

BRISTOL CITY COUNCIL

Resources Scrutiny Commission

20th September 2013

**Report of: Angie Ridgwell Interim Strategic Director
Organisational Development**

Title: Council Tax Reduction scheme 2014/15

Ward: Citywide

**Officer Presenting Report: Julia James/Service Director Integrated
Customer Services**

Contact Telephone Number: 0117 35 26218

Purpose of the report:

To seek the views of Members of the Commission on the two options currently under consultation regarding Council Tax Reduction (CTR) schemes for 2014/15 before submitting the final cabinet report for the meeting on 28th November 2013.

RECOMMENDATION:

1. To give views on the 2 CTR scheme options for 2014/15. These are;

Option 1 to continue to fully fund the current local CTR scheme.

or

Option 2 to reduce the cost of the CTR scheme overall by reducing the level of entitlement by 25% for non- vulnerable working age claimants
2. To note the work that has been done and continues to be done in order for cabinet to make an informed decision at Cabinet on 28th November 2013

Background

1. As part of the government's welfare reforms, the Local Government Finance Act 2012 required each Local Authority to implement its own Council Tax Reduction (CTR) scheme from April 2013. Following a robust options appraisal and public consultation, Full Council approved a decision on the 15th January 2013 to implement a local scheme for 2013/14 whereby the Council and preceptors absorbed the shortfall in government funding.

2. In 2013/14 the cost to Bristol was estimated at £2.9m. This was net of an additional allowance for estimated new income of £2.5m from technical reforms of Council Tax to tax second and empty properties and a £0.8m one off transitional government grant.

This compared to an estimated cost of £2.8m for a scheme which passed on the cut in funding to citizens following assessment of the estimated impact on the level of Council Tax collection and costs associated with the administration of relatively small amounts and increasing levels of customer demand.

3. The current approved scheme for 2013/14 maintains the same levels of entitlement for working age citizens as the previous Council Tax Benefit scheme, providing support to citizens on the lowest incomes in the city. Citizens of pensionable age automatically receive mandatory protection from any reduction in levels of entitlement.

4. CTR should be seen as one element of on-going welfare reform, the full impact of which on citizens, the economy and the council are still emerging.

Scheme changes

5. The council agreed that the 2013/14 scheme should be reviewed so that an alternative can be implemented for 2014/15 as necessary.

6. If the council wishes to amend or change its scheme, it is a statutory requirement to (in the following order);

- consult any major precepting authority which has the power to issue a precept to it (this applies to Avon and Somerset Police and Avon Fire and Rescue)
- publish a draft scheme in such a manner as it thinks fit,
- consult such other persons as it considers are likely to have an interest in the operation of the scheme

7. Transitional arrangements must be considered if a proposed change to the scheme will result in reduced levels of entitlement.

8. Any amendment or change to the council's scheme must be approved by Full Council no later than 31 January 2014. It was therefore necessary that approval was sought by Cabinet on 25th July for consultation to begin, so that this can align with the council's timeline for final approval by Full Council as required.

9. Government has not prescribed protection for groups other than low income pensioners, but Councils must have regard to existing duties including

- Child Poverty Act 2010
- Disabled Persons Act (Services, Consultation & Representation) Act 1986, and the Chronically Sick and Disabled Persons Act 1970
- The Housing Act 1996 and duty to prevent homelessness
- Armed Forces Covenant 2011

Comparison of 2013/14 CTR schemes with Core Cities and neighbouring councils

10. Bristol is the only core city and one of only 59 local authorities to adopt a fully funded CTR scheme to maintain levels of entitlement. This scheme qualified for a one off government transitional grant. Four other core cities, Liverpool, Manchester, Newcastle and Nottingham, part funded schemes to limit increases in Council Tax liability to 8.5% and also

qualified for transitional grant.

11. Sheffield, Leeds and Birmingham passed on the full cut in funding to citizens, meaning minimum levels of Council Tax liability ranging between 19% and 23%.

12. Bath & North East Somerset and North Somerset councils passed on the cut in full.

13. South Gloucester council agreed to adopt a fully funded CTR scheme as Bristol.

Comparison of 2014/15 CTR scheme proposals with Core Cities and neighbouring councils.

14. All core city authorities are looking at changing the year 2 scheme by increasing the % of the charge that claimants need to pay and are all currently out for consultation.

