

## Equality Analysis

### Equality Impact Assessment (EIA) Form 'Knowing your customers needs'

#### Background

An Equality Analysis is a way of making sure that equality considerations are embedded into our decision-making processes and that equality is considered when we are developing key policy & services etc.

One tool to help you do this is an Equality Impact Assessment or EIA. It will assist you in ensuring that “**due regard**” has been given to identify any potential or actual impact (Positive or Negative) that our policies/services/functions\*etc., have on differing groups of people.

EIAs also provide a systematic approach to identifying and recording gaps and actions in relation to ensuring equal access when providing functions.

The purpose of the Equality Analysis is to:

- make us focus on the needs, experiences and circumstances of everyone who will be affected by the decisions the Council makes
- direct us to seek alternative ways of achieving our aims and avoiding inequality
- enhance our credibility with our service users to have greater confidence in our performance
- improve our policy making procedures and services

**\* Note: For simplicity we have sometimes referred to the following (listed below) as 'Functions'. This includes:** Services, Employment Practices, Projects, Strategy, Processes, Systems, Practices, Procedures, Protocols and Guidelines

#### Legislation - Equality duty

As a local authority that provides services to the public, Melton has a legal responsibility to ensure that we can demonstrate having paid due regard to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance Equality of Opportunity
- Foster good relations

For the following protected characteristics:

1. Age
2. Disability
3. Gender reassignment
4. Marriage and civil partnership
5. Pregnancy and maternity
6. Race
7. Religion and belief
8. Sex
9. Sexual orientation

When completing the Equality Impact Assessment you are encouraged to consider other disadvantaged or socially excluded communities or groups e.g. carers, the homeless, rural communities, priority neighborhoods, ex-forces personnel etc., who are likely to be affected by the proposal. **The evidence** also needs recording to demonstrate that consideration has been given.

<b>Title of the policy</b>	Local Council tax Support Scheme
<b>Is it new or existing?</b>	Existing
<b>Date</b>	
<b>Officer undertaking EIA</b>	Martyn Bowen
<b>Who else is involved in undertaking this assessment?</b>	

## 1. Overview of policy/function being assessed

### **A. Outline: What is the purpose of this policy? (Specify the aims and objectives.) Please also state why the policy has been introduced or changed.**

The Policy specifies how Melton Borough Council will operate the Local Council Tax Support (LCTS) Scheme for people of working age who seek support to pay their Council Tax. People of pensionable age will be governed by rules determined by national Government. The LCTS Scheme was first introduced in April 2013 and the scheme adopted by Melton Borough Council (MBC) was largely based on the existing Council Tax Benefit scheme. The scheme was introduced with support of the other districts within Leicestershire and was designed to be broadly similar across the County.

Due to Government changes to the way Local Authorities (LA) were funded, the scheme introduced by MBC at that time asked for people in receipt of Council Tax Support (CTS) to pay a minimum of 8.5% towards their Council Tax. This figure was amended in April 2014 so that people on CTS had to pay a minimum of 12% towards their Council Tax. – MBC therefore paying a maximum of 88% CTS towards the Council Tax

Ongoing financial difficulties experienced by all LAs, led to Councils across Leicestershire to consider changes to the CTS scheme as part of a wide-ranging look at reducing costs – ie not just in this area. As part of this review, each District/Borough Council has been asked to look at amending their schemes so that the maximum amount of CTS that can be paid towards Council Tax is reduced to 80/75 or 70%. The Council reviewed and refreshed their corporate priorities in 2015 to support and achieve our vision with a strong focus on supporting people in our community to achieve social, financial and digital independence. As part of this work the Council has been successful in achieving these aims – especially in getting people into or closer to the job market. This has relied on people engaging with the Council to achieve this. To further support people to achieve their independence, the Council considers that the LCTS Scheme should be amended so that a person's entitlement to CTS will depend upon them working with the Council – i.e if a person does not continue to engage with the Council, they may lose their CTS.

