

Equality Impact Assessment / Equality Analysis

(Updated December 2022)

Item name	Details
Title of service or policy	Local Council Tax Support scheme proposals 2024/25
Name of directorate and service	Finance, Welfare Support
Name and role of officers completing the EIA	Damian Peak, Revenues and Benefits Manager
Date of assessment	08/11/2023

Equality Impact Assessment (or ‘Equality Analysis’) is a process of systematically analysing a new or existing policy or service to identify what impact or likely impact it will have on different groups within the community. The main aim is to identify any discriminatory or negative consequences for a particular group or sector of the community, and also to identify areas where equality can be better promoted. Equality impact Assessments (EIAs) can be carried out in relation to services provided to customers and residents as well as employment policies/strategies that relate to staffing matters.

This toolkit has been developed to use as a framework when carrying out an Equality Impact Assessment (EIA) or Equality Analysis. **Not all sections will be relevant – so leave blank any that are not applicable.** It is intended that this is used as a working document throughout the process, and a final version will be published on the Council’s website.

1.1 Identify the aims of the policy or service and how it is implemented

Key questions	Answers / notes
<p>1.1 Briefly describe purpose of the service/policy e.g.</p> <ul style="list-style-type: none"> ● How the service/policy is delivered and by whom ● If responsibility for its implementation is shared with other departments or organisations ● Intended outcomes 	<p>This is a support scheme for low-income households to help with council tax. All Local Authorities must have a Local Council Tax Support (LCTS) Scheme, and whilst some features of the scheme are prescribed by legislation, for example, how support should be delivered to Pensioner households, the LA has discretion over the amount of support provided to working age households. Responsibility for the Administration of the scheme sits within the Welfare Support service, specifically the Benefit Assessment team.</p> <p>The cost of the scheme, which is currently around £10.3M, is funded through an adjustment to the council tax base. There are around 9,500 households in B&NES receiving this support, and the council is currently consulting on making changes which would affect around half of these households; specifically working age households who receive Universal Credit.</p> <p>The LCTS entitlement for this cohort is determined depending on where their weekly income falls between different income bands. A percentage reduction is then applied to the council tax liability.</p> <p>The intended outcomes of the proposed changes are to address an imbalance in the way that support is currently provided to households, to provide more support for the poorest households, those who pay for childcare, and to align the rules of the council’s scheme with that of other Local Authorities and to provide more equal treatment of households who rent their homes and receive the Universal Credit Housing Costs Element and those who do not receive the</p>

Housing Costs element, for example because they own their homes. The discount rates and income bands will be changed to allow for the financial costs of providing additional support to more households through the disregard of the Housing and Childcare Elements, and the introduction of a band for the poorest households so that they do not have to pay council tax at all. As a guide, the current income bands and percentage discount rates for a single person are as follows.

Basic weekly income allowance	Discount
£0.00 - £110.09	90%
£110.10 - £220.19	85%
£220.20 - £330.29	80%
£330.30 - £385.34	70%
£385.35 - £440.39	50%
£440.40	0

The proposed income bands and percentage discounts for a single person are as follows.

Basic weekly income allowance	Discount
£0.00 - £85.10	100%
£85.11 - £185.10	85%
£185.11 - £285.10	60%
£285.11 - £335.10	40%
£335.11 - £385.10	20%
£385.11	0

1.2 Provide brief details of the scope of the policy or service being reviewed, for example:

- Is it a new service/policy or review of an existing one?
- Is it a national requirement?).

