

## Annex 3 Equality Impact Assessment

### Quick Guidance Notes

#### Stage 1. Screening Stage

Stage 1 of the template is classed as the Screening Stage. This should always be completed. **Remember it should be an integral part of policy development not a last-minute thought.**

At this stage you should be assessing obvious negative/positive impact or gaps in knowledge about likely impact. It should be a relatively short process which makes use of any previous consultation results, any differences in user satisfaction among groups, personal knowledge and experience, research, reports, existing equality data about service usage, internet searches, internal and external specialist advice, employees with previous experience of similar work, known inequalities etc. **If the likely impact on a particular group is unknown, then action should be taken to acquire this information.**

If the impact is positive (i.e. the outcome will benefit an Equality Group) then no further action is required. If no positive or negative impacts are identified then no further action is required. If the activity has the potential to cause adverse/negative impact or discriminate against different groups in the community it will require a full impact assessment (Stage 2).

In some cases it might be easy to put in place simple adjustments to eliminate any negative impact while you are working through the screening process, especially if you already have clear evidence/consultation and the process is an integral part of your policy development. It should only be done if you are absolutely confident that no other impact will be identified. If you choose to do this you should clearly document the reasons/evidence and put in place monitoring to ensure action is taken if unanticipated impact occurs.

#### Stage 2. Full Equality Impact Assessment Report

Stage 2 of the EIA process guides officers through the full impact assessment process, ensuring that research/consultation with relevant equality groups has been carried out and leads to an action plan aiming to minimise the negative impact/s.

Consultation involves engaging with representatives from equality groups who are likely to be affected by the activity. It could involve engaging with employees and Members, trade unions, other public bodies, voluntary and community groups. It is important to ensure sufficient time and resources are dedicated to the consultation process to encourage full participation. You should refer to the Consultation Toolkit to ensure your consultation follows good practice. The Focus system should also be used and is able to give you information relating to other consultation activities across the council as well as existing groups/volunteers you may be able to access.

## **Take a Proportionate Approach**

Your approach to assessing the equalities impact of a policy, strategy or service should be proportionate to the likely impact it will have. Issues you should consider include:

- the number of people likely to be affected
- the size of the budget/amount of money involved
- the extent of the proposed change
- wider public policy implications

This means you will assess more rigorously policies which are likely to have a significant impact on the local community.

**Additional guidance notes to help you through the process are available in the Equality Impact Assessment Guidance Document.**

## Stage 1 and 2 Equality Impact Assessment Templates

Directorate: Finance & Transformation

Service: Revenues & Benefits

Accountable Officer: Sharon Shelton

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Date of assessment: 12 November 2019

Names & job titles of people carrying out the assessment:

Andrew Rosevear, Welfare & Benefits Manager

Name of service/function/policy etc: <b>Council Tax Reduction Scheme</b>
Is this new or existing? <b>Replacement of existing scheme</b>

### Stage 1: Screening Stage

#### 1. Briefly describe its aims & objectives

The Council Tax Reduction scheme provides support for certain taxpayers who have a low income.

Where entitled, the scheme provides a reduction in liability for Council Tax.

The replacement scheme is designed to overcome the significant administrative complications with the introduction of Universal Credit within the area. The main issues are;

- The current scheme is too reactive to the constant changes in Universal Credit. With the frequent changes in liability, taxpayers receive multiple Council Tax demands which in turn has a negative effect on the taxpayer's ability to manage their finances and on collection levels;
- There is a need to make the scheme simpler and for taxpayers to be encouraged to claim a reduction;
- The scheme needs to be future proofed to avoid constant amendments.

#### 2. Are there external considerations? (legislation/government directive etc.)

Yes – the legislation (Local Government Finance Act 1992 as amended) allows the Council to amend the scheme for working age applicants only.

The scheme for pension age applicants is prescribed by Central Government and cannot be amended if the amendment is financially detrimental.

Schemes must be amended by 11<sup>th</sup> March of the financial year preceding the year of implementation.

All changes to schemes are subject to consultation with both precepting authorities and the public.

### 3. Who are the stakeholders and what are their interests?

The stakeholders are:

- Working age Council Taxpayers who have a low income (who may make an applicant for reduction);
- The District Council, who is responsible for administration of the scheme, and also receives a proportion (12%) of Council Tax receipts to provide services for local residents;
- The Major Precepting Authorities (Kent CC; Police & Crime Commissioner and Fire & Rescue) who receive the majority of Council Tax receipts to provide services for local residents;

### 4. What outcomes do we want to achieve and for whom?

Any new scheme must:

- Minimise any potential loss to existing applicants;
- Reduce administration costs which will occur through the roll out of Universal Credit;
- Ensure that collection rates are maintained in respect of Council Tax; and
- Prevent future changes in schemes

### 5. Has any consultation/research been carried out or relied upon?

Yes

Consultation was carried out in accordance with relevant legislation.

Major preceptors were consulted as well as the public and interested groups.

Consultation took place from 9 September to 4 November 2019. Results have been analysed and taken into account when the scheme is decided by full Council.

