

## Community impact assessments – for services, policies and projects

### What is a community impact assessment?

A community impact assessment is an important part of our commitment to delivering better services for our communities. The form will help us find out what impact or consequences our functions, policies, procedures and projects have on our communities, as well as employees and potential employees.

By undertaking an impact assessment, we are able to:

- Take into account the needs, experiences and circumstances of those groups of people who use (or don't / can't use) our services.
- Identify any inequalities people may experience.
- Think about the other ways in which we can deliver our services which will not lead to inequalities.
- Develop better policy-making, procedures and services.

### Background

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| <b>Name of service / policy / project and date</b>   | <b>Revenues and Benefits. Council Tax Support Policy from 1 April 2022.</b> |  |
| <b>Lead officer</b>                                  | <b>Jayne Gilpin, Head of Revenues and Benefits</b>                          |  |
| <b>Other people involved in completing this form</b> | <b>David Wyatt, Deputy Revenues and Benefits Manager</b>                    |  |

## Step 1 - About the service / policy / project

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| <p><b>What is the aim of the service / policy / project and what outcomes is it contributing to</b></p>           | <p>Council tax support is provided to around 7,000 households in Cheltenham at an annual cost of just under £6.9m. This includes working and pension age claimants. Approximately 68% of these households are of working age. The cost of the council tax support scheme is met by this council and the precepting authorities who are the county council and the police. The share of the cost is the same as the share of the council tax.</p> <p>Prior to April 2013, council tax payers on a low income could apply for council tax benefit to help pay their Council Tax. Under this national scheme and in accordance with the regulations, council tax payers could receive benefit of up to 100% of their council tax liability. The Council then received full funding from the government for all council tax benefit awards made.</p> <p>From April 2013, Councils became responsible for designing their own local council tax support (CTS) scheme for <u>working age people only</u>. The Government also reduced the funding given to Councils to pay for the scheme. Cheltenham Borough Council introduced its local council tax support scheme in April 2013 which more or less replicated the council tax benefit scheme. <u>Council tax support for pensioners was not localised and continues to be provided for by a national scheme.</u></p> <p>Each year the Council has to decide whether to make changes to the administration of its council tax support scheme for working age applicants in the borough.</p> <p>From 1 April 2019, Cheltenham Borough Council introduced a revised local council tax support scheme which increased the contribution that some people receiving help must make towards their council tax bills. From 1 April 2020, further changes were made to the scheme to provide further support to those people who receive a limited work capability payment in their Universal Credit. The Council is now in the position of considering a local council tax support scheme with effect from 1 April 2022.</p> <p>This year we have consulted on a proposed scheme from 1 April 2022. The aim of the service is to retain the existing council tax support scheme from 1 April 2022 and keep the current income bands in place to ensure that the most vulnerable customers still receive 100% support.</p> |
| <p><b>Who are the primary customers of the service / policy / project and how do they / will they benefit</b></p> | <p>It is important to note that any proposed council tax support scheme will not affect pensioners. These people are protected and their council tax support will continue to be awarded on the basis of the scheme prescribed by Central Government.</p> <p>The scheme will apply to working age people only who currently receive council tax support or apply in the future for help to have their council tax discounted. The scheme will apply without exception from 1 April 2022.</p>  |

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|   | <p>The working age customers who continue to require support or who claim council tax support in the future will provide evidence of their income and capital and the people living in their household. The level of income a person is determined to have will be derived from detailed scheme rules. Once the level of income has been derived, the band in which this income level falls will decide what level of support can be provided. There will be five income bands and the support provided will be either 20%, 40%, 60%, 80% or 100% of the charge.</p> <p>The amount of council support awarded is paid direct to the council tax account as a discount and the person then pays the reduced amount by instalments.</p> |
| <p><b>How and where is the service / policy / project implemented</b></p>             | <p>The Revenues and Benefits service, based at the Municipal Offices provides the service to customers and the revised council tax support scheme will be implemented from there.</p>   |
| <p><b>What potential barriers might already exist to achieving these outcomes</b></p> | <p>A draft council tax support scheme must be written, taking into account views from the public consultation, the views of the Cabinet Member for Finance and the financial forecasting that has been undertaken. Forecasting, utilising software provided by Civica Open Revenues, has been used to model a proposed scheme, identifying those who will be affected by the scheme.</p> <p>The proposed scheme will be submitted to the November Cabinet for consideration. Subject to agreement, the scheme will be published in draft on the Council's web site and further comments invited. The final report and proposed scheme will be presented at Full Council in December 2021.</p>   |

