

Equality Impact Assessment – Nottingham City Council Tax Support Scheme

Section 1 - Background to the Localisation of Council Tax Support

From April 2013, Central Government is ending the current national Council Tax Benefit scheme as part of its welfare reform programme. Central Government will no longer set all the rules on who qualifies for help instead, Local Authorities (LAs) have been given the responsibility to design new local schemes to help people on low incomes with their Council Tax bills.

Before Nottingham City Council (NCC) takes over this responsibility, Central Government is also reducing the amount of money it makes available. For Nottingham it is estimated that the move to a local Council Tax Support Scheme (CTSS) would result in up to a £6.1 million funding gap for 2013/14, if NCC were to continue to pay Council Tax Support based on the current national Council Tax Benefit rules. This figure is based on existing data on benefit expenditure; caseload make up, growth in demand of approximately 1% (based on age analysis and past years' growth trends) and the Council's medium term financial plan information. This means that there will be less money available next year to help people on low incomes with their Council Tax bills.

Central Government has outlined that local schemes should:

- not change the amount of help that low income pensioners currently receive;
- consider the needs of families, households with disabled people and people who receive war pensions as a result of bereavement or disablement and,
- encourage people to work and not discourage them from working.

The Government have also offered billing authorities a share of a transition funding grant which has been made available to those authorities who adopt schemes that meet specific Government set criteria. This announcement happened during the period of Nottingham's formal public consultation exercise on local CTSS proposals.

The Government set criteria that billing authorities must comply with are as follows:

- Those of working age who would be entitled to 100% support under current council tax benefit arrangements pay between zero and no more than 8.5% of their net council tax liability;
- The taper rate does not increase above 25%;
- There is no sharp reduction in support for those entering work.

The local scheme must be adopted by 31st January 2013 or the Government default scheme, modelled on the current Council Tax Benefit Scheme, will be implemented. This default scheme will mirror the current DWP scheme but with the reduced level of funding leaving the Council and precepting authorities (Fire and Police) with a significant budget shortfall estimated at £6.1m per annum.

The proposed local CTSS support scheme will impact on all working age people who currently claim CTB. In Nottingham, an estimated 26,500 Council Tax Benefit claimants are of working age; of these 26,500 working age people, 19,000 receive 100% CTB and 7,500 receive partial CTB. In Nottingham an estimated 14,628 pensioners are receiving CTB.

The DCLG have completed an Impact Assessment for Localising Council Tax which can be viewed here:

Section 2 - Information used to analyse the effects on equality

Nottingham City Council carried out a 2-stage consultation exercise relating to the big changes to Council Tax Benefits, due to take effect in April 2013. The **pre-consultation exercise** sought to let current Council Tax Benefit claimants know about the impending changes and to gather views to inform the Council's thinking in the development of a Council Tax Support scheme – the feedback received during these events was used to help shape the draft proposals for consultation. The **main consultation exercise** provided our formal consultation on draft proposals for a local CTSS.

The formal public consultation exercise took place between 5th September 2012 and 30th October 2012 and was followed by a period of evaluation during which all feedback on the proposals were taken into consideration to enable the Council to understand the impacts of the new scheme and to mitigate any negative impacts where possible.

The Council used various channels of communication during the consultation including:

- Information letter mailed out to all 26,500 council tax benefit claimants directing them to dedicated Big Changes to Council Tax web pages, information booklet, information events etc
- 5,000 information booklets printed which included a self completion questionnaire,
- 20 information sessions at a variety of community locations across the City using a short presentation and questions and answers format.
- As part of local democracy week shared stall with Ward Councillor and Neighbourhood Development Officer on Bulwell Market
- A communities of interest event with British Sign Language interpreter held at Nottingham Deaf Society on Oct 24th
- Questionnaire made available in alternative formats i.e. large print
- A self-completion online survey.
- Letter to precepting authorities i.e. Police Authority and Fire Service
- A dedicated telephone helpline - for booklet requests, event registration and specific questions around Council Tax.
- Internal communication channels i.e. plasma, impact and cascade briefings
- Email communications with Voluntary and Community Sector
- One Nottingham lunch time learning event

Modelling was carried out using available caseload data.