### 6. Are there any concerns at this stage which indicate the possibility of inequalities/negative impacts? (Consider and identify any evidence you have - equality data relating to usage and satisfaction levels, complaints, comments, research, outcomes of review, feedback and issues raised at previous consultations, known inequalities) If so please provide details.

Major changes to the scheme as proposed affects some claimants. Modelling of scheme options has been undertaken throughout 2019 to establish the optimum proposals.

Initial modelling indicates that the number of working age applicants will remain broadly the same.

Most applicants will experience a minimal change to their entitlement between +/- £0.56 per week.

The Council maintains an Exceptional Hardship Payment Scheme which can be applied for by any applicant. Where any applicant experiences exceptional hardship, further support can be given.

**7. Could a particular protected characteristic be affected differently in either a negative or positive way? (Positive – it could benefit, Negative – it could disadvantage, Neutral – neither positive nor negative impact or Not sure?)**

	Type of impact, reason & any evidence
Disability	Positive – disability benefits will be disregarded as income and a further income disregard granted where a person would have met the previous criteria for awarding disability premium, enhanced disability premium, disabled child premium or severe disability premium
Race (including Gypsy & Traveller)	Neutral
Age	Only working age applicants will be affected
Gender	Neutral – based on current modelling both male and female applicants can either receive increased or decreased support
Transgender	Neutral
Sexual Orientation	Neutral – sexual orientation has no bearing on the scheme
Religion/Belief	Neutral – religion or belief orientation has no bearing on the scheme
Pregnancy & Maternity	Neutral – although it should be noted that a third or subsequent child will not affect entitlement
Marriage/ Civil Partnership Status	Positive- couples or persons in Civil Partnerships / relationships are able to have a higher level of income than singles to receive the same level of support.

**8. Could other socio-economic groups be affected e.g. carers, ex-offenders, low incomes?**

Carers	Positive effect as Carers Allowance will be disregarded as an income under the scheme
Persons in receipt of Support Component of ESA	Positive effect as the Support Component of Employment and Support Allowance will be disregarded as an income under the scheme

Low income taxpayers – will be able to apply as in the current scheme	Neutral effect - as low income applicants can still apply for support under the scheme
Applicants who have more than two dependants	The scheme will provide additional support to families up to and including two dependants.  No additional support will be provided to a third or subsequent dependant. This is in line with Central Government benefits such as Housing Benefit, Tax Credits and Universal Credit
Applicants who have non dependants	Neutral – no change to current scheme
Disabilities	Positive effect as all applicants who receive a disability benefit such as DLA, PIP etc will have the income disregarded <b>and</b> a further disregard of £40 per week will be taken from their net income potentially allowing further support to be granted

**9. Are there any human rights implications?**

No

**10. Is there an opportunity to promote equality and/or good community relations?**

Yes – the new scheme will make applying for support easier and will treat all working age applicants equally.

**11. If you have indicated a negative impact for any group is that impact legal? (not discriminatory under anti-discrimination legislation)**

Yes

**12. Is any part of this policy/service to be carried out wholly or partly by contractors?**

No

**Please note that normally you should proceed to a Stage 2: Full Equality Impact Assessment Report if you have identified actual, or the potential to cause, adverse impact or discrimination against different groups in the community. (Refer to Quick Guidance Notes at front of template document)**

**13. Is a Stage 2: Full Equality Impact Assessment Report required?**

Yes
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**14. Date by which Stage 2 is to be completed and actions**

2 December 2019
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**Stage 2: Full Equality Impact Assessment Report**

**15. Summarise the likely negative impacts for relevant groups identified in the screening process** (Refer to Stage 1, Questions 7-8, start to think about possible alternatives)

	Type of impact, reason & any evidence
Disability	Positive
Race (including Gypsy & Traveller)	Neutral
Age	Only working age applicants will be affected
Gender	Neutral – based on current modelling both male and female applicants can either receive increased or decreased support
Transgender	Neutral
Sexual Orientation	Neutral – sexual orientation has no bearing on the scheme
Religion/Belief	Neutral – religion or belief orientation has no bearing on the scheme
Pregnancy & Maternity	Neutral – although it should be noted that a third or subsequent child will not affect entitlement
Marriage/ Civil Partnership Status	Positive- couples or persons in Civil Partnerships / relationships are able to have a higher level of income than singles to receive the same level of support.
Carers	Positive effect as Carers Allowance will be disregarded as an income under the scheme

Persons in receipt of Support Component of ESA	Positive effect as the Support Component of Employment and Support Allowance will be disregarded as an income under the scheme
Low income taxpayers – will be able to apply as in the current scheme	Neutral effect as low income applicants can still apply for a support under the scheme
Applicants who have more than two dependants	The scheme will provide additional support to families up to and including two dependants. No additional support will be provided to a third or subsequent dependant. This is in line with Central Government benefits such as Housing Benefit, Tax Credits and Universal Credit
Applicants who have non dependants	Positive effect as the new scheme will not make any deductions where there are non-dependants
Disabilities	Positive effect as all applicants who receive a disability benefit such as DLA, PIP etc will have the income disregarded <b>and</b> a further disregard of £40 per week will be taken from their net income potentially allowing further support to be granted

**16. What consultation/involvement activities have taken place or will need to take place with groups/individuals from each relevant protected characteristic or equality group? (refer back to Stage 1, Question 5)**

The scheme has been subject to consultation as follows:

- Major precepting authorities – the County Council, Fire & Rescue Service and the Police and Crime commission has been consulted on the new scheme. No objections have been received;
- A full public consultation has been undertaken between 9 September 2019 – 4 November 2019.