15. Sheffield have suffered a huge budget cut which has meant that year 2 has been increased from 23% to 40% ; Manchester 8.5% to 15%; Liverpool 15% to 17.5%; Newcastle 8.5% to 20%.

16. Bath & North East Somerset and North Somerset councils will not be revising their schemes

17. South Gloucester council are also out for consultation on a variety of schemes which pass on the full cut to citizens.

Emerging impact data from other councils

18. It has proven difficult to gather clear information at this point regarding early impacts. Tables A) and B) below show the information received to date from councils who have passed on the cut in funding to citizens in full or part.

19. Table A - Customer demand as at 31 May 2013

Council	Reported increases
Leeds	<ul style="list-style-type: none">• Council Tax enquiries up 79% (resulting in a need to recruit 6 additional posts)
Brent	<ul style="list-style-type: none">• Face to face up 30%• Telephone calls up 50%
Ealing	<ul style="list-style-type: none">• Telephone calls up 15,000 compared to same period 2012

20. It is not yet clear if these increases in demand will be sustained or level out as the year progresses. It is clear that significant additional costs could be incurred if Bristol were to receive similar levels of contact if the CTR scheme is amended to pass on the costs to citizens in 2014/15.

21. Table B - Council Tax recovery as at 31 May 2013

Council	Impact
Leeds	<ul style="list-style-type: none">• 46.7% of CTR recipients issued with Council Tax reminder notices• Total number of reminders issued increased from over 39,000

	in 2012 to over 46,000 in 2013
Hull	<ul style="list-style-type: none"> • 50% of CTR recipients issued with reminder notices • collection to date from CTR recipients 67%
Basildon	<ul style="list-style-type: none"> • 77% increase in reminders compared to 2012 (not solely CTR recipients)
Sheffield	<ul style="list-style-type: none"> • 73% more reminders issued compared to 2012 (not solely CTR recipients) • Update - Total additional reminders as of end of August was 25,000 and 13,000 summons
Newcastle	<ul style="list-style-type: none"> • 35% more reminders issued compared to 2012 (not solely CTR recipients)
Manchester	<ul style="list-style-type: none"> • 32% more reminders issued compared to 2012 (not solely CTR recipients)
North Somerset	<ul style="list-style-type: none"> • 26% more reminders issued compared to 2012 (not solely CTR recipients)

22. The information in table B indicates that councils are already seeing significant increases in recovery activity with the associated potential reduction in Council Tax collection. It is again clear that if Bristol were to experience similar increases in recovery action the impact on collection could be significant. Work will continue to monitor the experiences of other councils to further inform proposal with further detail being available by the 20th September.

Bristol CTR Caseload

23. Table C below shows that the CTR caseload has reduced overall from 45,460 households in 2012/13 to 44,818 households in 2013/14. The number of pensioners protected by regulations from any reduction in entitlement to CTR has declined, and the number of working age households impacted by a local CTR scheme has increased.

Table C

Group	No's 2012	No's 2013	Variance +/-
Pensioners	16,796	15,916	- 880
Working age	28,664	28,902	+ 238
	Total 45,460	Total 44,818	- 642

Financial Update

24. In 2013/14, grant funding for CTR was identified separately as £30.2m in the Authority's financial settlement from central government. From 2014/15 this funding will not be separately identified and will form part of the overall settlement.

25. Bristol's estimated proportion of the overall scheme cost, after reducing this for income related to Council Tax technical reform, is £33.5m.

26. The option of reducing the overall CTR scheme to match allocated funding is therefore not a cost free option. There will be significant costs incurred by the council as it looks to realise additional income from existing CTR recipients.

27. These costs fall broadly into two categories, these being collection losses and additional staffing/support costs. The estimates applied to the 2013/14 scheme have been applied to the estimated cost of the 2014/15 scheme as there is insufficient information at this time to materially change the assumptions made. It is anticipated that these estimates will be reviewed and updated as more information is obtained from other councils regarding the impact and experience of reducing CTR entitlement.

28. Taking this into consideration, the net cost would be billed to existing claimants with the council needing to fund losses on collection and additional staffing costs.

29. The overall cost of the scheme has to reflect the elements that are attributable to Bristol's preceptors. Costs to the Authority are approximately 85% of the overall costs of the scheme.

30. The net difference in cost for the two schemes (ignoring one off grants) for 2013/14 was estimated to be £946,000.

31. The precepting authorities have been asked for their opinion as part of our statutory requirement, with Avon and Somerset police only responding to date and stating they favour option 2.

