

Equality Analysis Template.

Directorate: Corporate Service Area: Revenues & Benefits	Lead Officer: Jenny Hoare Date completed: 12 December 2018
Service / Function / Policy / Procedure to be assessed: Council Tax Support Scheme 2019-2020 The introduction of a minimum change rule so that increases or decreases in entitlement of £3 or less per week are not applied to the assessment. Changes will be held until the cumulative impact of any further changes exceeds £3 per week, or until the annual calculation for the next financial year; whichever happens first. Calculation of council tax support will be based on the household and financial information used to calculate Universal Credit. Claims for council tax support will be accepted from notification of an award of Income Support, Jobseeker's Allowance (income-based), Employment and Support Allowance (income-related) or Universal Credit	
Is this: New / Proposed <input type="checkbox"/> Existing/Review <input type="checkbox"/> Changing <input checked="" type="checkbox"/> (Please tick appropriate box)	Review date: 1 April 2019

Part A – Initial Equality Analysis to determine if a full Equality Analysis is required.

What are the aims and objectives/purpose of this service, function, policy or procedure?

Council Tax support assists residents on low incomes to help to pay their council tax. It is the responsibility of each Council to design their own council tax support scheme for working age residents.

Please indicate its relevance to any of the equality duties (below) by selecting Yes or No?

	Yes	No
Eliminating unlawful discrimination, victimisation and harassment		✓
Advancing equality of opportunity	✓	
Fostering good community relations		✓

If not relevant to any of the three equality duties and this is agreed by your Head of Service, the Equality Analysis is now complete - please send a copy to the Equality & Diversity Team. **If any of the three equality duties are relevant**, a Full Equality Analysis will need to be undertaken (PART B below).

PART B: Full Equality Analysis.

Step 1 – Identifying outcomes and delivery mechanisms (in relation to what you are assessing)

What outcomes are sought and for whom?	To assist working age residents who have low incomes to pay their council tax
Are there any associated policies, functions, services or procedures?	All working age council tax support customers could be affected. Residents may be affected if they make a claim for council tax support. There is a separate statutory national scheme for those who are of pension age.
If partners (including external partners) are involved in delivering the service, who are they?	N/A

Step 2 – What does the information you have collected, or that you have available, tell you?

What evidence/data already exists about the service and its users? (in terms of its impact on the ‘equality strands’, i.e. race, disability, gender, gender re-assignment, age, religion or belief, sexual orientation, maternity/pregnancy, marriage/civil partnership and other socially excluded communities or groups) and **what does the data tell you?** e.g. are there any significant gaps?

We hold data such as the age and gender of people currently claiming council tax support. We also hold some information about disability and ethnicity, However, this information is not complete as it does not have to be provided when making a claim for Council Tax Support. Below is a breakdown of the data we hold

Total council tax support caseload 23,822 of those 10,659 are of pension age and will not be affected.

We hold the following data including Gender, for the total working age cases of 13163 who could be affected:

Working Age	Caseload	13163			
	Single female	Single male	Single gender unknown	Couples	Grand Total
no dependant	1708	2418	106	375	4607
dependants	3177	166	131	1302	4776
disabled no children	1168	941	88	686	2883
dependants and disabled	364	34	21	478	897
Totals	6417	3559	346	2841	13163

We hold the following data for Ethnic background for 7585 customers:

Ethnicity					
	Asian	Black	White	Mixed Background	Other
	800	852	5268	464	201

Of 464 with a mixed background and of those 342 describe themselves as white / back Caribbean. 201 described themselves as other.

We do not hold data about religion and beliefs, sexual orientation, gender reassignment, pregnancy or maternity

We have identified that there will some customers who are receiving universal credit and who will be affected by removing the additional earnings disregard. Our estimated figures show that of the working age caseload of 131163 customers 198 customers could be affected by the change. These customers could see a reduction in their council tax support award by an average of £2.62 per week The data we hold about those affected customers is below:

Total households affected	198		
	Single Female	Single Male	Couples
With dependants	115	4	48
No dependants	5	8	18

Ethnicity	198					
	Asian	Black	White	Mixed Background	Unknown	other
	9	22	84	15	64	4

Households receiving a disability related income	15		
	Single Female	Single Male	Couples
With dependants	2	0	2
No dependants	3	4	4

Has there been any consultation with, or input from, customers / service users or other stakeholders? If so, with whom, how were they consulted and what did they say? If you haven't consulted yet and are intending to do so, please list which specific groups or communities you are going to consult with and when.

The council has carried out a public consultation which was open from 28 August 2018 to 19 November 2019. The consultation was in the form of an online survey. The survey was available in other formats upon request. Details about the consultation was displayed on digital notice boards in the civic centre and libraries throughout the City and posters were on display in the 3 main Jobcentres, there was a local press release, social media campaign. Community groups and volunteers that were likely to be knowledgeable about the proposals such as citizens advice, refuge and migrant centre, access 2 business, job change, transforming communities together, social housing providers and private landlords, Wolverhampton Homes were also contacted by email this included the Wolverhampton Voluntary Sector Council.

The proposed changes are not expected to make savings in the cost of awards under the scheme but are designed to make it cheaper to administer. In respect of the minimum change rule, increases in income that would otherwise reduce entitlement are as likely to occur as decreases in income that would otherwise increase entitlement. Indeed a household could well have both situations in a single billing year. The level proposed for the minimum change rule was considered proportionate, balancing the impact on administration with the impact on households already on a low income. The proposed level of £3 weekly change in entitlement was one of the consultation questions, with respondents invited to suggest an alternative amount. Half of respondents agreed with the proposed rate.

