



**East Staffordshire Borough Council  
Equality and Health Impact Assessment (EHIA)**

This EHIA documents how you have taken into account health impacts and the requirements of the Public Sector Equality Duty in the decision making process for this function, policy or service.

<b>1</b>	<b>Title of function, policy or service to be assessed:</b> <b>Local Council Tax Reduction Scheme</b>
<b>2</b>	<b>Date:</b> Updated 12/11/2013
<b>3</b>	<b>Name of EHIA author:</b> Sarah Richardson and Charlotte Taylor
<b>4</b>	<b>EHIA team:</b> Equalities Working Group plus Steve Payne, Brett Atkinson, Stuart Fletcher and Sarah Richardson.
<b>5</b>	<b>Head of Service:</b> <b>Sal Khan</b>
<b>6</b>	<b>Is the policy, function or service existing, new or being reviewed?</b>  Review, due to 2013 scheme being replaced.
<b>7</b>	<b>State the aims, objectives and purpose of the function, policy or service and provide a summary of the service provided:</b>  The Local Council Tax Reduction Scheme replaced the Council Tax Benefit (CTB) scheme with effect from 01/04/2013. Each Local Authority has been required to design its own scheme to provide support to those Council Tax payers who need help to pay their Council Tax charge, whilst receiving a reduction in funding. The current scheme is in operation from 01/04/2013 to 31/04/2013, so the Council has to approve a replacement for the current scheme by 31 <sup>st</sup> January 2014, otherwise the Government will impose a default scheme on the authority that will have a damaging effect on the authority's finances. Local Council Tax Reduction Schemes must take note of the Authority's duties under the Equality Act 2010.  The Government has stated that no pensioner claimant should be any worse off under LCTR. The current pensioner claim caseload in East Staffordshire is 46% of the total number of claims. This means that the reduction in support must be borne by 54% of our caseload, who are classed as 'working age' claimants.
<b>8</b>	<b>Are there any other functions, policies or services which might be linked with this one for the purpose of this EHIA?</b>  This EIA considers the revised Local Council Tax Reduction Scheme, however, there

