

MID SUSSEX DISTRICT COUNCIL

Appendix D - Equality Impact Assessment

Title of Policy/Service/Contract: **CHANGES TO THE EXISTING COUNCIL TAX SUPPORT SCHEME FOR 2020/21 AND THE INTRODUCTION OF A BANDED INCOME APPROACH**

Division: Corporate Resources – Revenues and Benefits

Lead Officer: Kevin Stewart

Date Assessment completed: 25 July 2019 – (revised December 2019)

1. SCOPING

1.1 What are the aims of the policy, service/service change or contract?

The Council Tax Benefit scheme (CTB) was abolished by the Welfare Reform Bill with effect from April 2013. This was replaced with a local Council Tax Support Scheme (CTS). The Council introduced a CTS scheme in the first year that mirrored the previous CTB system.

From the 1 April 2014 the Council introduced a new Council Tax Support Scheme that for people of working age saw a baseline of 39%. Apart from protected vulnerable groups everyone of working age, even those on Benefits, had to pay at least 39% towards their Council Tax.

The Council's original overall budget for CTS had been cut by Central Government with further cuts experienced over the last four years and confirmed to continue. It is for local councils to determine how to manage any funding gaps and any cuts can only be made to a CTS scheme for working age recipients. This is due to the strict guidelines from government to ensure support for pensioners' remains at the same level as previously applied with CTB. This is delivered through a national framework of criteria and allowances. The current MSDC scheme is fully covered from Government grant and as a result there is no contribution from MSDC taxpayers towards the scheme.

The Government is also continuing with a national programme of welfare reform and it is appropriate to consider whether some of the changes to other welfare systems should be reflected in the Council's local CTS.

Mid Sussex District Council needs to annually review its CTSS. The scheme must be set each year by 11th March. Any proposed changes must be fully consulted on.

1.2 Who does the service/policy/contract affect? Who are the main customers (internal or external)?

The main stakeholders are:-

- Existing CTS Recipients
- Council Tax Payers
- DWP
- Citizens Advice

- Housing Associations
- Community Groups and Voluntary Sector
- Precepting Authorities
- Elected Members
- Staff

1.3 What equality information is available, including any evidence from engagement and analysis of use of services?

Every applicant making a claim for Council Tax Support provides the following personal information:

- The date of birth and sex of each person in the household
- The income of each person in the household including non-dependents
- The capital of each person in the household
- Whether the person has a disability
- Whether the person is in a same sex relationship

The draft scheme has been subject to a consultation exercise including an on-line survey on the Council's website and a stakeholder forum comprising Citizens Advice, the local Job Centre, foodbanks and social landlords. Also, the other precepting authorities of West Sussex County Council and the Sussex Police and Crime Commissioner's Office. The current recipients of Council Tax Support identified as being worse off under the scheme by more than £6 per week were also targeted for their views. Overall there were 7 respondents all of whom were White British, with 2 registered disabled.

The results of the consultation were to broadly support the proposed changes to the Scheme.

1.4 What does this information tell us about the equality issues associated with the service and implications for the protected groups?

Unless the CTS recipient is in one of the groups below:-

- a disability premium within Council Tax Support or Working Tax Credit
- the support group of Employment support allowance
- DLA or PIP
- Both Income Support and Carers allowance
- A War Disablement Pension
- Or any lone parent with a child under 5 years old

They will pay at least 40% towards their Council Tax.

1.5 Are contractors or partnerships used to deliver the service? No

If No go to section 2.

If yes, please refer to the guidance notes for completing impact assessments and complete the next three questions.

Identify the contractors/partnerships used to deliver the service.

What is their contribution to equality in service delivery and the promotion of equality?

How are equality issues addressed through contractual arrangements and service level agreements?



2. Assessment of Impact; Analysis and Action Planning

Any gaps in information or provision, opportunities to promote equalities and good relations identified above need to be translated into SMART actions and recorded here. These actions need to be delivered and monitored through the service planning process.

