

Equality Impact Assessment (EIA) Report

This form should be completed for each Equality Impact Assessment on a new or existing function, a reduction or closure of service, any policy, procedure, strategy, plan or project which has been screened and found relevant to equality.

Please refer to the 'EIA Report Form Guidance' while completing this form. If you need further support please contact acesstoservices@swansea.gov.uk.

Where do you work?
Service Area: Financial Services
Directorate: Corporate Services

(a) This EIA is being completed for a:

Service/ Function <input type="checkbox"/>	Policy/ Procedure <input type="checkbox"/>	Project <input type="checkbox"/>	Strategy <input type="checkbox"/>	Plan <input type="checkbox"/>	Proposal X
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(b) Please name and describe here:

Re-adoption of the Council Tax Reduction scheme from 1 April 2021. The authority is required to do this every year by 31st of January. In effect we re-adopt the CTRS scheme for Wales every year and set our policy on the discretionary areas within that scheme. Once again there are no significant changes for 2021/22 compared to 2020/21.

(c) It was initially screened for relevance to Equality and Diversity in 2013, on 14/12/18, 7/1/20 and reviewed again on 13/1/21.

(d) It was found to be relevant to...

Children/young people (0-18).....	x	Sexual orientation.....	x
Older people (50+).....	x	Gender reassignment.....	x
Any other age group	x	Welsh language.....	x
Disability	x	Poverty/social exclusion	x
Race (including refugees).....	x	Carers (including young carers).....	x
Asylum seekers.....	x	Community cohesion	<input type="checkbox"/>
Gypsies & Travellers.....	x	Marriage & civil partnership	x
Religion or (non-)belief.....	x	Pregnancy and maternity.....	x
Sex.....	x		

(e) Lead Officer

Name: Julian Morgans

Job title: Revenues and Benefits Manager

Date: 13/1/21

(f) Approved by Head of Service

Name: Ben Smith

Date: 13/1/21

Section 1 – Aims (See guidance):

Briefly describe the aims of the initiative:

What are the aims?

Owing to the expiry of the current Council Tax Reduction Scheme on 31 March 2021, the aim of this proposal is to re-adopt a new Council Tax Reduction Scheme, as required by the Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations 2013, which were laid on 26 November 2013. In effect though, we are re-adopting a scheme with exactly the same terms as the previous year's scheme (subject to some minor technical and consequential changes).

Who has responsibility?

Each Welsh local authority has responsibility for adopting a scheme every year. The decision must be made by full Council.

Who are the stakeholders?

All current recipients of and future applicants for a Council Tax Reduction.

Section 2 - Information about Service Users (See guidance):

Please tick which areas you have information on, in terms of service users:

Children/young people (0-18).....	x	Sexual orientation.....	<input type="checkbox"/>
Older people (50+).....	x	Gender reassignment.....	<input type="checkbox"/>
Any other age group	x	Welsh language.....	<input type="checkbox"/>
Disability	x	Poverty/social exclusion	<input type="checkbox"/>
Race (including refugees).....	x	Carers (including young carers).....	<input type="checkbox"/>
Asylum seekers.....	<input type="checkbox"/>	Community cohesion	<input type="checkbox"/>
Gypsies & Travellers.....	<input type="checkbox"/>	Marriage & civil partnership	x
Religion or (non-)belief.....	<input type="checkbox"/>	Pregnancy and maternity.....	x
Sex.....	x		

For anyone who is party to a Council Tax Reduction claim (applicant, partner, children, household members) we will hold combinations of the following details. What we hold will vary according to the circumstances of the claimant and their household:

- Name
- Address
- Date of birth
- Sex
- Financial circumstances – income, capital, property, certain payments made.
- Personal circumstances – age, partnership status, disabilities, make-up of the household, immigration status

Please provide a snapshot of the information you hold in relation to the protected groups above:

What information do you know about your service users and how is this information collected?

Information has been collected from data held by the authority's benefits section in respect of current recipients of a Council Tax Reduction, along with current census information.

At the time of writing, Swansea currently has 23,029 recipients of a Council Tax Reduction and is expected to award around £23.207 million in reductions for 2020/21. 15,058 (65.39%) of these awards are in respect of working age households, and 7,971 (34.61%) are in respect of pensioner households.

ONS's mid-year population estimate for 2019 for the City & County of Swansea was 247,000.

0 – 15 years of age	16.9%
16-64 years of age	63.4%
65 years of age and over	19.7%

More details can be found at: <http://www.swansea.gov.uk/population>

Any actions required, e.g. to fill information gaps?

No

Section 3 - Impact on Protected Characteristics (See guidance):

Please consider the possible impact on the different protected characteristics.