642 responses were received from the pre-consultation events and 454 responses were received from the formal consultation. Analysis of the formal consultation responses produced the following headlines:

Consultation Headlines:

- **25%** of respondents **agreed** with the proposal that **all** households should pay 20% of their Council tax. **66% disagreed.**

- **70%** feel that some households should get more support than others, but there is no consensus on how to fund more support for certain households or who those households are.
- **57%** of respondents **disagreed** with the proposal to remove backdating. **30% agreed**.
- **51%** of respondents **disagreed** with the proposal to cap support at the Band B rate. **31% agreed**.
- Opinion was more evenly split (between those in favour and those against) for the proposals on reducing the savings limit, removing second adult rebate and setting a minimum award level.

Key messages were:

- The proposed scheme is unaffordable to some people who will struggle to pay and would unfairly penalise some people.
- The Council should refuse to pass on the cuts and should campaign against Government cuts.
- The Council should save money elsewhere or use other money to make up the shortfall in funding, although this may be a short term solution.
- People would like to know how the proposed scheme will affect them personally.

Section 3 - Name and brief description of policy being assessed

In 2013/14 NCC will adopt a CTSS which seeks, as far as possible, to balance the significant cut to the council's resources for Council Tax Support and the Council's wider budget challenges with the need to help the most financially vulnerable members of the community with their Council Tax bills.

The proposed 2013/14 CTSS will also comply with the Government set criteria in order to access the one-off transitional Government funding, since this enables the Council to reduce the financial burden for working age households for 2013/14 only and makes the scheme comparatively more affordable for low income working age households.

However, since the DCLG transition funding is only available for one year, we anticipate that the 2013/14 CTSS will need to be revised for the following year, 2014/15. This Equality Impact Assessment relates to the proposed 2013/14 CTSS. It also provides a preliminary assessment of the equality impact relating to the proposed intentions for the 2014/15 CTSS.

NCC will review the 2013/14 CTSS in year before deciding on a scheme for 2014/15 and its current intentions are to operate a scheme based on the original local CTSS proposals (with amendments which have been recommended following consultation and equality impact assessment). The current intentions for the CTSS for 2014/15 are subject to consultation and to the financial and other circumstances existing at the time of reconsideration of the Council's scheme for 2014/15.

As a result of the consultation exercise some features of both the proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS were adjusted as follows:

- Retaining backdating – Consultation feedback demonstrated a strong opinion with 30% agreeing and 57% disagreeing with the proposal to remove backdating. Consultation responses indicated that by removing backdating there was the potential that individuals who may experience mental health issues or instability in their lives may be unduly affected by the removal of backdating. The CTSS scheme has been adjusted to retain backdating based on this feedback.
- Minimum award set at 50p. – Consultation feedback was fairly balanced with 35% agreeing and 38% disagreeing. The original proposals were to consider a minimum award of between £2 and £4 per week. The consultation indicated that setting the level of minimum award at between £2 and £4 per week would cause further hardship and potentially take a number of already financially vulnerable households out of the Council tax support scheme. NCC therefore amended the scheme to introduce a minimum award level that aligns to the existing Housing Benefit minimum award level of 50p per week.
- NCC recognises that, while people did not support some of the features of the proposed scheme, the long-term affordability and sustainability of a CTSS is a priority for NCC because balancing affordability with helping our most vulnerable citizens is a significant challenge in a difficult economic and fiscal climate. NCC anticipates rises in demand for services from some of its most vulnerable citizens while at the same time the Government's continued funding cuts have reduced the Councils budget by around £75m since 2010/11.

The proposed 2013/14 CTSS has been designed to ensure that NCC can access the one-off transitional funding available from the DCLG. This provides the opportunity to reduce the financial burden on some of our most vulnerable citizens for 2013/14. It recognises the concerns expressed within the consultation about affordability and as a result it responds to these by seeking a lower contribution than originally proposed (**8.5% rather than 20%**).

