



Equality Impact Assessment

Localisation of Council Tax Support

Equality Impact Assessment

General Information		
1.	Title of strategy, policy, plan, project, contract, major change in service or decision:	Localisation of Council Tax Support
2.	What is the objective or purpose of the strategy, policy, plan, project, contract, major change in service or decision?	As part of the welfare reforms being implemented by the Government, the City Council is required by law to administer a local council tax support system in the form of a Council Tax Reduction Scheme. This will replace Council Tax Benefit, which is a national Social Security benefit that is administered locally, but governed nationally.
3.	Who will be affected by this strategy, policy, plan, project, contract, major changes in services or decision?	<div> <input checked="" type="checkbox"/> Residents <input type="checkbox"/> Visitors <input checked="" type="checkbox"/> Staff </div> <div> A specific client group or groups (please state): People of working age, i.e. those who have not reached the qualifying age for State Pension Credit. </div>
4.	What type of strategy, policy, plan, project, contract, major change in service or decision is this?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Revised <input type="checkbox"/> Existing
5.	Responsible department, section, service manager and Head of Service.	Department: Customer and Community Services Section: Revenues and Benefits Service Manager: Alison Cole Head of Service: Alison Cole

6.	Are other departments or partners involved in delivering this strategy, policy, plan, project, contract, major change in service or decision?	<input type="checkbox"/> No <input checked="" type="checkbox"/> Yes (please give details): <p>Customer Service Centre, Strategic Housing, City Homes, Legal, Audit – internal and external, neighbouring local authorities / precepting authorities, social care, voluntary support agencies, landlords and registered providers of social housing.</p>
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Gathering Performance Data

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| 7. | How do you (or how will you) monitor the impact of the strategy, policy, plan, project, contract, major change in service or decision? | <input checked="" type="checkbox"/> Performance indicators/targets
<input checked="" type="checkbox"/> Benchmarking with other organisations
<input type="checkbox"/> User satisfaction survey results
<input checked="" type="checkbox"/> Consultation results
<input checked="" type="checkbox"/> Complaints information
<input type="checkbox"/> Freedom of Information requests
<input checked="" type="checkbox"/> Service uptake data
<input type="checkbox"/> External verification e.g. inspection results, views of organisations representing equalities groups
<input type="checkbox"/> Staff survey results
<input checked="" type="checkbox"/> Workforce monitoring data
<input checked="" type="checkbox"/> Partnership consultation
<input type="checkbox"/> Other (please state:) |
|----|--|--|

8.	Which of the equalities groups does this monitoring data relate to?	<input checked="" type="checkbox"/> Age <input checked="" type="checkbox"/> Disability <input checked="" type="checkbox"/> Gender/transgender (<i>inc gender re-assignment, pregnancy and maternity</i>) <input type="checkbox"/> Marriage and Civil Partnership <input checked="" type="checkbox"/> Race <input type="checkbox"/> Religion/belief <input type="checkbox"/> Sexual orientation <input type="checkbox"/> None	<p>Other factors that may lead to inequality e.g. social class, income or financial exclusion, children in care, ex-offenders (<i>please state</i>):</p> <p>Income</p> <p>If you collect different monitoring data for different groups for different aspects of your service please give details here:</p>
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Analysing Performance Data

		Same impact	Not same impact	Positive (P)/ / Negative(N)	Insufficient evidence	
9.	Using the monitoring information that you have or will be collecting, please indicate if the impact of the strategy, policy, plan, project, contract, major change in service or decision is/is likely to be the same for the equalities groups as it is for the population or the workforce as a whole.	Age	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Disability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Gender (<i>Inc pregnancy and maternity</i>)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Transgender (<i>inc gender re-assignment</i>)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Marriage and Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Race	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Religion/belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		Sexual orientation				
		Other factors that may lead to inequality (please state):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
		1. Income	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
		None				