### **B. Who are the people/groups affected and what is the intended change or outcome for them?**

Although there is a direct impact on people of working age on CTS, there is a wider issue regarding the funding of Leicestershire County Council (LCC) and MBC and their ability to provide services to the people of Leicestershire generally and to the Borough of Melton in particular. Therefore all people within the community do have a stake in the financial implications affecting Local Authorities and will be affected by these changes either directly or indirectly to varying degrees

### **C. Equality implications/obligations**

**Will this proposal/policy/service etc., meet the Equality Act requirement to have 'due regard' to the need to meet any of the following duties? In this question, consider both the new/current service and the proposed changes.**

	Is the equality duty listed in the left hand column relevant to your policy/service etc?		Comments on how it meets the duty or why is not relevant
	Yes	No	
<b>(1) Eliminate unlawful discrimination, harassment and victimisation – please complete section 4 of the template.</b>			

<p><b>(2) Advance equality of opportunity between different groups</b>  How does the proposal/policy/service etc ensure that the intended outcomes promote equality of opportunity for users who have protected characteristics?</p> <p>This includes:</p> <ul style="list-style-type: none"> <li>• Removing or minimising disadvantages for protected groups of people</li> <li>• Taking steps to meet the needs of people from protected groups where these are different from the needs of other people</li> <li>• Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low e.g. are stakeholders engaged in the process and are there any barriers?</li> </ul>		No	<p>The calculation of CTS is undertaken through a means test of a person/family based on their personal circumstances – ie the number of people in a property and also their financial circumstances. This is based on factual information either supplied to the Council by the Department of Work and Pensions (DWP) or through the completion of an application form where the person applying provides information and evidence relating to their financial and personal circumstances. Although the Council encourages an online application, support is given to applicants who do not wish to use this route, or cannot access this route e.g due to literacy, disability or language and will encourage people into work. Specialist workers within Customer Services and the Me and My Learning service act as customer advocates to support people to ensure they are receiving the correct entitlement to CTS. This may also occur even when a person’s contact with the Council is not directly related to an application for CTS.</p>
<p><b>(3) Foster good relations between different groups (tackling prejudice and promoting understanding).</b>  Does the service contribute to good relations or to broader community cohesion objectives? How does it achieve this aim?</p> <p>This could include:  <i>(The following are examples and so you do not need to answer all the bullet points below.)</i></p> <ul style="list-style-type: none"> <li>• Building services around people and communities and involving them</li> <li>• Considering if there are strong and positive relationships between groups/communities affected by this</li> </ul>		No	<p>Although the scheme does not look to directly promote good relations between different groups, there is an element of building services around people and communities. The Council has undergone a number of restructures recently through a vision of putting the ‘customer’ at the heart of what we do. Specifically we have started to introduce online transactions in Council tax and Benefits for those who wish to use them, to enable the Council to focus on more vulnerable members of our community. This has led to providing more targeted support</p>

<p>policy. Does the policy/service bring together groups of people not used to interacting with each other? If so will it raise any issues that need to be addressed?</p> <ul style="list-style-type: none"> <li>• Tackling myths and misinformation. If the service is seen as unfair by certain groups, how do you tackle the myths and communicate this?</li> </ul>		<p>– including financial- to those who need it. The Council has worked hard with partners to provide services to support people to achieve social, financial and digital independence. E.g. – if a person has drug and/or alcohol issues they are introduced to a partner agency with specific skills in this area to support the person. The work undertaken by the Council and partners has reduced ASB and crime in the Borough and reduced the number of young people going through the criminal justice system with a benefit to the wider community. The Council has been clear for a number of years that it wishes to protect the more vulnerable members of the community, which may be perceived by other sections of the community as being unfair. However, the Council as part of its transformation programme is trying to enable those who can to access self-service transactions with the Council, enabling more support to be targeted to those in need, which can in reality be any member of the community in the future.</p>
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**D. Which groups have been consulted as part of the creation or review of the policy? Did they identify any barriers?**

A consultation exercise has taken place across the whole of Leicestershire from the beginning of August until the end of September and has been co-ordinated by Leicester City Council. This is an online consultation process although there is the opportunity for people to complete paper surveys if they wish. The consultation focusses on the changes to the maximum support (80/75/70%), whether CTS should be restricted to Band D properties only; if the capital limit currently at £16K should be lowered to £6K and on the conditionality outlined above. To support the consultation, a consultation plan was constructed and this included a press release that went out to all local media outlets; voluntary groups working in the community (e.g. groups working for people with a disability/ people with learning difficulties/people with English as a second language) have been asked to comment and/or pass on to the people they are working with; a heavy presence on social media-twitter and face book; consultation with Parish Clerks and Borough Members; promotion by Customer Services; leaflets being sent with CTS notification letters and Council tax bills and representation at a Tenants Forum – breaking boundaries event to promote the consultation.

