

REPORT TO: OVERVIEW WORKING GROUP

DATE: 26 NOVEMBER 2015

TITLE: ANNUAL REVIEW OF LOCAL COUNCIL TAX SUPPORT SCHEME (LCTSS)

LEAD OFFICERS: SIMON FREEMAN, HEAD OF FINANCE
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RECOMMENDED that Overview Working Group:

- A** Acknowledges the current position regarding the 2015/16 Local Council Tax Support Scheme and endorses continuing stability within the scheme for 2016/17.
- B** Recommends to Cabinet that, following the results of the consultation process, the 2016/17 scheme is amended as follows :
- (i) The introduction of a minimum income floor for self-employed claimants of Local Council Tax Support.
 - (ii) The award of backdated Local Council Tax Support is limited to one month
- C** Recommends to Cabinet that the proposal to remove the Family Premium in calculating an award of Local Council Tax Support is deferred for a further 12 months.

BACKGROUND

1. In accordance with the Welfare Reform Act 2012, and the Local Government Finance Act 2012, councils are required to implement a Local Council Tax Support Scheme (LCTS) annually, and by 31 January each year at the latest for the forthcoming financial year.
2. The Pan Essex working group, originally established to consider a County wide approach to the localisation of council tax support, has continued to work effectively and has been looking at other aspects of collection. Having focussed on the development of the local schemes, more recently the work has been looking at those exemptions and discounts awarded to council tax payers. As a result the group has now finalised proposals to implement a third

business case relating to the implementation of a range of measures targeted at ensuring that each authority across Essex undertakes work on a consistent basis to help protect the tax base in each district. Work will be undertaken in 2016/17 to ensure compliance to check and challenge council tax reductions awarded for which entitlement may have subsequently changed or be no longer appropriate.

Local Council Tax Support (LCTS)

3. The national Council Tax Benefit (CTB) scheme, which was wholly funded by Central Government and administered locally by billing authorities, was abolished with effect from 1 April 2013. The Council approved its local scheme for the 2015/16 financial year at its meeting held on 18 December 2014.
4. Prior to the introduction of LCTS there had been no cap on CTB expenditure. However, with the introduction of LCTS Government funding was restricted through the introduction of a cash limit in the form of a fixed grant. In addition the grant was set at a level which was 10% less than the previous council tax benefit expenditure estimated from 2012/13. For Harlow this represents a reduction in funding of around £1.3 million per annum from April 2013.
5. The grant for LCTS was originally identified specifically within the Council's overall Revenue Support Grant and retained Business Rates income for 2013/14. The level of funding for 2014/15 and future years has not been identified in the same way and has been included in the Council's overall Revenue Support Grant and Retained Business Rates – overall Formula Funding. As a result of this there is no protection for the LCTS funding and it is subject to the wider Government cuts to local government funding. Since the introduction of the scheme the Councils overall funding has reduced by over 38% but there has been no reduction in the Councils support of its LCTS scheme.
6. In order to ensure that Pensionable Age customers should be no worse off under the local scheme, national rules remain in place for this group of claimants. As protection remains in place for those of Pensionable Age, the impact of the reduction in funding has fallen upon Working Age claimants as reported during the implementation of the 2013/14 2014/15 and 2015/16 schemes.
7. Harlow Council is part of a Pan Essex Project Group, with a remit to design an Essex Framework for LCTS. The principles of the framework were reported to Cabinet on 12 July 2012. On 22 November 2012 Harlow Council adopted a LCTS scheme following public consultation during the summer of 2012 based on these principles, which are detailed below:
 - The scheme will be cost neutral.

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- Council tax support will continue to be assessed on a means tested basis.
- Council tax support will not be paid above Council tax band H.
- Council tax support is capped at 76% of council tax liability.
- The first £25 of weekly earnings are disregarded in the calculation of support.
- There is no entitlement to support where the applicant has capital of over £6,000
- Second adult rebate and underlying entitlement were abolished to remove the administrative burden of these.

For comparison purposes, the LCTS schemes for the District Councils of Essex are attached at Appendix A.

