

Assessment details		
Assessment area	Local Scheme for Support for Council Tax 2023/24	
Date of assessment	October 2022	
Directorate and Service	Strategic (Internal) / Revenues and Benefits	
Manager	Heather Gaynor	
Officer conducting assessment	Sarah Martin	
Step 1: Scoping the assessment		
1	What are the aims and objectives of the activity or proposal?	<p>The Council Tax Reduction scheme replaced Council Tax Benefit with effect from 1 April 2013. Under the Council Tax Reduction provisions, the scheme for pensioners is determined by Central Government and the scheme for working age applicants is determined by the Council. Pensioners broadly receive the same level of support that was previously available under the Council Tax Benefit scheme.</p> <p>Small changes were made to the working age applicants scheme between 2013 to 2018 by increasing the minimum amount towards their Council Tax liability to 20% and if a person is self-employed, a minimum income floor may be imposed where a person's income is less than expected after two years of trading, this could be based on 35 hours x National Living Wage. (There are some exemptions to this)</p> <p>The scheme has also been amended each year for general changes in applicable amounts (primarily in relation to disability premiums) and for non-dependant deductions.</p> <p>In view of the problems being experienced with Universal Credit, the Council Tax Reduction scheme for Dartford has been fundamentally redesigned to:</p> <ul style="list-style-type: none"> a) Address the problems posed by full service Universal Credit and the inevitable increase in administration costs due to the high level of changes received in respect of Universal Credit; b) Simplify the claiming process for all applicants; c) Improve the speed of processing;

		<p>d) Maximise entitlement to every applicant, and e) Maintain council tax collection rates.</p> <p>Work was undertaken in 2018 on a new scheme which after consultation was accepted by Council and implemented from 2019/20. We have rolled this scheme forward each year. The new scheme had a number of features as follows:</p> <p>a) The overall expenditure (cost) of the scheme will remain broadly as at present; b) The changes can only be made to the working age schemes as the current scheme for pensioners is prescribed by Central Government; c) The current means tested scheme will be replaced by a simple income grid model; d) It is recommended that the highest level of discount will be set at the current maximum level of liability (80%) and all current applicants that are in receipt of a 'Passported Benefit' such as Income Support, Jobseeker's Allowance (Income Based) and Employment and Support Allowance (Income Related) receive maximum discount; e) All other discount levels are based on the applicant's (and partner's, where they have one) net income; f) The scheme allows for variation in household size with the levels of income per band increasing where an applicant has a partner, and / or dependants; g) Limiting the number of children used in the calculation of support to two for all working age applicants. This will bring the scheme in line with Universal Credit; h) Where an applicant had non-dependants living with them, no deduction shall be made from any entitlement. This is a significant change and means that the administration of the scheme will be more straightforward whilst also protecting low income families where adult sons and daughters for example remain at home; i) To remove Second Adult Rebate; j) To encourage work, a standard £25 per week disregard will be provided against all earnings for all applicant types. This will take the place of the current standard disregards and additional earnings disregards. Where a family also receives a child care disregard (for</p>
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		<p>child care costs not paid for by Central Government schemes), this has been allowed for within the income levels in the 'grid scheme';</p> <p>k) Disability benefits such as Disability Living Allowance and Personal Independence Allowance will continue to be disregarded and, in addition, the Support Component of Employment and Support Allowance and Carer's Allowance will also be disregarded, again providing additional protection with the scheme;</p> <p>l) Where an applicant is disabled, they have a disabled child or receive the Support Component of the Employment and Support Allowance, the amount they receive as a premium under the existing scheme will be replaced by an equivalent income disregard (in addition to the disregard of disability benefits as outlined in k. above);</p> <p>m) The total disregard on war pensions and war disablement pensions will continue;</p> <p>n) The capital limit under the new scheme will be £6,000. This is a reduction from the current level of £16,000. Any capital below this level will not have any effect on the applicant's entitlement to Council Tax Reduction;</p> <p>o) To remove the conditions that prevent certain students from claiming Council Tax Reduction;</p> <p>p) To remove extended payment provision;</p> <p>q) To change the CTRS claiming process for all applicants who receive Universal Credit;</p> <p>r) Make all changes in circumstances which change any entitlement to Council Tax Reduction on a daily basis rather than the current (benefit based) weekly basis;</p> <p>s) Where a request is made to backdate entitlement, the current scheme requires the applicant to prove 'good cause'. The new scheme will replace 'good cause' with a general discretion to backdate, and</p> <p>t) The scheme will have a minimum award of £1.00 per week.</p> <p>The impact assessment considers the cumulative effect of these changes, as the new scheme, on all working age applicants for a reduction in their council tax. The impact assessment is modelled on data from existing customers in receipt of a council tax reduction.</p>
2	Who will be affected?	Changes to the Council Tax Reduction scheme affected eligible working age applicants.

