

Equality Analysis (EA)

Financial Year
2016/74

Section 1 – General Information (Aims and Objectives)

See Appendix
A

Current decision
rating



Local Council Tax Reduction Scheme Report

In April 2013 the Government replaced the national Council Tax Benefit scheme with a requirement for each local authority to develop its own Local Council Tax Reduction Scheme (LCTRS). At the same time, the Government reduced its funding contribution to Local Authorities nationally by £500 million (10%) and put in place mandatory protections for some groups of recipients such as Pensioners. The cost of the current LCTRS scheme is around £26.5m with £19m supporting 22,551 working age households and £7.5m supporting 8,920 pensioner households.

Councils have discretion over their own LCTRS within certain constraints; the Government requires pensioner households in receipt of LCTRS to be protected, but councils can determine the level of support provided for working age households. The current Tower Hamlets LCTRS also includes protection for war widows.

Any number of schemes could be considered when designing a Local Council Tax Reduction scheme although there is clearly a balance between fairness, complexity and costs of administration that should be considered overall.

A number of actions have been put forward to mitigate any adverse effects and are detailed within this equality analysis.

This equalities analysis covers the range of options presented in the report.

Conclusion - To be completed at the end of the Equality Analysis process

As a result of performing the analysis, it is evident that a risk of discrimination exists and this risk may be removed or reduced by implementing the actions detailed within the *Action Planning* section of this document.

Name: Steve Hill
(signed off by)

Date signed off: 22nd December 2016
(approved)

Service area:
Resources

Team name:
Benefits Service

Service manager:
Steve Hill

Name and role of the officer completing the EA:
Lee Fearon – Benefits Policy and Procedures Manager

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

- Analysis of SHBE data
- Analysis of demographic profile of the borough
- Analysis of the demographic profile of LCTRS recipients

Section 3 – Assessing the Impacts on the 9 Groups

Please refer to the guidance notes below and evidence how you're proposal impact upon the nine Protected Characteristics in the table on page 3?

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

Working age households eligible for or in receipt of Local Council Tax Reduction

Of the 22,735 households, there is good levels of equality monitoring information on 65% of the caseload covering ethnicity, gender and disability.

From that we know that 51% of LCTRS recipients are Bangladeshi households compared to 30% of all households in the borough, 13% are Black / Black British compared to being 8% of all households in the borough, whilst 27% are White households whilst making up 56% of all households in the borough.

Although household size of LCTRS recipients has not been analysed, we expect that the household size of ethnic minority households on average to include more children. The Census 2011 data shows that there are 2.48 children per Bangladeshi household compared to 1.60 per White British household.

In taking households that are in receipt of a disability benefit as a proxy indicator for disability, 33% of the LCTRS caseload is a household in receipt of at least one disability benefit. This compares with 12% of the borough's population known to have a limiting or long term condition from the Census in 2011.

These factors show that there are likely to be potential impacts on these groups. This will be monitored as part of the range of mitigation measures that are proposed as part of the action plan accompanying the proposal.

- **What qualitative or quantitative data do we have?**

List all examples of quantitative and qualitative data available

- Census 2011 data on Tower Hamlets population
- Office of National Statistics (ONS) population estimate
- The London Voluntary Service Council (LVSC) on VCS profile in Tower Hamlets
- Community Plan 2015
- Joint Strategic Needs Assessment
- Borough Equalities Assessment

- SHBE date
- Council Tax data
- Council Tax Reduction scheme recipient data
- Housing Benefit data

- **Equalities profile of staff?**

N / A

- **Barriers?**

- **Recent consultation exercises carried out?**

- Online survey
- Letters to every household
- Use of local, BME and social media

- **Additional factors which may influence disproportionate or adverse impact?**

N / A

- **The Process of Service Delivery?**

Equalities monitoring and analysis will be built into the implementation of the agreed scheme to comply with general equality duties and equality more broadly:

- Individual financial assessments
- Income maximisation assessments
- Support in relation to income collection, recovery and arrears