In order to comply with the criteria set out by DCLG, to access the one-off transitional funding, **the proposed 2013/14 CTSS** includes the following elements:

- Putting a maximum limit on the amount of council tax support that can be paid to all working age people, so that working age households who get 100% help with their Council Tax bills now can receive a maximum of 91.5% help in 2013/14
- All working age households will pay at least 8.5% of their Council Tax bill in 2013/14
- There is no sharp reduction in support for those entering work

Following consideration of the consultation analysis it also includes the following additional features:

- Removing the Second Adult Rebate
- Retaining backdating of Council Tax Support
- Setting a minimum level award of 50p

Current intentions for the 2014/15 CTSS reflect considerations of affordability given the expected financial constraints and budget challenges for 2014/15.

They have also been shaped by considerations of the analysis of the consultation data relating to 2013/14. Currently intended key features for the 2014/15 CTSS are:

- Putting a maximum limit on the amount of council tax support that can be paid to all working age people – where everyone would pay at least 20% towards their Council Tax bill
- Capping the Council Tax support to 80% and Band B properties
- Reducing the upper savings limit from £16k to £6k
- Removing the Second Adult Rebate
- Retaining backdating
- Setting a minimum award level of 50p

Both the proposed 2013/14 CTSS and the current intentions for the 2014/15 CTSS meet the parameters set by government and respond to feedback from the consultation relating to the 2013/14 CTSS proposals by retaining mechanisms to take account of household circumstances. See Table 1 below:

Table 1

Scheme parameters	Scheme design (proposed 2013/14 CTSS and intentions for a 2014/15 CTSS)	Mechanism used	NCC actions following consultation
Continue to help low income pensioners	No change to the amount of help that low income pensioners currently receive	No mechanism used as scheme parameters are prescribed by government.	Scheme complies with Government criteria so no actions needed
Consider needs of families, disabled people and those who receive war pensions	The Council will recognise the needs of those with children, disability or caring responsibilities by retaining features of the current scheme that address those needs as listed opposite	<ul style="list-style-type: none"> - Disregard Child Benefit and childcare costs in the applicable amount -Recognise caring responsibilities by premiums in the applicable amount. - Premiums in the applicable amount, disregarding Disability Living Allowance and other disability premiums as well as those receiving War Disablement Pension and War Widows Pension. 	<p>Recognising the needs of particular households:</p> <p>Currently Council Tax Benefit allows for some incomes received by these households to be ignored when we calculate the household income.</p> <p>At the moment, when we calculate Council Tax Benefit, we look at the amount of money the household has to live on. Certain benefits, such as Child Benefit and Disability Living Allowance, are not taken into account. Under the</p>

			proposed scheme, this will not change.
Encourage people to work	The Council will recognise the needs of those with children, disability or caring responsibilities by retaining features of the current scheme that address those needs as listed opposite	- Retain earnings disregards and a tapered approach to the calculation of Council Tax Support that avoids the sudden drops – “cliff edges” – inherent in a stepped or banded approach to entitlement.	Proposed 2013/14 CTSS complies with Government criteria so no actions needed. The Council proposes to retain earnings disregards and a tapered approach to the calculation of Council Tax Support that avoids the sudden drops – “cliff edges” – inherent in a stepped or banded approach to entitlement.