**17. What other research has been or will need to be carried out to help you with the assessment?**

Financial modelling and impact analysis to establish optimum proposals that meet review objectives.

**18. Results of research/consultation (what does it tell you about the negative impacts?)**

Summary below

## Council Tax Reduction Scheme Consultation Results

### Questions: Agree / Disagree

1. Stop sending printed entitlement letters for working age claims - details of reductions will still be shown on the council tax bill.  
New applications for Council Tax Reduction will be made on-line for working and pension age house
2. Apply Minimum Income Levels for self-employed earners 6 months after making a new claim or starting a new business.
3. Introduce a banded income grid of reductions.
  - A. Increase Council Tax across the Borough
  - B. Reduce funding to other services we provide
  - C. Use what limited reserves we have

### Responses 10 September – 4 November 2019

Mailshot to 9130 households comprising all (4130) working age claimants and 5000 randomly selected other households. Responses received 379. The volume of responses is sufficient to give a 95% confidence level (+/-5%) of the data.

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	282	74.4
2	Self-employed minimum income	309	81.5
3	Banded reduction scheme	325	85.8
A	Increase Council Tax	84	22.2
B	Reduce funding to services	115	30.3
C	Use reserves	244	64.4

### The online consultation has been promoted to the following group meetings and stakeholders:

Welfare Reform Group, Health Action Team, Health & Wellbeing Group, DWP Complex Needs Forum, Clarion Housing, Citizens Advice North West Kent, Crosslight Debt Advice

### Direct consultation with Northgate Public Services (NPS)

NPS provide the software to administer our CTRS. Changes made to the scheme may require software alterations. NPS reviewed the consultation proposals Q1-Q3 and made the following comments:

**Q1** – achievable within current system and commonly used across sites, including Birmingham CC, the largest NPS customer

**Q2** – not achievable within current system. Would require bespoke enhancement which could not be in place for 1 April 2020. It is possible to administer a minimum income floor for self-employed for a single set of hours eg 35, which many customers now operate, aligned to Universal Credit regulations.

**Q3** – achievable with licensed software upgrade and used by several customers

### Consultation with major preceptors

The Council has a legal duty to consult its major preceptors over any changes to the CTRS. Emails and reminder emails were sent to the appropriate contacts at KCC, Kent Police & Crime Commissioner and Kent Fire & Rescue Service inviting them to participate in the consult. The only response was the following, from KCC:

‘I have prepared a response which is currently being considered by Cabinet Member. I will get back to you but we are likely to be supportive of this simplification as it must significantly reduce the amount of times claims have to be recalculated which in turn aids stability of tax receipts.’

### Further analysis

Contained within the population who agree with each question, how many agree with the other questions

**Q1 Electronic notifications and claims – population of 282**

Question	Description	Agree number	Agree %
2	Self-employed minimum income	246	87.2
3	Banded reduction scheme	260	92.2
A	Increase Council Tax	65	23.0
B	Reduce funding to services	93	33.0
C	Use reserves	173	61.3

**Q2 Self-employed minimum income floor – population 309**

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	245	79.3
3	Banded reduction scheme	284	91.9
A	Increase Council Tax	0	0
B	Reduce funding to services	93	30.1
C	Use reserves	199	64.4

**Q3 Banded reduction scheme – population 325**

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	258	79.4
2	Self-employed minimum income	284	87.4
A	Increase Council Tax	71	21.8
B	Reduce funding to services	158	48.6
C	Use reserves	266	81.8

**QA Raise council tax – population 84**

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	67	79.8
2	Self-employed minimum income	67	79.8
3	Banded reduction scheme	71	84.5
B	Reduce funding to services	25	29.8
C	Use reserves	48	57.1

**QB Reduce funding to services – population 115**

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	90	78.3
2	Self-employed minimum income	93	80.9
3	Banded reduction scheme	95	82.6
A	Increase Council Tax	25	21.7
C	Use reserves	92	80

**QC Use reserves – population 244**

Question	Description	Agree number	Agree %
1	Electronic notifications and claims	173	70.9
2	Self-employed minimum income	199	81.6
3	Banded reduction scheme	203	83.2
A	Increase Council Tax	48	19.7
B	Reduce funding to services	92	37.7

