




Somerset Equality Impact Assessment

Before completing this EIA please ensure you have read the EIA guidance notes – available from your Equality Officer or www.somerset.gov.uk/impactassessment

Organisation prepared for (mark as appropriate)	 Somerset Council	Yes	 NHS Somerset	No	 NHS Somerset NHS Foundation Trust	No
Version	0.1	Date Completed	13/11/2023			
Description of what is being impact assessed						
This assessment looks at the impact of either applying no uprating to the income band thresholds within the scheme (i.e. option 1 above) or applying uprating of less than the amount applied by Govt. to state benefits (i.e. option 2 above). Govt. have announced an increase of 6.7% for state benefits and 9.8% for the National Living Wage.						
Evidence						
<p>What data/information have you used to assess how this policy/service might impact on protected groups? Sources such as the Office of National Statistics, Somerset Intelligence Partnership, Somerset's Joint Strategic Needs Analysis (JSNA), Staff and/ or area profiles, should be detailed here</p> <p>Information relating to actual claims from individuals and their families held within the various back-office processing systems operated by Somerset Council, which includes information on age, sex and disability.</p>						

Who have you consulted with to assess possible impact on protected groups and what have they told you? If you have not consulted other people, please explain why?

We have not formally consulted on the proposed changes to the income bands. However, we undertook an eight-week consultation on the introduction of the current CTR scheme during the Summer of 2022. We received feedback from members of the public, in particular, Council Tax payers, CTR claimants, major preceptors (Avon and Somerset Police, Devon and Somerset Fire & Rescue Service) and key stakeholders, such as Citizens Advice, parish, town and city councils.

Analysis of impact on protected groups

The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail what considerations and potential impacts against each of the three aims of the Public Sector Equality Duty. Based on this information, make an assessment of the likely outcome, before you have implemented any mitigation.

Protected group	Summary of impact	Negative outcome	Neutral outcome	Positive outcome
Age	<p>The scheme for pension age people is mandated by Government and is unchanged by the proposed change to the income band thresholds. The working age scheme provided for in these proposals is open to all people of working age.</p> <p>Not increasing the income band thresholds in line with the rate of inflation used by Govt. to increase state benefits or the National Living Wage, will reduce the amount of CTR received by some of our working age claimants where this results in their income going over an income threshold.</p>	☒	☐	☐

Disability	<p>The income disregard of £30 per week together with a disregard of any Personal Independence Payments or Disability Living Allowance received (to recognise the additional costs for households containing people with a disability) remains unchanged in the proposed scheme and will remain in place with options 1 or 2.</p> <p>However, these options will see a number of existing claimants receiving a reduction in or losing CTR altogether. Given the additional living costs many disabled people experience it is not unrealistic to assume that any reductions could have a disproportionate impact on claimants who have a disability.</p>	☒	☐	☐
Gender reassignment	<p>This is not a factor used to determine entitlement to CTR. We do not hold specific data in respect of this group regarding CTR, but there is no evidence to suggest that these options will disproportionately disadvantage claimants with this characteristic.</p>	☐	☒	☐
Marriage and civil partnership	<p>The scheme is designed to take into account the higher living costs of couples and allows for these higher living costs in the determination of the claim. This approach is unaffected by these options. Whilst some claimants in this category may see a reduction in or loss altogether of their CTR, there is no evidence to suggest that they will be disproportionately impacted.</p>	☐	☒	☐

Pregnancy and maternity	This is not a factor used to determine entitlement to CTR. We do not hold specific data in respect of this group regarding CTR, but there is no evidence to suggest that these options will disproportionately disadvantage claimants with this characteristic.	□	⊗	□
Race and ethnicity	This is not a factor used to determine entitlement to CTR. We do not hold specific data in respect of this group regarding CTR, but there is no evidence to suggest that these options will disproportionately disadvantage claimants with this characteristic.	□	⊗	□
Religion or belief	This is not a factor used to determine entitlement to CTR. We do not hold specific data in respect of this group regarding CTR, but there is no evidence to suggest that these options will disproportionately disadvantage claimants with this characteristic.	□	⊗	□
Sex	<p>This is not a characteristic used to determine entitlement to CTR. However, claim data identifies that we have more female recipients of CTR than male recipients.</p> <p>Therefore, given that these options will see reductions in the amount of CTR paid to some claimants, it is reasonable to assume that this would have a disproportionate impact on females.</p>	⊗	□	□
Sexual orientation	Sexual orientation is not a factor used to work out CTR. However, we have identified that these options are likely to have a greater impact on single people and single parents. Given this and the fact that data indicates that some categories of people with this characteristic are more likely to live alone, there is the potential that these options will have a disproportionate impact on some people within this group.	⊗	□	□

Armed Forces (including serving personnel, families and veterans)	The scheme provides for specific disregards for veterans and will continue to do so. These disregards are unaffected by these options which will help to protect the proportion of CTR received by existing claimants.	☐	☐	☒
Other, e.g. carers, low income, rurality/isolation, etc.	The scheme is specifically targeted at those on low incomes and contains income disregards in relation to carers. However, these options will in some cases reduce or remove altogether the CTR received by some claimants. Given that this is an income based scheme these options will by definition impact on people on low incomes and it is not unreasonable to assume that this will have a disproportionate impact on unpaid carers.	☒	☐	☐

Negative outcomes action plan

Where you have ascertained that there will potentially be negative outcomes, you are required to mitigate the impact of these. Please detail below the actions that you intend to take.

Action taken/to be taken	Date	Person responsible	How will it be monitored?	Action complete
Recommend that we make increased provision for Exceptional Hardship payments within the CTR scheme and Council Tax Setting process.	15/02/2024	Richard Sealy	Through the year-end project team & plan	☐
Identify any existing claimants who are going to be significantly worse off and contact them following the Full Council decision on the new scheme in December 2023.	29/02/2024	Richard Sealy	Through the year-end project team & plan	

We will promote the availability of the Exceptional Hardship scheme when the Council Tax bills are issued for the 2024/25 financial year.	30/04/2024	Richard Sealy	Through the year-end project team & plan	<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>
	Select date			<input type="checkbox"/>

If negative impacts remain, please provide an explanation below.

No protected groups should be negatively impacted. If an applicant is adversely affected by the changes to the income band thresholds, additional support can be applied for through the council's Exceptional Hardship scheme.

Completed by:	Simon Doyle
Date	14 Nov 2023
Signed off by:	Richard Sealy
Date	16 Nov 2023
Equality Lead sign off name:	Tom Rutland
Equality Lead sign off date:	16 Nov 2023
To be reviewed by: (officer name)	Richard Sealy, Interim Revenues & Benefits Manager

Review date:

30 Sep 2024