

Babergh District Council and Mid Suffolk District Council Full Equality Analysis Assessment

M117A

PART 1: General information	
Name of work	The Babergh DC and the Mid-Suffolk DC Council Tax Support (CTS) schemes, due to be implemented 1 st April 2013.
State if you are assessing a contract, decision, function, policy, project or strategy	Policy and function
State if this is a new or existing piece of work	New
Name of any other people, departments or partners involved in the delivery of your work	Shared Revenues Partnership (SRP) who will administer and deliver the CTS schemes for both Councils.
State who the main stakeholders are (including who will be affected)	Working age council tax payers on low incomes, who would previously have qualified for Council Tax Benefit (CTB), which is abolished from 1 st April 2013.
Describe the aims, objectives and purpose of your work <ul style="list-style-type: none"> • Why you are doing this • How you are doing this • What you are doing • Who will benefit 	<p>Why? – Statutory requirement, though if the Councils fail to devise local CTS schemes the Government will impose a “default” scheme.</p> <p>How? – Within the limitations imposed by the legislation and the IT available to administer the CTS schemes, to devise a scheme that will have as low an impact on stakeholders as is possible, utilising funding from Council Tax technical reforms (such as extra charges on long-term empty properties), but with a neutral impact on the Councils budgets.</p> <p>What? – Amending the existing national CTB scheme for each Council so as to provide a local CTS scheme within the limitations set out above.</p> <p>Who will benefit? – No one as the Government is imposing an overall cut of 10% as compared to the funding of CTB. Working-age current recipients of CTB will be worse-off under CTS, though pension-age recipients of CTS will receive the same amount that they would have done under CTB.</p>
Name and job title of assessor	John Booty, Performance & Relationship Manager, Shared Revenues Partnership.
Telephone number	01473 432651
Date of completion	29 th November 2012

PART 2: Impact

You should use this section to explain in more detail why your work is likely to have a high impact (negative) on one or more of the equality groups (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation).

<p>Age</p>	<p>Pension age current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for persons of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Working age current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship.
<p>Disability</p>	<p>Disabled pension age current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for disabled persons of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Disabled working age current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance (Hardship) fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship. • The CTS schemes continuing the provisions within the CTB scheme to award extra monies to disabled households by way of additional sums within the applicable amount used to calculate CTS entitlement.

<p>Gender Reassignment</p>	<p>There are no specific provisions in CTB or CTS identifying, or specifically affecting, persons undergoing, or having undergone, gender reassignment.</p> <p>Persons undergoing, or having undergone, gender reassignment of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for Persons undergoing, or having undergone, gender reassignment of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Persons undergoing, or having undergone, gender reassignment of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship.
<p>Marriage and Civil Partnership</p>	<p>Married or civil partnered persons of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for married or civil partnered persons of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Married or civil partnered persons of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship.

<p>Pregnancy and maternity</p>	<p>Pregnant or maternal persons of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for pregnant or maternal persons of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Pregnant or maternal persons of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship. • The CTS scheme continues the current provisions identifying persons on maternity leave as “employed”.
<p>Race</p>	<p>Persons of identifiable racial groups of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for Persons of identifiable racial groups of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Persons of identifiable racial groups of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship. <p>The rules surrounding “persons from abroad” being excluded from entitlement to CTB are mirrored in the CTS schemes, essentially excluding EU citizens who are not “workers” and non-EU citizens with no “right of abode” in the UK. The restrictions are not extended.</p>

<p>Religion or Belief</p>	<p>There are no specific provisions in CTB or CTS identifying, or specifically affecting, persons of any particular religion or belief.</p> <p>Persons of identifiable religion or belief of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for Persons of identifiable religion or belief of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Persons of identifiable religion or belief of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship.
<p>Sex</p>	<p>There are no specific provisions in CTB or CTS identifying, or specifically affecting, persons of any particular sex.</p> <p>Persons of whatever sex of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for Persons of whatever sex of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Persons of whatever sex of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship.