## Response comments

<p>Dear Sir</p> <p>I feel that the council tax is high enough benefits should be paid were needed but any one found defrauding the council the money must be recovered. I also feel that the council waste a lot of money on projects that never bring any benefits for the council tax payers .when problems with roads rights of way environment etc etc are reported it takes ages to even get a acknowledgement to the problem let alone any thing done about it .</p>
<p>I am concerned that the Hardship Funds mentioned would be hard to access and people would be making the choice between, for example food and heating whilst they waited for the payments to come through.</p>
<p>1. cut down on useless mailshots - must of cost quite a lot of money to send out details including a link that is not working.</p> <p>2. cut down inflated salaries of all executives</p> <p>3. as with private enterprises, look for cost efficiencies - note this does not mean cut services and blame central government - there is more that enough revenue being received by council tax, parking charges, etc...</p>
<p>Am happy for all forms to be on line, but it must be noted that not all can cope with the internet. I have been trying to teach those who need help at the Ditton Internet Cafe, but can only teach those that pop in</p>
<p>Any increase in council tax should be used for essential services and not wasted on pointless schemes such as bus lanes that are removed several years later. There is a need to look at infrastructure before allowing new developments. The Aldi Macdonalds at Hermitage Lane is a prime example of a plan that has caused total disruption to traffic at that junction. More and more building has been approved in that area to add to the chaos.</p>
<p>Any reduction in help with</p> <p>Council tax will cause more</p> <p>Hardship to people who</p> <p>Have no way to pay more</p>
<p>As a disabled person who currently receives a discount in council tax, I feel very let down that I have to pay the discounted fee, when before we used to get more help towards the costs of council tax. I'm not in a position to earn money, so things are very difficult financially. Those who are on the basic rates of universal credit are usually in a worse position than I am and they cannot afford basic things like food most of the time, especially when making a claim. We need to do more to help those who are financially poor and struggling.</p>
<p>As a single person who earns over £250 a week, I am still in financial hardship. I have a one bedroom flat, but my council tax is extortionately high compared to other places I've lived and also other areas of Kent. This is another terrible idea that makes single people who already don't get to split their bills/ rent/ mortgage have to pay an disproportionately higher amount than other people. I already have to pay out for other people's kids, even though I don't have any, other people's benefits (not all of whom I believe should be entitled to them) and other sub-standard services this council provide.</p>

<p>As a working single person and a lone parent of two young children I already find it extremely difficult to meet my council tax bill each month.</p> <p>I believe remaining single and focusing on my children is the most sensible option for me in my current situation. But by making this informed decision, I put myself at a constant financial disadvantage.</p> <p>Single people should automatically pay no more than half of what a house hold expects from two working adults living in the same property. And further more, low income house holds with dependants and the elderly should be given a further reduction.</p>
<p>As long as i don't get inundated with emails I don't have a problem. At the moment I receive in excess of 6 letters from you per month, the last one telling me I had a 13pence reduction! How ridiculous!</p>
<p>As mentioned regarding online services, although I am a pensioner, I am lucky enough to be able to do things on line. However there are a lot of elderly people who do not have access to the internet, nor have any idea how to go about it. This does need to be taken in to consideration regarding using the internet.</p>
<p>as someone on a low income i need the reduction. i still struggle as it is paying the 20%</p>
<p>be much clearer on the process and assessment criteria</p>
<p>Change 1:agree it is good to attempt to ween people off hard copy but, as low income families are probably less likely to be able to communicate online, the option for hard copy as the alternative should exist.</p> <p>Option 2: seems unreasonable to comment as I am not familiar with the considerations that apply to self employed. "No comment" does not appear to be an option.</p> <p>Option 3: Not in agreement with council tax increases, either direct or back door ones (as with additional payment for brown bins for garden waste). Suggest that the council should demand more money from government to fund the impositions that are dumped on Kent, seeing that they (government) appear to have plenty to slosh around on brexit.</p>
<p>Change 3, a banded grid of incomes: there is no explanation of what this means so I've disagreed with it.</p> <p>Also, online applications for ctr will be impossible for many pensioners, some of whom are VERY old and are unlikely to have a computer/iphone and may be unable to visit our counters.</p>
<p>Changes all make sense and a small increase in tax makes sense.</p>
<p>Changes should be made to take more of the tax payers circumstances into consideration. The council should also consider and acknowledge those on zero hour contracts where their income is likely to fluxuate month to month. It is unfair to base a tax calculation for 12 months on the basis of a payment of 400 for example when the next month they may only receive 200. I dont believe the current system is fair to people on zero hour contracts and so these changes should be made.</p>
<p>Consider people in rural areas who don't get street lighting, road cleaning and many of the other facilities people in urban areas get. We should pay less, by all means increase towns to pay.</p>

