

Impact Assessment Level 1: Initial screening assessment

Subject of assessment:	Council Tax Reduction (CTR) Scheme 2022-23			
Coverage:	Service Specific (affects all wards)			
This is a decision relating to:	<input checked="" type="checkbox"/> Strategy	<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Service	<input checked="" type="checkbox"/> Function
	<input checked="" type="checkbox"/> Process/procedure	<input type="checkbox"/> Programme	<input type="checkbox"/> Project	<input type="checkbox"/> Review
	<input checked="" type="checkbox"/> Organisational change	<input type="checkbox"/> Other (please state)		
It is a:	New approach:	<input type="checkbox"/>	Revision of an existing approach:	<input checked="" type="checkbox"/>
It is driven by:	Legislation:	<input checked="" type="checkbox"/>	Local or corporate requirements:	<input checked="" type="checkbox"/>

<p>Description:</p>	<ul style="list-style-type: none"> ○ Key aims, objectives and activities ○ The aim is to introduce a cost effective, simplified Council Tax Reduction scheme with effect from 1st April 2022. ○ The proposed changes will provide the following: <ul style="list-style-type: none"> ○ Simplified claiming arrangements for all working age applicants; ○ Speed of processing - applications will be dealt with more efficiently and without the need for significant levels of evidence; and ○ Reduced administration costs. The proposed changes will prevent the administration costs from rising year on year which would be inevitable under the current scheme. The cost of the scheme has to be affordable to the council, and as such is not mandated by Central Government. The council can choose to fund the scheme over and above the current cost (or vice versa), however our options appraisal shows why remaining with the current scheme and various alternative options are not recommended. ○ The new scheme will affect all working age applicants who are currently in receipt of Council Tax Reduction on 1st April 2022 or those who apply after 1st April 2022. The scheme will not affect pension age applicants ○ Statutory drivers (set out exact reference) ○ The Local Government Finance Act Section 67 (2012 Act) inserted into LGFA 1992 (Functions to be discharged by the Authority) making or revising a Council Tax Support Scheme – Section 13 (2) confirms that each billing Authority in England must make a Council Tax Support scheme by no later than 11 March each year. Any scheme cannot be made by officers, with the above legislation confirming that authorisation of the full scheme is subject to member approval ○ Differences from any previous approach ○ The proposed scheme has been simplified for working age claimants, using a broad ‘income grid’ approach, whereby a claimant’s CTR is decided by a number of factors, but predominantly by where their net weekly income compares to a broad income band range. ○ Key stakeholders and intended beneficiaries (internal and external as appropriate) ○ The key stakeholders include working age residents on low incomes, and precepting authorities such as Cleveland Police and Cleveland Fire. Consultation has been carried out with all stakeholders. ○ Intended outcomes. ○ More support for claimants on low income; ○ Simplification of the scheme; ○ Reduction in the administrative burden and the provision made for bad debtors; ○ Reduce, if not remove, the high level of rebilling that occurs throughout the year due to benefit changes which ultimately leads to a delay in cash collection.
<p>Live date:</p>	<p>1 April 2022</p>
<p>Lifespan:</p>	<p>The proposed scheme (if accepted) will be in place for 2022-23 year. Each year the Council needs to confirm its scheme by 11th March.</p>
<p>Date of next review:</p>	<p>Annually - reviews can be made every April, and the Council will review roll out, implementation and any unforeseen problems, and use this learning when designing schemes in future years.</p>

Screening questions	Response			Evidence
	No	Yes	Uncertain	
<p>Human Rights</p> <p>Could the decision impact negatively on individual Human Rights as enshrined in UK legislation?*</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>This proposed scheme is designed to ensure that the Council operates a simpler approach to Council Tax reduction, offering more support for the most financially vulnerable claimants of the scheme. The proposed scheme will be simpler to understand and will hopefully be positive in helping those residents who choose not to claim (who would otherwise qualify for help), to make a claim for the discount. There are no concerns that the proposed scheme could infringe qualified or absolute human rights.</p> <p>Evidence used to inform this assessment includes analysis of the various circumstances of the resident (using a modelling tool of proposed scheme options), compared to current support provisions. In addition, engagement has taken place with senior officers who have been involved in the development of the proposed scheme and supporting detailed delivery plans.</p> <p>Consultation has also taken place with residents of Middlesbrough, stakeholders, partners and Major Precepting authorities. The results are that all of the major changes have attained a majority of support. This consultation has resulted in a few minor suggested changes to the proposed scheme, which generally impact positively on those who will claim the discount.</p>

* Consult the Impact Assessment further guidance appendix for details on the issues covered by each of these broad questions prior to completion.