	<ul style="list-style-type: none"> • The current provisions within CTB to award additional allowances for carers receiving (or entitled to) a carers allowance will continue, as will those for lone parents (Carers and lone parents being mainly female). • CTS will continue the CTB rule of, on request, identifying a persons sex as “X” instead of “M” or “F” and using non-sexual titles instead of Mr, Mrs, Miss etc. .
Sexual Orientation	<p>There are no specific provisions in CTB or CTS identifying, or specifically affecting, persons of any particular sexual orientation.</p> <p>Persons of whatever sexual orientation of pension age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Neutral, for Persons of whatever sexual orientation of pension age the CTS scheme in each Council mirrors the current CTB scheme</p> <p>Persons of whatever sexual orientation of working age who are current CTB recipients or those who would qualify for CTB if the scheme continued after 1st April 2013 – Negative impact, as the 10% Government funding reduction for the whole scheme falls only upon working age recipients. This is mitigated by:-</p> <ul style="list-style-type: none"> • Using each Councils new powers to charge an “empty homes” premium on long-term empty and unoccupied homes and to vary, or abolish, the discount on short-term unoccupied properties. Each Council has agreed to use all of the extra income thus obtained to off-set part of the Government 10% funding cut. • Providing a Discretionary Financial Assistance fund, so that awards over and above entitlement under the new CTS schemes can be made in cases of extreme hardship. • CTS will continue the CTB rule of, on request, identifying a persons sex as “X” instead of “M” or “F” and using non-sexual titles instead of Mr, Mrs, Miss etc. .

PART 3: Details of consultation and research

Provide details of the new consultation/research you have carried out and how you have involved key stakeholders.

A mailshot was sent in October 2012 to all current CTB recipients of working age, since they were the negatively impacted group.



Draft MSDC CTS Draft BDC CTS
 Mailshot Oct12.docx Mailshot Oct12.docx

This pointed recipients to the Council’s web site to complete a consultation form, or they could request a paper form.

Seminars were held with Private Landlords and Social Landlords in June 2012 and September 2012 and with Voluntary and Charitable Groups in September 2012. These were held jointly with the other 5 District/Boroughs in Suffolk and the County Council. The whole range of Welfare Reforms was discussed, including CTB/CTS changes.

Research was carried out on the current CTB caseload

PART 4: Outcome of consultation and research

Describe the outcomes of the consultation/research carried out.



SurveySummary_103SurveySummary_103
 12012 Mid Suffolk.pdf 12012 Babergh.pdf

Results of the consultation exercise, which closed on 25th October 2012.

From the Seminars, apart from general concerns at perceived cuts in welfare, Landlords concerns around charges on empty homes between tenants were noted.

Caseload research involved:-

1. Identifying CTB claimants by gender, and comparing % of each gender to the gender of consultation replies received.

Gender of BDC/MSDC CTB Claimants Oct 12			Gender of BDC/MSDC Consultation replies Oct 12		
Gender	BDC	MSDC	Gender	BDC	MSDC
F	3922	3425	F	45	49
M	2409	2251	M	35	25
X	62	78	X	2	4
	6393	5754		82	78
Gender	BDC	MSDC	Gender	BDC	MSDC
F	61.35%	59.52%	F	54.88%	62.82%
M	37.68%	39.12%	M	42.68%	32.05%
X	0.97%	1.36%	X	2.44%	5.13%

2. BDC/MSDC has no meaningful statistics on the race of CTB recipients. There are no new rules regarding race/nationality in CTS over and above CTB. The few statistics held show:-

BDC:

Ethnic Origin	Count of Current Claims	%
White: Any other White background	3	2.56%
White: British	113	96.58%
White: Irish	1	0.85%
Count:	117	1.79%

MSDC:

Ethnic Origin	Count of Current Claims	%
White: Irish	1	0.34%
Asian or Asian British: Bangladeshi	3	1.02%
Black-Black British:Caribbean	3	1.02%
Black-Black British:Other	3	1.02%
Mixed :Any other mixed background	3	1.02%
Mixed: White and Black African	3	1.02%
Black-Black British:African	4	1.36%
Asian or British : Any other Backgrnd	8	2.71%
Mixed: White and Black Caribbean	8	2.71%
White: Any other White background	40	13.56%
White: British	219	74.24%
	295	5.07%

3. Claimants with Disability was analysed by disability/sickness benefits received:

Benefit	BDC		MSDC	
	Number	%	Number	%
Attendance Allowance	663	10.16%	574	9.86%
DLA Care Low	355	5.44%	292	5.02%
DLA Care Mid	760	11.64%	410	7.04%
DLA Care High	233	3.57%	284	4.88%
DLA Mobility	997	15.28%	821	14.10%
ESA Contribution Based	114	1.75%	94	1.61%
ESA Income Related	373	5.71%	344	5.91%
ESA Assessment Phase	85	1.30%	61	1.05%
ESA Support Comp.	37	0.57%	33	0.57%
ESA Work Comp.	45	0.69%	39	0.67%
SDA	17	0.26%	23	0.40%
Claims with Disability Benefit	2,139	32.77%	1,809	31.07%
Total Claims	6,527	100.00%	5,822	100.00%

4. An analysis of claims involving children or lone parents:

BDC			MSDC		
Number	Type	%	Number	Type	%
1879	With Children	28.79%	1494	With Children	25.66%
693	Lone Parent	10.62%	513	Lone Parent	8.81%
6527	Total Claims	100.00%	5822	Total Claims	100.00%

5. An analysis by age:-

Age	BDC		MSDC	
	Number	%	Number	%
Up to 18	26	0.38%	16	0.27%
19 - 21	84	1.24%	92	1.54%
22 - 25	167	2.47%	183	3.07%
26 - 35	838	12.39%	620	10.41%
36 - 45	995	14.71%	754	12.66%
46 - 55	888	13.13%	679	11.40%
56 - 65	875	12.94%	818	13.73%
66 - 75	1189	17.58%	1088	18.26%
76 - 85	1092	16.15%	1101	18.48%
86 - 95	569	8.41%	571	9.58%
Over 95	40	0.59%	36	0.60%
	6763	100.00%	5958	100.00%

PART 5: Summary of analysis

In light of the new evidence listed above, please summarise the impact of your work.

Please include in your summary how the proposals:

- Impact on the elimination of discrimination, harassment or victimisation
- Advance the equality of opportunity
- Promote good relations between groups

Due to the offer of a transitional grant from DCLG, BDC/MSDC decided to comply with the restrictions applied to that grant, namely that no one currently receiving 100% CTB should have to pay more than 8.5% of their Council Tax under CTS.

The BDC CTS scheme is based on replacing the current 100% maximum benefit in CTB with 91.5% maximum support in CTS.

The MSDC CTS scheme is based on replacing the current 100% maximum benefit in CTB with 95% maximum support in CTS.

The only other change from CTB to CTS in BDC/MSDC from April 2013 is the abolition of second adult rebate for working age claims as the research did show that abolishing second adult rebate for working age claimants would have minimal impact.

Given the legal and financial restrictions, and the restrictions regarding the transitional grant, BDC/MSDC has not included any changes in CTS as from CTB that:-

- Impact on the elimination of discrimination, harassment or victimisation
- Advance the equality of opportunity
- Promote good relations between groups

However, there are no changes, other than the reduction for working age claimants, that:-

- Increase discrimination, harassment or victimisation
- Reduce the equality of opportunity
- Adversely affect relations between groups

PART 6: Changes

Explain what changes you propose to make as a result of your consultation/research.

Equality group	Negative Impact	Changes Proposed	Lead Officer	Timescale	Resource implications	Monitoring system
None						

PART 7: Review

When will the proposed changes be reviewed?

October 2013 as changes are permitted to the CTS scheme from April 2014