The proposals are to introduce changes to an existing policy framework which underpins the LCTS scheme. This follows an internal review of the current rules of the scheme, and feedback from residents, staff and welfare rights organisations. The proposals have been costed and are currently subject to public consultation. There is no scope for changes to the proposals at this stage. The decision to make changes to the scheme can only be made by Full council and the timescales which must be followed are that the decision must

<ul style="list-style-type: none"> How much room for review is there? 	<p>be made on 30th November 2023 so that the impacts on the council tax base can be accurately estimated and the changes implemented from 1st April 2024. The decision to be taken by full council will be whether to adopt the proposed changes, or not. The council can introduce mitigation measures outside of scheme, but this is the limit to any review of the issues under consideration in this EIA.</p>
<p>1.3 Do the aims of this policy link to or conflict with any other policies of the Council?</p>	<p>There will be some residents who would receive less support than they currently do if the proposed changes are implemented, and so this may have the effect of undermining the council’s commitment to Improving People’s Lives. However, a greater number of residents will be better off under the new proposals, and so in this respect the proposed changes will link to the council’s main objective.</p>

2. Consideration of available data, research and information

Key questions	Data, research and information that you can refer to
<p>2.1 What equalities training have staff received to enable them to understand the needs of our diverse community?</p>	<p>None – this has been added to the action plan. Advice has been provided by B&NES Equalities team.</p>
<p>2.2 What is the equalities profile of service users?</p>	<p>Out of 4310 claimants who are in scope to be affected by these changes, 2943 or 68% are Female, 1284 or 30% are Male and the gender of 83 or 2% is not known. 1391 or 32% are considered to be disabled in that they receive disability benefits which would mean they qualify for the disability premium. 1910 or 44% are responsible for children or young people and of these 1445 or 34% are single parents.</p>
<p>2.3 Are there any recent customer satisfaction surveys to refer to? What were the results? Are there</p>	<p>No</p>

any gaps? Or differences in experience/outcomes?	
2.4 What engagement or consultation has been undertaken as part of this EIA and with whom? What were the results?	A public consultation exercise is underway which outlines what the proposed changes are and why they are being proposed. This is open to all residents of Bath and North East Somerset. Officers have also written to all 4310 households who currently receive LCTS and Universal Credit to summarise the changes, explain how the changes might affect their entitlement based on their current financial circumstances, and to invite them to give their views through the consultation web page on the public website.
2.5 If you are planning to undertake any consultation in the future regarding this service or policy, how will you include equalities considerations within this?	This is underway and will be completed by 12.11.2023.

3. Assessment of impact: 'Equality analysis'

Based upon any data you have considered, or the results of consultation or research, use the spaces below to demonstrate you have analysed how the service or policy:

- Meets any particular needs of equalities groups or could help promote equality in some way.
- Could have a negative or adverse impact for any of the equalities groups

Key questions	Examples of what the service has done to promote equality	Examples of actual or potential negative or adverse impact and what steps have been or could be taken to address this
3.1 Issues relating to all groups and protected characteristics	The proposed changes to the rules include a disregard of the Housing Costs and Childcare elements of Universal Credit, and the disregard of Housing Benefit for residents	The proposed changes include reductions in the income bands, so that the lowest band is in line with the Standard Allowance of Universal Credit, and the percentage reductions for each income band will also be changed so that there is a more tiered reduction in

	<p>living in specified (supported) accommodation.</p> <p>Under the current rules of the scheme the inclusion of these elements of Universal credit means that households who rent or are reimbursed for childcare costs may receive less support than those who own their accommodation or do not pay for childcare. Within the cohort who receive the housing costs element there is also an imbalance of support where those with higher rental costs, e.g.) private renters may also receive less support than households who rent social sector accommodation, where rents will typically be lower. Of the 4310 claimants in scope to be affected by this policy change 2682 will receive more support, 319 will receive the same and 1309 will receive less.</p>	<p>support as household's income increases and they move down the income bands. This means that some households will receive less support than they currently do, and some will receive no support at all under the proposed rules. The council is proposing to mitigate the adverse effects of these rule changes by directing households who cannot afford to pay the increased council tax charges to the Discretionary help available from the Welfare Support team.</p>
<p>3.2 Sex – identify the impact/potential impact of the policy on women and men.</p>	<p>Of the 2682 of claimants who will receive more support, 1697 or 63% are female.</p> <p>However, there is also a cohort of households who do not currently qualify for any support because their income is too high, in part because receipt of the housing costs element pushes them out of</p>	<p>Of the 2943 claimants who are female, 1050 or 36% will receive less support than they currently do. So more female claimants would be better off under the proposed changes. However, of the total number of 1309 who will receive less support, 1050 or 80% are female. This is slightly higher than the percentage of females within the overall group of service users (68%), who will be affected by the changes. The reason for this appears to be that there is a relatively large group of</p>

