

Guidance

Please read the [Equality and Consultation Analysis Guidance Note](#) for help in completing this form. For further information and support to complete this form, please contact – **equalities**: Jaspal Mann (Jaspal.Mann@coventry.gov.uk 024 7683 3112) or Wendy Ohandjanian (Wendy.Ohandjanian@coventry.gov.uk 024 7683 2939) in the Chief Executive's Policy Team; or for **consultation**: Helen Shankster (Helen.Shankster@coventry.gov.uk 024 7683 4371) in the Insight Team.

About the project

Project or review	Council Tax Support Scheme 2016/17
Service	Revenues and Benefits
Directorate	Resources

About the person completing this form

Name	Jaspal Mann and Wendy Ohandjanian
Role	Policy and Communities Officer
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Date section 1a completed	14/07/2015

Updated section 1a and 1b 17/11/2015

1. Provide brief details of the aims of the project / review

This Equality and Consultation Analysis is being carried out as part of the project to make changes to the Council Tax Support scheme for 2016/17. These changes are necessary as the Council considers ways to make additional savings in response to the decreased level of funding from central government over recent years. The amount needed to be saved is around £2.4 million and some potential options for requiring a contribution from working-age residents towards their Council Tax are being looked at as the new scheme is being developed. The four options are as follows:

Option 1 – make no change

Option 2 – excluding disabled residents from any reduction in council tax support and introducing a 20% reduction in support for the rest of the working age population in the city.

Option 3 – introducing a minimum 10% reduction in support with a taper of 40% on excess income.

Option 4 – introducing a universal 15% reduction in support for all working age people.

Under national rules governing support for pensioners (who make up approximately 40% of the caseload in the city) people of pension age will not receive any reduction in entitlement under the new scheme.

In developing ideas for a new scheme, the Council has been mindful of its existing responsibilities under the Child Poverty Act 2010, the Disabled Person Act 1986 and the Housing Act 1996 – as well as the public sector equality duty in the Equality Act 2010.

In addition to this, and in line with statutory guidance, the Council is required to undertake consultation firstly with major precepting authorities before consulting more widely on the revised scheme.

Attached as an appendix to this Equality and Consultation Analysis form is a more comprehensive analysis of claimant data for each of the three options outlined above.

In summary, this shows:

Option 2 – excluding disabled residents from any reduction in council tax support and introducing a 20% reduction in support for the rest of the working age population in the city. This option would result in more of an impact across the board for all non-disabled residents than the other options, in particular for those in work, couples, those with children (especially larger households) and those benefit capped.

Option 3 – Introducing a minimum 10% reduction in support with a taper of 40% on excess income. This option would have less of an impact on those out of work and those already subject to the benefit cap and a greater impact on couples, working claimants and working claimants with children.

Option 4 – Introducing a universal 15% reduction in support for all working age people. This option would have a fairly even impact across all equality groups, with a slightly higher reduction for couples and larger families. For this reason this option is preferred.

From an impact perspective **Option 4** is best.

Once implemented, the effects of the final scheme will need to be carefully monitored in order to track the impact on key protected groups in the city.

Please note that in the commentary below, the figures in brackets relate to the additional weekly council tax charge that would be made.

Impact on service users

2. What are the possible impacts of this project / review on the following groups?



Assess the impact of this project / review on people with the following [protected characteristics](#); and agreed local priority groups. Please summarise local service level data as evidence of any impact and also consider other local and national data or evidence. Under 'Mitigating Actions' outline briefly what actions you plan to put in place to lessen any negative impact on protected groups. Delete any of the characteristics below which do not apply.