<p>Council tax bills can be difficult to understand for some people with disabilities. Making a change or changes obvious would help. A lot of people communicate by text now (including Royal Mail, Universal Credit, banks and schools). I would find it easier to receive text alerts about changes or things I might be entitled to.</p>
<p>Council tax is based on the market value of my home and how much income is coming in - How do you know the market value of my home? as no-one has been round to look at the condition of the property which does have an impact on value.</p>
<p>Council Tax is high enough already and all means to reduce or stabilise this tax charge should be investigated. I agree with some of the changes to save costs but do not agree that the answer is simply to raise tax charges as an easy option.</p>
<p>Council tax reduction is very complicated and should only be given to those on full benefits and pensioners.</p>
<p>Cut leisure provision.</p> <p>Reduce the number of councillors.</p> <p>Take a few more bribes.</p>
<p>Cut your salaries and trim the waste rather than reducing services and raising taxes. Just a thought.</p>
<p>Disgraceful. My bins are never emptied when they are supposed to be. No recycling bins ect we have no street lighting. Please advise why mor emonwy needs to be sourced because we certainly no not see it in the gypsy and traveller community.</p>
<p>Ensure that people receiving the discount are regularly reviewed, so that if their circumstances change and they are able to pay the Council Tax in full they do so.</p>
<p>Even in this day and age there are people with little or no I.T. Skills so they should not be made to feel disadvantaged in any way when applying for any new system</p>
<p>Far better to increase council tax than reduce services and give in to developers</p>
<p>For working families the cost of living is increasing - whether it is council tax, train fare, homes, childcare. Most people's earnings (if you are employed by public or third sector) are increasing in line with inflation. Therefore I do not think it is fair to reduce benefits at this time. I think asking people to pay more when there isn't a noticeable improvement in services is unfair.</p>
<p>From a personal point of view any change that results in a price increase would be absolutely devastating. As a severely disabled for life any cost increase has a huge impact on every other part of day to day living which is already at breaking point. Sadly we are constantly seeing price increases in most areas of life but reductions in the support FOR THOSE WHO GENUINELY NEED IT along with with less and less being given by the services we pay for.</p>
<p>Give people a choice whether it's online or in post as not everyone has Internet. Also take into account people with coeliac disease as the food is expensive</p>
<p>I find the amount of paperwork around the council tax benefit very confusing and usually have to phone to get clarification. I would prefer to just be told yes or no to benefit and how much I will have to pay or not pay for council tax. Thank you.</p>
<p>I agree that TMBC should try and make people more accountable for their responsibilities, hi lighting entitlements is not pro active.</p> <p>Chasing non payments with media coverage may well assist the council in retrieving payment losses.</p> <p>Indeed, why should others loose services to cover the losses of reduced payments and non payment of council tax.</p>

<p>Not always but presumably some do not pay and just wait to see what will happen if they don't in terms of prosecution.</p> <p>The regularly , full paying paying Council Tax residents should not be penalised further.</p> <p>Maybe a campaign showing loss of earnings by all non payment to TMBC and what it physically means to the whole community ie: less refuse collection, reduced services might be helpful.</p> <p>We need all residents to be more accountable for their responsibilities and the more offered the more will be taken.</p>
<p>I agree you should stop sending letters to working age claims but why stop there? Pensioners surely don't need them either - what's the difference??</p>
<p>I am on a low wage and find it hard to pay what u charge me now so I hope it doesn't go up</p>
<p>I believe you should charge the wealthy more to help support the people who cannot simply afford!</p>
<p>I don't have sufficient knowledge to say anything very helpful. Many people's incomes are likely to vary somewhat from month to month, so it's right to take a broad view rather than go through the administratively costly approach of repeatedly changing the benefits (which is also very confusing). Beware of avoiding paper copies of benefits statements: many people struggle with the internet, and most fraud is online these days.</p>
<p>I don't think working people who don't get any help should have to pay for people who are on reductions etc by increasing the council tax rates</p>
<p>I have a reduction as a single occupancy but I have a larger house because I use a wheelchair.</p>
<p>I imagine that income for low earners varies often and by quite a lot. Therefore an almost continual review of the amount of the benefit should take place. However the costs of advising the claimant could be used as a reason for reviewing less frequently. There is a risk that too much or too little benefit is paid that way, so the facts need to be continuously ascertained.</p>
<p>I myself have no problem with paperless council bills. BUT!!!!!! My husband does not go on the Internet and does not want to go on the Internet. What are you doing to provide help for these people?</p> <p>As for example, if I was to "Pop my clogs", he has no one else to help him with a bill he will know nothing about, unless it comes through the post. You can cut the amount paid out, by reducing the Executives pay!!!!</p>
<p>I suspect that if we come back to this later in the year when you've made your decision, the decision will be to implement these changes.</p> <p>You assume that everyone has access to IT, has the capability to use IT or wants to use IT, can travel to get to use your IT.</p> <p>You suggest that it is safer more secure but that may not be true there are people who revel in hacking IT systems.</p> <p>"Winners and losers" I'm sure who ever they are they will not be happy about filling out yet another form to claim yet another benefit just to remind them how hard up</p>