The results of the consultation are shown below. For the main options although the No change has the highest individual Yes response, this does also mean that 69% of responders feel there should be an increase, although what that increase should be is less clear. The response has been split down to show the difference in responses between those people on CTS and those who are not receiving CTS.

For the ‘other options’ there is a majority approval for all the options being put forward, with a large

percentage of responders agreeing that people on CTS should engage with the Council to reduce their reliance on benefits.

Within the consultation, responders were invited to provide additional comments. Over 100 of these were received and ranged from those who thought that the Council shouldn't even consider to make reductions and in fact should provide more support to those saying the maximum entitlement to CTS should be reduced to 50%

main options	NO CTS		Receiving CTS		Total	
	numbers	No CTS %	numbers	Receiving CTS %	numbers	total %
1 - no change	32	26	10	71	42	31
2 - 80%	32	26	2	14	34	25
3 - 75%	25	21	0	0	25	19
4 - 70%	32	26	2	14	34	25
total	121	100	14	100	135	100

other options	yes		no		don't	Don't	total
	numbers	YES %	numbers	NO %	know numbers	Know %	numbers
align to HB	76	58	19	15	35	27	130
restrict to band D	70	54	43	33	17	13	130
capital £6K	68	52	48	37	14	11	130
Should work with Council	99	76	19	15	12	9	130
Remove CTS if don't work with the Council	76	58	34	26	20	15	130

## 2. What we already know and where there are gaps

### A. What existing information/data do you have/monitor about different diverse groups in relation to this policy? This could consist of previous EIA's, reports, consultation, surveys, demographic profiles etc.

There are a number of sources of data concerning the general population of the Borough. These include:

- Health Profile – including health inequalities – ethnicity
  - Unemployment data – overall and by ward
  - Basic facts on Melton 2014 – the latest available information on demographic and socio-economic make-up of the 16 wards in Melton
  - 2014 Population – mid-term estimates
- We also have a number of sets of data from the 2011 census including:
- Age
  - Disability and unpaid care
  - Ethnic Groups
  - Marital Status
  - Religion and belief
  - Usual resident population 2011-2011

Sources of information for the public include: [http://www.leics.gov.uk/meltonweb\\_ch2\\_demographic.pdf](http://www.leics.gov.uk/meltonweb_ch2_demographic.pdf)  
[http://www.melton.gov.uk/site/scripts/google\\_results.php?q=health+profile](http://www.melton.gov.uk/site/scripts/google_results.php?q=health+profile)

The Council has also commissioned an external partner (Policy in Practice) to undertake some modelling of the impacts of changing the LCTS Scheme. This modelling has taken place on changes to reducing the maximum support to 80 and 70% and also to limiting the award of CTS to maximum of Band D level and changing the amount of capital to be entitled to CTS from £16K to £6K and the impact that this will have on current CTS claimants.

This data identified there are 253 lone parents with children under 5 and 421 households in receipt of Employment Support Allowance/Disability Living Allowance or carer's allowance may require additional support through the Discretionary Council tax Support Scheme.

