




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	1.0		Date Completed	6 November 2024		
Description of what is being impact assessed						
<p>Council Tax Reduction (CTR) is an income-related local discount scheme operated by Somerset Council to help people on low incomes pay their Council Tax bill. Local arrangements have been in place since 1 April 2013 following the abolition of the former nationally prescribed scheme known as Council Tax Benefit.</p> <p>The CTR rules for people who have reached state pension age are set by central Government. Somerset Council is responsible for designing a CTR for working-age people. The current scheme is an income banded discount scheme where a discount is awarded to a taxpayer based on their weekly income and their family composition.</p> <p>This assessment looks at the impact of reducing the support available through CTR to working-age people by:</p> <ul style="list-style-type: none"> • Reducing the discounts available from 100%, 75%, 40% and 25% to 100%, 50%, 25% and 10% respectively; • Introducing a flat-rate non-dependant deduction of £10 a week for each non-dependant living in the home (such as a grown-up son or daughter or other adult family member who could be contributing to the household income, such as paying 'house-keeping') • Limiting the amount of support for those living in properties banded E, F, G or H for Council Tax to the maximum equivalent of a Band D property (this means those living in such properties will get their discount based on a percentage of what their bill would be if they lived in a Band D property and so would have to pay more Council Tax as a result) • Reducing the amount of time we can backdate a claim for CTR from 12 months to one-month 						

Evidence

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

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.

Evidence from the Office of National Statistics (ONS) has also been referenced.

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?

A ten-week public consultation was undertaken on the proposed changes, which included proposals to reduce the maximum discount available for those on the lowest incomes from 100% to 75%. Each of the 18,000 customers getting working-age CTR was written to, as well as major preceptors and key stakeholders and invited them to respond. 1,720 responses were received to the formal consultation questionnaire.

In summary:

- 62% of respondents were getting CTR
- 61% did not think the Council should make changes to the CTR to help it balance their budget
- 27% of the respondents supported the introduction of reduced level of discounts within the scheme
- 45% supported the introduction of a non-dependant deduction
- 63% supported the introduction of a limit on the amount of support available to those living in properties in Council Tax bands E, F, G and H
- 55% supported reducing the amount of time a claim for CTR could be backdated

Analysis of impact on protected groups

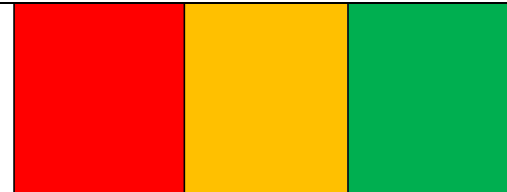
The Public Sector Equality Duty requires us to eliminate discrimination, advance equality of opportunity and foster good relations with protected groups. Consider how this policy/service will achieve these aims. In the table below, using the evidence outlined above and your own understanding, detail 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 (including Care Experienced)	<ul style="list-style-type: none"> The CTR scheme for people who have reached state pension credit age is set by central Government; as such these proposals will not affect pensioners. An estimated 12,633 working age customers currently getting CTR (69% of the working age caseload) will see a reduction in the amount of CTR they get and will have to pay more Council Tax (on average £7.99 a week or £415 a year) 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Disability	<ul style="list-style-type: none"> These proposals will disproportionately affect claimants with this characteristic. 45% of working age claimants (8,194) are either disabled or live with someone with a disability. <ul style="list-style-type: none"> 68% of these (5,606) will see a reduction in their CTR through these changes (losing on average £9.03 a week or £470 a year) 20% will have a weekly non-dependant deduction applied, where the non-dependant(s) living with them may be there to provide support and help with the general needs of that person. 83% of respondents to the consultation who classed themselves as disabled and in receipt of CTR said the proposals to introduce a non-dependant deduction would negatively impact them. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Gender reassignment	<ul style="list-style-type: none"> • CTR is based on income and family make-up. Data is not held on the numbers in this protected group claiming CTR. The changes don't specifically target this group and there is no evidence currently to suggest they will disproportionately disadvantage claimants with this characteristic. 	□	⊗	□
Marriage and civil partnership	<ul style="list-style-type: none"> • CTR is based on income and family make-up. The changes don't specifically target this group and there is no evidence currently to suggest they will disproportionately disadvantage claimants with this characteristic. 	□	⊗	□
Pregnancy and maternity	<ul style="list-style-type: none"> • Data is not held on the numbers of claimants with this characteristic. • Pregnancy is not relevant in the assessment of CTR. Once a child is born, the claimant's income allowance will increase if it is their first or second child. There is no evidence currently to suggest they will disproportionately disadvantage claimants with this characteristic. 	□	⊗	□
Race and ethnicity	<ul style="list-style-type: none"> • Data is not held on the numbers of claimants with this characteristic. • According to ONS, a multi-generational household is a household where people from more than two generations of the same family live together. This includes households with grandparents and grandchildren, even if the intervening generation doesn't live in the household. • Asian or Asian British claimants are more likely to live in multi-generational households (ONS, 2021) and are therefore more likely to have a non-dependant living in the household. Therefore, the introduction of the non-dependant deduction could disproportionately disadvantage claimants with this characteristic. 	⊗	□	□