<p>they are (the losers I mean) and the “winners” could be 1penny off getting more help</p>
<p>I think a tighter review needs to happen for households where there are minors who are now adults still living at home who are earning a wage. This income needs to be taken into account as income for the whole family. This could see in increase in revenue from council tax as everyone will be contributing at the correct level. We pay too much tax as it is for very little in return. the bin tax has already been levied how much more do you expect us to give.</p>
<p>I think council tax should be increased to cover more money for policing, social care, education, fire service etc. I think people would be happy to pay the increase if they know this is where the money is going rather than it disappear on increased salaries for council staff, pensions etc. I mean no offence by this.</p>
<p>I think there should be provision for those incapable or unable to operate computers to apply. I also think that minimum income levels should be set by reference to external independent sources. Lastly, I would support use of some of the reserves, if that helps.</p>
<p>I think there should have been a "Don't Know" option to all the above questions - the additional info was not totally helpful, particularly on minimum income levels</p>
<p>I think you need to take into account people on a low income. Especially working people or people over 50 years. We can't physically work lots of hours as our bodies are not young anymore. Whereas the young can. We pay a lot a month and for what.</p>
<p>I think you should send an initial entitlement letter, after that just Council Tax bills is fine.</p>
<p>I would like to see a lot less paper being used and agree you should stop sending out entitlement letters but I don't agree with applications having to be made online. So many people still do not have IT skills or even a laptop etc to fill in these forms. Those people should not be penalised because of that.</p>
<p>I would rather you wouldn't cut services that they have been there for many years like for older people in need or disabled people like myself, for many years we had the grass cutting service and you don't have any more since the beginning of the year 2019 the same thing house decorating, my illness it has become very bad, being disabled have to do chemotherapy for a cancer on my liver and suffering for osteoporosis too, I think to be quite honest I find very wrong your decision and my money instead to use for buying food I need to spend for someone to have my garden to look nice, well this is a piece of mind for you people and my opinion so don't talk about limitation of work that it was available to people in need and you cut it down</p>
<p>If instead of bands, whatever reductions you give, you just minused the extra amount someone has earned from that it would be fairer. e.g. if they get £82.10 benefit a week, and they take home an extra £40 that week, then deduct £40 from that week.</p>
<p>If the council were more professional in negotiating external services and contracts money wasted could be saved and better spent providing needed services.</p> <p>Councillors expenses should be carefully vetted they should not get paid for attendance at meetings they do not attend.</p>

<p>For the input they have the number of councillors should dramatically be reduced. We have three councillors in our ward one would be sufficient.</p>
<p>If times are tough for T MB C then reduce the support to low income houses, most will get universal credit and should prioritise paying bills over trainers, sky, PCP finance for Nissan quashqais and cigarettes.</p>
<p>I'm not sure that my opinions will be of use as I am not as fully informed of the Council's financial situation or any unforeseen consequences arising out of any changes made, as I would be if I had such a thorough understanding as those who work with these figures.</p>
<p>Increase CT on the higher value houses or HMO's. That is only fair</p>
<p>Instead of addressing the bill solely to the tenant, billing each liable adult living in a property seperately would help people like me who lives with an adult child, he pays a small amount of bed and board and is not enough to cover the council tax I am charged because he works and I am on benefits. Because he refuses to pay me extra to cover it and I cannot afford to pay it from benefits I get taken to court where more debt is added on it, I get the can, I risk having my possessions taken and I am at risk of going to prison.</p>
<p>It is an unfair system for people in my situation and i' m sure i' m not the only one.</p>
<p>It gives no information on what other services could be potentially be given reduced funding. No suggestions of how sensible cutbacks could be made.</p>
<p>It needs to be simple to understand for customers and council staff and FAIR.</p>
<p>Look into mitigations for those that would need help using online tools.</p>
<p>make town councils stop illegal practices they put up signs that are totally disregarded and we have to pay for all the enviromental damage</p>
<p>Many of our clients in Crosslight Advice struggle with use of IT systems (hence continuing need for paper communications), are forced into self-employment working e.g. 16 hours a week so would be hit by a minimum income level.</p>
<p>Shifts between, e.g. 80% and 65% , banding levels from small changes in income would really hit many of our clients. There would be too many losers from this change.</p>
<p>Do you have examples you can share with us?</p>
<p>Maybe pensioners could not have to apply online, maybe they don't have computers, laptops or smartphones, they might have to rely on someone else to assist, I personally think they should be given the option of a paper form in the post</p>
<p>Move to emailing letters, this will save money and resources. Most people have an email address.</p>
<p>Put more money into fraudulent claims, so that the only people who need it receive it.</p>

Use council reserves to generate more income,
N/a
No as won't effect people like ne
None
Not every household is able to connect on line due to lack of income, illiteracy, lack of computer skills to name but a few. To this end making it computer only based is excluding a number of possibly needy homes. Does this thought never enter into the heads of whoever thinks up these schemes?
Not everyone can use computers or go on line.
Online forms , pdf uploads available .  It shouldn't matter how low income is (self employed or other ) long as willing to provide up to date accounts 6 monthly ..  A lot if family's are struggling through no fault of there own so taking away help will only put pressure on them elsewhere including the nhs for mental health help .
Only that i am a single working parent who just about scrapes by, i know i get 25 per cent reduction already but seriously i feel the people who work and are on breadline deserve more , perhaps some more reduction . I know people on benefits do seem to be laughing with everything paid, y would they get a job ! more help for the working poor not the lazy lot that dont,
our council tax goes up each year and the service goes down.  for example, grass and shrub cutting has been delayed between cuts.  we now have to pay for an extra brown bin, this was your decision so you should cover the costs.
Please make decision forms easier to understand.  I can understand paperless for those of working age who are more likely to have access to the internet, however I have concerns over those of pension age who often do not have access to the internet or have very limited ability to access relevant parts of the internet. Therefore maybe the option of paper could be beneficial for those who do not have access.
Reduce council tax costs. Make the new recycling system much more straight forward. Allow food and cardboard to go in together, let cans/plastic etc also go in together like Medway council.
reduce funding on crazy ideas as you approach the end of the financial year and have to 'spend' or lose it..ie. cycle lanes on busy A roads that 6 months later disappear !
Reductions should remain in line with household income. As those relying on reductions and benefits can not afford to have an increase as it massively impacts daily living expenses.