Commentary / Analysis

Impacts / Mitigating actions

	Commentary / Analysis	Impacts / Mitigating actions
Age Option 2	<p>The average impact for this option is £2.59 per household.</p> <p>Those currently claiming support aged over 45 would have to pay less additional tax (£2.19 per week), compared to those aged 25 and under and those aged 26-45 (£2.88 and £2.84 respectively). This option therefore has greater impacts on those claimants aged 45 or younger.</p> <p>In terms of household impacts, those with children are the most affected (£3.11, rising to £3.57 for those with more than 5 children) compared with those without children (£1.98). It will also disproportionately affect those households that include working claimants who have dependent children the impact is also greater (£3.46)</p> <p>This is likely to be due to bigger size of the property and the larger Council Tax award to these families.</p>	<p>Positive impacts: Options 2, 3 and 4 will benefit Pensioners as they are exempt from the council tax reduction.</p> <p>Negative Impacts: Options 2, 3 and 4 will all have a potentially negative impact on children and young people and could contribute to increased child poverty. Younger people claiming council tax support are more vulnerable because they have less disposable income and are more likely to have a shortfall in their rent.</p> <p>Mitigations: Appendix 3 outlines the Council's discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases.</p>
Option 3	<p>This option is likely to have more impact on households where the claimant is aged 26-45 (£2.74), which is likely to be because this group is more likely to be in work.</p> <p>Out of all three options, this one has the least impact for households with five or more children (£2.75).</p>	
Option 4	<p>There will be more impact on larger families with 5 or more children (£3.08). This is due to bigger size of the property and the larger Council Tax award to these families.</p> <p>This option has the least variation in the size of impacts across age groups of the claimant. It also has the least variation between those with any children compared to those without children, although it would have a slightly greater impact for those with five or more children compared to option 2. There are currently approximately 400 households with five or more children claiming council tax support.</p>	

	Commentary / Analysis	Impacts / Mitigating actions
Disability	<p>Option 2 Disabled people would be protected from charges under this option. However, non-disabled claimants will be disproportionately impacted more (£3.09).</p> <p>Option 3 This option is more favourable than Option 4 for disabled people as they would pay marginally less (£2.05) than option 3 (£2.69).</p> <p>Option 4 This option will mean that disabled people pay 8 pence (£2.69) more than the median amount payable (£2.61) by the other characteristics</p>	<p>Positive impacts: Option 2 is better for all disabled people</p> <p>Negative impacts: In Option 4 the preferred option -Disabled people will have to pay 8 pence per week more than the average amount payable (£2.61) i.e. £2.69 in option 3</p> <p>Mitigations: Appendix 3 outlines the Council's discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases</p>

Commentary / Analysis

Impacts / Mitigating actions

Gender The analysis below only looks at the gender impacts for single adult households claiming support; it would not be meaningful to draw conclusions from data about couples where the lead claimant is female v's male.

It is worth noting that for each option, single females are impacted slightly more than single males. This is likely to be because single women are more likely to have dependents and therefore are more likely to be living in a larger property with a higher council tax banding. Hence additional charges that are calculated using percentages, will result in a higher £value.

Option 2

Single women will be impacted more (£2.59) than single men (£2.00) under this option.

Option 3

Single women will be impacted a lot more (£2.41) than single men (£1.89) under this option.

For single men, this option has the lowest impact, because this group is more likely to be out of work.

Option 4

Single women will be impacted slightly more at (£2.49) than single men (£2.33) under this option.

Gender Reassignment No data is available here to inform equality analysis

Positive impacts: None

Negative impacts: Single women are impacted more than single men under each of three options.

Mitigations: Appendix 3 outlines the Council's discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax.

The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases
Not applicable

	Commentary / Analysis	Impacts / Mitigating actions
Marriage/Civil Partnership	Households including couples are more likely to be living in a larger property with a higher council tax banding. Hence additional charges that are calculated using percentages, will result in a higher £value.	Positive impacts: none Negative impacts: Couples are impacted negatively under all three options in comparison with single people.
	Option 2 There will be a greater impact on couples under this option (£3.21) in comparison with single people (£2.40).	Mitigations: Appendix 3 outlines the Council’s discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council’s Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases
	Option 3 There will be a greater impact on couples under this option (£3.57) in comparison with single people (£2.24).	
	Option 4 This option will impact more on couples (£3.20) than on single people (£2.44)	

	Commentary / Analysis	Impacts / Mitigating actions
Race	<p>NB – data by ethnic group is not collected so firm conclusions in relation to equality impact cannot be drawn.</p> <p>Option 2 There will be more impact on larger families (£3.57) This is due to bigger size of the property and the larger Council Tax award to these families. Evidence suggests that certain ethnic groups have larger families and therefore particular ethnic groups may be more affected.</p> <p>Option 3 There will be no disproportionate impact on larger families from any ethnic group.</p> <p>Option 4 There will be more impact on larger families (£3.08) This is due to bigger size of the property and the larger Council Tax award to these families. Evidence suggests that certain ethnic groups have larger families and therefore particular ethnic groups may be more affected.</p> <p>In addition, although there is an equal household impact across all wards, the cumulative impact is highest across Foleshill, St. Michael's, Longford, Binley and Radford, which is because there are more people claiming council tax support in these areas. This correlates with a higher concentration of some ethnic groups within these wards.</p>	<p>Positive impacts: none</p> <p>Negative impacts: as data by ethnic groups is not collected as a primary source, no firm conclusions about negative equality impact have be drawn although it is perceived that there will be a negative impact due to evidence that suggests that many of the larger families are from certain ethnic groups in options 1 and 3</p> <p>Mitigations: Appendix 3 outlines the Council's discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases</p>
Religion/Belief	No data is available here to inform equality analysis by this protected group	Not applicable
Sexual Orientation	No data is available here to inform equality analysis by this protected group	Not applicable