	Positive	Negative	Neutral	Needs further investigation
Children/young people (0-18)	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Older people (50+)	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Any other age group	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Disability	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Race (including refugees)	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Asylum seekers	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Gypsies & travellers	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Religion or (non-)belief	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Sex	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Gender reassignment	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Welsh Language	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Poverty/social exclusion	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Carers (inc. young carers)	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Community cohesion	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Marriage & civil partnership	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>
Pregnancy and maternity	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>

Thinking about your answers above, please explain in detail why this is the case.

It is important to stress that the authority has no control over the impact of the new scheme other than in the three discretionary areas shown below.

The maximum Council Tax Reduction entitlement available to eligible recipients for the scheme is set at 100% and therefore levels of entitlement to a reduction are largely unchanged from 2020/21 rates and those afforded under Council Tax Benefit which was abolished from 1 April 2013.

The following areas of discretion in the operation of the scheme are available to the authority:

1. disregard of war pensions and war widow(ers) pensions (it is proposed that all such income is disregarded as it is at present and has been for many years)
2. a longer period for back dating applications for a reduction (it is proposed that the maximum limit for back dating remains unchanged from the regulations)
3. a longer extended (or run-on) period for certain applicants / recipients who have started work or increased their hours of work (it is proposed that the run-on period remains unchanged from the regulations).

Neutral impact on all groups above:

The 2021/22 scheme is largely unchanged from the provisions of the 2019/20 scheme although the amending set of regulations also incorporate changes to reflect consequential and technical amendments required to take account of inter-related changes to welfare benefits and other legislation made by the UK Government.

Section 4 - Engagement:

Please consider all of your engagement activities here, e.g. participation, consultation, involvement, co-productive approaches, etc.

What engagement has been undertaken to support your view? How did you ensure this was accessible to all?

The authority carried out a consultation exercise from the 1st to the 30th of November 2018. Although a previous consultation exercise had been carried out in 2013 and the scheme has remained broadly the same since then, it was felt that it was time to 'refresh' the exercise. The intention is to carry out the exercise again after a similar period. However, this might change as Welsh Government is currently reviewing the CTR scheme as it stands and should there be substantial changes it may be necessary to carry out a consultation exercise earlier than planned if there are significant changes made to the scheme.

What did your engagement activities tell you? What feedback have you received?

What consultation and engagement has been undertaken (e.g. with the public and/or members of protected groups) to support your view? Please provide details below.

The authority consulted on the discretionary elements of the scheme from 5th November 2018 to 2nd December 2018. The responses are analysed as follows:

Number of responses

- 23 responses received
- 23 by individuals
- 0 on behalf of an organisation

Method of responding:

- 8 completed on line
- 15 written

Of those who answered the "about you" section in whole or part:

- 8 were male, 14 female and 1 preferred not to say.
- 14 described themselves as British (some further describing themselves as Welsh (9), English (2), Irish (1) and 1 as a refugee/asylum seeker.
- 20 stated their ethnicity as white British, 1 as Black British and one stating Arab.
- 9 indicated they had a disability and 13 stated they did not

Age

- 21 respondents indicated their age, with 4 of current pensionable age and 17 of working age

The majority of responses were supportive of the authority's proposals in respect of the discretionary areas of the scheme.

- 14 of 23 responses agreed it was reasonable for the existing 4 week standard extended payment given to people after they return to work when they have been in receipt of a relevant qualifying benefit for at least 26 weeks to remain unaltered.
- 16 of 23 responses agreed it was reasonable for the Council to continue to disregard the whole amount of War Disablement Pensions and War Widows Pensions when calculating income.
- 16 of 23 responses agreed it was reasonable for the Council to continue to keep the maximum backdate period available for awards of Council Tax reduction to the 3 month statutory period.

How have you changed your initiative as a result?

No change

Any actions required (e.g. further engagement activities, mitigation to address any adverse impact, etc.):

- The Revenues and Benefits Section will continue to provide advice to applicants for a reduction. An internal referral process exists so that if staff responsible for collecting Council Tax identify someone in financial difficulties, they can liaise with the Benefits staff to ensure entitlement to Council Tax Reduction is maximised. Revenues staff are also aware of the various exemptions and discounts that are available in order to reduce liability for Council Tax and will ensure these have been allowed where the customer is entitled to them.
- The section will also signpost applicants / recipients to relevant advice agencies and support services inside and outside the authority.

Section 5 – Other impacts:

Please consider how the initiative might address the following issues - see the specific Section 5 Guidance

Foster good relations between different groups	Advance equality of opportunity between different groups
Elimination of discrimination, harassment and victimisation	Reduction of social exclusion and poverty

Please explain any possible impact on each of the above.