**Model 1 – Maximum Council Tax Support reduced to 70% for all households**

Reduction of £203,662 awarded – 22.7% reduction to Working Age claimants

Social Tenants – 740 households - loss of £3.22 CTS p/w

Private Tenants – 339 households - loss of £3.28 CTS p/w

Owner occupier – 151 households- loss of £2.82 CTS p/w

Single people 464 households – loss of £3.02 p/w

Lone parent 492 households – loss of £2.98 p/w

Couple with no children 73 households – loss of £4.11 CTS p/w

Couple with children 201 households – loss of £3.73 CTS p/w

Employed 337 households – loss of £2.72 CTS p/w

Self-employed 55 households – loss of £3.08 CTS p/w

Out-of- work benefits 838 households – loss of £3.38 CTS p/w

**Model 2 – Maximum Council Tax Support reduced to 80% for all households**

Reduction of £91,492 awarded – 10.2% reduction to Working Age claimants

Social Tenants – 740 households - loss of £3.22 CTS p/w

Private Tenants – 339 households -loss of £3.28 CTS p/w

Owner occupier – 151 households - loss of £2.82 CTS p/w

Single people 464 households – loss of £1.35 p/w

Lone parent 492 households – loss of £1.34 p/w

Couple with no children 73 households – loss of £1.84 CTS p/w

Couple with children 201 households – loss of £1.68 CTS p/w

Employed 337 households – loss of £1.26 CTS p/w

Self-employed 55 households – loss of £1.38 CTS p/w

Out-of- work benefits 838 households – loss of £1.50 CTS p/w

**Model 3 – Introducing a band cap at Band D and a capital limit of £6,000**

Reduction of £17,650 awarded – 2.00% reduction to Working Age claimants

Social Tenants – 740 households - loss of £0.10 CTS p/w

Private Tenants – 339 households -loss of £0.58 CTS p/w

Owner occupier – 151 households - loss of £0.47 CTS p/w

Single people 464 households – loss of £0.11 p/w

Lone parent 492 households – loss of £0.18 p/w

Couple with no children 73 households – loss of £0.43 CTS p/w

Couple with children 201 households – loss of £0.84 CTS p/w

Employed 337 households – loss of £0.19 CTS p/w

Self-employed 55 households – loss of £0.17 CTS p/w

Out-of- work benefits 838 households – loss of £0.32 CTS p/w

**B. What does this information/data tell you about diverse groups? If you do not hold or have access to any data/information on certain/all diverse groups, what do you need to begin collating/monitoring? (please list)**

This information tells us that people in receipt of CTS are going to be worse off financially if the proposal to amend the maximum amount of CTS is reduced. We are waiting for further modelling

data, which will provide more detailed analysis. This analysis can be broken down by sex/couples as partners/people with a disability and the age of people affected. The information will not necessarily cover the other protected characteristics. Although Equality information is requested from people making applications it is not collated or analysed. It is a voluntary request as this information cannot be demanded to process a CTS application. Therefore MBC needs to undertake more work to understand implications of changes to CTS on other protected characteristics.

**3. Do we need to seek the views of others and if so, who?**

**A. In light of the answers you have given in question 1D & 2 do you need to consult with specific groups? If not please explain why.**

It is not considered that additional consultation needs to take place as a fairly comprehensive consultation exercise has already taken place and we have undertaken a comprehensive external modelling of the impact of the changes on all CTS applicants. We do however, need to gather more equality data to identify impact on different protected characteristic groups.

**4. Assessing the impacts**

<p><b>In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has an actual or potential positive or negative impact on the groups specified and whether there is evidence of discrimination. Please read the guidance that accompanies this template.</b></p> <p><b>If you have identified actual or potential negative impact or discrimination that is <i>illegal</i>, you are required to take action to remedy this immediately.</b></p> <p><b>If you have identified negative impact or discrimination that is justifiable or legitimate please give your reasons. You will need to consider what can be done to mitigate its effect on those groups of people.</b></p> <p><b>Provide an explanation for your decisions</b></p>				
<u>Diversity Groups</u>	<u>Positive impacts</u>  (Actual or Potential)	<u>Negative impacts</u> (Including any barriers)  (Actual or Potential)	Is there evidence of direct/indirect discrimination? (Is it illegal or legitimate/justifiable?)	<u>Mitigation</u>  Where there are potential barriers, negative impacts identified and/or the barriers or impacts are unknown, please outline how you propose to minimise or remove all negative impact or discrimination.
<b>Age</b>		Although people of pensionable age are not affected by the changes to the LCTS Scheme, younger people may be affected by the differing welfare entitlement for		The current LCTS discretionary scheme will continue <sup>17</sup> to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to

		the under 25s		deal with personal issues, such substance misuse or mental health problems through to supporting people getting into work or supporting those in work with their career progression
<b>Disability</b> (physical, visual, hearing, learning disability, mental health )		There will be a financial implication for people with this characteristic in receipt of CTS as they will have to pay more Council Tax if it is agreed to have a reduction in the maximum CTS entitlement		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship, including with disabled people unable to work. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, such substance misuse or mental health problems through to supporting people getting into work or supporting those in work with their career progression
<b>Gender / Sex</b>		There will be a financial implication for people with this characteristic in receipt of CTS as they will have to pay more Council Tax if it is agreed to have a reduction in the maximum CTS entitlement		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, such substance misuse or mental health problems through to supporting people getting into work or supporting those in work with their career progression
<b>Religious Belief</b>		Although there will be a financial impact for individuals from this group, the data is less		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In