	Could particularly benefit (X)	May adversely impact (X)	How different groups could be affected: Summary of impacts	Details of actions to reduce negative or increase positive impact (or why action not possible)
People from different ethnic groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>The financial arrangements for the CTSS must be affordable to the Council and ultimately to the Council Tax payers whilst supporting protection for pensioners since the Government has outlined that there should be no change in the amount of benefit low income pensioners receive.</p> <p>One group with 'protected characteristics' that will see no change are older people who are low income pensions and the scheme will fully protect low income pensioners from the changes.</p> <p>Given the significant cut to the council's resources for Council Tax Support and the Council's wider budget challenges, working age households who currently receive Council Tax benefit will be affected.</p> <p>Consideration was given to whether to provide more support to certain households and less to others. This approach would cause a disproportionate impact on those receiving less support, potentially meaning that they would be liable to pay a much higher proportion of their council tax bill, perhaps as much as 38%.</p> <p>The overall impact for different equality groups are summarised in Table 2.</p>	<p>The Council will continue to disregard war pensions in full in the proposed 2013/14 CTSS and in its intentions for a 2014/15 CTSS.</p> <p>The proposed 2013/14 CTSS seeks as far as possible, to balance the significant cut to the council's resources for Council Tax Support and the Council's wider budget challenges with the need to help the most financially vulnerable members of the community with their Council Tax bills.</p> <p>The proposed 2013/14 CTSS seeks to limit the impact on low income households by taking the approach to evenly distribute a reduction in support for working age people and not allow this reduction in support to have a disproportionately negative affect on any sub-group within the working age population. The intentions for a 2014/15 CTSS would retain this approach.</p> <p>Using the DCLG one year transition funding enables NCC to mitigate, for 2013/14, the impact of reduced levels of support available for low income households to pay their Council Tax and means that the proposed 2013/14 CTSS is comparatively more affordable for all working age households.</p>
Men, women (including maternity/pregnancy impact), transgender people	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Disabled people or carers	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
People from different faith groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Lesbian, gay or bisexual people	<input type="checkbox"/>	<input checked="" type="checkbox"/>		
Older or younger people	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Other (e.g. marriage/civil partnership, looked after children, cohesion/good relations, vulnerable children/adults)	<input type="checkbox"/>	<input checked="" type="checkbox"/>		

				<p>The Government's wider welfare reform agenda seeks to make sure that work pays and that increases in earnings are not undermined by similar or greater reductions in other income. The Council proposes to retain earnings disregards and a tapered approach to the calculation of Council Tax Support that avoids the sudden drops – “cliff edges” – inherent in a stepped or banded approach to entitlement.</p>
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Outcome(s) of equality impact assessment:

No major change needed Adjust the policy/proposal Adverse impact but continue Stop and remove the policy/proposal

Arrangements for future monitoring of equality impact of this proposal / policy / service:

Note when assessment will be reviewed (e.g. Review assessment in 6 months or annual review); Note any equality monitoring indicators to be used; consider existing monitoring/reporting that equalities information could form part of.

Approved by (manager signature): The assessment must be approved by the manager responsible for the service/proposal (this does not need to be an actual signature).
Include a contact tel & email to allow citizen/stakeholder feedback on proposals.

Date sent to equality team for publishing: Send document or link to equalityanddiversityteam@nottinghamcity.gov.uk

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Table 2 – Outline of potential impacts and measures taken to minimise impact for different protected groups

The following is an equality impact assessment carried out for proposals set out in the Council’s Council Tax Benefit Consultation to introduce a new local Council Tax Benefit support scheme. It summarises the impact for each group of protected characteristics and notes actions taken to minimise adverse impacts.

Details of how individual proposals have been adjusted to minimise impact are set out in the equality impact assessments for affected groups.

Equality Group	Reasons for positive / negative impact	Actions needed to reduce/mitigate impact for proposed 2013/14 CTSS and in the intended features for a 2014/15 CTSS.
People from different ethnic groups	<p>Ethnic group data is available for 12,883 working age claimants, 48% of the total. The data shows that the Mixed White and Black Caribbean groups are the most overrepresented amongst Council Tax Benefit claimants followed by Black Caribbean and Black Other. The groups which are underrepresented in terms of claimants are the Indian and Chinese groups. (see Table 4 in Appendix 2). The group who responded to the formal consultation are largely representative of those groups claiming CTB with the exception of the group ‘Arab’ which is not explicitly recorded for CTB claimants.</p> <p>Race and ethnic group are not relevant to the calculation of Council Tax Benefit and data on the ethnicity of CTB claimants is limited.</p> <p>The analysis of the formal consultation does not highlight any specific adverse impacts on ethnic groups other than those within these groups who are of working age.</p>	<p>PROPOSED 2013/14 CTSS: The Council is supporting the proposed 2013/14 CTSS because it considers that this scheme seeks, as far as possible, to balance the significant cut to the council’s resources for Council Tax Support and the Council’s wider budget challenges with the need to help the most financially vulnerable members of the community with their Council Tax bills. The 2013/14 CTSS evenly distributes a reduction in support for working age people and does not allow this reduction in support to have a disproportionately negative affect on any sub-group within the working age population.</p> <p>Now that the one year DCLG transition funding is available, it provides the opportunity for NCC to reduce the financial burden for 2013/14 for citizens by accessing and using this funding to mitigate the impact as far as possible during a period of significant welfare reform changes.</p> <p>This enables NCC to revise the originally proposed 2013/14 CTSS in a way which does not fundamentally differ from the original proposed scheme but which responds to the consultation feedback which indicated a very high proportion¹ of respondents would find it difficult</p>