	<p>entitlement. There are 496 potential claims in this category and 423 or 90% are female. However, it is uncertain whether this group will claim LCTS from 1st April 2024 if the proposed changes are agreed by Full council.</p>	<p>households – 694, which comprise single mothers with comparatively higher income and low or no rental costs. This also needs to be considered in the context that there would be 826 single mother households which would receive more support under the proposals.</p> <p>Measures which have been employed to mitigate the negative impacts on households who will receive less support than they currently do include writing to them to explain what percentage reduction they currently receive in their bill and what percentage reduction they would receive if the proposals were agreed. The letters also included details of further support provided by the council’s Welfare Support team, which includes help with debt, bills, rental costs, school uniform, food, and household items. In addition to this details of partner organisations were also shared including Citizens Advice, Step Change and Future Bright, who might be able to assist applicants by providing advice and support to find work or increase working hours to mitigate the additional costs of increased council tax. If the changes are agreed, then a further mailshot may be issued in February, around the time that the annual council tax bills are issued for 2024/25, and details of additional council support and partner organisations will be included with the bills.</p>
<p>3.3 Pregnancy and maternity</p>	<p>It is not anticipated that the policy changes would impact households where the applicant or their partner were pregnant.</p>	<p>The policy changes could impact on a particular cohort who currently qualify for council tax support but may receive less under the new proposals. The council will hope to mitigate against this adverse impact by offering discretionary help with council tax</p>

		<p>via the Welfare Support team. This could in turn lead to households in this cohort receiving more support for their households through getting help with household items or other bills, and signposting to further support such as healthy start vouchers. Officers understand and accept that the limit of an addition of £50 per child to the income bands to two children may impact households with more than two children, however if further rule changes were made to accommodate these households it would be prohibitively expensive or mean that support for other households within the scheme would have to be further reduced.</p>
<p>3.4 Gender reassignment – identify the impact/potential impact of the policy on transgender people</p>	<p>Although the service does not collect data on gender reassignment, it is not anticipated that the policy changes will impact on transgender people. However, the rules of the scheme do not treat people differently based on their gender identity.</p>	<p>Although it is not anticipated that the changes would impact on transgender people, there is a high majority of poor mental health within the trans community, and it could be that there may be members of this cohort who would be financially worse off under the proposals. All claimants who are adversely affected by the changes will be signposted to the Welfare Support team for financial help. Staff within the Welfare Support team and the Council Tax team who may come into contact with this cohort in relation to paying their Council Tax will be asked to attend equalities training. They will use the information available on the Livewell site to signpost residents to appropriate mental health support.</p>
<p>3.5 Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration both physical,</p>	<p>Of the 1391 claimants who currently qualify for LCTS and are entitled to the disability premium, 998 or 72% would receive more support than they currently do and</p>	<p>Other than the reduction in income bands and the percentage reductions, there are no anticipated impacts which the proposed changes would have on disabled people.</p>