Opportunity to promote equality, good relations and/or address barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
The needs of different ethnic groups including white minorities, but also established white communities				
None identified.				
The needs of men and women. Including taking account of pregnancy and maternity.				
None identified.				
The needs of disabled people				
Issue of treatment of people with a disability in the scheme.	<p>Disability benefit income is disregarded in full when calculating entitlement. Higher allowances are awarded when calculating support for those receiving disability benefits.</p> <p>Our scheme has a hardship fund that provides a safety net so that additional support can be provided for those in exceptional need.</p> <p>We have a track record of providing proactive and tailored support for those working age customers who struggle to make payments.</p> <p>We will continue to ensure our recovery procedures</p>	<p>The disabled people of Working age will be identified in a specific vulnerable group and if their circumstances allow will qualify for maximum Council Tax Support. No further specific negative impact is identified for those with disabilities.</p> <p>No further action required apart from monitor.</p>	Kevin Stewart	Any impact will be monitored and action taken as appropriate.

	identify cases where additional support might be required.			
The needs of people with a religion or belief				
None identified.				

Opportunity to promote equality and/or barriers to service/differential impact	Current action taken to address these	Further actions required and timescales	Lead Officer	How will impact be measured
The needs of gay men, lesbians, bisexuals and heterosexual people				
None identified.				
Issues from marriage and civil partnership				
None identified.				
The needs of different age groups, for example older and younger people				
Differential impact of the scheme between people of pension age and those of working age.	<p>People of pension age are protected and will not be subject to change under the new scheme.</p> <p>Could incentivise people back into work as earnings disregards and extended payments apply.</p> <p>Our scheme has a hardship fund that provides a safety net so that additional support can be provided for those in exceptional need.</p> <p>We have a track record of providing proactive and tailored support for those working age customers who struggle to make payments. We will continue to ensure our recovery procedures identify cases where additional support might be required.</p>	<p>The scheme will discriminate on the grounds of age because of the Central Government requirement to protect pensioners. The National Pensioner Scheme treats them more favourably because allowances are more generous and 100% maximum support applies where entitled.</p> <p>Working age people receive less CTS unless they are in a designated vulnerable group therefore have more Council Tax to pay.</p>	Kevin Stewart	Any impact will be monitored and action taken as appropriate.
The needs of transgender communities				
None identified.				
The needs of people who are disadvantaged by socio-economic factors such as low incomes, skill or living in a deprived area				
This is a means tested benefit which is designed to assist people on low incomes. We need to ensure people on low incomes are not adversely affected	This is a means tested benefit which is designed to assist people on low incomes	All people in the working age group unless in a specified vulnerable group who currently receive CTS will pay at least 40% of their	Kevin Stewart	The impact has already been assessed as part of the scheme – see

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by the scheme		Council Tax. We can continue to offer extra assistance outside of the Council Tax Support scheme through the use of the Section 13A hardship fund for people on low incomes who may be adversely affected.		Appendix A of the report
The needs of people who live in a rural area				
None identified.				

3. Mid Sussex District Council Equality Impact Assessment Summary

Key Findings	Future Actions
<ul style="list-style-type: none"> • All people in the working age group unless in a specified vulnerable group who currently pay CTS will pay at least 40% Council Tax. • It is a specific scheme that unless identified above does not differentiate between people in the district. • Very few people in a vulnerable group will be greatly disadvantaged by the introduction of the new scheme. • A Section 13A Hardship Fund is available to help people in need of further financial help. 	<ul style="list-style-type: none"> • No actions apart from continuing to make Section 13A Hardship Fund available. • Implement the scheme with protections as detailed in the report

4. Signing off this assessment and action plan

SignatureKevin Stewart.....
 Person undertaking the assessment

Date9 December 2019.....

Signature
 Head of Service

Date

Please send your completed impact assessment to Neal Barton for publication on the website.