

Equality Impact Assessment – Nottingham City Council Tax Support Scheme

This Equality Impact Assessment relates to the 2014/15 CTSS for Nottingham City.

Section 1 – Background

In April 2013, the Government abolished Council Tax Benefit and gave responsibility for Council Tax Support (CTS) to Council's but cut the money given to do this by at least 10%. The change meant that everyone, except low income pensioners, had to pay something towards their Council Tax bills from 1 April 2013.

In 2012, the DCLG published an Impact Assessment for Localising Council Tax which can be viewed here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/8464/2063707.pdf

The Local Government Finance Act (LGFA) 2012 inserted a new Schedule 1A into the LGFA 1992 which provides that for each financial year, each billing authority must consider whether to revise its scheme or to replace it with another scheme. The local scheme must be adopted by 31st January.

The CTSS for the City of Nottingham will impact on all working age people in Nottingham. There are an estimated 22,300 claimants of working age in Nottingham.

Section 2 - Information used to analyse the effects on equality

The localisation of CTS is one part of the wider Welfare Reform programme which also includes reforms to out of work benefits, housing benefits and disability benefits. Analysis carried out by the Council to quantify and map at cumulative impacts of welfare reform in Nottingham shows that the reform to Council Tax benefit will have the widest impact on households in the City (currently approximately 22,300 claimants), while the financial impact will be relatively small. In contrast, a reform such as the benefits cap will have the largest financial impact on individual households but affects the smallest number of households. There are potentially a large number and wide range of households likely to be at risk of some degree of financial impact and vulnerability due to welfare reform changes. The impact of changes to council tax support will inevitably be felt most by those people who are in receipt of more than one benefit affected by the welfare reform programme.

Section 3 - Name and brief description of policy being assessed

In 2016/17 NCC will retain the current CTSS which seeks, as far as possible, to balance the significant cut to the council's resources for CTS 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 CTSS will include the following elements

- Putting a maximum limit on the amount of CTS that can be paid to all working age people – where everyone would pay at least 20% towards their Council Tax bill.
- Setting a maximum level of Council Tax support
- No Second Adult Rebate
- Backdating of awards
- A minimum award level of 50p

The CTSS will meet the parameters set by government for local CTSS's. See Table 1 below:

Table 1

Scheme parameters	Scheme design proposed 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 parameters 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 benefits as well as those receiving War Disablement Pension and War Widows Pension. 	<p>Recognising the needs of particular households:</p> <p>At the moment, when we calculate CTS, 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 proposed scheme, this will not change.</p>
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 CTS that avoids the sudden drops – “cliff edges” – inherent in a stepped or banded approach to entitlement.	<p>Scheme complies with Government parameter so no actions needed.</p> <p>The Council proposes to retain earnings disregards and a tapered approach to the calculation of CTS that avoids the sudden drops – “cliff edges” – inherent in a stepped or banded approach to entitlement.</p>

	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 pensioners and the scheme will fully protect low income pensioners from the changes.</p> <p>Given the significant cut to the council's resources for CTS and the Council's wider budget challenges, working age households who currently receive Council Tax reduction will be affected.</p> <p>The overall impact for different equality groups are summarised in Table 2 below.</p>	<p>The Council will continue to disregard war pensions in full in the CTSS.</p> <p>The CTSS seeks as far as possible, to balance the significant cut to the council's resources for CTS 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 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.</p> <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 CTS that avoids the sudden drops – "cliff edges" – inherent in a stepped or banded approach to entitlement.</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"/>		

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:

The CTSS will be reviewed annually.

Approved by (manager signature):

Date sent to equality team for publishing:

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 Support Scheme 2014/15 consultation to change 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 this equality impact assessments for affected groups.

Equality Group	Reasons for positive / negative impact	Actions needed to reduce/mitigate impact for the CTSS
People from different ethnic groups	<p>Ethnic group data is available for approximately 30% of the total number of working age claimants. The 2015 data shows that the African and Black Other groups are the most overrepresented amongst CTS claimants followed by White and Black Caribbean and Caribbean. The group which are underrepresented in terms of claimants is the Other Ethnic group. (see Table 4 in Appendix 2).</p> <p>Race and ethnic group are not relevant to the calculation of CTS and data on the ethnicity of CTS 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>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.</p> <p>The Council is supporting the CTSS because it considers that this scheme seeks, as far as possible, to balance the significant cut to the council's resources for CTS 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 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>
Men, women (including maternity/pregnancy impact), transgender people	<p>Men/Women</p> <p>Our modelling showed us that from approximately 22,300 CBT claimants, there are approximately 11,000 households with dependents – 8,000 lone parents and 3,000 couples with children¹.</p> <p>A large proportion of the lone parent households are headed by women.</p> <p>No issues identified. No data is collected in respect of Gender reassignment or transgender people as it is</p>	<p><u>Men/Women</u></p> <p>The CTSS includes considerations of 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 CTSS and carers will continue to receive an additional allowance towards living costs when we calculate income.</p> <p>Retaining these features of the current CTSS seeks to mitigate the impact on households with children, including</p>