<p>sensory and mental impairments and mental health)</p>	<p>20% would receive less. 8% would see their level of support unchanged because of these changes.</p> <p>Disabled people who receive the housing costs or childcare element of Universal Credit are likely to be better off, and those who live in supported accommodation and receive Universal Credit and are liable to pay Council Tax will also be better off under the proposed rules.</p> <p>Claimants will not need to share their updated income details with the council, as these are received automatically from the DWP via a system called ATLAS. This happens every time there is a change in UC entitlement. This makes the scheme more accessible for residents in this cohort.</p>	<p>The reason why 20% of claimants who currently qualify for the disability premium would be worse off is because this cohort will typically receive a higher amount of Universal Credit or receive a higher income as they would receive the Limited Capability for Work Related Activity addition. They would therefore have to meet the increase in Council Tax charge from this income, as is the case with the current rules of the scheme. The rules of the current scheme disregard in full PIP and DLA and there are no plans to change this.</p> <p>The service does not record the claimant's type of disability or health condition, therefore a range of accessible formats for documentation and correspondence relating to the LCTS scheme are available upon request.</p> <p>Officers have considered whether the changes would impact on Deaf people. Sign language translation to explain the changes will be provided upon request, and the letters which have been issued contain details of the council team to telephone or email for more information.</p>
<p>3.6 Age – identify the impact/potential impact of the policy on different age groups</p>	<p>This policy change is only aimed at working age households who receive Universal Credit. The council is not permitted to make similar changes to Pensioner households. In recognition that the standard allowance of Universal</p>	<p>The policy changes should not impact a particular age group, other than to the extent that the proposed changes can only apply to working age claimants. Residents who are below the age of 18 are not liable to pay Council Tax, however there could be a second-hand impact on the children of claimants who will receive less support under these proposals.</p>

	<p>Credit may be different for people who are under the age of 25, the lowest income band would be set at the rate applicable for people aged 25 or older. This would ensure that those aged under 25 are treated the same as those aged 25 or older.</p>	<p>Officers understand that the current limitation in support for increasing the income bands to a maximum of two children may impact on larger families, however any further changes to this rule would impact on the cost of the scheme and could mean that less support would be given to other households who receive Council Tax support.</p>
<p>3.7 Race – identify the impact/potential impact on across different ethnic groups</p>	<p>We do not collect ethnicity data on the benefits system so cannot measure this, however the rules of the scheme would apply equally to residents of different ethnic groups.</p>	<p>It is not anticipated that there will be an impact on different households because of their ethnicity, however officers understand that people from ethnic minorities may be in lower paid work https://www.gov.uk/government/publications/ethnicity-pay-reporting-guidance-for-employers/introduction-and-overview The changes to the scheme are designed to provide more support to households which have lower incomes, particularly to those who rent their homes. Some ethnicities are also more likely to have larger families and would potentially qualify for a higher Universal Credit Housing Costs element because the applicable Local Housing Allowance rate would be higher to accommodate more people living in the property. The proposed changes to the scheme would benefit households through the disregard of this element of Universal Credit. However, Officers also accept that such families may be disadvantaged because the income bands would not be increased beyond the additional amounts for 2 children, however as previously stated in this document, any changes to those rules would impact on the cost of the scheme.</p>

		Officers understand that residents for whom English is not their first language may have difficulty in accessing the information on the proposed changes, and so we will provide details of the changes in accessible formats/translation services as requested.
3.8 Sexual orientation – identify the impact/potential impact of the policy on lesbian, gay, bisexual, heterosexual people	It is not anticipated that there will be an impact on residents depending on their sexual orientation.	It is not anticipated that there will be an impact on residents depending on their sexual orientation as there is no differentiation of entitlement between same sex or opposing sex households.
3.9 Marriage and civil partnership – does the policy/strategy treat married and civil partnered people equally?	When assessing which income band applies, total Household income is considered, so whether members of a couple are married or in a civil partnership or simply living together makes no difference.	It is not anticipated that there will be any difference in treatment between members of a couple who are married, living in a civil partnership or living together.
3.10 Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no religion.	It is not anticipated that there will be an impact on residents depending on their Religion or Beliefs.	It is not anticipated that there will be an impact on residents depending on their Religion or Beliefs, however officers are aware that certain members of different religious or faith groups may have more children than the average household. Officers accept that such families may be disadvantaged because the income bands would not be increased beyond the additional amounts for 2 children, however as previously stated in this document, any changes to those rules would impact on the cost of the scheme and so are not in scope for the proposed changes.
3.11 Socio-economically disadvantaged* – identify the	Officers carried out a review into the rules of the current scheme and	The proposed changes could mean that a particular household group of owner-occupiers who are unable