		Equalities Group Affected	What the potential negative impact is	Evidence of potential negative impact if there is any.
10.	<p>List and explain any negative impacts identified in Qu 9. State which equalities group is/may be affected, what the negative impact is/may be and give details of any evidence of this impact/potential impact e.g. document titles, web links.</p> <p>If you have no evidence of the negative impact but believe it may exist, please say so.</p>	<p>The scheme is still being drafted and the impact on different equalities groups will depend on the details of the final scheme.</p> <p>Appended to this form is further information about the potential impact on different groups. This assessment will continue to be refined as a draft scheme is produced and in light of the results of our consultation.</p>	<p>Overall it is likely that people from all equalities groups will receive less financial support in the future, with the exception of older people because the Government have set out specific protections for them.</p> <p>Regardless of the details of the final scheme, there is a risk that people may not understand the changes that are happening and how they will be affected.</p>	<p>It is likely that the final scheme will result in reductions of between 18% and 25% in the amount of financial support that individuals receive.</p>
11.	<p>Are or will people from equalities groups take up services associated with the strategy, policy, plan, project, service, contract, major change in service or decision at the same rate as the population or the workforce as a whole?</p>	<p><input checked="" type="checkbox"/> Yes - People from certain equality groups are likely to take up the service at a higher rate than the population as a whole, because the welfare state provides support to targeted groups.</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Insufficient evidence</p>	<p>If no, please provide details....</p>	

12.	<p>Is your strategy, policy, plan, project, service, contract, major change in service or decision likely to exclude or disadvantage equalities groups in the longer term?</p>	<p> <input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Insufficient evidence </p> <p>The scheme is still being drafted, so it is difficult to say at this point. In addition, the wider welfare reforms may make quantifying the long-term impacts difficult.</p> <p>The scheme will be reviewed annually and it is at the end of the first year that the longer-term impacts will start to become clearer.</p> <p>In the longer-term, a reduction in the dependency upon the welfare state and an increase in the take up of work may have a positive affect on health and well-being.</p>	<p>If yes, please indicate which groups will be affected and what the impact will be...</p>
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Checking Delivery Arrangements						
			Yes	No	Insufficient evidence	Reason
13.	<p>Please check the delivery arrangements for the strategy, policy, plan, project, service, contract, major change in service or decision against these criteria:</p> <p>If you answered no to any of the criteria, please explain why, giving details of any legal justification if there is one...</p>	<p>Are any premises involved accessible to all?</p> <p>Is any ICT software and equipment accessible to all?</p> <p>Is consultation and participation inclusive of all?</p> <p>Are public events and meetings accessible to all?</p> <p>Do public meetings and events avoid conflict with religious events?</p> <p>Is electronic, web based and paper information accessible for all?</p> <p>Are images and text in documents and publicity campaigns representative of all?</p>	<p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input checked="" type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input checked="" type="checkbox"/></p> <p><input type="checkbox"/></p> <p><input type="checkbox"/></p>	<p>New software is being developed.</p> <p>The dates are to be arranged.</p>

Conclusions and Next Steps		
14.	a) The evidence has not identified any disadvantages or negative impacts.	
	b) The evidence indicates that there are no disadvantages or negative impacts that cannot be easily addressed.	
	c) It has not been possible to say whether or not there is a disadvantage or negative impact e.g. there is insufficient evidence.	Go to Question 15.
	d) The evidence indicates potential disadvantages or negative impacts that cannot be easily addressed.	

Gathering additional information

15.	What additional evidence are you going to gather?	<input checked="" type="checkbox"/> Advice from experts <input checked="" type="checkbox"/> Demographic profile e.g. Census <input type="checkbox"/> Existing consultation results <input checked="" type="checkbox"/> Existing user data <input checked="" type="checkbox"/> External verification e.g. expert views of people/organisations representing equality group(s) <input checked="" type="checkbox"/> Local needs analysis e.g. Joint Strategic Needs Assessments <input checked="" type="checkbox"/> National best practice information e.g. Audit Commission reports <input checked="" type="checkbox"/> New consultation with a specific equality group(s) <input checked="" type="checkbox"/> Research reports <input checked="" type="checkbox"/> Relevant staff group expertise	Other (<i>please state</i>): Mapping Poverty
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16.	If you have any additional comments please add them here.	
Completion		
17.	Name and job title of assessment lead officer:	Naomi Armstrong
	Date of completion:	17 July 2012
	Names of other assessment team members and people consulted:	Kim Larkin, Chris Williams
	Date of next review of the EqIA	Prior to publishing the draft scheme.