32. Option 1- Continue current CTR scheme

Continuing with the current 2013/14 scheme would allow the same levels of entitlement as now for some of our most disadvantaged citizens in the city with similar levels of customer demand and collection of Council Tax.

33. The additional sum in 2013/14 if purely financed by an increase in Council Tax was estimated to be the equivalent of 15p per week to a band B Council Tax charge.

34. Option 2 - Reducing entitlement by 25% for non- vulnerable households

Reducing the cost of the CTR scheme by reducing the level of entitlement by 25% for non-vulnerable working age CTR recipients. This will still incur costs to the authority, with a reduction in entitlement of £4.90 per week / £254.80 p.a. for some of our most financially disadvantaged citizens.

35. Option 2 would need to be considered as part of wider welfare reform changes such as the under occupation rules (Bedroom Tax), the Benefit Cap, changes from Disability Living Allowance to Personal Independence Payments, and Universal Credit. The cumulative impact of changes is still emerging, but the socio and economic impacts and potential for increased debt will need to be considered.

36. In consideration of requirements in section 9 above, it is proposed that the groups in Table D below are considered 'vulnerable' and therefore 'protected' from any reduction in entitlement arising from option 2. The criteria considered is mainly linked to the Department of Work & Pensions assessment for Income Support for groups who may also be disadvantaged when seeking work. The total number of households to be protected is around 8,782 of the 28,902 total working age claimants.

Table D – Vulnerable groups to be protected (option 2 only)

	Criteria
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Child Poverty act 2010	Lone Parents in receipt of Child Benefit for child under 5
Disabled Persons Act 1986 and Chronically Sick and Disabled Persons Act 1970	Any family member in receipt of Disability Living Allowance (middle or high rate) or Personal Independence Payment (PIP) equivalent – Daily Living Component (standard to enhanced rate) Any child in receipt of Disability Living Allowance or PIP equivalent
Equalities Act 2010	Claimant or Partner in receipt of Carers Allowance/Carers premium
Armed Forces Covenant	Claimant or Partner in receipt of any War Pension/Payment

37. Other than the provisions in the paragraph above, it is not proposed to include transitional arrangements to cushion the impact of option 2 due to additional cost and administration requirements.

38. It is proposed that work continues to assess the impacts of other council's schemes as the year progresses and that further consideration is given to the development of more innovative proposals for 2015/16 onwards encompassing a corporate response to welfare reform that supports people back into work and training and better targets support.

39. It is however important to note that the government itself is reviewing the value of localising of Council Tax support at the end of 2015/16.

Consultation publicity and results

40. Public consultation runs from 26th July until 27th September (public) and 18th October 2013 (voluntary sector).

41. As of 6th September 2013 3,120 people have replied to the consultation request with 51% favouring a continuation of Bristol's existing scheme.

42. 62% of respondents also believe that if option 2 was approved that there should be some protection for vulnerable adults of working age. Pensioners are already protected by the national scheme.

43. Of the people that have responded 85% class themselves as Council Tax payers and 19% as someone in receipt of Council Tax Reduction.

Consultation and scrutiny input:

a. Internal consultation:

- This report to be considered at Resources Scrutiny meeting
- Corporate Services Finance Business Partner
- ICS Management Accountant
- Corporate Communications & Consultation team

- Equalities team

b. External consultation:

- Public and voluntary sector consultation – 9 and 12 week period respectively
- In progress consultation with precept authorities

Other options considered:

1) To fund the 2014/15 scheme in part, and reduce entitlement in part to working age CTR recipients. This option was not progressed for 2014/15 due to the high likelihood of adverse impact on collection levels, additional administration costs associated with very small sums and increases in customer demand associated with changes affecting over 20,000 citizens.

2) A range of additional features to consider further reduced entitlement. Features were not progressed for 2014/15 due to impact on citizens and limited impact on reducing the cost of the scheme.