## Step 2 – What do you know already about your existing / potential customers

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| <p><b>What existing information and data do you have about your existing / potential customers e.g. Statistics, customer feedback, performance information</b></p> | <p>Every applicant making a claim for council tax support provides the following personal information:</p> <ul style="list-style-type: none"> <li>• the date of birth, sex and nationality of each person in the household</li> <li>• the income of each person in the household, including non-dependants (for example grown up children)</li> <li>• the capital of each person in the household</li> <li>• whether any person has a disability</li> <li>• whether the person is in a same sex relationship</li> </ul> <p>The information obtained from the customer is not for statistical purposes. The information is obtained only to be able to determine a council tax support entitlement. No data is held on the system relating to:</p> <ul style="list-style-type: none"> <li>• sexual orientation</li> <li>• ethnicity and/or race</li> <li>• religion or belief</li> </ul> |
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|   | <p>Information may be held, subject to the customer volunteering it on the following:</p> <ul style="list-style-type: none"><li>• pregnancy and/or maternity/paternity</li><li>• gender reassignment</li></ul>   |
| <p><b>What does it tell you about who uses your service / policy and those that don't?</b></p>  | <p>People are accessing the service as they do not have enough household income to pay their council tax. The reason for claiming assistance is purely financial. There are no other advantages. It tells us that those who do not claim assistance and pay their council tax from their household income do not require the same level of financial support as those that do.</p> <p>The information and data held tells us the following information:</p> <ul style="list-style-type: none"><li>• the age of the customer and others in the household</li><li>• the number of men and women claiming council tax support</li><li>• the number of customers who have responsibility for a child or children</li><li>• the number of people in the household</li><li>• whether there are any disabilities</li><li>• the household income</li><li>• whether any capital is held</li></ul>   |
| <p><b>What have you learnt about real barriers to your service from any consultation with customers and any stakeholder groups?</b></p> | <p>No adverse feedback has been provided from consultation with customers and stakeholder groups.</p> <p>The service is made widely available to ensure that all members of the community can access it. Application forms are available and can be emailed or posted to customers. The application form is also available to be downloaded on line. A visiting service is provided for those customers who are unable to visit the council offices and require assistance with form filling in their homes.</p> <p>There are various other options available in the town centre for people to take advice on claiming council tax support including advice agencies like CCP and CAB.</p> <p>Customers identified as having difficulties in paying their council tax are also invited to make claims for council tax support. This is built into the council tax recovery processes and is a preferred option to taking enforcement action.</p> |



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| <b>If not, who do you have plans to consult with about the service / policy / project?</b> | Not applicable. |
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### Step 3 - Assessing community impact

How does your service / policy / project impact on different groups in the community?

| <b>Group</b>   | <b>What are you already doing to benefit this group</b>  | <b>What are you doing that might disadvantage this group</b>  | <b>What could you do differently to benefit this group</b>   | <b>No impact on this group</b>   |
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| <b>People from black and minority ethnic groups</b>            | No specific benefits to this group   | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>People who are male or female</b>                           | No specific benefits to this group   | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>People who are transitioning from one gender to another</b> | No specific benefits to this group   | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>Older people / children and young people</b>                | Council tax support is awarded to any age group (over 18) if their financial position warrants help. This includes people of working age and pension age   | The local council tax support scheme only applies to those customers of working age. Therefore this group of people aged 18 to 67 will be directly impacted upon  | The council tax support scheme could remain unchanged but this is an unlikely option. Support will be made available to customers affected | There will be an impact on some customers due to their financial position and the household income they have |
| <b>People with disabilities and mental health challenges</b>   | Council tax support is awarded to any age group (over 18) if their financial position warrants help. This includes people of working age and pension age. There are provisions in the scheme to ignore certain disability benefits and this will continue so | There may be some impact on a few customers due to their financial position and the household income they have, but the impact is being moderated by introducing enhancements to the scheme for these customers. The customers with disabilities that are | The council tax support scheme could remain unchanged but this is an unlikely option. Support will be made available to customers affected | There will be an impact on some customers due to their financial position and the household income they have |



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|  | that the most vulnerable of customers still receive 100% support | affected will be those who have additional income, for example, a partner with earnings |  |  |
| <b>People who have a particular religion or belief</b>                               | No specific benefits to this group                               | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>People who are attracted to their own sex, the opposite sex or to both sexes.</b> | No specific benefits to this group                               | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>People who are married or in a Civil Partnership</b>                              | No specific benefits to this group                               | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | No specific impact identified  |
| <b>People who are pregnant or who are on maternity leave</b>                         | No specific benefits to this group                               | No specific disadvantages to this group   | There is no requirement to do things differently to benefit this group   | There will be an impact on some customers due to their financial position and the household income they have |
| <b>Other groups or communities</b>   | No specific benefits to these groups or communities              | No specific disadvantages to these groups or communities                                | There is no requirement to do things differently to benefit these groups | No specific impact identified  |