Screening questions	Response			Evidence
<p>Equality</p> <p>Could the decision result in adverse differential impacts on groups or individuals with characteristics protected in UK equality law? Could the decision impact differently on other commonly disadvantaged groups?*</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>The Public Sector Equality Duty (PSED) requires that when exercising its functions the Council must have due regard to the need to:-</p> <ul style="list-style-type: none"> eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act; advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and foster good relations between persons who share a relevant protected characteristic and persons who do not share it. <p>In having due regard to the need to advance equality of opportunity, the Council must consider, as part of a single equality duty:</p> <ul style="list-style-type: none"> removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of people who do not share it; and encouraging people who share a protected characteristic to participate in public life or in any other activity in which participation is low. <p>The proposed scheme should make thinks simpler and more transparent for those who claim (or consider claiming) Council Tax Reduction.</p> <p>It is potentially relevant to all the protected characteristics.</p> <ul style="list-style-type: none"> Age <ul style="list-style-type: none"> The Government have legislated that the Council cannot amend their Council Tax Reduction scheme for pension age claimants, which central Government recognise as being a protected group, and as such should not be impacted by any proposed changes brought about by any revised scheme. The scheme is open to all working age applicants. Approximately 2,800 of the 18,000 who currently claim, may lose some support under the new scheme - many of the losses are generally small in weekly terms. Disability - No specific impact due to membership of this group. Gender reassignment - No specific impact due to membership of this group. Marriage and Civil Partnership - No specific impact due to membership of this group. Pregnancy - No specific impact due to membership of this group. Race (ethnicity, nationality, colour) - No specific impact due to membership of this group. Religion or Belief (and lack of belief) - No specific impact due to membership of this group. Sex - No specific impact due to membership of this group. Sexual orientation - No specific impact due to membership of this group. <p>The Armed Forces Bill places a new duty on public bodies to have due regard to ensure those who serve in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services. Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved. War Pensions and War Disablement Pensions will continue to be disregarded for both working age and pension age applicants, therefore they are not impacted by these proposals.</p>

Screening questions	Response			Evidence
<p>Equality (continued)</p> <p>Could the decision result in adverse differential impacts on groups or individuals with characteristics protected in UK equality law? Could the decision impact differently on other commonly disadvantaged groups?*</p>				<p>The proposed scheme is also relevant and impacts other groups.</p> <ul style="list-style-type: none"> • Carers - No specific impact due to membership of this group. • Households with more than two dependants – Under the proposed scheme, Couples (and lone parents) with 2 or more children are all combined into the same income level. This means the income band is the same regardless of whether a claimant has 2 children, or more. This will negatively impact on some of the claims (depending on their other circumstances). The approximate number of claimants affected by this proposed change are 1,160. They are included in the overall number (2,800) of claimants impacted stated above. Any applicant who feels that they will experience exceptional hardship will be able to apply for additional support from the Council’s Exceptional Hardship Fund. This approach is in alignment with the Government’s approach to some other means – tested benefits. • Persons in receipt of Universal Credit - No specific impact due to membership of this group. • Applicants in receipt of the support component of Employment and Support Allowance (ESA) - No specific impact due to membership of this group. <p>Evidence used to inform this assessment includes analysis of the various circumstances of the resident (using a modelling tool of proposed scheme options), compared to current support provisions. In addition, engagement has taken place with senior officers who have been involved in the development of the proposed scheme and supporting detailed delivery plans.</p> <p>Consultation has also taken place with residents of Middlesbrough, stakeholders, partners and Major Precepting authorities. The results are that all of the major proposed changes have attained a majority of support. This consultation has resulted in a few minor suggested changes to the proposed scheme, which generally impact positively on those who will claim the discount.</p>
<p>Community cohesion</p> <p>Could the decision impact negatively on relationships between different groups, communities of interest or neighbourhoods within the town?*</p>	☒	☐	☐	<p>The proposed scheme should not impact negatively on relationships between different groups, communities of interest or neighbourhoods within the town. The scheme continues to be fair and consistent, although much broader in terms of the way in which net weekly income is assessed for support.</p> <p>Where there may be any different needs because of a protected characteristic or geography, the service will develop follow up actions focussed on addressing those unequal impacts. There are no concerns that the proposed scheme could have an adverse impact on community cohesion.</p> <p>Evidence used to inform this assessment includes analysis of the various circumstances of the resident (using a modelling tool of proposed scheme options), compared to current support provisions. In addition, engagement has taken place with senior officers who have been involved in the development of the proposed scheme and supporting detailed delivery plans.</p> <p>Consultation has also taken place with residents of Middlesbrough, stakeholders, partners and Major Precepting authorities. The results are that all of the major proposed changes have attained a majority of support. This consultation has resulted in a few minor suggested changes to the proposed scheme, which generally impact positively on those who will claim the discount.</p>

Screening questions	Response	Evidence
<p>Next steps:</p> <ul style="list-style-type: none"> ➡ If the answer to all of the above screening questions is No then the process is completed. ➡ If the answer of any of the questions is Yes or Uncertain, then a Level 2 Full Impact Assessment must be completed. 		

Assessment completed by:	Mark Symmonds	Head of Service:	Janette Savage
Date:	26/01/2022	Date:	26/01/2022