

## Appendix B: West Suffolk Council Local Council Tax Reduction Scheme 2022-23

### Equality screening form

#### Step 1: The changes being proposed

What changes are being proposed? For example, in policy, service, charging, location.

Changes to the West Suffolk Council Local Council Tax Reduction Scheme 2022-23. The four proposed changes are as follows:

#### Proposal 1

It is proposed to lower the 'capital threshold' for Local Council Tax Reduction from £16,000 to £10,000 and remove the requirement to pay a tariff on savings over £6000.

#### Proposal 2

It is proposed to set a fixed deduction of £7.40 on the amount of Council Tax reduction a customer on 'non-passported benefits' (see definition below) is entitled to if they live with non-dependent adult family members or friends. At the moment, the amount of deduction has to be calculated individually and can cause problems when the non-dependent family members or friends refuse to, or forget to, let the customer know about changes in their circumstances.

#### Proposal 3

West Suffolk Council is proposing to simplify the application process for LCTRS by requiring all customers to apply to DWP rather than direct to the local authority. Whereas previously, customers submitted separate claims for LCTRS, the proposals would mean customers would in future only need to apply for benefits through DWP, who will automatically notify ARP if someone is eligible for LCTRS.

#### Proposal 4

The council is proposing to adjust the current rule whereby customers' income can vary up to £65 a month (£15 a week) before a reassessment is required, to £100 a month. Since the £65 threshold was introduced in 2020, ARP have seen a significant reduction in adjustment notifications, direct debit amendments and refunds. It has also given customers greater certainty to enable them to manage their payments and household budgets.

**Step 1a. Who will the changes have an impact on in general?** (For example, taxi drivers, customers, staff, owners of businesses)

**List the groups:**

Existing recipients of LCTRS

**Step 1b. What changes will each of the groups listed experience?**

**Impacts on specific groups:**

Based on modelling the proposed changes would impact those customers who have over £10,000 of savings. These customers would not qualify for LCTRS assistance.

	<p>Customers with savings of between £6,000 and £10,000 would be entitled to more LCTRS.</p> <p>The total number likely to be affected by these changes amounts to 76 customers.</p> <p>The proposed non-dependent fixed deduction change would enable customers to budget more easily because there would be less changes to customers' LCTRS entitlement.</p> <p>The total number of customers claims likely to be affected amounts to 225. Some customers will receive more LCTRS and some less based on the proposed changes.</p> <p>The increase amount within the Universal Credit tolerance rule should result in fewer adjustments to LCTRS awards.</p> <p>Both the capital and fixed deduction change will reduce the burden on the customer to provide evidence for ongoing LCTRS claims.</p>
Council tax payers not currently in receipt of LCTRS	No impact
Anglia Revenues Partnership staff	<p>The proposed changes should result in a reduction of staff time contacting customers as less evidence will be required.</p> <p>There are likely to be fewer benefit reassessments in relating to customers' savings, Universal Credit data re-assessments and non-dependent income variations.</p>
Carers and advocates of recipients of LCTRS	<p>These proposed changes do not affect this group specifically.</p> <p>These changes will reduce the burden on all customers to provide evidence in relation to changes concerning savings and adult non-dependents.</p>
Voluntary sector organisations providing advice and advocacy services	These proposed changes should result in fewer LCTRS adjustments letters in relation to capital changes, adult non-

	<p>dependents and Universal Credit data re-assessments. Customers may need less assistance with LCTRS claim changes notifications from the voluntary sector and advocacy services.</p> <p>The proposed simplification of the LCTRS claim process, the removal of having to provide evidence to both the DWP and the council should assist these services.</p> <p>The change to the claim LCTRS gateway should also help organisations help customers maximise incomes.</p>
--	--

**Step 2: Impacts on specific groups**

<p><b>Step 2a.</b> Within any of the groups you listed in Step 1, is there a <b>higher proportion of people with a protected characteristic</b> (see list below) that the populations of West Suffolk as a whole? (For example, users of Shopmobility are more likely to have a disability than the West Suffolk population)</p> <p><b>Describe how representation within the group affected differs from the West Suffolk population (use data if possible)</b></p>	<p><b>Step 2b.</b> Are there any elements of the decision or changes that will <b>impact differently</b> on people with a protected characteristic? (For example, people in rural areas with poor broadband may find it harder to access services if moved online.</p> <p><b>Describe how the change will impact differently on different groups, positively and negatively.</b></p>
<p>Recipients of LCTRS</p> <ul style="list-style-type: none"> <li>- Disability</li> </ul> <p>A greater proportion of disabled people are likely to receive council tax discount than non-disabled people, therefore the chances that the changes will negatively impact this group are higher.</p> <p>(Evidence sources: In 2016, the proportion of people without a disability in work was 79.9% and with a disability in work was 46.9%. This is a statistically significant difference. <a href="#">Department for Work and Pensions Equality Information (Customer Data) 2016 (publishing.service.gov.uk)</a></p> <p>In 2018, median pay was consistently higher for non-disabled employees than for disabled employees; in 2018, median pay for non-disabled employees was</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of disability.</p> <p>Existing protections for customers entitled to a severe disability premium would be retained meaning there would continue to be an exemption from non-dependent deductions.</p> <p>Further any applicant that cannot pay their liable council tax as a result of these changes will have access to the Exceptional Hardship fund and be treated in accordance with the Vulnerability policy.</p> <p>No mitigation is required</p>