¹ Pre-consultation - 85% of respondents said they would find it hard to meet household bills if they had to pay more Council Tax. Main consultation 71% of respondents said changes to Council Tax Benefit would mean they would have to reduce spending on essential items e.g. food and heating.

		<p>to meet household bills whilst at the same time meeting the criteria necessary to secure transitional funding. [Note – this applies to all equality groups listed below]</p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The Council has considered all responses to the formal consultation and has taken account of the available demographic and caseload data relating to race and ethnicity and have acted to amend the proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS by removing the proposals to remove backdating and to set a minimum level award (see Table 3 on page 14) in order to mitigate any adverse impacts for vulnerable people and CTB claimants within ethnic groups in Nottingham.</p>
<p>Men, women (including maternity/pregnancy impact), transgender people</p>	<p>Men/Women Our modelling showed us that from the 26,500 CBT claimants, there are approximately 13,350 households with dependents (50%) – 9535 lone parents (35%) and 3815 couples with children (14%)².</p> <p>A large proportion of the lone parent households are headed by women.</p>	<p>Men/Women Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS scheme design includes looking at the amount of money a household has to live on and certain benefits such as child benefit will not be taken into account as income. In addition, we will continue to disregard child care costs to the same levels as the current scheme and carers will continue to receive an additional allowance towards living costs when we calculate income.</p> <p>Retaining these features of the current scheme seeks to mitigate the impact on households with children, including those headed by lone parents. The current intentions for the 2014/15 CTSS are to continue to retain these features.</p>

² Working age Council Tax Benefit claimants (1st September 2012)

	<p>No issues identified. No data is collected in respect of Gender reassignment or transgender people as it is not relevant to the calculation of Council Tax Benefit.</p>	<p><u>Pregnancy/Maternity</u> Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both Proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS will not need to be adjusted to mitigate the effect on people of this protected characteristic because no adverse impacts have been identified.</p> <p><u>Transgender people / Gender reassignment</u> Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS will not need to be adjusted to mitigate the effect on people of this protected characteristic because no adverse impacts have been identified.</p>
<p>Disabled people or carers</p>	<p>Limited local data is currently held in relation to Council Tax liabilities of disabled households of working age, although a number of disability related benefits (e.g. income Support: Disability Premium, Employment Support Allowance, Disability Living Allowance, Attendance Allowance and Independent Living Fund) potentially qualify citizens for CTB.</p> <p>Concerns were expressed within the consultation about the affordability of our proposals for disabled citizens particularly in relation to proposals to remove backdating and the second adult rebate. Feedback told us that removing backdating could</p>	<p><u>Disabled People</u> Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The 2013/14 CTSS design includes looking at the amount of money a household has to live on and certain benefits such as Disability Living Allowance and attendance allowance etc will continue to be disregarded in full and recipients will continue to benefit from the enhanced premiums and personal allowances to which they are</p>