		clear for how the changes impact for people with a religious belief, although there is mitigation measures in place.		addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, raised by people from this particular group.
<b>Racial Group</b>		Although there will be a financial impact for individuals from this group, the data is less clear for how the changes impact for people with a religious belief, although there is mitigation measures in place.		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, raised by people from this particular group.
<b>Sexual Orientation</b>		Although there will be a financial impact for individuals from this group, the data is less clear for how the changes impact for people with a religious belief, although there is mitigation measures in place.		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, raised by people from this particular group.
<b>Gender reassignment/ Transgender</b>		Although there will be a financial impact for individuals from this group, the data is less clear for how the changes impact for people with a religious belief, although there is mitigation measures in place.		The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, raised by people from this particular group.
<b>Other protected</b>		There will be a		The current LCTS

<p><b>groups</b> (pregnancy &amp; maternity, marriage &amp; civil partnership)</p>		<p>financial implication for people with this characteristic in receipt of CTS as they will have to pay more Council Tax if it is agreed to have a reduction in the maximum CTS entitlement</p>		<p>discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, such substance misuse or mental health problems through to supporting people getting into work or supporting those in work with their career progression</p>
<p><b>Other socially excluded groups</b> (low literacy, offenders, priority neighbourhoods, ex forces personnel etc)</p>		<p>There will be a financial implication to people in these groups who are on CTS if the maximum amount of CTS is reduced as they will have to pay more Council Tax.</p>		<p>The current LCTS discretionary scheme will continue to provide support to those experiencing severe financial hardship. In addition support will be given to people either through Me and My learning or Senior Advisors within Customer Services, to deal with personal issues, such substance misuse or mental health problems through to supporting people getting into work or supporting those in work with their career progression</p>

## 5. Action Plan

<p><b>Please include any identified concerns/actions/issues in this action plan:</b> <i>The issues identified should inform your 'One Council Delivery Plan' and, if appropriate, your Consultation Plan</i></p>			
<p><b>Question Number</b> (Ref)</p>	<p><b>Action</b></p>	<p><b>Responsible Officer</b></p>	<p><b>Target Date</b></p>
<p>1</p>	<p>Improve the collation and analysis of information provided on the Equality and Diversity survey to help inform this and future changes to CTS</p>	<p>Jackie Aimson</p>	<p>30/06/17</p>
<p>2</p>	<p>Monitor the impact of the proposed changes at a customer level including equality monitoring</p>	<p>Martyn Bowen – via Customer</p>	<p>Ongoing during</p>

		Service Liaison Meeting	2017/18
	Undertake a 6 monthly review of the impact of the changes on all CTS cases	Mark Shields	31/10/17
	Undertake informal/formal surveys as appropriate with customers contacting Customer Service	Customer Insight Officer	April – June 2017

**6. Who needs to know about the outcomes of this assessment and how they will they be informed**

	<b>Who needs to know</b> (Please tick)	<b>How they will be informed</b> (we have a legal duty to publish EIA's)
<b>Internally (employees &amp; Check &amp; Challenge group)</b>		
<b>Externally (service users, stakeholders, private sector householders, landlords etc)</b>		
<b>Others</b>		
<b>To ensure ease of access, what other communication needs/concerns are there?</b>		

**7. Internal Scrutiny (to be completed and signed by a [member of the check and challenge group](#)).**

Please delete as appropriate
I agree / disagree with this assessment / action plan
If <i>disagree</i> , state action/s required
Signed (Check and challenge):
Date:

**8. Conclusion (to be completed and signed by the [Head of Service](#))**

Please delete as appropriate
I agree / disagree with this assessment / action plan
If <i>disagree</i> , state action/s required, reasons and details of who is to carry them out with timescales:
Signed (Head of Service):

Date:

Once approved by Head of Service please pass to Chris  
Morris to publish on the internet