8. Harlow has ensured that in the development of the local scheme the eligibility criteria for LCTS remains aligned with the previous national council tax benefit scheme, with specific protection for families and persons with disabilities. In addition and despite the reductions in overall Government grant received by the Council the scheme has been supported and maintained without variation to the above principles for its third full year of operation.
9. The 2013/14 scheme was designed to deliver savings of £1,361,235 to ensure that expenditure on LCTS did not exceed the total Government funding allocated for the scheme. At the time of writing this report the LCTS scheme costs for the current and previous financial years are as follows:

| LCTS Award | 1 April 2013 | 31 March 2014 | 31 March 2015 | 31 October 2015 |
|-------------------------|-------------------|-------------------|-------------------|-------------------|
| Pensionable Age | | | | |
| Caseload | 3,819 | 3,673 | 3,547 | 3,341 |
| LCTS Award | £3,535,031 | £3,483,230 | £3,240,964 | £3,048,752 |
| Working Age | | | | |
| Caseload | 5,302 | 5,189 | 4,890 | 4,521 |
| LCTS Award | £3,810,068 | £3,741,202 | £3,363,313 | £3,188,503 |
| Total LCTS Award | £7,345,099 | £7,117,494 | £6,604,277 | £6,237,255 |

- 10 It was estimated that the in-year council tax collection rate for 2013/14 in

Harlow would be affected by the introduction of LCTS and could fall by over 3% compared to the collection rate in 2012/13. Council tax collection at the end of the second quarter in 2015/16 is reported at 56.71%, compared to a collection rate of 56.83% for the same period in the 2012/13 financial year.

| | 30 September 2012 | 30 September 2013 | 30 September 2014 | 30 September 2015 |
|--|----------------------------------|----------------------------------|----------------------------------|----------------------------------|
| Council Tax Collection Rate | 56.83% | 56.60% | 56.28% | 56.71% |

At the time of writing this report –

- Council tax collection rate is currently exceeding original forecasts. The introduction of a 12 month instalment scheme by the Government in 2014 will also be impacting on the collection statistics when compared with prior years with income having been collected predominantly over 10 months.
 - The additional funding provided within the agreement with the precepting bodies has enabled employment of extra staff dedicated to working with LCTS claimants. This has meant that the normal collection processes on the remaining non LCTS clients has not been compromised.
 - There is continuing good engagement with LCTS claimants meaning that it has been possible to agree payment arrangements with residents at an early stage, and reducing avoiding the need for further recovery action.
11. Recovery action for council tax in LCTS cases has been taken in accordance with legislation with the addition of the specialist advice from the LCTS officers. Of the 4,890 working age LCTS claimants, 1,158 (25.6%) have received a final notice where a payment has not been received and 1,046 (23.1%) of the total working age claimants have been summonsed. Where a summons has been issued, the Council continues to work to engage with those affected to provide support and advice to reach a payment solution wherever possible, subject to the claimant's willingness to disclose relevant information and work with Council officers. The table below provides a comparison with previous years.

| | 30 October 2013 | 30 October 2014 | 30 October 2015 |
|---|--------------------|--------------------|--------------------|
| Percentage of working age LCTS claimants receiving a Final Notice | 26.7% | 29.8% | 25.6% |
| Percentage of working age LCTS claimants receiving a Summons | 16.6% | 18.4% | 23.1% |

12. Whilst the collection position is currently higher than expected and the level of support being awarded has fallen, recovery of amounts falling due can take several years to collect and it is currently too early in the operation of the new scheme to be able to forecast what the overall collection position will be as the scheme matures and settles over the next two or three years.

LCTS 2016/17 Proposals

13. Officers are keeping the performance of the LCTS scheme under review but as the Council plans for 2016/17 there is still only a very short period of operation of the new scheme, – two full financial years, on which to base judgements and future estimates. In addition to the scheme still being new, there are also significant Government led welfare reforms been implemented and proposed, the impacts of which are difficult to analyse and quantify at this time.
14. Monitoring of the local scheme indicates that it is operating well and that collection of the amounts billed to claimants is being maintained. Engagement with residents impacted by the changes has also been extremely good. In order to maintain certainty for both claimants and the Council, the proposals for the scheme in 2016/17 are to maintain the restriction on the entitlement to support at 24% for a fourth year and that the reductions to the Councils core Formula Funding will not be passed on to claimants despite further reductions being forecast for 2016/17 as part of the Governments ongoing austerity measures.
15. A public consultation exercise was conducted in 2015 on the LCTS scheme for 2016/17. Consultation ended on 25 October 2015 and the results are shown at Appendix B. The consultation made three proposals for change to the scheme all of which are intended to simplify its operation and administration. The options and the consultation response to them are set out in the following paragraphs of the report.

16. **Option 1**
Setting a Minimum Income Floor for Self Employed Persons in line with other Welfare Reforms

In order to align the Council's Council Tax Support scheme with Universal Credit, it is proposed that the Council uses a minimum earned income figure for those who are self-employed in line with the UK national minimum wage of £7.20* per hour for 35 hours per week. Any income above this amount would be taken into account based on the actual amounts earned. This minimum would not apply for a designated start-up period for new self-employed business start-ups.