	are links to other benefit functions and upcoming national changes.																				
<b>9</b>	<p><b>Who is it intended to affect or benefit (the target population)?</b> Current and future claimants of Council Tax Reduction in East Staffordshire including pensioner claimants, working age claimants, and their dependents.</p> <p>Decisions made regarding Local Council Tax Reduction Schemes have the potential to affect everyone liable for Council Tax within the Borough.</p>																				
<b>10</b>	<p><b>Equality impacts</b> The Public Sector Equality Duty requires public bodies, in the exercise of their functions, to have due regard to the need to:</p> <ul style="list-style-type: none"> <li>• Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.</li> <li>• Advance equality of opportunity between people who share a protected characteristic and those who do not.</li> <li>• Foster good relations between people who share a protected characteristic and those who do not.</li> </ul> <p><b>Within this table, state whether the policy, function or service will have a positive or negative impact across the following protected characteristics and provide any comments.</b></p> <table border="1"> <thead> <tr> <th></th> <th>Positive Impact</th> <th>Negative Impact</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>Age Pensioner claimants</td> <td>X</td> <td></td> <td>The proposed Scheme will have a positive impact on pensioner claimants as their Council Tax Reduction entitlement will be calculated under the default scheme. In future, under the proposed scheme, people who become pensioner claimants of Council Tax Reduction, who were working-age claimants, will be positively impacted as they will be subject to the default scheme for pensioners and their reduction entitlement will not be affected by the local scheme rules.</td> </tr> <tr> <td>Working Age claimants</td> <td></td> <td>X</td> <td>Working age claimants and their dependents will be negatively impacted by the proposed Scheme as they will have their Council Tax Reduction reduced and will be required to contribute at least 25% of their full Council Tax liability. This will impact on 54% of claimants across the Borough (unless they fall within a protected group).</td> </tr> <tr> <td>People aged under 35</td> <td></td> <td>X</td> <td>Within the group of working age claimants, those aged under 35 may be particularly negatively affected by the proposed scheme as a cumulative result of other changes in the benefit system affecting those aged under 35.</td> </tr> <tr> <td>Non-dependant people living in the claimants household, including young people over the age of 18</td> <td></td> <td>X</td> <td>The scheme may have a negative impact upon young people aged over 18 who are living in the family/parental home and who are not receiving passported benefits as anyone not receiving these benefits will be expected to pay towards the claimant's Council Tax liability through non-dependant deductions applied in the entitlement calculation. Students and those in full time education were identified in the consultation undertaken in 2012 as</td> </tr> </tbody> </table>		Positive Impact	Negative Impact	Comments	Age Pensioner claimants	X		The proposed Scheme will have a positive impact on pensioner claimants as their Council Tax Reduction entitlement will be calculated under the default scheme. In future, under the proposed scheme, people who become pensioner claimants of Council Tax Reduction, who were working-age claimants, will be positively impacted as they will be subject to the default scheme for pensioners and their reduction entitlement will not be affected by the local scheme rules.	Working Age claimants		X	Working age claimants and their dependents will be negatively impacted by the proposed Scheme as they will have their Council Tax Reduction reduced and will be required to contribute at least 25% of their full Council Tax liability. This will impact on 54% of claimants across the Borough (unless they fall within a protected group).	People aged under 35		X	Within the group of working age claimants, those aged under 35 may be particularly negatively affected by the proposed scheme as a cumulative result of other changes in the benefit system affecting those aged under 35.	Non-dependant people living in the claimants household, including young people over the age of 18		X	The scheme may have a negative impact upon young people aged over 18 who are living in the family/parental home and who are not receiving passported benefits as anyone not receiving these benefits will be expected to pay towards the claimant's Council Tax liability through non-dependant deductions applied in the entitlement calculation. Students and those in full time education were identified in the consultation undertaken in 2012 as
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			affected by the current scheme. As the proposed scheme will mirror the existing scheme, non-dependents who are students will have nil charge applied to the claimant's reduction entitlement.
Disability			
Working Age claimants who are in receipt of a Disability Premium	X		People entitled to a Disability Premium will be classed as vulnerable and will therefore be protected. A claimant receiving Disability Allowance will be protected, provided they qualify for a Disability Premium. This replicates the current requirements within the Government's Default Scheme.
Sex / gender reassignment / pregnancy or maternity	N/A	<b>N/A</b>	No differential impact identified. Consultation responses did not identify any potential differential impacts of the proposed scheme on people related to gender, gender reassignment or pregnancy and maternity. Information on lone parents and couples with children can be found in the 'other' section.
Race	N/A	<b>N/A</b>	41% of consultation responses were made by people from Black and minority ethnic communities. 13.8% of the Borough's residents are from Black and Minority Ethnic backgrounds (2011 Census). No differential impact has been identified. Consultation responses did not identify any potential differential impacts of the proposed scheme on people related to their ethnicity.
Religion or belief	N/A	<b>N/A</b>	No differential impact identified. Consultation responses did not identify any potential differential impacts of the proposed scheme on people related to their religion or belief.
Sexual orientation	N/A	<b>N/A</b>	No differential impact identified. Consultation responses did not identify any potential differential impacts of the proposed scheme on people related to their sexual orientation.
Other			
Lone Parents and Couples with children	X		Child care costs, child benefit payments and child maintenance payments are all disregarded in the proposed scheme, which will positively impact lone parents and families with children, whether they are employed or not employed. This is no change from the current scheme. Lone parents have been identified as the group that the changes will have the greatest impact upon by the consultation responses, along with part time workers.
Unpaid Carers	X	<b>X</b>	The proposed scheme negatively impacts upon working age claimants who are unpaid carers as they are not considered a vulnerable group. There is no change from the current scheme. However, if an unpaid carer lives in the same house as a claimant who receives a Disability Premium then the claimant will be protected. Unpaid carers who are pensioner claimants will be protected under the new scheme, but the amount of reduction they

				will receive will depend on their income and circumstances. The new scheme proposals will not affect that calculation.
	Working Age claimants in Band E and above properties		<b>X</b>	The proposed scheme will continue to limit the amount of Council Tax Reduction to the cost of a Band D property, which will negatively impact on the claimants that live in properties where the Council Tax Band is E, F, G or H, which may include larger families, or widow/er[s]. Consultation responses did not identify any further impacts in relation to this category.
	Single Working Age claimants		<b>X</b>	Single working age claimants may be negatively impacted by the scheme as they receive a smaller income than other groups and thus any additional amount of money they are required to pay towards their Council Tax will be a proportionately higher share of their income.
	Single people/childless couples	<b>X</b>		Couples and single working age claimants will be positively impacted by the Scheme as the earnings disregard is increased in line with the disregard amount for lone parents (£25).
	Geographical impact		<b>X</b>	The scheme will have more impact on certain areas of the borough, particularly those wards that have the greatest number of working age claimants.
	Working age claimants in receipt of war pensions and Armed Service Compensation Payments.	<b>X</b>		Working age claimants entitled to a war pension or Armed Service Compensation Payments will be protected under the Scheme. Depending on their other income, they may still have to pay something towards their bill. This is in line with the Government's Default Scheme.
	Homelessness	<b>N/A</b>	<b>N/A</b>	No impact identified. Consultation responses did not identify any potential impacts of the proposed scheme on homelessness.
	People receiving second adult rebates		<b>X</b>	The proposed Scheme will continue to remove the Second Adult Rebate scheme for working age claimants that are not protected under the proposed scheme. This affects a small number of people. Consultation responses did not identify any further impacts in relation to this category.