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Neutral	<p>No inadvertent bias or discrimination on the basis of race is indicated in the options presented in the report. However, it is noted that the proportion of existing LCTRS recipients that are Bangladeshi is significantly higher than the proportion of Bangladeshi households in the borough. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.</p>
Disability	Neutral	<p>No inadvertent bias or discrimination on the basis of disability is indicated in the options presented in the report. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change. Schemes 1B and 2B specifically protect vulnerable households which includes those in receipt of disability related benefits.</p>
Gender	Neutral	<p>No inadvertent bias or discrimination on the basis of gender is indicated in the options presented. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change. Schemes 1B and 2B specifically protect vulnerable households which includes lone parents, a greater proportion of which are women.</p>

Gender Reassignment	Neutral	No inadvertent bias or discrimination on the basis of gender reassignment is indicated in the options presented in the report. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.
Sexual Orientation	Neutral	No inadvertent bias or discrimination on the basis of sexual orientation is indicated in the options presented in the report. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.
Religion or Belief	Neutral	No inadvertent bias or discrimination on the basis of religion or belief. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.
Age	Neutral	No inadvertent bias or discrimination on the basis of religion or belief. The proposed schemes do not impact pension age households, are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.
Marriage and Civil Partnerships.	Neutral	No inadvertent bias or discrimination on the basis of Marriage and Civil Partnerships is indicated in the options presented in the report. All the options proposed take account of both the claimant's and partner's income regardless of marital status. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change.
Pregnancy and Maternity	Neutral	No inadvertent bias or discrimination on the basis of Pregnancy and Maternity is indicated in the options presented in the report. The proposed schemes and options are means tested and include mitigation measures by ensuring vulnerability and ability to pay Council tax are a key part of the proposals. There will also be regular and on-going monitoring to review the impact of any new scheme. The Council is also proposing a hardship scheme as part of any proposed scheme change. The Addition limiting claims

		to two children if selected would impact on those households with more than two children.
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Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? ✓

No?

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed?

The analysis of the four options demonstrated that very similar proportions of equality groups will be impacted as per the current profile of recipients of the LCTRS and that disproportionate numbers of equality groups are part of this profile. The councils approach to incorporating means testing, exemptions for vulnerability e.g. disabled and lone parent households, and the local welfare support scheme provide a framework of mitigation measures to support affected households where this is required.

Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? ✓

No?

How will the monitoring systems further assess the impact on the equality target groups?

Regular analysis of the demographic profile of claimants and households

Does the policy/function comply with equalities legislation?

(Please consider the OTH objectives and Public Sector Equality Duty criteria)

Yes? ✓

No?

If there are gaps in information or areas for further improvement, please list them below:

N / A

How will the results of this Equality Analysis feed into the performance planning process?

Equalities monitoring will be embedded in the implementation and forms part of the regular service monitoring and reporting.

Section 6 - Action Plan

*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.*

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Income maximisation	<p>Income maximisation assessments will be undertaken for all claimants affected by the new scheme if the existing scheme is changed.</p> <p>Work with voluntary sector partners will include advice and information regarding income maximisation and support for claimants</p>		Steve Hill	
LCTRS Hardship Policy	<ul style="list-style-type: none"> - A new policy to address hardship based on vulnerability and ability to pay will be developed and in place from 1st April if the existing scheme is changed and will be reviewed annually. 	<p>March 2017</p> <p>Annual</p>	<p>Steve Hill</p> <p>Steve Hill</p>	
Local Welfare Support Scheme	<ul style="list-style-type: none"> - A new local welfare support scheme will be developed and implemented for 2017/18 to address the wider impacts of welfare reform which will include LCTRS recipient households. 	May 2017	Steve Hill	
Income Collection and Debt Recovery Support	<ul style="list-style-type: none"> - An income collection and debt recovery process will be put in place to ensure in particular 	March 2017	Roger Jones	

	those receiving Council Tax bills for the first time are appropriately advised and supported, to minimise any financial burden			
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Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 