ACTION PLAN

Equality Impact Assessment Title:

Date:

Equality Group	Details of possible disadvantage or negative impact	Action to be taken to address the disadvantage or negative impact	Officer responsible for progressing the action	Date action to be completed by
Age				
Disability				
Gender/Transgender <i>Inc gender reassignment and Pregnancy and Maternity</i>				
Marriage and Civil Partnership				
Race/ethnicity				
Religion or belief				
Sexual orientation				
Other factors that may lead to inequality				

Name and Job Title of Officer completing the Action Plan:

Department/Service:

This plan will next be updated (*Please give date*):

Appendix A: Vulnerable Groups – Impact Assessment

This report is an attempt to identify all groups of persons in CCC that may be defined as vulnerable for the purpose of the localisation of council tax support and the making of a localised council tax reduction scheme.

Groups for consideration

Children

With regard to The Child Poverty Act 2010, Cambridgeshire's Child Poverty Needs Assessment of June 2011 identified that child poverty in CCC is decreasing whilst in Cambridgeshire as a whole it is increasing

The Government's review of child poverty reports that what happens in the first five years of a child's life has a significant impact on that child's lifetime opportunities.

The new approach being taken by the Government is that "work, not welfare" is the best route out of poverty for those who are able to work. By bringing the work ethic back into families increases social mobility, well-being, mental and physical health. Children of working parents are more likely to go into work after leaving education.

However, according to the Institute for Fiscal Studies the changes to benefits, tax and tax credits announced in the budget are regressive, and are likely to have a significant impact on the most deprived households, and may increase levels of child poverty

There is clearly a conflict between protecting a child's family income be that from state benefits and incentivising people to go into work through decreasing the levels of welfare benefits

A DWP study concludes that the "small role currently played by work retention and progression in reducing the likelihood of poverty for families with children leaves considerable scope for improvements in advancements within work to help lift working parents and their children out of poverty". Underneath this conclusion it examines the different groups involved, showing that –

- 65% of families move out of poverty when a parent *enters* work, with 46% being in poverty the month after *exiting* work – although the effects of entering work on poverty are less positive for –
 - mothers' in couples entering work
 - lone mothers
 - people with fewer qualifications
 - non-owner occupiers

- people who have been out of work for longer
- people not working full time.
- The poverty rate of lone mothers entering work declines substantially more (from 37% to 18%) than for other groups over the first 3 years of work. But 59% of working lone mothers will enter poverty again at some point during the three years – the highest proportion of any group
- Out of the factors considered, work retention only reduces the risk of poverty for lone mothers

The Cambridgeshire Child Poverty Needs Assessment concludes that –

“The welfare system creates a trap and the incentives to leave benefits through work are insufficient to overcome the short term issues which arise”

“A focus on worklessness and skills is the most appropriate way to tackle the long-term impact of child poverty”

Source: [Cambridgeshire Child Poverty Needs Assessment 2011](#)

The decision to be made is whether to classify as vulnerable claimant's with children who are –

- five years of age and under, or
- receiving free school meals, whatever their age, or
- disabled, whatever their age

The above conclusions would suggest that protecting all families with children 5 years and under or all those receiving free school meals is not in keeping with the latest Government approach on child poverty

Young People

Young people between the ages of 18 – 24 are amongst the hardest hit by the current recession's impact on employment opportunities, particularly in rural areas.

Cambridge CC is, however, a regional centre of employment that is relatively affluent with a resilient economy that has higher value industries.

The most vulnerable people within this age group are those that have left local authority care; indeed the current HB scheme makes extra provision for a person who is 21 years or under and has a history of social care.

It is also this group of people who are most vulnerable to becoming homeless

The decision to be made is whether to define a person who is 21 years or under and has a history of social care as vulnerable for the purposes of a council tax reduction?