	<p>potentially have an adverse affect on the disabled in poor health or with a mental health condition who are not able to make a claim without help or due to circumstances relating to their condition.</p> <p><u>Carers</u> No current caseload data is collected in respect of caring responsibilities and consequently it is difficult to draw any firm conclusions in terms of equality impact on carers, however the Council recognises the needs of those with caring responsibilities</p>	<p>entitled to claim as a result of their disability.</p> <p>Retaining these features of the current scheme seeks to mitigate the impact on households with disability. The current intentions for the 2014/15 CTSS are to continue to retain these features.</p> <p>Following full consideration of the feedback, the 2013/14 CTSS has been amended to retain the ability to backdate claims. This seeks to mitigate any potential adverse impact on more vulnerable households, especially those where there is poor mental or physical health and to prevent hardship. The current intentions for the 2014/15 CTSS are to continue to retain this feature.</p> <p><u>Carers</u> The proposed 2013/14 CTSS design recognise the needs of those with caring responsibilities by retaining features of the current scheme that address those needs. It looks at the amount of money a household has to live on and recognises those with caring responsibilities by the inclusion of premiums in the applicable amount.</p> <p>The current intentions for the 2014/15 CTSS are to continue to retain this feature.</p>
People from different faith groups	<p>No issues identified. The data available in respect of religion or belief as it is not relevant to the calculation of Council Tax Benefit.</p> <p>The formal consultation analysis did not highlight any potential adverse impacts for people of different faith groups.</p>	<p>Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS will not need to be adjusted to mitigate the effect on people of this protected characteristic because no adverse impacts have been identified.</p>

Lesbian, gay or bisexual people	<p>No issues identified. No data is collected in respect of sexual orientation as it is not relevant to the calculation of Council Tax Benefit.</p> <p>The formal consultation analysis did not highlight any potential adverse impacts for lesbian, gay or bisexual people.</p>	<p>Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS will not need to be adjusted to mitigate the effect on people of this protected characteristic because no adverse impacts have been identified.</p>
Older or younger people	<p>People over pension age will not be affected by the proposals because they are excluded from the changes. The Government has determined that people over the state pension age for women and younger people with a partner over the state pension age for women will receive help with Council Tax under a national scheme as now. The Council has no power to change this. Pensioners who are protected make up 34.1% of our current caseload (14,628 pensioners). The cost to NCC of protecting pensioners in 2011/12 was approximately £12.4m.</p> <p>The Government is cutting the amount they pay local authorities towards help with Council Tax. In Nottingham this cut is equivalent to cutting present levels of Council Tax Benefit by an estimated 18%³ Nottingham City Council cannot provide resources to make up for all of this cut so it has designed an alternative scheme in which it proposes that all people of working age will receive less Council Tax Support than under the present Council Tax Benefit scheme. Appendix 1 shows the Nottingham City profile of working age CTB claimants.</p>	<p>Both proposed 2013/14 CTSS and intentions for 2014/15</p> <p>Older People:- Low income pensioners are protected and therefore no mitigation measures are necessary.</p> <p>Younger People:- Proposed 2013/14 CTSS: <i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both Proposed 2013/14 CTSS and intentions for 2014/15 The proposed 2013/14 CTSS spreads the impact of the reduction in CTB support as evenly as possible. No claimants of working age will receive help that covers all their Council Tax and everyone will have to pay something. The intentions for the 2014/15 CTSS retain this approach.</p>
Other (e.g. marriage/civil partnership, looked after children,	<p><u>Marriage / Civil Partnership</u> No issues identified. No data is collected in respect of</p>	<p><u>Marriage / Civil Partnership</u> Proposed 2013/14 CTSS:</p>

³ Estimated figure used in formal consultation exercise

cohesion/good relations, vulnerable children/adults)	Marriage and civil partnership. Same sex partners are treated the same as opposite sex partners for the purposes of Council Tax Benefit and this will be the case for the new local CTSS.	<p><i>See actions outlined to mitigate impact on page 60 – these also apply to this equality group.</i></p> <p>Both proposed 2013/14 CTSS and intentions for 2014/15</p> <p>The 2013/14 CTSS and the intentions for the 2014/15 CTSS will not need to be adjusted to mitigate the effect on people of this protected characteristic because no adverse impacts have been identified.</p>
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Overall, the proposed 2013/14 CTSS and NCC's intended features for a 2014/15 CTSS will protect low income pensioners so there will be no impact on this group. This complies with the Government's requirement that there should be no change in the amount of benefit low income pensioners receive. The Council will continue to disregard war disablement pensions and pensions for war widows and widowers. The Council uses a discretionary power to disregard the full amount of these pensions and will continue to disregard these pensions in full both the proposed 2013/14 CTSS and the intentions for the 2014/15 CTSS.