	Commentary / Analysis	Impacts / Mitigating actions
<p>Looked After Children</p>	<p>No data is available here to inform equality analysis by this group</p>	<p>Not applicable</p>
<p>Carers</p>	<p>No data is available here to inform equality analysis by this protected group</p>	<p>Not applicable</p>
<p>Deprivation (e.g. income, educational attainment, worklessness)</p>	<p>Analysis generally shows equal household impact across all wards, but cumulative impact is highest in the areas of St. Michael's and Foleshill due to the fact that there are a higher number of claimants concentrated in these wards</p> <p>Option 2 This option will have a greater impact on those who are also subject to other impacts of welfare reform, including the benefit cap (£3.85)</p> <p>Option 3 This option is better than Option 1 or 3 for those people already subject to the Benefit Cap although they would still have to pay (£1.93) per week.</p> <p>However, this option would disproportionately impact on working claimants (£4.44) than claimants not in work (£1.93). In addition, there would be a disproportionate impact on working claimants with children under this option (£4.53)</p> <p>Option 4 Although all three options do not substantially impact any one ward, option 3 is seen to minimise any impact across wards</p> <p>However, this option would disproportionately impact on working claimants (£4.44) than claimants not in work (£1.93). In addition, there would be a disproportionate impact on working claimants with children under this option (£4.53)</p>	<p>Positive impacts: None</p> <p>Negative impacts: Option 2 will impact on those already subject to other impacts of welfare reform Option 4 will have more impact on those people already living in the most deprived wards of the city. Also, options 1 and 2 will have a more disproportionate impact on working claimants generally and working claimants with children than option 3. This is due to bigger size of the property and the larger Council Tax award to these families.</p> <p>Mitigations: Appendix 3 outlines the Council's discretionary relief policy which enables the Council to mitigate against the worst impacts of a reduction in support on a case by case basis. The discretionary policy is not restricted to households receiving council tax support and is open to all residents liable to pay council tax. The policy takes account of the individual financial circumstances of the tax payer rather than determining the protected group. The Council already has very strong links with a number of key partners across the City. There are a number of forums already in place (e.g, Working Together Group on welfare reform, liaison meetings between the Council, CAB, Law Centre and the Council's Enforcement Agents) these meetings can help to provide a new focus in tackling problems as they arise. The Council will continue to work closely with partner agencies to identify vulnerable people and signpost people to appropriate advice and support via a leaflet. The Council has a designated Money Management Advisor based within the revenues and benefits service who will help to provide advice and budgeting support in relevant cases</p>

3. Have you considered social value requirements as part of this project/review?

Not applicable

Impact on the workforce

4. How many staff belong to the protected characteristics?



Contact the HR Change Management Team (Marion O'Brien, Marion.O'Brien@coventry.gov.uk 024 7683 2454) for management information on the workforce affected by this project/review.

Not applicable

5. What are the likely impacts of this project / review on different groups of staff?

Not applicable

6. Do you plan to undertake formal consultation as part of this project?

Yes No

If no, why not?

7. Has a report to elected members been prepared in relation to this work?

Yes No


Web link to the report: Insert link to the report (usually <http://moderngov.coventry.gov.uk/>....).

Next steps

Please send this completed pre-consultation form to the Chief Executive's Policy Team: Jaspal Mann (Jaspal.Mann@coventry.gov.uk 024 7683 3112); or Wendy Ohandjanian (Wendy.Ohandjanian@coventry.gov.uk 024 7683 2939). This form will also be shared with Public Health, who will be in touch in relation to the impact of this project/review on health inequalities.