<p>I do feel these new bin charges should also be included in council tax and part of the reductions. As I for one can not afford the new service</p>
<p>Six month start up period for Self employed claimants seems harsh. UC allows 12 months. Start ups do need time to get established. 18 months may be more reasonable.</p>
<p>Sorry but I don't want to pay extra on my tax to fund this, it's expensive enough as it is, without being forced to pay more to subsidise other people, I can't afford it !!!!</p>
<p>Stop paying benefits to druggy wasters</p>
<p>Stop penalizing single people. Single people on low incomes/benefits such as jSA/ESA/UC of £73.00 lw can't afford to pay anymore they struggle as it is. The suggestion that pensioners should apply on line is quite laughable considering that most want have the Internet</p>
<p>Thankyou for my council tax reduction.</p> <p>People on low incomes cannot afford internet service.</p> <p>I have to take a painkiller to walk to the library and back.</p> <p>I do not trust internet banking.</p> <p>Thankyou for your attention.</p>
<p>The banded income grid of reductions shown should state the period of income specified - ?weekly? The grid does not say.</p> <p>Not sure why it is necessary to reduce council tax. Would be preferable to increase it from time to time to take account of local needs and wishes.</p>
<p>The current system is very confusing and I do not understand all the paperwork that arrives in the post. I do often think it is such a waste of money and paper!</p> <p>I don't really understand how the proposed changes work, but if it reduces the paper wastage then fair enough!</p>
<p>The income grid of reductions seems back to front, unless I have misread it, surely the single person or lone parent with children should receive the largest reduction in Council Tax not the couple with two children+. Before I was divorced and we had two incomes and two children, we were comfortably off and could easily afford the Council tax, when I became a single mum I struggled to afford the Council tax and we often cut back on food and heating to pay for it. One of my children is now working on a low private sector income and one is due to go to Uni and we basically have to survive on my income alone, now classified as a single person, supporting three people basically. We are back to cutting down on food and heating, reduced contributions towards my pension, I won't have enough to live on when I retire as result, pension poor, and so I guess I will become reliant when I retire on the Council to house and support me because the Council tax is so incredibly high for me now as a single person with two children over the age of 18. The Council Tax is like having a second mortgage. I now have two jobs, working six days a week, to cover household expenses and of course Council Tax being the most expensive of them all. When I was married we had a joint household</p>

<p>income in excess of £70,000 now I have less than half the amount. Surely it would be fairer to charge the registered proprietors of a household with two incomes the most, and reduced Council tax for single people or single parents, or a tier system where say if the registered proprietors' household income exceeds £40,000.00 they pay more in Council Tax, regardless of the number of children they have because they have double the income, rising upwards based on the registered proprietors income not the number of people who live in the home but the actual registered owners e.g a property owned by a husband and wife with two incomes with children earning a combined income of say £100,000.00 pay more than a single person on say £30,000. I currently pay more in Council Tax than someone in the highest band in Kensington &amp; Chelsea, almost double the amount than those that live in Westminster with a property worth multi millions of pounds, they only pay £1507.70. Council Tax needs to be reduced dramatically. I personally can see areas where cut backs could easily be made.</p>
<p>The initial claim process is confusing and could be better laid out or segmented as the 40 page form is daunting.</p>
<p>The last three questions are impossible to answer without further detail. I can see the point you are trying to make i.e. this system is costing more, and either everyone else has to pay more, or services have to be cut. I understand that. The money has to come from somewhere. But just to ask those three questions without any supporting information to help me understand the context and impact (as for the previous questions) is pointless.</p>
<p>The only thing I would say was that you continue to use the Tax payers money wisely.</p> <p>I'm a pensioner so I have to use my money carefully and budget.</p> <p>Of course if it means putting up the council tax then so be it.</p>
<p>The poorest in the borough are being hit the worst, we should not even be thinking about changes to their entitlement.</p>
<p>The questionnaire is very vague on how or who will pay more, as for surplus, i am always confused as to how these are built up as council tax should be for a service that has been calculated and broken down, if there is a surplus then the amount has been calculated wrong</p>
<p>The survey is rather vague and hard to understand the impact of either agreeing or disagreeing with each proposal.</p>
<p>The various options offered by you could have had more explanation</p>
<p>The way council tax reductions along with calculations for housing benefit are stated in letters are confusing with no way to check if calculations are correct. A clearer letter would help many</p>
<p>There may be a considerable number of residents within the borough that may fall into the category of working age but through physical or mental impairment or simply no access to online use are not included in this survey - how are you dealing with this issue??</p>
<p>There needs to be a change to how council tax is calculated - to a land value tax which would be more proportionate. These types of changes do not deal with the fundamental problem of income for councils.</p>
<p>These changes make sense</p>
<p>These changes proposed affect the poorest people in our borough negatively. These are the people you should be supporting and helping. Stop wasting money</p>