<p>impact on people who are disadvantaged due to factors like family background, educational attainment, neighbourhood, employment status can influence life chances (this is not a legal requirement, but is a local priority).</p>	<p>this included sample checks of 650 claims. This fieldwork identified that 97% of the claimants who received the highest level of support did not receive the Housing Costs element of Universal Credit, because they did not have to pay rent or they owned their homes. This is not a proportionate representation of the caseload split between owner-occupiers and renters because figures from the DWP's Stats Xplore tool show that as of May 2023 only 33% of UC claimants do not receive the Housing costs element.</p> <p>The proposed changes would change this so that excluding rental costs and based on basic household income, households would be treated equally.</p> <p>The proposed changes would mean that 1277 households would be taken out of having to pay Council Tax altogether, where their income is at or below the standard Allowance of Universal Credit. These are some of the poorest households in the area. (add in those who are above the uc limit – what help is available to them?)</p>	<p>to work may receive less support than they currently do and will be unable to mitigate the negative effects of the changes by increasing their income. This group would include unpaid carers.</p> <p>It has been highlighted to the S151 Officer that there may be additional demand placed on the Welfare Support team to provide discretionary support in 2024/25 for households who are negatively affected by the proposed changes, and service budgets may need to be supplemented for households who cannot afford to pay the increase in Council Tax caused by the changes to the rules.</p>
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<p>3.12 Rural communities* identify the impact / potential impact on people living in rural communities</p>	<p>It is not anticipated that there will be an impact on residents that live in rural communities</p>	<p>It is not anticipated that there will be a significant impact on residents that live in rural communities, however the revenue income of parish councils may be affected slightly due to the increase in the cost of the scheme on impacting the tax base in each parish. This will in some cases impact positively, and in some cases negatively. Details have been shared with the vice chair of the B&NES Avon Local Council Association, who has contacted members to ask if they would like specific details of the modelled impacts to be shared for their parish. Overall, the impact for all parish councils is forecast to be £8,390.19.</p>
<p>3.13 Armed Forces Community ** serving members; reservists; veterans and their families, including the bereaved. Public services are required by law to pay due regard to the Armed Forces Community when developing policy, procedures and making decisions, particularly in the areas of public housing, education and healthcare (to remove disadvantage and consider special provision).</p>	<p>We do not collect data on whether claimants are part of the armed forces community so it is not possible to assess whether there will be an impact on this community.</p>	<p>We do not collect data on whether claimants are part of the armed forces community so it is not possible to assess whether there will be an impact on this community.</p>

*There is no requirement within the public sector duty of the Equality Act to consider groups who may be disadvantaged due to socio economic status, or because of living in a rural area. However, these are significant issues within B&NES and have therefore been included here.

** The Equality Act does not cover armed forces community. However, the Armed Forces Bill (which came in on 22 Nov 2022) introduces a requirement to pay 'due regard' to make sure the Armed Forces Community are not disadvantaged when accessing public services.

4. Bath and North East Somerset Council & NHS B&NES Equality Impact Assessment Improvement Plan

Please list actions that you plan to take as a result of this assessment/analysis. These actions should be based upon the analysis of data and engagement, any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. The actions need to be built into your service planning framework. Actions/targets should be measurable, achievable, realistic and time framed.

Issues identified	Actions required	Progress milestones	Officer responsible	By when
Training	Staff must undergo internal equalities training.	100% of staff within the Revenues and Benefits service have undertaken the training.	D Peak	31.03.2024
Additional support required for households who will be worse off.	Specific correspondence to be issued to claimants who will be worse off under the proposed changes to signpost to support agencies and to provide practical financial support through the Welfare Support team.	Letters issued	D Peak	February 2024.
Guidance for signposting customers to supportive services via the Livewell site will be provided to the Council Tax and Welfare Support teams.			D Peak	February 2024.

5. Sign off and publishing

Once you have completed this form, it needs to be 'approved' by your Divisional Director or their nominated officer. Following this sign off, send a copy to the Equalities Team (equality@bathnes.gov.uk), who will publish it on the Council's and/or NHS B&NES' website. Keep a copy for your own records.

Signed off by: A. Rothery

(Divisional Director)

Date: 14.11.2023.