1b

Post-consultation

 **The section below should be completed following consultation.**

Name Wendy Ohandjanian
Date section 1b completed 17/11/2015

8. Update any equality impacts on service users listed in Part 1a question 2 following consultation.

 Reflect any new information that may have come to light during the consultation process. Under mitigating actions, identify the responsible Council officer or named person in an external provider responsible for completing the action and timescales involved.

9. What were the key findings from the consultation process?


See Appendix 1 Consultation Analysis Report

10. Have any of the preferred delivery options or service model(s) changed following the consultation?

Yes No

If yes outline what changes are to be incorporated

11. Update the workforce data tables in Part 1a question 4 as required.

 If no changes have been made, state 'no changes made'.

13. Following consultation, please indicate which of the following best describes the equality impact of this review/project.

- There will be **no** equality impact if the proposed option is implemented
- There will be **positive** equality impact if the proposed option is implemented
- There will be **negative** equality impact if the proposed option is implemented but this can be objectively justified

14. Will this form be used to compile a Programme Level Analysis (Part 2)?

Yes No

If yes, state the name of the programme: Enter the name of the programme.

15. Approvals from Director and Cabinet Member

Name
Director: Name of Director.
Cabinet Member: Name of Cabinet Member.

Date
Click here to enter date agreed.
Click here to enter date agreed.

16. Please detail below any committees, boards or panels that have considered this analysis.

Name	Date	Chair	Decision taken
Name of board.	Click here to enter meeting date.	Name of chair.	Decision made / link to report.
Name of board.	Click here to enter meeting date.	Name of chair.	Decision made / link to report.
Name of board.	Click here to enter meeting date.	Name of chair.	Decision made / link to report.

Next steps

Please send the completed form to the Chief Executive’s Policy Team: Jaspal Mann (Jaspal.Mann@coventry.gov.uk 024 7683 3112); or Wendy Ohandjanian (Wendy.ohandjanian@coventry.gov.uk)

Version control

Find the latest version on Beacon at <http://beacon.coventry.gov.uk/equalityanddiversity/>

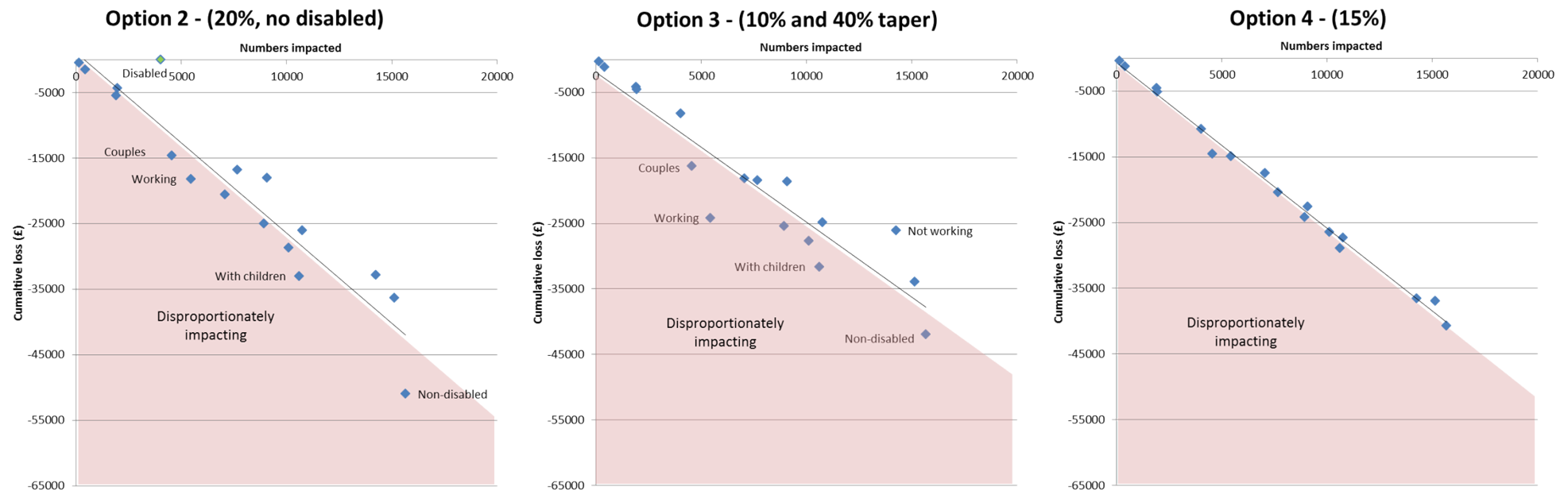
Version	Date	Summary of Changes (Author)
1.0.0	17 July 2014	Initial release (Jaspal Mann)
1.0.1	05 August 2014	Added protected characteristic of Disability under section 2 (Si Chun Lam)
1.0.2	05 May 2015	Jaspal Mann
1.0.3	20 th July 2015	Jaspal Mann/Wendy Ohandjanian