¹ Working age Council Tax Benefit claimants (3rd December 2015)

	not relevant to the calculation of Council Tax Reduction.	those headed by lone parents. <u>Pregnancy/Maternity</u> No adverse impacts have been identified within the CTSS. <u>Transgender people / Gender reassignment</u> No adverse impacts have been identified within the CTSS.
Disabled people or carers	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 CTS. <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	<u>Disabled People</u> The CTSS will continue to disregard in full certain benefits such as Disability Living Allowance and attendance allowance etc. Recipients will continue to benefit from the enhanced premiums and personal allowances to which they are entitled to claim as a result of their disability. Retaining these features of the current scheme seeks to mitigate the impact on households with disability. The current intentions for the CTSS are to continue to retain these features. 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. <u>Carers</u> The CTSS design recognises the needs of those with caring responsibilities by retaining features of the 2013/14 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. The CTSS will retain this feature.
People from different faith groups	No issues identified. The data available in respect of religion or belief as it is not relevant to the calculation of CTS.	No adverse impacts have been identified within the CTSS.
Lesbian, gay or bisexual people	No issues identified. No data is collected in respect of sexual orientation as it is not relevant to the calculation of Council Tax Reduction.	No adverse impacts have been identified within the CTSS.

Older or younger people	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 36.87% of our current caseload (13,030 pensioners).	<p>Older People:- Low income pensioners are protected and therefore No adverse impacts have been identified within the CTSS.</p> <p>Working Age People:- Nottingham City Council is delivering a number of targeted initiatives to support vulnerable working age residents back into work:</p> <ul style="list-style-type: none"> • The Integrated Employer Hub in partnership with JCP links unemployed city residents to vacancies and opportunities secured through employer engagement, public sector partners and planning and procurement obligations. • The Nottingham Jobs fund is a grant to employers creating roles for unemployed city residents • The Apprenticeship Hub works with employers to create apprenticeships in the City • NCC funds community based employment and skills provision through the Area Based Grant programme • The Council supports PATRA by providing apprenticeship opportunities. <p>The Council has also secured £3 million through the youth contract to tackle unemployment amongst 18-24 year olds.</p>
Other (e.g. marriage/civil partnership, looked after children, cohesion/good relations, vulnerable children/adults)	<p><u>Marriage / Civil Partnership</u> No issues identified. No data is collected in respect of Marriage and civil partnership. Same sex partners are treated the same as opposite sex partners for the purposes of Council Tax Reduction and this will be the case for the CTSS.</p>	<p><u>Marriage / Civil Partnership</u> No adverse impacts have been identified within the CTSS.</p>

Overall, the 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 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 CTS with the need to protect the most vulnerable members of the community. The CTSS limits 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.