		<p>The principles on which the scheme is designed ensures that those with the least income and the least amount of savings (capital) are entitled to greater levels of discount. Working age applicants on 'passport benefits' will see their entitlement to discount protected at Band 1.</p> <p>Pension age applicants will not be affected because they are protected from any reduction in support as the level they receive is set by Central Government.</p>
3	<p>How does the activity or proposal contribute to:</p> <p>a) any key performance indicators?</p> <p>b) policies, values or objectives of Dartford Borough Council?</p>	<p>a) The Council monitors the Council Tax Support caseload and the percentage of Council Tax collected</p> <p>b) The Council Tax Reduction Scheme relates to the Corporate Plan 2021-23 theme of 'A Council Performing Strongly' which has a strategic aim to 'provide high quality services that reflect public aspirations and demonstrate improvement'. Under this theme, the strategic objectives are to 'deliver high quality services, offering value for money and demonstrating a culture of continuous improvement' and 'inform and consult residents and stakeholders about Council services'.</p>
4	<p>Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?</p>	<p>The Local Government Finance Act 2012 contains provisions to require local authorities to put in place their own localised council tax reduction scheme from April 2013. The Council has discretion in the ability to determine the level of support to working age applicants. The scheme for pension age applicants is determined by Central Government.</p> <p>In making local schemes, the Council must give consideration to the effects of the options on working age applicants, in particular vulnerable groups. In considering this, the Council has existing responsibilities under the Equality Act 2010, Disabled Persons (Services, Consultation and Representation) Act 1986 Housing Act 1996 (as amended) and the Welfare Reform Act 2016.</p>
<p>Step 2: Information collection</p> <p>Note: Equality and Diversity information for Dartford can be found at http://www.kent.gov.uk/about-the-council/information-and-data/Facts-and-figures-about-Kent/equality-and-diversity-data</p>		
5	<p>What do you know about the groups of people who will be affected? i.e. demographic information in relation to the protected</p>	<p>It is not required for council tax purposes to collate data relating to protected characteristics (other than disabled claimants and pensioners) and therefore only limited data is available.</p> <p>The current split between working age claimants and pensioner age</p>

	characteristic groups (age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment)	claimants is 5,013 and 1,708 respectively
6	What consultation has taken place with affected groups? Please describe who was consulted and the key findings	<p>In 2018 an on-line questionnaire was available on the Council's website over the eight week period. A letter was sent to all working-age claimants advising them of the web link and also giving them an option to request a hard copy of the questionnaire. Registered Social Landlords and third sector organisations were also advised of the consultation and encouraged to respond. Overall the responses were favourable to the changes proposed.</p> <p>In addition to a full public consultation, the Council also consulted with the major preceptors namely the Kent County Council, Kent Fire and Rescue Service and the Police and Crime Commissioner for Kent. The preceptors agreed with the changes proposed and are happy with the approach taken by the Council.</p>
7	Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	Some data is available on the protected characteristic groups. The changes proposed to the scheme would have no specific impact on the individual groups other than that for working age claimants generally.