Council Tax Support Equality Analysis – Draft

Option 2– The impact of a **20%** reduction in Council Tax Support would result in from the reduction in Council Tax Support. However, other claimants will have a disproportionate impact, especially those working, couples, those with children (larger households), those benefit capped and generally all non-disabled households.

Option 3 – The impact of a **10%** reduction and an increase in the taper to 40% in Council Tax Support would result in a reduced impact on those who are out-of-work. However, it would have a greater impact on working households, couples, those with children and non-disabled households claiming Council Tax Benefit Support.

Option 4 - The impact of a **15%** reduction in Council Tax Support would result in a relatively **even impact** across all equality groups, with only a slightly higher reduction for couples and large families (most probably due to them living in larger houses/higher CT band).



Note: the following analysis has used the latest Housing Benefit and Council Tax Benefit download (19th June 2015) and mapped this to the previously modelled data. Due to movement on and off this database 4,992 claimants who are currently claiming HB/CTB were not included in the modelled data; also those previously claiming at the time of modelling and not currently on the database will be excluded. 12,431 elderly claimants are also excluded as they are protected.

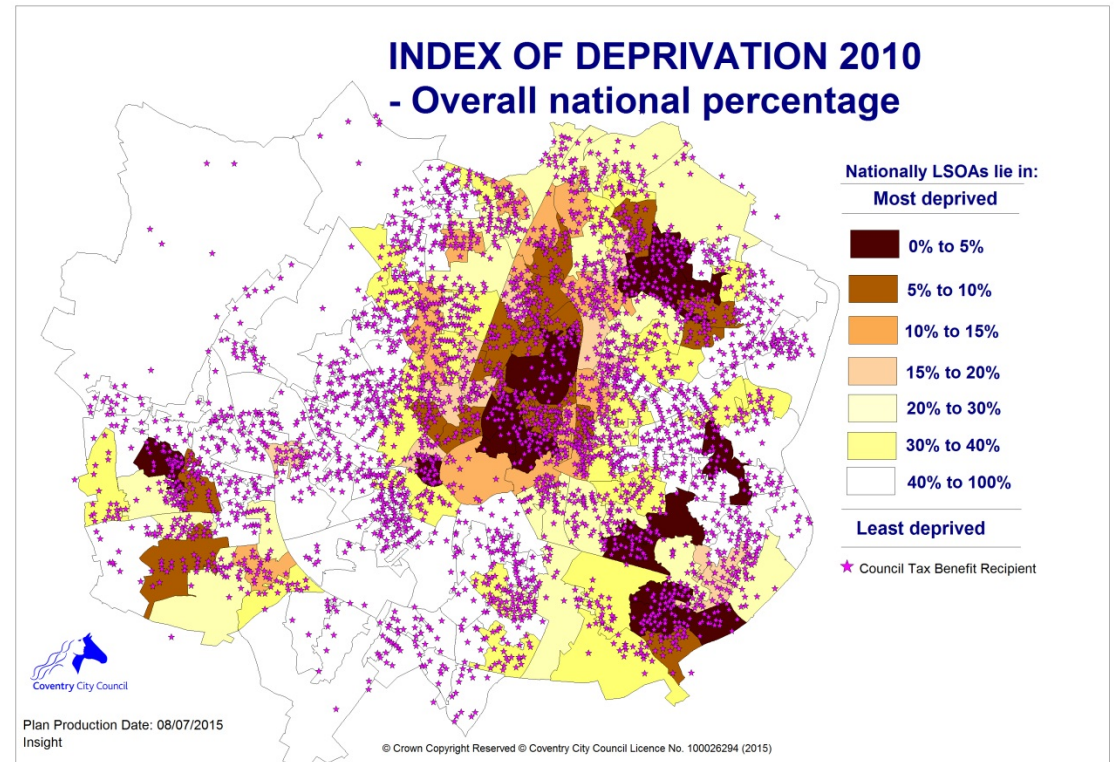
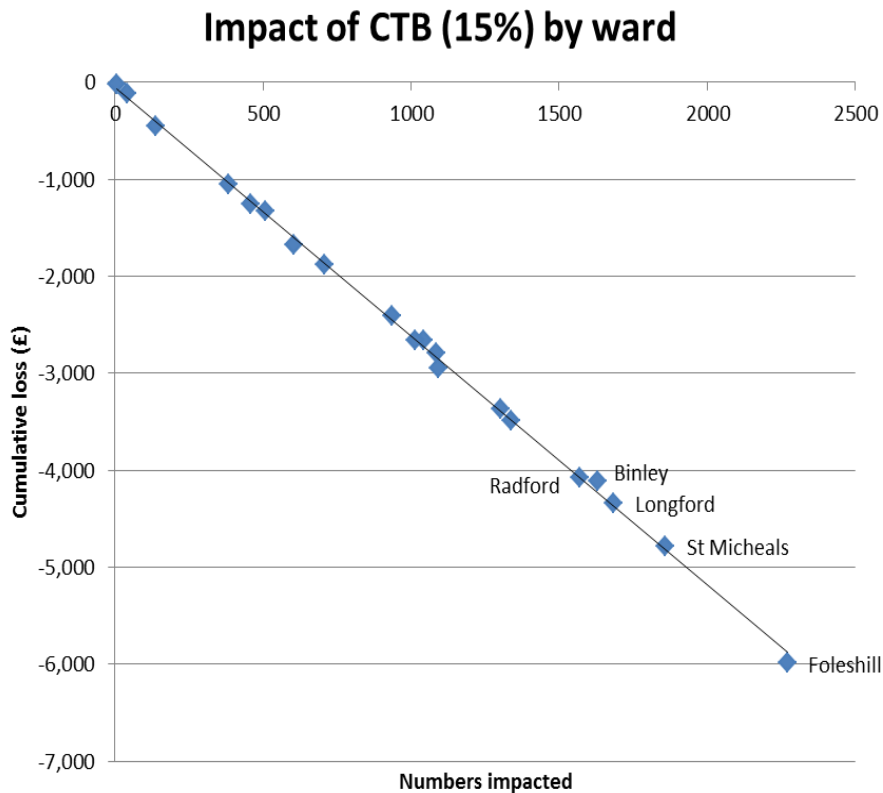
The following table highlights the current proportion of claimants who do not pay any Council Tax, i.e. all of their Council Tax payments at present are covered by Council Tax Benefit Support. This ranges from only 37% of households claiming Council Tax Support who are in work to 98% of those households who are already impacted by the Benefit Cap.