This is national scheme, and the authority has a duty to implement it. The only criteria the scheme would impact on is the 'reduction of social inclusion and poverty' as it ensures the taxpayers on a low income would be required to pay a lower amount of, or no Council Tax.

What work have you already done to improve any of the above?

The Revenues and Benefits Section advises people on maximisation of benefit income to ensure they are claiming all they are entitled to. Also on the process required to claim Council Tax Reduction to make it as easy as possible. We also ensure that all available discounts and exemptions have been allowed to eligible taxpayers. The Authority's Poverty and Prevention Team is also available to provide support as is Citizen's Advice with whom we have a referral arrangement in place.

Is the initiative likely to impact on Community Cohesion? Please provide details.

No

How does the initiative support Welsh speakers and encourage use of Welsh?

N/A

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

None

Section 6 - United Nations Convention on the Rights of the Child (UNCRC):

Many initiatives have an indirect impact on children and you need to consider whether the impact is positive or negative in relation to both children's rights and their best interests. Please read the UNCRC guidance before completing this section.

Will the initiative have any impact (direct or indirect) on children and young people (think about this age group holistically e.g. disabled children, those living in poverty or from BME communities)? If not, please briefly explain your answer here and proceed to Section 7.

This is national scheme, and the authority has a duty to implement it This issue should have been considered by Welsh Government.

All initiatives must be designed / planned in the best interests of children and young people.

Best interests of the child (Article 3): The best interests of children must be the primary concern in making decisions that may affect them. All adults should do what is best for children. When adults make decisions, they should think about how their decisions will affect children. This particularly applies to budget, policy and law makers.

Please explain how you meet this requirement:

This is national scheme, and the authority has a duty to implement it. This issue should have been considered by Welsh Government.

Actions (to mitigate adverse impact or to address identified gaps in knowledge).

None - This is national scheme, and the authority has a duty to implement it and is required to do so.

Section 7 - Monitoring arrangements:

Please explain the monitoring arrangements for this initiative:

Monitoring arrangements: A number of monitoring activities will be carried out during the scheme's lifespan:

- monitoring of caseload
- Monitoring of the amount spent on Council Tax Reduction

Actions: see action plan below

Section 8 – Outcomes:

Having completed sections 1-5, please indicate which of the outcomes listed below applies to your initiative (refer to the guidance for further information on this section).

- | | |
|---|--------------------------|
| Outcome 1: Continue the initiative – no concern | X |
| Outcome 2: Adjust the initiative – low level of concern | <input type="checkbox"/> |
| Outcome 3: Justify the initiative – moderate level of concern | <input type="checkbox"/> |
| Outcome 4: Stop and refer the initiative – high level of concern. | <input type="checkbox"/> |

For outcome 3, please provide the justification below:

For outcome 4, detail the next steps / areas of concern below and refer to your Head of Service

/ Director for further advice:

Section 9 - Publication arrangements:

On completion, please follow this 3-step procedure:

1. Send this EIA report and action plan to the Access to Services Team for feedback and approval – accesstoservices@swansea.gov.uk
2. Make any necessary amendments/additions.
3. Provide the final version of this report to the team for publication, including email approval of the EIA from your Head of Service. The EIA will be published on the Council's website - this is a legal requirement.

EIA Action Plan:

Objective - What are we going to do and why?	Who will be responsible for seeing it is done?	When will it be done by?	Outcome - How will we know we have achieved our objective?	Progress
Monitor caseload (Council Tax Reductions awarded)	Revenues and Benefits Section (Julian Morgans)	Quarterly	We will have ensured that council tax payers entitled to a reduction are aware of their opportunity to apply for one.	Caseload is monitored on a quarterly basis. we continue to receive a high number of applications and are working with other departments (e.g. Council Tax collection, poverty and prevention, housing associations, CAB) and agencies to ensure potential applicants are aware of the opportunity to claim CTR.
Monitor Council Tax collection rate	Revenues and Benefits Section (Julian Morgans)	Quarterly	We will have evaluated the new scheme's impact on council tax collection	The collection rate is monitored on a monthly basis. We believe the scheme may have had an impact on the collection rate as applicants in receipt of Universal Credit (UC) have their CTR recalculated every time their UC award, changes. As this can

				happen every month it results in multiple Council Tax bills being issued in a year and potential confusion on the payments that need to be made. This element of the scheme cannot be changed by the authority but we are aware Welsh Government is currently reviewing the scheme and they have been made aware of this issue a number of times as it affects all Welsh LAs.
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*** Please remember to be 'SMART' when completing your action plan (Specific, Measurable, Attainable, Relevant, Timely).**