Risk management / assessment:

FIGURE 1							
The risks associated with the implementation of the (CTR) decision :							
No.	RISK Threat to achievement of the key objectives of the report	INHERENT RISK (Before controls)		RISK CONTROL MEASURES Mitigation (i.e. controls) and Evaluation (i.e. effectiveness of	CURRENT RISK (After controls)		RISK OWNER
		Impact	Probability		Impact	Probability	
1	Failure to undertake appropriate statutory consultation will leave scheme open to challenge	High	Medium	Consultation plan will be agreed with communications and consultation team. Include VCS organisations and Equalities groups Complete EQIA Consultation to be structured to fit Council approvals process	High	Low	J James
2	The option which passes on reductions in levels of entitlement will mean high likelihood of economic hardship and increasing debt. This could have significant negative impact on administration costs, Council Tax collection and increases in customer demand	High	Medium	Full options appraisal undertaken to asses numbers affected and impacts Full EQIA completed	Medium	Medium	J James
3	Amendments to the current scheme will mean changes to software and the need review and amend operational processes and procedures	High	Medium	Proposals are known to be deliverable by software company. Close working with software suppliers. E establishment of robust testing processes. Officer group established to plan operational implementation	Medium	Low	J James

FIGURE 2

The risks associated with not implementing the (CTR) decision:

No.	RISK	INHERENT RISK		RISK CONTROL MEASURES	CURRENT RISK		RISK OWNER
		(Before controls)			(After controls)		
		Impact	Probability		Impact	Probability	
1	<p>Failure to take a decision will mean the need to develop further proposals, which will require Cabinet approval for public consultation.</p> <p>The timetable for this could be prohibitive in ensuring required statutory consultation and relevant council approvals, meaning the scheme open to challenge</p>	High	High	<p>Alternative proposals to pass on the cut in funding to CTR recipients are prepared</p> <p>Contingency plan to be agreed to prepare alternative consultation materials should a different scheme be proposed to the recommendations</p>	High	Medium	Julia James
2	<p>Affordability of a scheme which passes on a cut in entitlement will be difficult for citizens and compounded by other welfare changes, which could lead to greater poverty and in the worst case public protests.</p>	High	High	<p>Alternative proposals to fully consider vulnerable groups and reference wider welfare reform changes</p>	High	Medium	Julia James

Public sector equality duties:

Note Draft EQIA in progress

We have identified those households who are most likely to be affected by the introduction of the proposal and compared those to the make-up of our overall customer base to identify any equality groups that may be disproportionately affected.

There will be financial mitigation for those people of working age and deemed 'vulnerable' in that they will be protected from any change.

For the small number of households that are adversely affected by comparison to the general populous only, the changes will be appropriately communicated to those affected.

The draft EqIA has also been circulated to 'voice and influence' groups who may be disadvantaged as a result of these changes for the opinion on this assessment and to engage with the consultation process.

Eco impact assessment

The report has been reviewed and no direct environmental impacts are identified.

Advice given by:- Steve Ransom Environmental Performance Programme Co-ordinator

Date 19th June 2013

Resource and legal implications:

Finance

a. Financial (revenue) implications

In 2013/14 a ring fenced grant of £30.2m was included in the Finance Settlement, but an equivalent figure will not be separately identified for 2014/15 and will form part of the overall settlement.

Bristol's estimated proportion of the overall scheme cost, after reducing this for income related to Council Tax technical reform, is £33.5m. The level of income allocated to the scheme in the budget setting process would reduce this, resulting in a net scheme cost.

The cost of supporting the scheme as proposed for 2014/15 will depend on the level of funding allocated during the budget process.

b. Financial (capital) implications:

None

Advice given by Alison Kearney Finance Manager

Date 15th July 2013

c. Legal implications: Check

The Welfare Reform Act 2012 and Local Government Finance Act 2012 requires the Council to implement a Local Council Tax Reduction (CTR) scheme and this was implemented by the Council for 2013/2014. The recommendation in this report asks the Mayor to note the emerging position regarding the review and impact of CTR schemes and secondly to agree statutory public consultation regarding two CTR scheme options for 2014/15.

Any amendments to the CTR Scheme have to be approved by Full Council. A further report will be presented to Full Council in December 2013 for approval of the CTR Scheme for 2014/15.

Advice given by Penny Wilford Team Leader Legal Services

Date 2nd Jul 2013

d. Land / property implications:

No implications arising from this report

Advice given by Ian Smith Project Leader Corporate Property

Date 19th June 2013

e. Human resources implications:

There are no implications arising from this report.