Weekly reduction			Option 2 Disabled protected 20% reduction		Option 3 10% reduction and 40% levy		Option 4 15% reduction		
	Numbers impacted	Proportion who pay no CT	Average loss per House Hold	Total impact on groups	Average loss per House Hold	Total impact on groups	Average loss per House Hold	Total impact on groups	
Age	Pensioners	Protected							
	25 and under	1,894	85%	-£2.88	-£5,452	-£2.16	-£4,098	-£2.38	-£4,517
	26-45	10,091	75%	-£2.84	-£28,672	-£2.74	-£27,653	-£2.62	-£26,449
	46-65	7,655	81%	-£2.19	-£16,738	-£2.40	-£18,345	-£2.66	-£20,381
Disabled	Yes	4,013	93%	Protected		-£2.05	-£8,235	-£2.69	-£10,790
	No	15,654	74%	-£3.09	-£50,951	-£2.68	-£41,923	-£2.60	-£40,632
Couples	Yes	4,548	68%	-£3.21	-£14,622	-£3.57	-£16,257	-£3.20	-£14,561
	No	15,119	81%	-£2.40	-£36,328	-£2.24	-£33,901	-£2.44	-£36,860
Single	Women	10,278	77%	-£2.59	-£26,644	-£2.41	-£24,764	-£2.49	-£25,563
	Men	4,836	90%	-£2.00	-£9,684	-£1.89	-£9,121	-£2.33	-£11,285
Children	Yes	10,602	71%	-£3.11	-£33,006	-£2.98	-£31,609	-£2.72	-£28,866
	No	9,065	87%	-£1.98	-£17,945	-£2.05	-£18,548	-£2.49	-£22,556
	5 or more	406	81%	-£3.57	-£1,450	-£2.75	-£1,116	-£3.08	-£1,249
	Lone parents	7,051	74%	-£2.91	-£20,518	-£2.56	-£18,081	-£2.48	-£17,465
Working	Yes	5,433	37%	-£3.34	-£18,145	-£4.44	-£24,104	-£2.75	-£14,914
	No	14,234	94%	-£2.30	-£32,806	-£1.83	-£26,054	-£2.56	-£36,507
	Yes and children	4,408	39%	-£3.46	-£15,235	-£4.53	-£19,963	-£2.81	-£12,425
RSL	Yes	10,747	83%	-£2.42	-£25,984	-£2.30	-£24,762	-£2.54	-£27,247
	No	8,920	73%	-£2.80	-£24,966	-£2.85	-£25,396	-£2.71	-£24,175
Welfare reform	Under- occupied	1,934	84%	-£2.20	-£4,262	-£2.34	-£4,517	-£2.61	-£5,048
	Benefit cap	124	98%	-£3.85	-£477	-£1.93	-£239	-£2.89	-£358
TOTAL		19,667	78%	-£2.59	-£50,951	-£2.55	-£50,158	-£2.61	-£51,421