**11. What evidence do you have for the statements made in question 10?**

The current caseload for East Staffordshire is:

46% pension age claimants ( protected under the new Scheme)

54% working age claimants, 19% of whom fall into the vulnerable groups. ( As of 31/10/2013)

A total of 8,400 claimants.

Information from the 2001 and 2011 Census and data on claimants.

Within East Staffordshire there are four Lower Super Output Areas (LSOAs) that are within the top 10% most deprived LSOAs in England. These four are located within Eton Park, Stapenhill, Shobnall and Winhill wards. (Source: Department of Communities & Local Government, Indices of Deprivation 2010) The five wards with the greatest number of working age claimants are: Horninglow and Eton, Stapenhill, Shobnall, Anglesey and Winhill. The number of working age claimants per ward varies significantly between wards.

The largest Black and Minority Ethnic (BME) group within East Staffordshire is Asian / Asian British: Pakistani, which accounts for 4.9%, or around 5,600, residents. The second largest BME group within the Borough is "White: Other", which accounts for 3.7%, or over 4,200, of the Borough's residents. (2011 Census)

- At the time of the 2011 Census 11,467 people across East Staffordshire, or 10.1% of the total population, provided some level of unpaid care each week.

**National statistics on disability:**

- A substantially higher proportion of individuals who live in families with disabled members live in poverty, compared to individuals who live in families where no one is disabled. 19% of individuals in families with at least one disabled member live in relative income poverty, on a Before Housing Costs basis, compared to 15% of individuals in families with no disabled member.
- 21% of children in families with at least one disabled member are in poverty, a significantly higher proportion than the 16% of children in families with no disabled member

Disabled people remain significantly less likely to be in employment than non-disabled people. In 2012, 46.3% of working-age disabled people are in employment compared to 76.4% of working-age non-disabled people.. (HM Government, Office for Disability Issues)

**National Statistics on lone parents:**

97% of lone parents on Income Support are female. Around 3 in 5 lone mothers are in employment compared to approximately two thirds of lone parents who are male (it should be noted that male lone parents generally care for fewer, older children than lone mothers). ( Income Support Lone Parent Demographics and Lone Parent Employment Rates, Department for Work and Pensions, July 2013)

Children in single parent families are twice as likely as children in couple families to live in relative poverty. Over four in every 10 (43%) children in single parent families are poor, compared to just over two in 10 (22%) of children in couple families

Paid work is not a guaranteed route out of poverty for single parents; the poverty rate for single parent families where the parent works part time is 31 per cent, and 17 per cent where the parent works full time. (Data from Households Below Average Income (HBAI) 1994/95-2011/12, Table 4.5db. Department for Work and Pensions, 2013 accessed via Gingerbread.org.uk)

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**Consultation:**

Describe what consultation has been undertaken on this function, policy or service, who was involved and the outcomes.

Consultation on the proposed Local Council Tax Reduction scheme was launched on 09/09/2013 and the closing date was the 04/11/2013. Major preceptors, parish preceptors, local groups, residents and Council Tax support claimants were consulted. Consultation methods included: Online consultation, article in ESNews, press releases.

The public consultation document comprised one question. Firstly the questionnaire asked people to rate the reasonableness of the proposal for the LCTR scheme. Respondents were asked to identify any groups who may be affected by the proposals and then to identify how these changes would affect the identified groups. There are also a number of questions which gathered equality information from respondents. The consultation documents were available in other formats and languages on request. East Staffordshire Borough Council collated the responses.

31 responses were received to the consultation. These comprised:

- Residents of East Staffordshire (62%)
- Council Tax Benefit Claimant (6.5%)
- Other / Private landlord / Resident outside of East Staffordshire (9%)
- Voluntary organisation / Community group / a friend of a Council Tax Benefit claimant / Partner organisation / Housing association (1%)

**Respondent equality profile**

39% of respondents were male, 53% were female and 7% chose 'prefer not to say'. 18% of respondents stated that they had a disability or long term health condition. This is similar to the 17.7% of the Borough's residents who say their day to day activities are limited. (2011 Census). 41% of consultation responses were made by people from Black and minority ethnic communities. This is higher than the borough composition as identified in the 2011 Census (13.8%). 15% of respondents regularly provided unpaid care.