	<ul style="list-style-type: none"> 32% of respondents to the consultation who were not white-British and getting CTR said the proposals to introduce a non-dependant deduction would negatively impact them. 			
Religion or belief	<ul style="list-style-type: none"> Data is not held on the numbers in this protected group. The proposals do not target this specific group. The impact identified above for race and ethnicity could apply to claimants with this characteristic (multi-generational households). 	☒	☐	☐
Sex	<ul style="list-style-type: none"> The majority of CTR claimants are female (either single, a lone parent or part of a couple). Consequently, more females will be impacted by the changes than males. 	☒	☐	☐
Sexual orientation	<ul style="list-style-type: none"> Data is not held on the numbers in this protected group. There is no evidence to suggest the changes will disproportionately disadvantage claimants with this characteristic. 	☐	☒	☐
Armed Forces (including serving personnel, families and veterans)	<ul style="list-style-type: none"> Data is not held on the numbers in this protected group getting CTR. The current scheme provides for specific disregards of certain incomes for veterans and will continue to do so. No evidence suggests the changes will disproportionately disadvantage claimants with this characteristic. 	☐	☒	☐
Other, e.g. carers, low income, rurality/isolation, etc.	<ul style="list-style-type: none"> As CTR is based on a claimant's income, the changes will impact people on low incomes. 69% of those of working age currently getting CTR will see a reduction in the amount of CTR they get and will have to pay more Council Tax (on average £7.99 a week or £415 a year) 70% of respondents to the consultation who said they cared for someone said the proposals would negatively impact them. 	☒	☐	☐

- 32% of respondents to the consultation who said they did not live in a town or city said the proposals would negatively impact them.



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
All claimants who will see a reduction in their CTR from 1 April 2025 as a result of these changes will be written to at least 4 weeks before they receive their Council Tax bill for 2025-26 to explain the changes and promote our Exceptional Hardship scheme	09/02/2025	Shaun Warren / Simon Doyle	Will form part of year end project plan to create new year bills	<input type="checkbox"/>
Monitor uptake of Exceptional Hardship scheme to identify if those losing out from the proposals have made claims for additional relief.	30/06/2025	Shaun Warren / Simon Doyle	Monthly reporting	<input type="checkbox"/>
Monitor impact of changes on Council Tax collection rates and report if the proposals are having a detrimental effect on collection and cashflow, as well as costs associated with collection and administration.	30/06/2025	Shaun Warren / Simon Doyle	Monthly reporting	<input type="checkbox"/>

If negative impacts remain, please provide an explanation below.

The Council will continue to operate its Exceptional Hardship scheme to provide additional relief from Council Tax for those individuals who are struggling to pay their Council Tax bill and who meet the criteria set out in the scheme.

Completed by:

Simon Doyle, Benefits Specialist

Date	6 November 2024
Signed off by:	Shaun Warren, Interim Head of Revenues and Benefits
Date	6 November 2024
Equality Lead sign off name:	Tom Rutland, Public Health Promotion Manager - Equalities
Equality Lead sign off date:	6 November 2024
To be reviewed by: (officer name)	Shaun Warren
Review date:	31 August 2025