Ward analysis

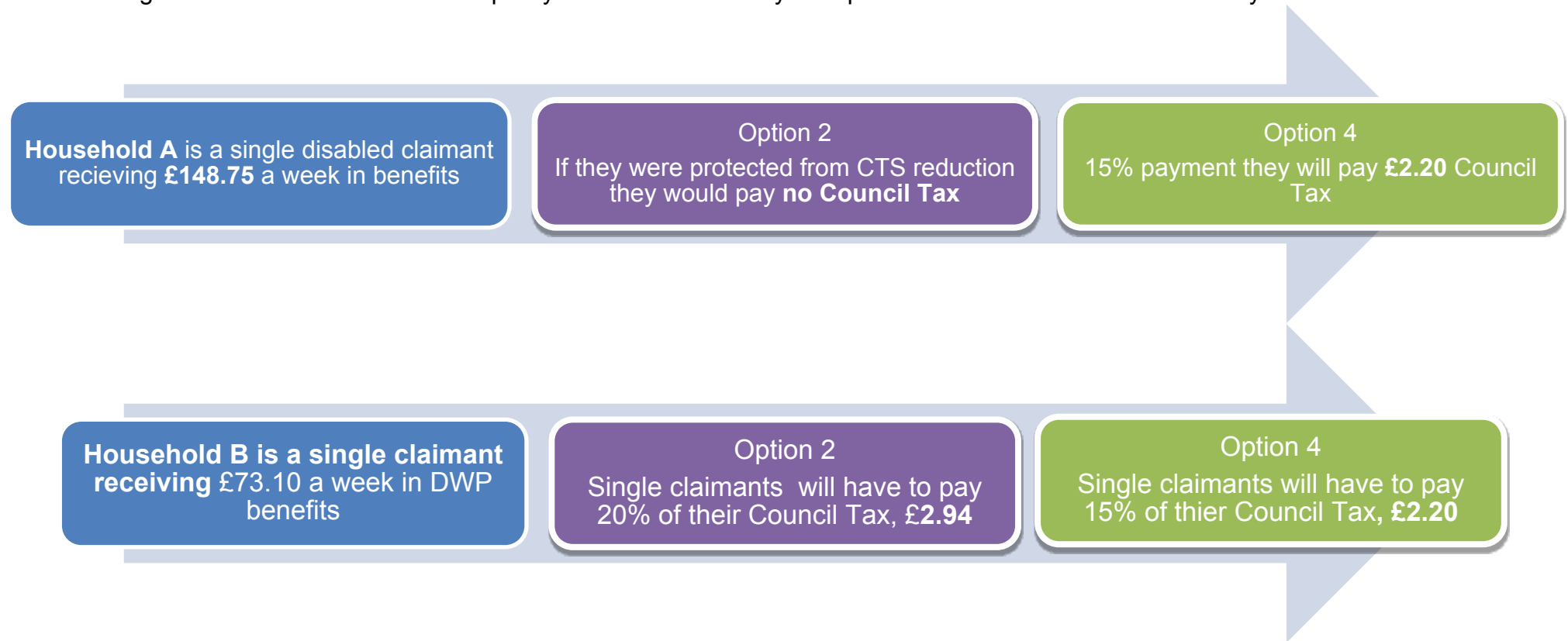
Additional analysis on the impact by ward shows equal household impact across all wards, but the cumulative impact is highest across the following areas, due to these areas of deprivation having more claimants of Council Tax Support households; Foleshill, St Michaels, Longford, Binley and Radford.