**Findings of the Consultation:**

74% of respondents agreed that the proposed scheme was reasonable or very reasonable. 29% of respondents stated that the changes will have a low impact on their

financial situation, or the financial situation of those communities that they represent. 35% felt it would have a medium impact and 16% a high impact.

The consultation responses identified the following suggestions for managing the transition into the new scheme:

- A gradual introduction of changes
- Cancelling Council Tax payments for those claimants

**13 Briefly explain how the policy, function or service contributes to community cohesion by answering the following questions:**

- How will it provide equality of access to services, information and employment?
- Does it or could it promote good relationships within and between communities?
- How will it help to prevent social exclusion?
- Will it help to reintegrate those who have become excluded?
- Will this assist with communities feeling that they are connected to decision making that affects them?
- How will it provide good quality, inclusive services?

The proposed scheme provides protection for vulnerable groups such as people who are in receipt of a Disability Premium and people who receive a war pension, or Armed Service Compensation Payments. The proposed scheme may increase social exclusion for some groups in the borough as they will have less money than under the previous scheme.

**14 Health impacts – screening question**

Will the subject of this EHIA:

	<b>No</b> (provide a brief explanation of your response)	<b>Yes</b> (Is this impact positive or negative? provide a brief explanation of your response)
Have a direct impact on health, mental health and wellbeing?		<b>Money worries may cause some claimants to suffer mental health issues.</b>
Have an impact on social, economic and environmental living conditions that would indirectly affect health?		<b>Claimants may find they have less income to spend on their homes which could indirectly affect their health.</b>
Have an effect on an individual's ability to improve their own health and wellbeing?	<b>Any claimant who identifies a requirement for help will be sign posted to</b>	

		<b>the relevant agencies.</b>	
	Affect access to, and the quality of, health, mental health or wellbeing services?	<b>Any claimant who identifies a requirement for help will be sign posted to the relevant agencies.</b>	
	Please refer to the EHIA guidance document. If you answer yes to any of these questions a health impact assessment is required, please complete section 16.		
<b>15</b>	<b>Head of Service signature:</b> I am satisfied with the results of this EHIA.		



### 16. HEALTH IMPACT ASSESSMENT<sup>1</sup>

To be completed if you have answered yes to any of the health impact screening questions.

A. Describe the health impact(s). Please refer to the screening questions in Q14.	B. Answering yes to these questions indicates an important health impact. Be explicit and include the evidence that has been considered.			C. Are the health impacts significant?
Identify the health impact(s)	Will the health impacts affect the whole population? Will it affect particular groups of people differently?	Will the health impacts be difficult to remedy or have an irreversible impact? Are they likely to cause public concern?	Will the health impacts be medium to long term? Are they likely to create cumulative impacts?	Does this health impact have a significant positive or negative impact? (based on your responses to section B)
Direct impact on health, mental health and wellbeing	Will not affect the whole population; only those claimants in severe financial difficulties	No; ESBC has approved a Discretionary Payments Policy to help claimants in severe financial difficulties	No; ESBC has approved a Discretionary Payments Policy to help claimants in severe financial difficulties	Positive impact
Impact on social, economic and environmental living conditions that would indirectly affect health	Will not affect the whole population; only those claimants in severe financial difficulties	No; ESBC has approved a Discretionary Payments Policy to help claimants in severe financial difficulties	No; ESBC has approved a Discretionary Payments Policy to help claimants in severe financial difficulties	Positive impact

<sup>1</sup> Adapted from 'Health Impact Assessment of Government Policy, a guide to carrying out a Health Impact Assessment of new policy as part of the Impact Assessment process.' Department of Health, July 2010 p.13

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### 17. EQUALITY AND HEALTH IMPACT ASSESSMENT RECOMMENDATIONS AND ACTION PLAN

Please describe the actions, if any, you will take to mitigate against negative health or equality impacts identified in this assessment, or to maximise the benefits of the policy or service. If significant action is required it should be included in Service Plans.

Is it a Health or Equality action?	Issue/impact identified	Recommendation / action required	Lead officer and timescale	Resource allocation
Health	Health, mental health, wellbeing, indirect impacts from social, economic and environmental living conditions	Referral to relevant agencies for advice and guidance.	Sarah Richardson	R, B, & CC staff