Advice given by Rachel Falla HR Business Partner

Date 21st June 2013

Appendices:

- Appendix 1 - Draft EQIA

Access to information (background papers):

- [26 Jul 2012 Cabinet report 'Local Council Tax Support scheme & Technical Reforms of Council Tax'](#) – agenda item 10
- [20 December 2012 Cabinet report 'Options for a decision on the introduction of a new Council Tax Reduction scheme'](#) – agenda item 7
- [15 January 2013 Full Council report ' Council Tax Reduction scheme'](#) – agenda item 9A
- [Institute of Fiscal Studies Jan 2012 'Impact of austerity measures on households with children'](#)
- [Institute of Fiscal Studies May 2012 'Reforming Council Tax Benefit'](#)

Equality impact assessment – IN PROGRESS

Localised Council Tax Reduction scheme – 2014/15

Directorate and Service: Corporate Services, Integrated Customer Services

Lead officer: Matthew Kendall (Assistant Benefits Manager)

Additional people completing the form (including job title): Andrew Mclean (Equalities Officer), Ian McIntyre (Senior Benefits Policy Officer)

Start date for EqIA:

Step 1 – Use the following checklist to consider whether the proposal requires an EqIA

1. What is the purpose of the proposal?

To agree a localised Council Tax Reduction scheme for 2014/15 as required by the Welfare Reform Act and Local Government Finance Act.

There are currently 2 options being considered;

1. The 2014/15 scheme will continue to incorporate a £5m deficit in central government funding and that will be financed by cuts in other services and/or through council tax itself (i.e. a continuation of the 2013/4 scheme), or
2. The 2014/15 scheme will pass the £5m deficit in central government funding on to working age claimants meaning that those non protected 'vulnerable' households will see a 25% reduction in their existing entitlement.

	High	Medium	Low
2. Could this be relevant to our public sector equality duty to:			
a) Promote equality of opportunity		✓	
b) Eliminate discrimination	✓		
c) Promote good relations between different equalities communities?	✓		
If you have answered 'low relevance' to question 2, please describe your reasons			

3. Could the proposal have a positive effect on equalities communities?

Pensioners are protected and therefore any impact on this group will be neutral in that they will experience no changes. The definition of pensioner for this purpose will be those households where claimant or partner has attained State Pension Credit age (nationally defined). From April 2014 this will be 62 years old or older.

In addition working age 'vulnerable' households would be protected from any impact on this group will be neutral in that they will experience no changes. These 'vulnerable' households protect certain groups within the city. Lone parents with children under 5 years old, households where certain disability benefits are in payment, carers and those who receive certain armed forces payments will continue to receive similar levels of support as they would currently (if option two were implemented).

Vulnerability has been determined through the use of Department for Communities and Local Government [guidance](#) issued in May 2012 when developing a scheme with specific reference to public sector equality duty, mitigating child poverty and the armed forces covenant.

In its proposal, the council has also taken into account, where possible, those who may be at a disadvantage in finding employment and linked definitions to existing ones within Department for Work and Pensions legislation (such as Income Support entitlement for lone parents being limited to those with children under 5 years of age).

In the case of a fully funded scheme, all households will continue to get similar levels of support to what they get currently.

4. Could the proposal have a negative effect on equalities communities?

All people of working age who are not protected under the definition of 'vulnerable' will be affected by losing all/some of their entitlement if the shortfall in government funding is passed on to those households (i.e. option 2).

If the government shortfall is funded by increasing council tax and/or cutting other services this would have a far wider impact on the majority of households in Bristol but at this stage would be impossible to know what the effect on the equalities groups would be.

If the proposal has low relevance and you do not anticipate it will have a negative impact, please sign off now. Otherwise proceed to complete the full equalities impact assessment

Service director.....Equalities officer
Date

Step 2	Describe the Proposal
2.1	Briefly describe the proposal and its aims? What are the main activities, whose needs is it designed to meet, etc.
	<p>Central government has delegated responsibility to local authorities for providing financial support to Council Tax payers, with low incomes from 2013/14, through a non ring fenced grant.</p> <p>In 2013/14 it was agreed that any shortfall in funding would be made up from other means, e.g. reducing expenditure in other services and/or increasing council tax. This means that all Council Tax Reduction recipients would not see any reduction in their entitlement as a result of the scheme that Bristol had approved.</p> <p>For 2014/15 the scheme has been reviewed by officers and has been recommended that we should consult on the following;</p> <p>1. Continue with the current Council Tax Reduction scheme 'as-is'.</p> <p>This would require £5m funding shortfall financed by cuts in other services and/or increase in council tax. This has no immediate equalities impact upon benefit claimants but may have an indirect negative affect through the accessing of other (affected) services.</p> <p>2 All 'non-vulnerable' working age claimants (20,087) receive 25% less</p> <p>This would require £5m funding shortfall financed by cuts in benefits.</p> <p>All non-vulnerable households (20,087) would be affected equally with no impact on vulnerable working age households.</p> <p>It is worth noting that any cost to BCC in funding the scheme could have a knock on effect for other services, depending where the funds originate from. Any scheme must protect those who are of pension age (dictated by legislation).</p>
2.2	If there is more than one service* affected, please list these:
	<ul style="list-style-type: none"> ✓ Integrated Customer Services (ICS) – delivery of service ✓ Fraud ✓ Welfare Rights and Money Advice Service (WRAMAS) – increased need for advice ✓ Neighbourhoods (including landlord services, strategic housing) – possible increased customer demand for advice, corporate debt issues etc. ✓ Communications and Marketing - advise of the changes plus handle any media interest ✓ Health and Social Care ✓ Children and Young People's Services ✓ Finance ✓ Any service that may be adversely affected due to loss in funding reallocated to the proposal (option 2 only)
2.3	Which staff or teams will carry out this proposal?
	Revenues and Benefits team within ICS

Step 3	Current position: What information and data by equalities community do you have on service uptake, service satisfaction, service outcomes, or your workforce (if relevant)?
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Available equality group data is shown below. However, we do not have available information regarding sexual orientation, transgender, religion and belief or travellers. Some travellers may be affected but many sites are not liable for Council Tax.

The table below shows the current Council Tax Reduction scheme caseload by household.

Definition	Numbers/Percentage
Total number of households receiving a Council Tax Reduction	44,867
<i>Working age households</i>	<i>28,909 (64%)</i>
<i>Pension age households</i>	<i>15,958 (36%)</i>
A breakdown of working age households by equality groups	
Male	11,193 (39%)
Female	17,371 (60%)
Unknown	344 (1%)
Lone parents	8,562 (30%)
Disability (by disability living allowance award)	5,928 (21%)
Households without any children	14,898 (52%)
Households with 3+ children	3,508 (12%)
White (ethnicity)	12,498 (43%)
Black and Minority Ethnic (ethnicity) (BME)	3,071 (11%)
Other (ethnicity)	4,333 (15%)
Unknown (ethnicity)	9,007 (31%)
Carers	2,028 (7%)

A further breakdown of those working age households determined as 'vulnerable' and therefore protected from any changes to Council Tax Reduction, is as below.

Definition	Numbers
Total number of vulnerable households	8,782
Lone Parents/Children	
Lone Parents with children under 5	3,663
Disability	
Any family member in receipt of Disability Living Allowance (middle or high rate) or Personal Independence Payment (PIP) equivalent - Daily Living Component (standard to enhanced rate)	3,406
Disabled children	
Any child in receipt of Disability Living Allowance or PIP equivalent	948
Carers	
Claimant or Partner in receipt of Carers Allowance/Carers Premium	2,028
Armed Forces Covenant	
Claimant or Partner in receipt of any War Pension/Payment	20

Please note that some of these households when broken down in to various groups may also appear in other groups, therefore total of each group exceeds 8,782.

Those who are not treated as 'vulnerable' and subject to a reduction in support under option 2 of the proposal are shown below.

Definition	Numbers/Percentage
Male	9,230 (46%)
Female	10,644 (53%)
Unknown	226 (1%)
Lone parents	4,899 (24%)
Disability (by disability living allowance award, mobility and lower rate care)	351 (2%)
Households without any children	11,875 (59%)
Households with 3+ children	2,036 (10%)
White (ethnicity)	8,081 (40%)
Black and Minority Ethnic (ethnicity) (BME)	2,170 (11%)
Other (ethnicity)	3,212 (16%)
Unknown (ethnicity)	6,637 (33%)

Please note, your evaluation in 3.3 will be built upon in Step 5 where you will set out what you plan to do to address any issues for equalities communities

Step 4	Ensure adequate consultation is carried out on the proposal and that all relevant information is considered and included in the EqIA
4.1	<p>Describe any consultations that have taken place on the proposal. Please include information on when you consulted, how many people attended, and what each equalities community had to say (& provide a web link to the detailed consultation if possible).</p> <p>Consultation starts on 26th July 2013, details of which can be found here. The public consultation ends on 27th September 2013 and the community and voluntary sector consultation ends on 18th October 2013.</p> <p>The consultation will be publicised to interested groups and current Council Tax Reduction recipients electronically, with a dedicated helpline for the period of the consultation. There will also be a drop in event for one day during the consultation process. This will be located in central Bristol.</p>

Please note details of the consultation findings in 4.1 will be built upon in Step 5 where you will set out what you plan to do to address any issues for equalities communities.

Step 5 – Giving due regard to the impact of your proposal on equalities communities	
Possible Impact on Equalities Communities, whether or not you will address the impact	Actions to be included in the proposal
<p>Age</p> <ul style="list-style-type: none"> ✓ Pension age claimants are protected from reductions in support under a nationally prescribed scheme ✓ Children under 18 are not eligible for council tax ✓ Low paid/benefit reliant working age households ✓ Younger people are not over represented as Council Tax Reduction recipients ✓ Lone parent households with children under 5 year of age are protected from reductions in support proposed under option 2 	<ul style="list-style-type: none"> ✓ Awareness campaigns for those affected, targeted communications
<p>Disability</p> <ul style="list-style-type: none"> ✓ Those in receipt of the high or middle care component of disability living allowance or PIP equivalent - Daily Living Component (standard to enhanced rate) are protected ✓ Any child in receipt of Disability Living Allowance or PIP equivalent are protected ✓ Protection included for those receiving certain disability related benefits 	<ul style="list-style-type: none"> ✓ Awareness campaigns for those affected, targeted communications
<p>Ethnicity</p> <ul style="list-style-type: none"> ✓ BME communities are not over represented as Council Tax Reduction recipients 	<ul style="list-style-type: none"> ✓ Awareness campaigns for those affected targeted communications. ✓ Targeted consultation with BME groups and their organisations to understand further any negative impacts
<p>Gender</p> <ul style="list-style-type: none"> ✓ Females are over represented as Council Tax Reduction recipients and this is reflected in the equality group affected by the proposal ✓ Lone Parents (predominately females) with a child under 5 are protected, resulting in fewer females affected as a percentage of overall Council Tax Reduction Caseload 	<ul style="list-style-type: none"> ✓ Awareness campaigns for those affected, targeted communications

Step 5 – Giving due regard to the impact of your proposal on equalities communities	
Possible Impact on Equalities Communities, whether or not you will address the impact	Actions to be included in the proposal
Pregnancy & maternity	<p><i>Data is not collected for these groups in respect of Council Tax reduction. We are investigating how data could be accessed via the customer insight team. However, we do not have a current timescale for when this may happen.</i></p> <p><i>The consultation exercise will target these communities and organisations to gain a clearer understanding of any potential negative impacts.</i></p>
Religion and belief	
Sexual orientation	
Transgender	
5.2	Next Steps
<p>We will communicate the effects of the new scheme so that those affected will be aware before the changes happen. Impacts and behaviours will be monitored and inform changes to the scheme in 2015/16.</p>	

6.1	Describe how, in completing steps 1-5, you have given due regard to the three aims of the public sector equality duty (a-c above).
<p>We have identified those households who are most likely to be affected by the introduction of the proposal and compared those to the make-up of our overall customer base to identify any equality groups that may be disproportionately affected.</p> <p>There will be financial mitigation for those people of working age and deemed 'vulnerable' in that they will be protected from any change.</p> <p>Those who are affected will be notified and awareness campaigns in place with targeted communications as appropriate.</p>	

Step 7	Monitoring arrangements
7.1	<p>If your proposal is agreed, how do you plan to measure whether it has achieved its aims as described in 2.1? Please include how you will ensure you measure its actual impact on equalities communities?</p> <p>Regular reporting using the information within the system used to administer Council Tax Reduction with data matching to other council information sources.</p>

Step 8	Publish your EqIA
8.1	<p>Ensure the EqIA is signed off by a Service Director and the directorate equalities officer.</p> <p>Signed _____ Signed _____</p> <p>Service Director _____ Equalities officer _____</p> <p>Date _____ Date _____</p>
8.2	<p>Can this EqIA can be published on the web. Yes/No</p> <p>If no, please explain why the proposal is confidential and cannot be published.</p>
<p>Contact Communications and Marketing Team or your directorate equalities officer to arrange to publish the equalities impact assessment on the Equality and Diversity web pages.</p>	
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