Disabled

It is a duty to protect those who are incapable of work, in general this means people who are receiving or have an underlying entitlement to a disability benefit, such as –

- Constant Attendance Allowance
- Disability Living Allowance Care
- Disability Living Allowance Mobility
- Employment and Support Allowance – Support Component
- Employment and Support Allowance - Work-related Activity Component
- Exceptionally Severe Disablement Allowance
- Incapacity Benefit
- Industrial Diseases Benefit
- Industrial Injuries Benefit
- NHS Injury Benefit
- Severe Disablement Allowance
- The Trusts –
 - The Eileen Trust and The Fund - to assist people infected with HIV through NHS blood products, other than where the infected person has haemophilia, and

- The Independent Living Fund, The Independent Living (Extension) Fund and The Independent Living (1993) Fund - to assist severely disabled people live independently, and
- The London Bombings Relief Charitable Fund - to assist victims of the London bombings on 7th July 2005, and
- The Macfarlane Trust, The Macfarlane (Special Payments) Trust and The Macfarlane (Special Payments) (No 2) Trust - to assist people with haemophilia who are infected with HIV through NHS blood products, and
- The Skipton Fund - to assist people infected with hepatitis C through NHS blood products, and
- The Caxton Foundation - to assist certain people infected with hepatitis C
- v Creutzfeldt-Jacob Disease Trust
- War Disablement Pension

The decision to be made is whether to define a person who receives any of the above as vulnerable for the purposes of a council tax reduction, or to restrict the criteria to those receiving only specified benefits?

Registered Blind

It is recommended a person who is registered blind be considered as vulnerable in all cases as a person who is blind will have difficulty adapting to new surroundings should he need to move

Carers

It is recommended that those receiving Carer's Allowance be considered as vulnerable because there is little or no prospect of working whilst their caring duties continue.

If carers are forced to go into work and give up their caring duties this could place an unacceptable burden on the Council's Social Services Dept.

Pregnancy

Women who are pregnant and have worked during a relevant period may be entitled to either Maternity Allowance (MA) or Statutory Maternity Pay (SMP) from the 39th week of pregnancy. However a woman who is unemployed and who has not worked during the

relevant period is required to sign- on for work to receive Jobseekers Allowance (JSA) or if medically unfit for work during the pregnancy a claim for Employment and Support Allowance (ESA) may be made.

Where JSA is in payment, it ends for the period starting six weeks before the expected date of confinement (EDC) when ESA will be paid until 14 days after the birth

This demonstrates that women in pregnancy are not automatically treated as incapable of work until very close to the EDC, despite those who are unemployed during pregnancy being unlikely to find work until after the birth.

The decision to be made is whether women in pregnancy are afforded any extra protection under the local scheme and if so is there any differentiation between those who are unemployed and those who are receiving full maternity benefits?

Vulnerable Groups – Impact Assessments

This report is an attempt to identify all groups of persons in Cambridge City that may be defined as vulnerable for the purpose of the localisation of council tax support and the making of a localised council tax reduction scheme.

Groups for consideration

Children and young people

The decision to be made is whether to classify people with children –

- who are five years of age and under, or
- whatever their age, or
- receiving free school meals, whatever their age, or
- who are disabled, whatever their age,

as vulnerable or not?

With regard to The Child Poverty Act 2010, Cambridgeshire's Child Poverty Needs Assessment of June 2011 identified that child poverty in Cambridge City is decreasing whilst in Cambridgeshire as a whole it is increasing.

The Government's review of child poverty reports that what happens in the first five years of a child's life has a significant impact on that child's lifetime opportunities.

The new approach being taken by the Government is that "work, not welfare" is the best route out of poverty for those who are able to work. By bringing the work ethic back into families increases social mobility, well-being, mental and physical health. Children of working parents are more likely to go into work after leaving education.

However, according to the Institute for Fiscal Studies the changes to benefits, tax and tax credits announced in the budget are regressive, and are likely to have a significant impact on the most deprived households, and may increase levels of child poverty.

There is clearly a conflict between protecting a child's family income, be that from state benefits, and incentivising people to go into work through decreasing the levels of welfare benefits.

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Young Persons’

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Cambridge City is, however, a regional centre of employment that is relatively affluent with a resilient economy that has higher value industries.

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