<p>£12.11 an hour whilst for disabled employees it was £10.63 an hour, resulting in a pay gap of 12.2%  <a href="https://www.ons.gov.uk/people-in-work/pay-and-earnings/disability-pay-gaps-in-the-uk">Disability pay gaps in the UK - Office for National Statistics (ons.gov.uk)</a></p>	
<p>Recipients of LCTRS  - Age</p> <p>The proposed changes only affect working age customers.</p>	<p>The West Suffolk Council Tax Support Scheme is based in the national default scheme which was previously the Council Tax Benefit Scheme.</p> <p>The proposed changes may affect working age customers dependent on capital, household circumstances or Council Tax liability, not on the basis on age.</p> <p>Customers of pensionable age (this is defined by legislation and will change over time as the state retirement age changes upwards) will not be affected by these changes as the Government has specified that they must be protected.</p> <p>All information being published about the changes make reference to the changes only affecting working age customers. Households with children and young adults at school will continue to be supported by Child Benefit and maintenance being ignored in calculation Council Tax Support assessments.</p>
<p>Marriage and civil partnership:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of marital or civil partnership status.</p> <p>No mitigation is required</p>
<p>Pregnancy and maternity:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to pregnancy and maternity. Applicable amounts and premiums remain unchanged.</p> <p>No mitigation required.</p>
<p>Race:</p>	<p>The changes to the Council Tax Support Scheme may affect working age</p>

<p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>customers based on either capital, household income or Council Tax liability There is no impact in relation to race of a person. Council Tax Support is a means tested benefit, race is not a factor of the scheme.</p> <p>No mitigation required.</p>
<p>Gender reassignment:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability irrespective of a person's gender reassignment.</p> <p>No mitigation is required.</p>
<p>Religion or belief:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to religion or belief of a person.</p> <p>No mitigation required.</p>
<p>Sex:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to the sex of person.</p> <p>No mitigation required.</p>
<p>Sexual orientation:</p> <p>No evidence that the population in receipt of LCTRS has higher representation from individuals with protected characteristics under this strand.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. There is no impact in relation to sexual orientation of a person.</p> <p>No mitigation required.</p>
<p>Deprivation/Socioeconomic Disadvantage:</p> <p>A greater proportion of people on low incomes will receive council tax discount, therefore the chances that the changes will negatively impact this group are higher.</p>	<p>The changes to the Council Tax Support Scheme may affect working age customers based on either capital, household income or Council Tax liability. These proposed charges will result in some customers receiving more Council Tax Support and some receiving less. The proposed changes aim to target assistance to those customers who have under £10,000 capital and reduce the evidence requirement burden for</p>

	<p>customers. In addition, the proposed changes aim to provide stable payment arrangements and provide financial certainty by applying a standard rate nondependent deduction and increasing the amount used within the Universal Credit tolerance rule.</p> <p>Mitigation.</p> <p>To continue with the discretion to review exceptional cases to override the Universal Credit tolerance rule in the case of a single beneficial change being reported.</p> <p>Any applicant who cannot pay their liable council tax as a result of these changes will have access to the Exceptional Hardship fund and be treated in accordance with the Vulnerability policy.</p>
--	--

<b>Step 3: Adjustments to the proposals</b>	
<p><b>Step 3a.</b> What are the views of the changes from those who are affected by them and what (if any) amendments would they like to see? Please note this engagement should precede formal consultation. For example, what do charities think of proposed changes to business rates relief?</p> <p><b>Record any feedback on the proposals that has been gathered</b></p>	<p><b>Step 3b.</b> Based on the feedback from 3a, can we alter the proposed changes so that the negative impacts are removed or reduced and the positive impacts maximised? For example, adjust eligibility criteria to exclude small charities from changes.</p> <p><b>What changes could be made to the proposals? If none, say why not.</b></p> <p><b>How can we ensure the proposals are communicated effectively to those affected?</b></p>
<p>Appendix A to Cabinet paper which gives details of feedback received</p>	<p>No changes required</p>
<p>All consultations were conducted formally but included stakeholders and customers.</p>	<p>Effective communication of all of the changes will be required, including through the groups contacted as part of the consultation exercise.</p>

**West Suffolk Council is committed to assessing the impact of our proposals on those with a protected characteristic** (that is age, disability, sex, pregnancy or maternity, marriage or civil partnership, race, religion, sexual orientation and gender re-assignment, as well as on families and those with caring responsibilities, people on

low income, people suffering rural isolation and those for whom English is not their first language).