Are there any complaints, compliments, satisfaction surveys or customer feedback that could help inform this assessment? If yes, what do these tell you?

Feedback is included in the M.E.L Report

Step 3 – Identifying the negative impact.

a. Is there any negative impact on individuals or groups in the community?

✓	<p>Barriers:</p> <p>What are the potential or known barriers/impacts for the different 'equality strands' set out below? Consider:</p> <ul style="list-style-type: none"> • Where you provide your service, e.g. the facilities/premises; • Who provides it, e.g. are staff trained and representative of the local population/users? • How it is provided, e.g. do people come to you or do you go to them? Do any rules or requirements prevent certain people accessing the service? • When it is provided, e.g. opening hours? • What is provided, e.g. does the service meet everyone's needs? How do you know? <p>* Some barriers are justified, e.g. for health or safety reasons, or might actually be designed to promote equality, e.g. single sex swimming/exercise sessions, or cannot be removed without excessive cost. If you believe any of the barriers identified to be justified then please indicate which they are and why.</p> <p>Solutions:</p> <p>What can be done to minimise or remove these barriers to make sure everyone has equal access to the service or to reduce adverse impact? Consider:</p> <ul style="list-style-type: none"> • Other arrangements that can be made to ensure people's diverse needs are met; • How your actions might help to promote good relations between communities; • How you might prevent any unintentional future discrimination. 		
Equality Themes	Positive Impacts	Negative Impacts identified	Solutions (ways in which you could mitigate the negative impact)
Age (including children, young people and older)	The scheme will assist all age groups who are below state	The statutory national scheme available for pensioners is of greater	Consider introducing Transitional Protection for those affected.

<p>people)</p>	<p>pension age who have a low income. This will include families with children.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support.</p> <p>We are retaining elements of the scheme that positively impact on young people, for example protection for single people under 25 who can get up to 88% of their council tax paid rather than 78% for those over 25.</p>	<p>financial benefit to the individuals concerned.</p> <p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition, some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard.</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the additional earnings disregards and could be affected by an average of loss of £2.62 per week.</p>	<p>We have a Discretionary Council Tax Hardship Policy</p>
<p>Disability</p>	<p>The scheme will assist those disabled people who have a low income.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

	<p>We are retaining elements of the scheme that positively impact on people with disabilities, for example disregard of disability related benefits and protection for disabled people who can get up to 88% of their council tax paid rather than 78% for those without a disability.</p>	<p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the addition earnings disregard and could be affected by an average of loss of £2.62 per week.</p>	
<p>Gender (men and women)</p>	<p>The scheme will assist people on a low income on an equal basis irrespective of gender.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>A higher proportion of women than men currently claim assistance due to receiving a low income.</p> <p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the addition earnings disregard and could be affected by an average of</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

		loss of £2.62 per week	
Race (including Gypsies & Travellers and Asylum Seekers)	<p>The scheme will assist people on a low income on an equal basis irrespective of their race.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the additional earnings disregard and could be affected by an average of loss of £2.62 per week</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>
Religion or belief (including people of no religion or belief)	<p>The scheme will assist people on a low income on an equal basis irrespective of their religious belief or if they have no religious belief.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

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<p>Gender Re-assignment (those that are going or have gone through a transition: male to female or female to male)</p>	<p>The scheme will assist people on a low income irrespective of whether they are going through or have gone through a transition.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the addition earnings disregard and could be affected by an average of loss of £2.62 per week</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>
<p>Pregnancy and Maternity</p>	<p>The scheme will assist people on a low income who are pregnant or on Maternity Leave.</p> <p>Working age claimants could be</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

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<p>Sexual orientation (including gay, lesbian, bisexual and heterosexual)</p>	<p>The scheme will assist people on a low income irrespective of sexual orientation</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the addition earnings disregard and could be affected by an average of</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

		loss of £2.62 per week	
Marriage and Civil Partnership	<p>The scheme will assist people on a low income irrespective of whether they are married or in a Civil Partnership.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p> <p>The maximum they could lose is £3.93 per week in council tax support.</p> <p>From the data we hold it is estimated that there are 198 households who receive the addition earnings disregard and could be affected by an average of loss of £2.62 per week</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>
Human Rights	<p>The scheme will assist all individuals meet their Council Tax liabilities if they have a low income.</p> <p>Working age claimants could be positively affected by slight increases in income as they wouldn't immediately receive a decreased amount of Council Tax Support</p>	<p>Working age claimants could be negatively affected by slight decreases in income. The decreases would not immediately increase the amount of Council Tax Support.</p> <p>In addition some customers who are receiving universal credit could be negatively affected by the removal of the additional earnings disregard</p>	<p>Consider introducing Transitional Protection for those affected.</p> <p>We have a Discretionary Council Tax Hardship Policy</p>

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Step 4 – Changes or mitigating actions proposed or adopted

Having undertaken the assessment are there any changes necessary to the existing service, policy, function or procedure? What changes or mitigating actions are proposed?

In response it is recommended that each household affected by loss of the additional earnings disregard is given transitional protection for one year by a one-off award equivalent to the reduction in their council tax support for the 2019-2020 billing year

Step 5 – Monitoring

How are you going to monitor the existing service, function, policy or procedure?

We intend to monitor the impact of introducing a minimum change rule by carrying out a short study between April and August 2019. We will focuss on the impact of the minimum change rule and whether there is an increased incidence of income decreasing rather than increasing and any differential impact from an equalities perspective.

Part C - Action Plan

Barrier/s or improvement/s identified	Action Required	Lead Officer	Timescale

Equality Analysis approved by:

Head of Service: 	Date: 17 December 2018
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Please send an electronic copy of the Equality Analysis to the Equality & Diversity Team: