

EQUALITY IMPACT ASSESSMENT

Name of proposal/policy	North Northamptonshire Council Local Council Tax Support Scheme	Budget number (if applicable)	N / A
Programme / Service area responsible	Revenues & Benefits Service	Programme Board meeting date	20.10.20
Name of completing officer	Nick Woods & Lucy Hogston	Date EqIA created	01.10.20
Approved by Programme Manager	Akhtar Pepper	Date of approval	20.10.20

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'Due regard' to:

- Eliminating discrimination, harassment and victimisation
- Advancing equality of opportunity
- Fostering good relations

We do this by undertaking equality impact assessments (EqIAs) to help us understand the implications of policies and decisions on people with protected characteristics – EqIAs are our way of evidencing this.

PART A – REMOVE ALL GUIDANCE IN ITALICS ONCE COMPLETED

1) Description of current provision/policy and main beneficiaries/stakeholders

From April 2013 each Local authority has been required to determine a Local Council Tax Reduction Scheme (LCTRS).

Currently each district and borough council within North Northamptonshire has a different scheme that gives different levels of council tax support for people with a low income.

There are currently circa 10,500 working age residents who benefit from a reduction in Council Tax.

The scheme applies to working age claimants only, as the Government prescribes the scheme for pensioner claimants who receive up to 100% support.

The existing maximum reduction rates across North Northamptonshire for 2020/21 are

- Corby 91.5%
- Wellingborough 80%
- East Northamptonshire 80%
- Kettering 55%

2) Description of proposal under consideration/development

The aim is to have one scheme supporting those who are eligible for a reduction on their council tax across North Northamptonshire from April 2021. One scheme for the whole of North Northamptonshire will mean that that people in the same situation are treated consistently and fairly wherever they live.

A Task & Finish Group comprising of Members met to consider a new LCTRS scheme and proposed that the scheme should be cost neutral.

The harmonised percentage that would have no net impact upon Council Tax income would be 24.9%, based upon current caseloads. Permission to consult on the scheme recommended by the Task & Finish Group was approved at the Shadow Executive Committee meeting on 24 September 2020.

A public consultation will now take place for 8 weeks starting on 5 October 2020.

3) Data used in this Equality Impact Assessment (general population data where appropriate but each EqIA should contain information on people who use the service under consideration – if this is not applicable to your proposal then you probably do not need to do an EqIA)

Data Source (include link where published) – quantitative or qualitative	What does this data tell us?
LCTRS helps those residents of working age who are on low income pay their Council Tax.	Any changes to the LCTRS scheme will have a direct impact upon those residents of a working age on a low income. Currently there are circa 10,500 residents within the area who benefit from the scheme.

4) Please give details about planned consultation or engagement with communities and other stakeholders that are likely to be affected by the policy/decision/service change. **Contact the Consultation, Equalities & Accessibility Team (ceat@northamptonshire.gov.uk) for advice** or complete the online form with details of your consultation/engagement activity.

If you are not carrying out any consultation or engagement activity, please provide reasons why you think this is not necessary.

We are carrying out an 8 week consultation period which involves the following

- Online digital survey
- Telephone survey for any residents that are unable to partake digitally
- Writing to all 10,500 residents currently in receipt of LCTRS to let them know about proposed changes to the scheme
- Sent briefing note to all North Northamptonshire Members and town and parish councils to inform them
- Writing to several of our local partners that work actively with our residents to inform them

5) If consultation or engagement has been carried out in the past, please provide details. If so, what were their views and how have their views influenced the work to date?

N/A

Protected characteristics as set out in the Equality Act 2010

6) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.

Sex	Impact and explanation	Neutral
	Mitigations/actions	Explanation: Neutral impact, not relevant to assessing eligibility.
Gender Reassignment	Impact	Neutral Explanation:

	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.
Age	Impact	Positive & Negative Explanation:
	Mitigations/actions	There will be an impact on some customers due to the different levels of support available currently in each district and borough council. Some of those affected will be families with children.
Disability	Impact	Neutral Explanation:
	Mitigations/actions	Neutral, the disability premiums and disregards currently used in the calculation of LCTRS will still remain.
Race & Ethnicity	Impact	Neutral Explanation:
	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.
Sexual Orientation	Impact	Neutral Explanation:
	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.
Religion or Belief (or No Belief)	Impact	Neutral Explanation:
	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.
Pregnancy & Maternity	Impact	Neutral

		Explanation:
	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.

Cross-cutting considerations

7) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are unsure, set out what you will do to get enough information to make an assessment.		
<p>Human Rights – relevant articles and local authority context:</p> <p><i>Article 2 – Right to life</i></p>	Impact	<p>Neutral</p> <p>Explanation: The scheme applies to all working age claimants and will not affect human rights due to the LCTSS providing adequate support to protect the life of vulnerable people from neglect.</p>
<p><i>Article 3 – Freedom from torture and inhuman or degrading treatment</i></p> <p><i>Article 4 – Prohibition of slavery and forced labour</i></p> <p><i>Article 5 – Right to liberty and security</i></p> <p><i>Article 6 – Right to a fair trial</i></p> <p><i>Article 8 – Right to private and family life</i></p> <p><i>Article 9 – Freedom of thought, belief and religion</i></p> <p><i>Article 10 – Freedom of expression</i></p> <p><i>Article 11 – Freedom of assembly and association</i></p> <p><i>Article 14 – Protection from discrimination</i></p> <p><i>Article 1 of the First Protocol:</i></p>	Mitigations/actions	Neutral impact.

<i>Protection of property</i> <i>Article 2 of the First Protocol: Right to education</i>		
Rural isolation	Impact	Neutral Explanation:
	Mitigations/actions	Neutral impact, not relevant to assessing eligibility.
Socio-economic exclusion	Impact	Positive & Negative Explanation:
	Mitigations/actions	There will be a negative impact for some residents who are on low income where their current authority run a more generous scheme than is proposed. Some residents who are on a low income will be positively affected, where their current authority run a less generous scheme than is proposed.
Health and wellbeing considerations	Impact	Positive & Negative Explanation:
	Mitigations/actions	There will be a negative impact for some residents who are on low income where their current authority run a more generous scheme than is proposed. Health and Wellbeing for some residents who are on a low income will be positively affected, where their current authority run a less generous scheme than is proposed.

* reference to Authorities includes: Corby Borough Council, East Northamptonshire Council, Kettering Borough Council, Borough Council of Wellingborough, North Northamptonshire Council

PART B – if you are undertaking any further work before the decision on this policy or service change is made, please complete Part B and then make a final assessment based on this additional information

REMOVE ALL GUIDANCE IN ITALICS ONCE COMPLETED

1) Consultation, follow up data and information gathered from actions identified above	
	What does this information tell us?
<p>We received 409 survey responses to the consultation on the Council Tax Support Scheme for the new North Northamptonshire Council for the year 2021-22. The consultation ran for 8 weeks from 5 October 2020 to 30 November 2020. 406 responses were received via online survey and 3 via letter or email.</p> <p>The consultation was communicated and promoted as follows:</p> <ul style="list-style-type: none"> • Banners on all District and Borough’s websites • Advertising on email signatures • Internal staff communications • Social Media platforms • Press Releases • Liaison with the voluntary sector • Liaison with money and debt advice services • Liaison with homeless prevention forums & officers • Liaison with the Department for Work & Pensions (Job Centre Plus) • Emails to preceptors (Police, Fire, Town and Parish Councils) • Emails to local MPs • Member Briefing circulated to all North Northamptonshire Members • Letters sent to all current working age LCTS recipients (approximately 10,500) advising them of the consultation, an information sheet was also enclosed advising how the proposed changes would specifically impact them depending on the scheme their council currently operated • All North Northamptonshire Members also received a copy of the 	<p>Full analysis of the consultation responses can be found in Appendix 1 of the Local Council Tax Support report being presented to the Shadow Executive Committee on the 7 January 2020.</p> <p>The analysis illustrates:</p> <ul style="list-style-type: none"> • The demography of the respondents • The levels of support for each proposal • The relationship between responses and demography (e.g. whether gender or age affected the level of support for each proposal) • A summary of comments received as part of the consultation for each proposal. <p>Looking at the current schemes offered, you can see that residents in Corby will be most negatively effected due to their current scheme being most generous. Both quantitative and qualitative data from the consultation support this - only residents from Corby are in disagreement more than agreement with the 25% minimum contribution.</p>

<p>letter sent to LCTS recipients and the supporting information sheet.</p> <p>In addition, the consultation analysis was presented to the Shadow Overview & Scrutiny Committee on the 10 December 2020.</p>	
<p>It was previously estimated that the cost in the 2020/21 financial year of the existing LCTSS across the four sovereign councils is £15.7m, this was based on June 2020 caseload and expenditure.</p> <p>It was also previously highlighted that the cost neutral position could change between the consultation period starting and the final scheme being agreed. This is due to several factors including the number of claimants receiving LCTS, their changing circumstances and the impact of Covid-19.</p> <p>Following the closure of the consultation the cost neutral position has been reviewed based on December's LCTS caseload and expenditure. Although the caseload and expenditure has decreased slightly the breakeven position is still 24.9%.</p>	

Protected characteristics as set out in the Equality Act 2010 – see Part A for explanations and guidance

<p>2) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.</p>		
<p>Sex</p>	<p>Impact</p>	<p>Neutral Explanation: Although there are more female claimants than male the proposed scheme would not specifically affect one gender more than another. Also, sex is not relevant in the assessment of LCTS. The consultation showed there was no difference in whether males or females agreed more or less with the changes.</p>
	<p>Mitigations/actions</p>	<p>N/A</p>
<p>Gender Reassignment</p>	<p>Impact</p>	<p>Neutral</p>

		Explanation: We do not collect this data as it is not relevant to the assessment of LCTS.
	Mitigations/actions	N/A
Age	Impact	<p>Positive and negative Explanation: The LCTSS only applies to working age claimants, there are approximately 10,534 claimants; 3073 of these will be positively affected and 7461 will be negatively affected.</p> <p>Claimants of pensionable age (approximately 8056 claimants) are protected from the proposed changes as the LCTSS for them is prescribed by government. The consultation results support this - respondents of pensionable age agreed with the proposal at a greater percentage than respondents of working age.</p>
	Mitigations/actions	<p>Mitigations include an effective income and debt service that improves social inclusion and works closely with claimants to ensure they are advised and supported, in the first instance to try and prevent debts occurring but also to help with money and budget management.</p> <p>Existing resources and agreements for money and debt provision have already been rolled forward for the new authority.</p> <p>It has also confirmed that one of the current LGR workstreams were considering this matter, but it was intended that existing levels of support be maintained for the near future.</p>
Disability	Impact	<p>Neutral Explanation: The LCTSS only applies to working age claimants, there are currently approximately 10,534 claimants; 3073 of these will be positively affected and 7461 will be negatively affected.</p> <p>Though the consultation results show that slightly more respondents with a disability disagreed than those without a disability, the proposed scheme applies to all working</p>

		age claimants, whether or not just they have a disability therefore the proposal would not specifically affect this group.
	Mitigations/actions	The LCTSS is retaining protections for disabled claimants such as a full disregard of any Disability Living Allowance (DLA) and Personal Independence Payments (PIP) they receive. In addition, non dependent deductions will not be made from their LCTS entitlement. This means if they have an another adult such as a son or daughter living with them we won't make a deduction from their LCTS because they live with them.
Race & Ethnicity	Impact	Neutral Explanation: We do not collect this data as is is not relevant to the assessment of LCTS, however the proposed LCTSS would not affect one race/ethnicity more than another.
	Mitigations/actions	N/A
Sexual Orientation	Impact	Neutral Explanation: We do not collect this data as is is not relevant to the assessment of LCTS.
	Mitigations/actions	N/A
Religion or Belief (or No Belief)	Impact	Neutral Explanation: We do not collect this data, however the proposed LCTSS would not affect one religion/belief more than another and is not relevant to the assessment of LCTS.
	Mitigations/actions	N/A
Pregnancy & Maternity	Impact	Neutral Explanation: The LCTSS only applies to working age claimants, there are currently approximately 10,534 claimants; 3073 of these with be positively affected and 7461 will be negatively affected. Some of these working age claimants may be pregnant however we do not collect or use this data when assessing eligibility for LCTS.
	Mitigations/actions	N/A

Cross-cutting considerations – see Part A for explanations and guidance

3) Based on the above information, what is the likely impact on the following groups? Please explain why you have made this assessment. If you are still unsure, please explain what you plan to do in future to address this.		
Human Rights (Please see articles in the toolkit for more information)	Impact	Neutral Explanation: The scheme applies to all working age claimants and will not affect human rights due to the LCTSS providing adequate support to protect the life of vulnerable people from neglect.
	Mitigations/actions	Mitigations include an effective income and debt service
Rural isolation	Impact	Neutral Explanation: The same LCTSS would apply regardless of where you live.
	Mitigations/actions	N/A
Socio-economic exclusion	Impact	Positive & negative Explanation: All LCTS claimants fall into this category. There are approximately 10,500 working age LCTS recipients in North Northamptonshire; this represents approximately 7% of the North Northamptonshire community liable to pay council tax. The existing maximum reduction rates across North Northamptonshire for 2020/21 are <ul style="list-style-type: none"> • Corby 91.5% • Wellingborough 80% • East Northamptonshire 80% • Kettering 55% The proposed harmonised maximum reduction rate of 75%, will have a positive impact for Kettering claimants (3073) but a negative impact for the other three district and boroughs's claimants (7461).

	Mitigations/actions	<p>Mitigations include an effective income and debt service that improves social inclusion and works closely with claimants to ensure they are advised and supported, in the first instance to try and prevent debts occurring but also to help with money and budget management.</p> <p>Existing resources and agreements for money and debt provision have already been rolled forward for the new authority.</p> <p>It has also confirmed that one of the current LGR workstreams were considering this matter, but it was intended that existing levels of support be maintained for the near future.</p>
Health and wellbeing considerations	Impact	Positive & negative Explanation: See above
	Mitigations/actions	See above

4) Final impact analysis (taking the findings from Part B into account) – including review date if required

There will be a negative impact on some claimants currently receiving LCTS (7461), this is because the LCTS that their current council operates is more generous than the proposed scheme, this represents 71% of LCTS recipients.

Mitigations include an effective income and debt service that improves social inclusion and works closely with claimants to ensure they are advised and supported, in the first instance to try and prevent debts occurring but also to help with money and budget management.

Existing resources and agreements for money and debt provision have already been rolled forward for the new authority.

It has also confirmed that one of the current LGR workstreams were considering this matter, but it was intended that existing levels of support be maintained for the near future.

* reference to Authorities includes: Corby Borough Council, East Northamptonshire Council, Kettering Borough Council, Borough Council of Wellingborough, North Northamptonshire Council