economically Disadvantaged
Maximum Award	Negative (high)		Negative (high)			Negative (high)	Negative (high)

Step 7: Community Impact Assessment Action Plan

Once you have taken all factors into account, you need to create an Action Plan using the template below. These actions should be based on the information and analysis gathered during Steps 1 to 6. It should include any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. You should also identify positive actions. The actions need to be built into your service planning framework. Actions / targets should be SMART, Specific, Measurable, Achievable, Realistic and Time framed.

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
Age: Younger People Impact due to reduced household income through the need to pay some / more Council Tax	Monitor any adverse impact reported in the 2016/17 as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the year	Use data collected at the end of the year to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the year prior to the review of the scheme	Head of Revs & Bens
Age: Children Impact due to reduced household income through the need to pay some / more Council Tax	Monitor any adverse impact reported in the 2016/17 as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the year	Use data collected at the end of the year to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the year prior to the review of the scheme	Head of Revs & Bens

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
Disability: Impact due to reduced household income through the need to pay some / more Council Tax	Monitor any adverse impact reported in the 2016/17 as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the year	Use data collected at the end of the year to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the year prior to the review of the scheme	Head of Revs & Bens
Gender:				Head of Revs & Bens
Race:				Head of Revs & Bens
Pregnancy and Maternity: Impact due to reduced household income through the need to pay some / more Council Tax	Monitor any adverse impact reported in the 2016/17 as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the year	Use data collected at the end of the year to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the year prior to the review of the scheme	Head of Revs & Bens

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
Socio-Economically Disadvantaged: Impact due to reduced household income through the need to pay some / more Council Tax Impact due to not having experience of paying / budgeting for Council Tax payments Indirect impact due to wider welfare reforms impact Impact of socio-economic climate on employment and other factors	Monitor any adverse impact reported in the 2016/17 as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the year Monitor collection rates and contact made by those who may not have previously paid Provide information, help and advice on request Specifically contact those who may not have received Council Tax demand notices previously	Monitor collection rates through the year and react accordingly Use data collected at the end of the year to inform future decision making This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the year prior to the review of the scheme	Head of Revs & Bens
Staff: Potential abuse and stress faced by staff from irate residents and increased workload	Communicate developments and progress made through the proposal, consultation and decision making stages Train front line staff in the new scheme	Specifically review at team meetings, 1-to-1s and appraisal meetings and take action as required	On-going and throughout the life of the scheme	Head of Revs & Bens

Step 8: Sign off

	Name & Job Title	Signature **	Date
Lead Officer:	Pete Wells – Benefits Manager		
Validated By: (Head of Service)	Judith Doney – Head of Revenues & Benefits		
Approved By: (Equalities Lead)	Frances Rutter – Chief Executive		
Published on website by: (Consultation & Communication team)			

^{**} Please type your name to allow forms to be sent electronically