## Step 4 - what are the differences

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| <p><b>Are any groups affected in different ways to others as a result of the service / policy / project?</b></p> | <p>Yes. Councils became responsible for designing their own local council tax support scheme for <u>working age people only</u>. The Government also reduced the funding given to Councils to pay for the scheme. Cheltenham Borough Council introduced its local council tax support scheme in April 2013 which more or less replicated the council tax benefit scheme. <u>Council tax support for pensioners was not localised and continues to be provided for by a national scheme.</u></p> <p>As a result of this people of working age are affected by a local council tax support scheme. The Government produced its own Equality Impact Assessment in 2012 prior to the introduction of localised support being introduced. <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/8464/2063707.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/8464/2063707.pdf</a></p> <p>In localising support for council tax, the Government believes that local schemes should provide support for the most vulnerable, including vulnerable pensioners. The Government has concluded that support for vulnerable pensioners should be delivered through a national framework of criteria and allowances. Local authorities already have clearly defined responsibilities in relation to, and awareness of, the most vulnerable groups and individuals other than pensioners in their areas. This includes, for example, through their responsibilities under:</p> <ul style="list-style-type: none"> <li>• The Child Poverty Act 2010, which imposes a duty on local authorities to have regard to and address child poverty and their partners, to reduce and mitigate the effects of child poverty in their local areas;</li> <li>• The Disabled Persons (Services, Consultation and Representation) Act 1986, and Chronically Sick and Disabled Persons Act 1970, which include a range of duties relating to the welfare needs of disabled people;</li> <li>• The Housing Act 1996, which gives local authorities a duty to prevent homelessness with special regard to vulnerable groups.</li> </ul> |
| <p><b>Does your service / policy / project either directly or indirectly discriminate?</b></p>                   | <p>The council tax support scheme will directly discriminate against people of working age. However the Government's view is that by giving local authorities a significant degree of control over how a reduction in expenditure is achieved, allowing councils to balance local priorities and their own financial circumstances. Reducing the costs of support for council tax is a contribution to the Government's vital programme of deficit reduction. Giving local authorities a financial stake in the provision of support for council tax and so a greater stake in the economic future of their local area, so supporting the Government's wider agenda to enable stronger, balanced economic growth across the country. This reform creates stronger incentives for councils to get people back into work and so support the positive work incentives that are being introduced through the Government's implementation of Universal Credit.</p>  |
| <p><b>If yes, what can be done to improve this?</b></p>  | <p>The council tax support scheme forecasting has identified that protection can be given to the most vulnerable working age people in the borough. It is proposed in the draft scheme that those customers who receive</p>  |

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|  | <p>“passported” benefits including Job Seeker’s Allowance, Income Support and Employment and Support Allowance will continue to receive up to 100% support ensuring that they continue to pay no (or very little) council tax.</p>   |
| <p><b>Are there any other ways in which the service / project can help support priority communities in Cheltenham?</b></p> | <p>Yes. The proposed draft scheme has been designed to protect where possible and provide greater financial assistance to priority communities. The banded income scheme has been designed with the following elements to ensure that within the scheme certain priority communities face less of an impact:</p> <ul style="list-style-type: none"> <li>• child benefit and maintenance payments made in respect of children are wholly disregarded</li> <li>• a weekly disregard of up to £175 (for one child) or £300 (two children or more) will apply to customers who pay child care and who fit the qualifying conditions</li> <li>• an additional £100 weekly disregard will apply for each disabled child living in the household</li> <li>• an earnings disregard of £10 per week will apply to those customers who fit the qualifying conditions</li> <li>• Attendance Allowance, Personal Independence Payments, Disability Living Allowance, the Limited Work Capability element paid within Universal Credit and War Pensions will be wholly disregarded</li> <li>• customers who receive Job Seeker’s Allowance, Income Support and Employment and Support Allowance will continue to receive up to 100% support ensuring that they continue to pay no (or very little) council tax</li> </ul> |

## Step 5 – taking things forward

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| <p><b>What are the key actions to be carried out and how will they be resourced and monitored?</b></p> | <p>A forecasting tool is being used which has been provided by Civica, the software provider for Open Revenues. The forecasting tool allows modelling of different schemes to be carried out and developed to suit the needs of the customers and the Council. The modelling carried out enables the Council to establish any financial winners and losers and the extent of these. The number of winners needs to be mitigated to as few as possible as this has a direct impact upon the numbers of people losing from the new scheme.</p> <p>Once the modelling is complete a draft scheme will be devised which will encompass the views of the people who completed the on line consultation survey and the political steer. The scheme will be presented to Cabinet in November 2021 with a recommendation that it is adopted from 1 April 2022 as the Council’s preferred council tax support scheme. The draft scheme, subject to Cabinet approval will be published on line inviting further comments from the public. The final scheme will then be presented to Full Council in December 2021 seeking Council approval.</p> |
| <p><b>Who will play a role in the decision-making process?</b></p>                                     | <p>The Head of Revenues and Benefits and the Deputy Revenues and Benefits Manager will devise the draft scheme to be presented to the elected Members of the Council.</p> <p>The decision to implement the new scheme and on what basis will be taken by the elected Members at the Full Council meeting scheduled for December 2021.</p>  |



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| <b>What are your / the project's learning and development needs?</b>          | Full training will be provided to Revenues and Benefits staff ahead of the annual billing exercise in March 2022 which will reinforce the scheme conditions.   |  |
| <b>How will you capture these actions in your service / project planning?</b> | The proposed scheme to be introduced from 1 April 2022 is not expected to impact on service planning. However the scheme implementation forms part of the annual Council Tax and uprating of benefits exercise. This exercise is carried out during February each year and will be overseen by the Head of Revenues and Benefits and the Deputy Revenues and Benefits Manager. |  |