Option 4 – 15% Council Tax Support reduction is illustrated below highlighting the cumulative effect in these areas of deprivation.



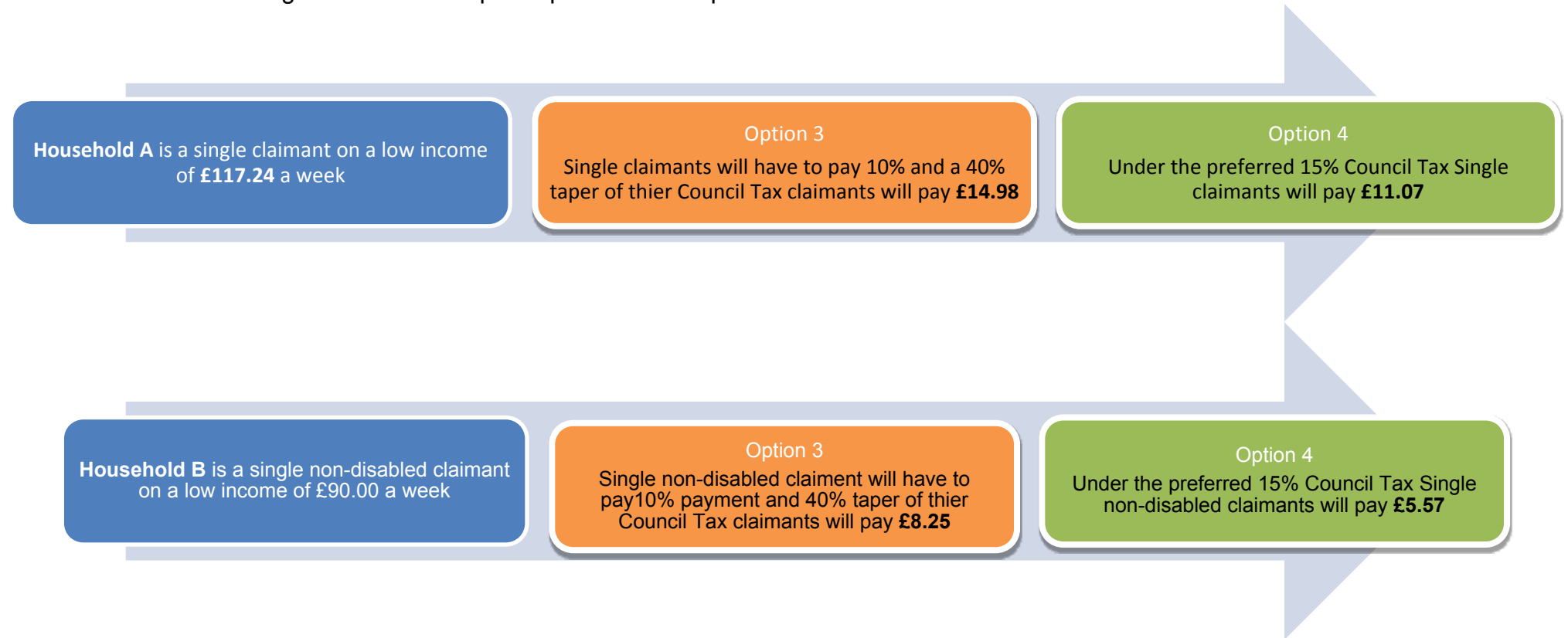
Case studies

Option 2 compared with Option 4 - protecting disabled households and implementing a higher reduction of 20% across all other households is not preferred due to its severity of impact on other groups and inequality in income levels against Council Tax payments. For working age people who are claiming benefit from the Department for Works and Pensions, disabled people are entitled to the same basic level of DWP benefit as non-disabled people. However, people with disabilities receive extra benefit based on the level and nature of their disability and this extra benefit is awarded to help them with their day to day support needs. Therefore, in Option 3 the impact will be the same as it would for a non-disabled person, as the extra benefit they receive for their disability will not be affected. The following case studies illustrate this inequality in income and ability to cope with an additional Council Tax Payment



Option 3 compared with Option 4

The 15% reduced is preferred over a 10% reduction and 40% taper because it is believe the impact of this would be too great on working households. The following case studies help to represent this impact.



Version – 03/12/15