Other vulnerable citizens' impact

During the development of a local scheme the Council has tried as far as possible to balance the significant cut to our resources for Council Tax Support with the need to protect the most vulnerable members of the community. Both the proposed 2013/14 CTSS and the intentions for 2014/15 CTSS limit the impact on people of different equality groups as listed in Table 2 above by:

- evenly distributing a reduction in support for working age people
- not allowing for a disproportionately negative affect on any sub-group within the working age population.

In response to the consultation, two features of the originally proposed 2013/14 CTSS were adjusted in order to mitigate potential adverse impacts which were highlighted in the consultation, these are shown in Table 3.

Table 3

Feature to be retained	Response from Consultation	Action from NCC
Removing backdating	<p>There was strong disagreement with this proposal due to the potential adverse impacts upon vulnerable people and in particular those with mental health problems and those who may have experienced a period illness or disability.</p> <p>There were also concerns that this feature may increase levels of hardship for vulnerable</p>	<p>In response to the consultation, backdating will be retained in both the proposed 2013/14 CTSS and in NCCs intended features for a 2014/15 CTSS in order to protect vulnerable people and meet the Council's responsibility to consider the needs of those with a disability.</p>

	people.	
Setting a minimum level award	There was some disagreement with this proposal. Responses suggested that people felt that those people who receive a small amount of benefit would be unfairly penalised if it was below the minimum level set by the Council.	<p>In response to the consultation this feature will be retained the both the proposed 2013/14 CTSS and in NCCs intended features for a 2014/15 CTSS in order not to unfairly penalise people who receive a small amount of Council Tax benefit.</p> <p>The minimum award will be set at 50p to align with the administration of Housing Benefit and in order to mitigate the financial burden on low income households who may in future have to contribute something to their Council Tax bill.</p>

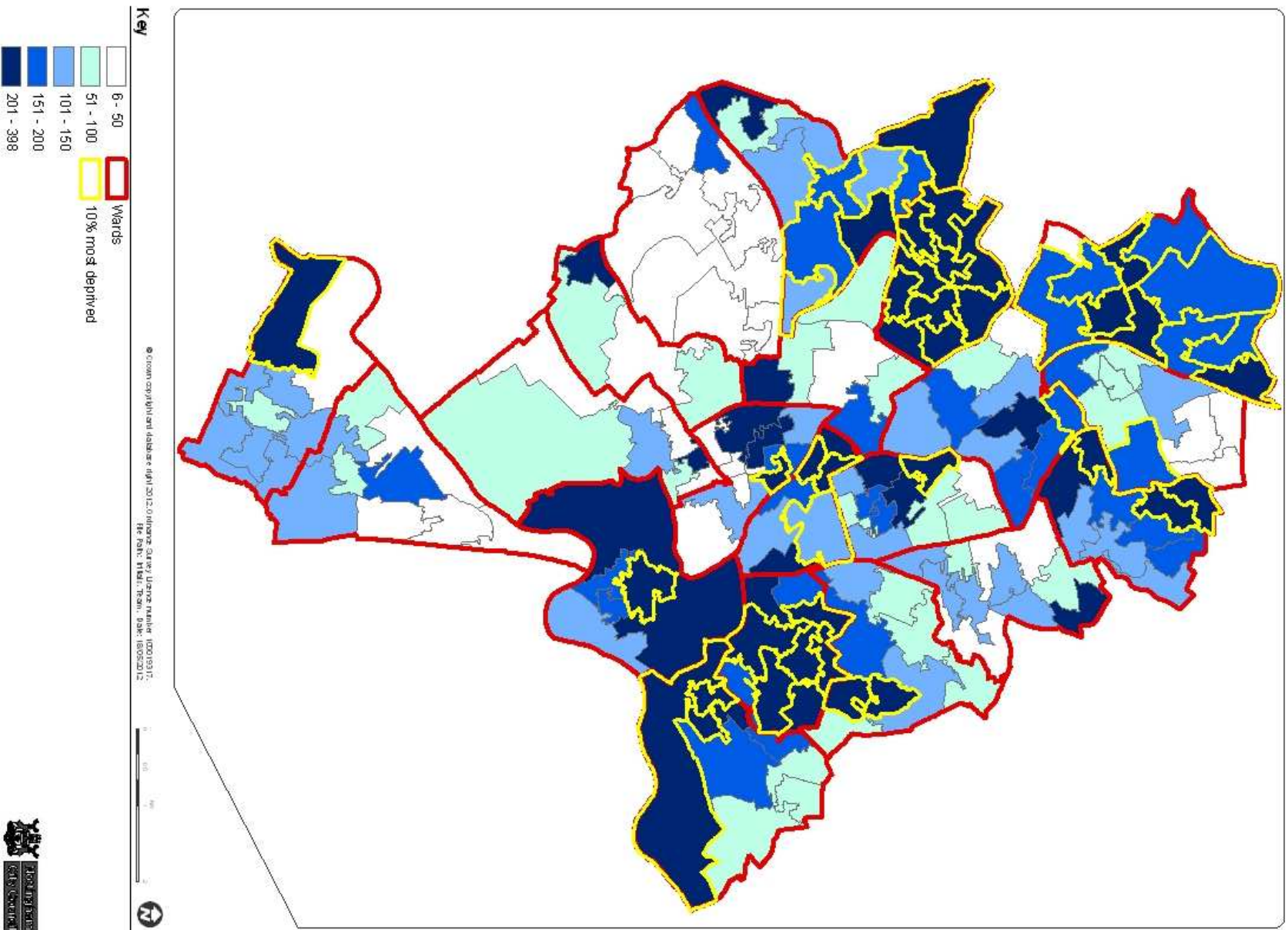
The Council will recognise the needs of those with children, disability or caring responsibilities by retaining features of the current scheme that address those needs. The current Council Tax Benefit scheme makes a wide range of provision that recognises the needs of:

- those with children: in the applicable amount, in disregarding Child Benefit and in disregarding childcare costs.
- those with disabilities: by premiums in the applicable amount, disregarding Disability Living Allowance and other disability premiums as well as those receiving War Disablement Pension and War Widows Pension.
- those with caring responsibilities: by premiums in the applicable amount.

These features have stood the test of time and the Council's intentions for the 2014/15 CTSS retains this approach.

Affordability: Affordability for both NCC and citizens is a concern for NCC. Consultation told us that many people didn't support the proposal that they pay up to 20% of their Council Tax bill when they have previously had 100% help. By adopting the proposed 2013/14 CTSS that complies with the Government criteria and gives NCC access to the one-off transitional grant amount, the financial burden on citizens will be reduced in 2013/14. Since the DCLG transition funding is only available for one year, the Council anticipates that the 2013/14 CTSS will need to be revised for the following year, 2014/15.

Working Age Council Tax Benefit claimants by SOA - August 2012



Appendix 2

Table 4 – Council Tax Benefit client breakdown by ethnicity as at 1st November 2012

	Ethnic Group	% of working age claimants	% of Working age population	Under/Over representation
White	British	70.3	73.3	1.0
	Irish	0.5	0.8	0.7
	Other White	5.2	3.9	1.3
Mixed	White and Black Caribbean	4.7	1.2	4.0
	White and Black African	0.5	0.3	1.6
	White and Asian	0.7	0.7	1.0
	Other mixed	0.6	0.6	1.1
Asian or Asian British	Indian	0.9	5.3	0.2
	Pakistani	3.5	3.3	1.1
	Bangladeshi	0.4	0.7	0.6
	Other Asian	1.6	0.9	1.8
Black or Black British	Caribbean	6.5	2.4	2.7
	African	3.3	2.2	1.5
	Black other	1.1	0.4	2.9
Chinese		0.2	2.1	0.1

Source: Claimant data from November 2012, Nottingham City Council. Population data from the 2009 ONS mid year estimates by ethnic group (experimental statistics)

Notes: Ethnic group data is available for 12,883 working age claimants, 48% of the total