<p>on pointless schemes, improving the look of high streets etc and spend it on the poorest in our communities</p>
<p>This comment is of a personal issue. It has nothing to do with proposed changes.</p> <p>I was unemployed earlier this year and was having trouble paying my council tax.</p> <p>I was informed that my account was going to be forwarded to a debt collection agency.</p> <p>Two days before this was due to happen, I tried to contact you several times by phone but to no avail.</p> <p>I sent an email the day before it was due to go to debt collection agency.</p> <p>I did not receive a reply to this until about 2 weeks after it was passed over which resulted in me getting further penalties.</p>
<p>This consultation is too broadbrush for the man on the street. Those in receipt of benefits should not have their entitlements changed. The paperwork is essentially meaningless - clarity should be introduced to correspondence. Explain what has happened and why. For now, paperwork is an impenetrable spreadsheet style affair. It is not the documents outlining change that are the problem per se, it is that they way they are written does not make sense.</p>
<p>This survey needs to be sent out to all council tax paying residents not just those claiming the reduction.</p>
<p>TMBC has one of the highest rates of council tax in the south east, there should be no further increases. The council needs to save money elsewhere not increase council tax to make up a shortfall</p>
<p>To many cuts being made on people who really need the service. Cuts being made to the wrong people - genuine disable people being affected by those whom claim they are disable and are not!!</p>
<p>Try and get more money from government Council Tax is expensive as it is in our borough if you are gonna give cuts to people then it should be because you have the budget to do so not just charge other households.</p>
<p>Unemployed ppl should not have to pay any council tax, royals should not be funded by taxpayers, the tmbc mayor should be paid half the amount, increase car psrking fines, fine motorists who park on pavements, n rural people should pay less for highways as they don't get much benefits compared to urban residents , increase litter fines incl car litter and flytipping</p>
<p>While I sympathise with those on a low income or with financial issues. Everyone has to take responsibility for their own circumstances. Whatever the solution there will always be winners, losers and others that will take advantage. Personally I would like to see more resources put into reviewing individual circumstances and where appropriate enforcement.</p> <p>I would like to comment on this survey method. By default all of the answer were agree. I feel there should have three options: No opinion, agree and disagree, with no opinion being the default.</p>
<p>While it appears to be generally assumed that everybody conducts all their business on-line there should be prominent advice ( eg with council tax bills and</p>

perhaps TV adverts/ bus stop advertising/ council staff) that application can be made in person and by hand as it were.)
yes Instead of making proposed changes, you can save money by  Not paying such high salaries to some staff, annual wage increases  Bonuses and perks every year.
you did not ask if we prefer to have more money or less money to spend on things other than the massive cost of having a home if you wish to generate more income for the council to spend then change the laws that allow corporations to avoid tax that the rest of us are forced to pay , change the laws that allow landlords to get the council to buy them a house and kick out the poor tenant in order to cash their investment in, change the planning laws that allow large house development corporations to set the selling price of land and homes. its no coincidence that the vast majority of law makers are landlords making judgments on those who have been left to rot in society from a position of vast un earned income...
You should not assume that new applications for council tax reductions for pension age, or working age, households can all be made online. Not everyone is comfortable with computers, or has access to them.
Your survey has some design flaws and while the information boxes are helpful, the information is not well explained. There should be a 'don't know/neither agree or disagree' option, and there should be a clearer explanation of the Bands grid. What do the amounts in the grid relate to? What does it mean that Bands are a calculation of number of hours x living wage? I have 'disagreed' with this proposal because it isn't clearly presented.  I'm afraid the survey reads like something by the council for the council, to tick the 'consultation' box rather than to actually inform or involve residents.

## 19. Conclusions & Action Planning

You should explain what and how negative impacts have been reduced or removed and how positive impacts are to be improved or included.

Your final decisions or recommendations may include making immediate changes, stopping or proceeding with a new policy, justifying a decision or adding objectives/targets to the service development plan/equality scheme (long term changes).

You could use the template below to record your conclusions/actions. You should also make reference to any additional monitoring or research that is still required, or was not retrievable at the point of assessment, but will be required in subsequent reviews or in order to complete actions.

Impact/Issue	Action/Objective/Target or Justification	Will this remove negative impact?	Resources	Lead Officer & Timescale
Reductions in support	The Council will operate an Exceptional Hardship Fund. Any applicant who receives less support, may apply for additional discretionary support. A careful examination will be made of their circumstances (income and essential expenditure). Where it is determined that they are experiencing exceptional hardship, further support may be granted	Yes	Staff have been fully trained to administer the Exceptional Hardship Fund	

**20. How will you monitor, evaluate and check the policy in the future?**

The scheme will be monitored on an ongoing basis after implementation in April 2020

**21. When will a review take place?**

Ongoing

**Please complete**

We are satisfied that a full impact assessment has been carried out.

Completed by: Andrew Rosevear

Role: Benefits and Welfare Manager

Date: 7 December 2019

Countersigned by Head of Service:  
Sharon Shelton, Director of Finance & Transformation