Step 3: Assessing the equality impact

8	<p>Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the General Equality Duty:</p> <p>a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations</p> <p><u>NOTES:</u></p> <ul style="list-style-type: none"> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9
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	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
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a	Age	<p>When the new scheme went to members in Oct 2018 the following was provided:</p> <p>Pension age claimants will be protected from the changes.</p> <p>Currently 64% of applicants are on 'passport benefits' and under the proposed new scheme will see their entitlement to discount protected at Band 1.</p> <p>The data that follows evaluates the impact on the remaining 36% of current applicants that apply directly to the council for a discount in their council tax.</p> <p>Under the current scheme the average council tax reduction payable by age band is shown below: 18-24: £578.72 25-34: £648.10 35-44: £671.75 45-54: £709.09 55-65: £718.72</p> <p>Under the new scheme the average council tax reduction payable by age band, and the average change from the existing scheme is estimated to be: 18-24: £659.58 (+ £80.86/year or £1.56/week) 25-34: £639.69 (- £8.41/year or</p>	<p>When the new scheme went to members in Oct 2018 the following was provided:</p> <p>The number of applicants that are currently entitled to a reduction in their council tax that would not qualify for a discount under the new scheme are shown by age band below, with the current average amount they receive in council tax discount. 18-24: 2 applicants, average discount £658.98 25-34: 26 applicants, average discount £445.93 35-44: 28 applicants, average discount £469.54 45-54: 14 applicants, average discount £538.92 55-65: 15 applicants, average discount £794.61</p> <p>In the 18-24 age group one applicant would not qualify for a discount as a direct result of their capital exceeding the proposed limit of £6,000 and one applicant would not qualify for a discount as a direct result of the removal of the second adult rebate.</p> <p>The majority of those in age groups from 25 to 44 would not qualify for a discount as a direct result of their income exceeding the levels set out for Band 5 of the income grid model.</p> <p>The majority of those in age groups</p>	<input type="checkbox"/>	<input type="checkbox"/>
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		<p>£0.16/week 35-44: £670.59 (- £1.16/year or £0.02/week) 45-54: £753.45 (+ £44.36/year or £0.85/week) 55-65: £810.60 (+ £91.89/year or £1.77/week)</p> <p>The age of the claimant is not a material consideration in the calculation of council tax discount. The variation in the amounts payable is linked directly to individual circumstances rather than a particular feature or aspect of the scheme. For example a single female aged 25 with the same costs, income and capital as a single female applicant aged 57 would receive exactly the same level of discount. This would equally be the case if the applicants had children of the same age.</p> <p>All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship.</p>	<p>from 45 to 65 would not qualify for a discount as a direct result of their capital exceeding the proposed limit of £6,000.</p> <p>Certain applicants may experience a reduction in overall support (as with other working age claimants) due to the proposed changes to the scheme</p>		
b	Disability	<p>When the new scheme went to members in Oct 2018 the following was provided:</p> <p>Pension age claimants will be protected from the changes.</p> <p>Currently 64% of current applicants</p>	<p>When the new scheme went to members in Oct 2018 the following was provided:</p> <p>It is estimated that 13 applicants that are currently entitled to a reduction in their council tax would not qualify for a discount under the new scheme.</p>	<input type="checkbox"/>	<input type="checkbox"/>

		<p>are on 'passport benefits' and under the proposed new scheme will see their entitlement to discount protected at Band 1.</p> <p>The data that follows evaluates the impact on the remaining 36% of current applicants that apply directly to the council for a discount in their council tax.</p> <p>Under the current scheme the average council tax reduction payable to those with a disability is £760.77 per year. Under the new scheme this would increase to £790.99 per year. This is an increase of £30.22 per year, the equivalent of £0.58 per week.</p> <p>Under the current scheme the average council tax reduction payable to those without a disability is £669.98 per year. Under the new scheme this would increase to £693.97 per year. This is an increase of £23.99 per year, the equivalent of £0.46 per week.</p> <p>All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship.</p>	<p>These claimants currently receive on average £836.25 in council tax discount. This is as a direct result of the proposal to reduce the capital limit to £6,000.</p> <p>Certain disabled applicants may experience a reduction in overall support (as with other working age claimants) due to the proposed changes to the scheme.</p>		
c	Gender (including reassignment)	When the new scheme went to members in Oct 2018 the following was provided:	When the new scheme went to members in Oct 2018 the following was provided:	<input type="checkbox"/>	<input type="checkbox"/>