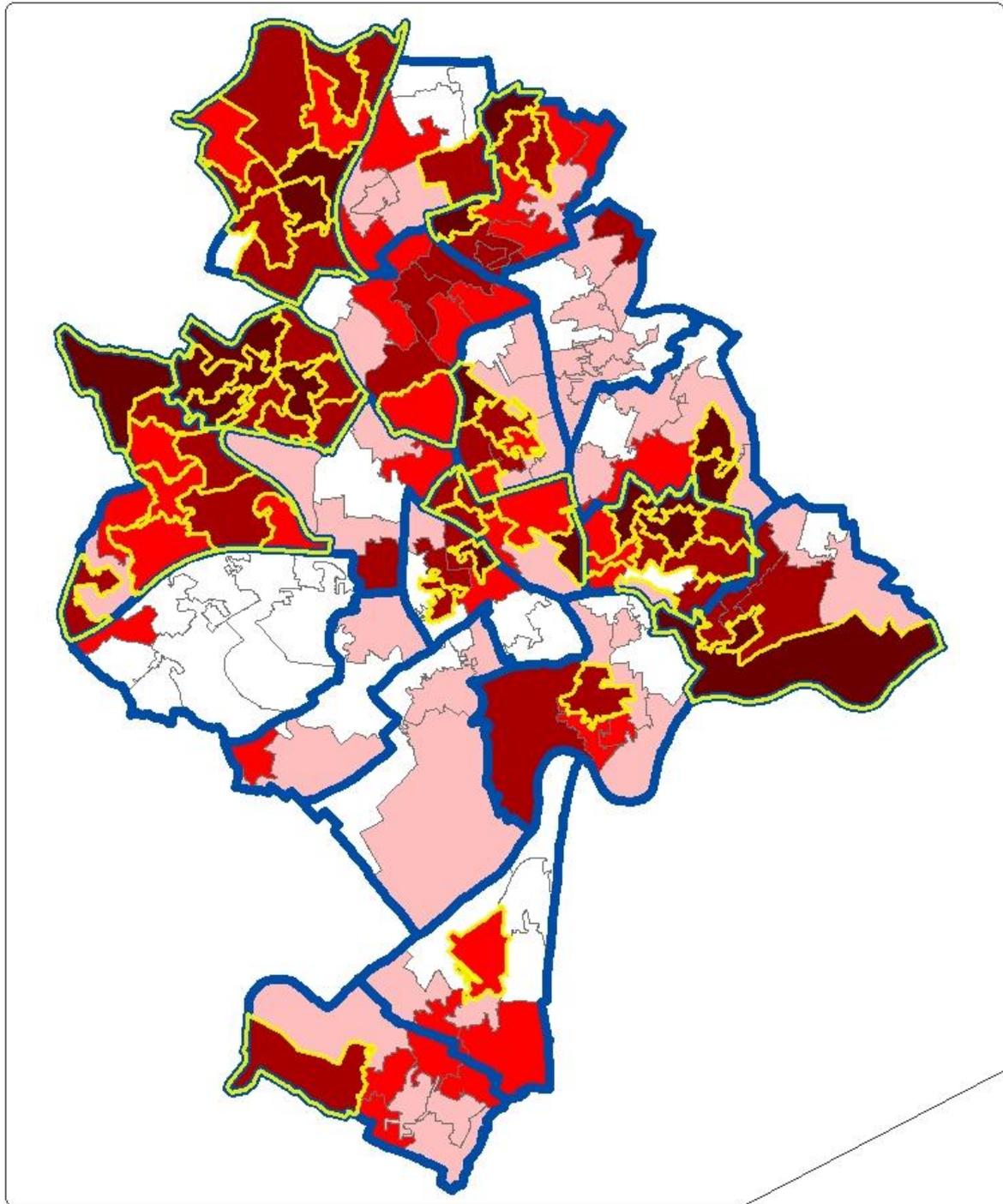
NCC recognise that there were concerns expressed within the consultation about the affordability for many low income working age households. The CTSS seeks, as far as possible, to balance the significant cut to the council's resources for Council Tax Support and the Council's wider budget challenges with the need to help the most financially vulnerable members of the community with their Council Tax bills.

In the design of the CTSS, the Council has recognised the needs of those with children, disability or caring responsibilities by including features that address those needs. The CTSS will make a wide range of provision to recognise 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.

Affordability: Affordability for both NCC and citizens is a concern for NCC. By retaining the current CTSS, NCC will comply with the Government CTSS parameters while evenly spreading the reduction in support across all citizens of working age and therefore not allowing for a disproportionately negative affect on any sub-group within the working age population.

Working Age Council Tax Support claimants by SOA - December 2015



Key

- 3 - 50
- 51 - 100
- 101 - 150
- 151 - 200
- 201 - 348
- 10% most deprived
- Wards

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Scale 1:50,000



EIA Appendix 2

Table 4 – Council Tax Benefit client breakdown by ethnicity as at December 2015

	% of working age claimants	% of working age population	Under/overrepresentation *
British	70.6	65.2	1.1
Irish	0.8	0.8	0.9
Gypsy or Irish Traveller	0.0	0.1	0.2
Other White	5.3	5.8	0.9
White and Black Caribbean	3.8	3.2	1.2
White and Black African	0.3	0.5	0.6
White and Asian	0.5	1.0	0.5
Other Mixed	0.5	0.7	0.7
Indian	0.9	3.7	0.2
Pakistani	3.8	4.9	0.8
Bangladeshi	0.5	0.3	1.6
Chinese	0.4	2.6	0.1
Other Asian	2.1	2.2	1.0
African	5.0	3.4	1.5
Caribbean	3.3	3.0	1.1
Other Black	2.1	0.8	2.7
Arab	0.1	0.8	0.1
Other ethnic group	0.0	0.8	0.0

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 12,904 working age claimants, 50% of the total.