		<p>Pension age claimants will be protected from the changes.</p> <p>Currently 64% of current applicants are on 'passport benefits' and under the proposed new scheme will see their entitlement to discount protected at Band 1.</p> <p>The data that follows evaluates the impact on the remaining 36% of current applicants that apply directly to the council for a discount in their council tax.</p> <p>Under the current scheme the average council tax reduction payable to female applicants is £653.88 per year. Under the new scheme this would increase to £694.40 per year. This is an increase of £40.52 per year, the equivalent of £0.78 per week.</p> <p>Under the current scheme the average council tax reduction payable males is £740.96 per year. Under the new scheme this would decrease to £721.25 per year. This is a decrease of £19.71 per year, the equivalent of £0.38 per week.</p> <p>The proposals under the scheme would reduce the average existing variance between male and female claimants from £84.16 per year to</p>	<p>It is estimated that 58 female applicants currently entitled would not qualify for a discount under the new scheme. These claimants currently receive on average £504.64/year in council tax discount. This is as a direct result of their capital exceeding the proposed limit of £6,000, the removal of the second adult rebate or their income exceeding the levels set out for Band 5 of the income grid model.</p> <p>It is estimated that 27 male applicants currently entitled would not qualify for a discount under the new scheme. These claimants currently receive on average £602.00 in council tax discount. This is as a direct result of their capital exceeding the proposed limit of £6,000 or their income exceeding the levels set out for Band 5 of the income grid model.</p> <p>Certain applicants may experience a reduction in overall support (as with other working age claimants) due to the proposed changes to the scheme.</p>		
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		<p>£26.85 per year.</p> <p>The sex of the claimant is not a material consideration in the calculation of council tax discount. The variation in the amounts payable is linked directly to individual circumstances rather than a particular feature or aspect of the scheme. For example a single male with the same costs, income and capital as a single female applicant would receive exactly the same level of discount. This would equally be the case if the applicants had children of the same age.</p>			
d	Race	All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship	This information is not collected from claimants as it is not relevant to the calculation of council tax reduction. Same impact as that for working age claimants generally	<input type="checkbox"/>	<input type="checkbox"/>
e	Religion/Belief	All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship	This information is not collected from claimants as it is not relevant to the calculation of council tax reduction. Same impact as that for working age claimants generally	<input type="checkbox"/>	<input type="checkbox"/>
f	Sexual Orientation	All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship	This information is not collected from claimants as it is not relevant to the calculation of council tax reduction. Same impact as that for working age claimants generally	<input type="checkbox"/>	<input type="checkbox"/>
g	Pregnancy/Maternity	All applicants will have access to the exceptional hardship policy should they experience exceptional financial hardship	This information is not collected from claimants as it is not relevant to the calculation of council tax reduction. Same impact as that for working age claimants generally	<input type="checkbox"/>	<input type="checkbox"/>

9	If 'no impact' or 'unknown' was selected, please explain	There is no identified impact on the protected characteristic groups other than if they were of working age generally.
10	If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The Revenues and Benefits service is a shared partnership with Sevenoaks District Council.
11	Any other comments	<p>Written into the scheme it states "The authority may increase the level of incomes within the grid on an annual basis by the appropriate level of inflation measured by the Consumer Price Index (CPI) at 1st October preceding the effective financial year, rounded to the nearest pound". This is to ensure that the overall impact on all claimants is minimised whilst keeping the amount spent in line with the current scheme.</p> <p>The Council also makes available an Exceptional Hardship Policy which applicants can apply to should the new scheme impact them significantly. To ensure the scheme remains accessible to claimants who may no longer qualify as a result of capital, second adult rebate or income rules the Policy is proposed to be amended to include those that were in receipt of a reduction within the last six weeks.</p>

Step 4: Action plan					
11. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:					
a) any gaps in information and consultation					
b) how any negative impacts on equality will be mitigated or eradicated					
a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?					
Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?					
Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Potential financial impact	Encourage applications for the exceptional hardship scheme	To provide additional support to any claimants suffering exceptional hardship as a result of the changes	31 December 2022	Use of the exceptional hardship scheme will be monitored by officers	Sarah Martin Chief Officer & Director of Corporate Services

Step 5: Decision making and future monitoring	
13	<p>Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</p> <p>Chief Officer & Director of Corporate Services</p> <p>Cabinet will be asked to consider this Customer Access Review assessment alongside the Local Scheme of Support for Council Tax report on 8 December. This will then go to the General Assembly of the Council on 12 December 2022.</p>
14	<p>How will you continue to monitor the impact of the activity or proposal on the equality groups?</p> <p>Annual review of scheme and impact</p>
15	<p>When will you review this Customer Access Review?</p> <p>On an annual basis</p>
Step 6: Final steps	
16	Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer
17	If the subject of the Customer Access Review is going to committee, summarise your findings in the committee report

18	Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded
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Reviewed by Legal Services: 21 November 2022

Signed: Chief Officer and Director of Corporate Services