The benefits of doing this are:

- Council Tax Support will be brought into line with Universal Credit;
- It will incentivise working age applicants to grow and expand their business

The drawbacks of doing this are:

- Where a working age resident is in self-employment and continues to run a business where their income is below the minimum level, they will be assumed to earn at least minimum wage (based on a 35 hour week) after a start-up period.

*£7.20 is the national minimum wage level from April 2016.

59% of respondents to the consultation agreed with this proposal.

Where claimants currently work less than 35 hours per week, the actual number of hours worked will be used, except where declared earnings are less than the national minimum income floor level of £7.20 per hour. The Council currently has 224 LCTS claimants who are self-employed. Declared gross earnings range from £0.00 per week to £415.00 per week.

An example of how this proposed change would affect an LCTS claimant with self-employed earnings is at Appendix C.

17. **Option 2**
Removing the Family Premium for all new working age claimants.

The removal of the Family Premium from 1st April 2016 for new claims will bring the Council Tax Support Scheme in line with the changes in Housing Benefit announced by Central Government. The Family Premium is part of

how 'needs' of any claimant are assessed and is included in their Applicable Amount, which is compared with their income. The family premium is normally given where a claimant has at least one dependent child or young person. Removing the family premium will mean that when assessing a claimants "Applicable Amount" the Family Premium, currently £17.45 per week will not be included. This change would **not** affect those claimants on Universal Credit, Income Support, Income Related Employment and Support Allowance or Income Based Jobseeker's Allowance.

The benefits to the Council of doing this are:

- To bring the Council Tax Support Scheme in line with Housing Benefit changes proposed by Central Government;
- It is a simple alteration to the scheme.

The drawbacks of doing this are:

- New working age claimants may see a reduction in the amount of support they received.

Whilst 62% of respondent's agreed with this proposal, it is recommended that this proposal be deferred for 12 months. At the time of writing this report the regulations have been laid, with a proposed implementation date of 1 May 2016 for Housing Benefit. It is estimated that the number of households affected by this change would be low, as the change would not apply to existing claims, and the extent of the exceptions that would apply.

18. **Option 3** **Reducing Backdating to 4 weeks**

Currently claims for Council Tax Support for working age claimants can be backdated for up to 3 months where a claimant can prove that there was 'good cause' that they could not claim at an earlier time. From April 2016 Central Government will be reducing the period for Housing Benefit claims to 4 weeks. It is proposed that the Council's Council Tax Support Scheme be aligned with the changes for Housing Benefit.

The benefits to the Council of doing this are:

- To bring the Council Tax Support Scheme in line with Housing Benefit changes proposed by Central Government.
- It is a simple alteration to the scheme and simplifies the administration.

The drawbacks of doing this are:

- New working age claimants may see a reduction in the amount of support they receive if they are unable to claim on time.
- Claimants may not be able to pay any council tax due prior to the award of LCTS.

54% of respondents to the consultation agreed with this proposal.

At the time of writing this report regulations have been laid for this change and the intention now is to restrict the backdating of Housing Benefit to 1 month, and not 4 weeks.

There have been 162 backdated awards of LCTS made in the current financial year, and the average period of award is 47 days. Reducing the backdated awards to a maximum of 30 days, would result in an average loss of £48.20 of support where a claimant is resident in a Band C property and receives support at the maximum level of 76%, based on a Band C charge of £1,389.64.

To mitigate any potential exceptional circumstances, or financial hardship, the Council has an Exceptional Hardship fund.

19. A full equalities impact assessment was carried out on the current 2015/16 scheme. This has been reviewed to take account of the proposed changes to the scheme for 2016/17 and is attached to this report at Appendix D

Conclusions

20. The LCTS scheme operated by the Council has performed well in its first two years of operation with claimants being helped significantly through the support officers appointed at the outset of the scheme through the funding agreement with the key precepting bodies.
21. Following consultation on the 2016/17 scheme it is again proposed to retain the scheme largely unchanged with the exception of the options set out in the report to set a self-employed income floor and to limit backdating to one calendar month. The changes will improve the administrative arrangements for the scheme and will also help to align the scheme with Housing Benefit administration.

IMPLICATIONS

Place (includes Sustainability)

No implications specifically arise from the Council Tax Benefit reforms. Welfare Reform more widely will have a range of different impacts on delivery of service objectives.

Author: **Graeme Bloomer, Head of Place**

Finance (Includes ICT)

Financial impacts of the LCTSS scheme are being considered as part of the wider budget process and development of the Medium Term Financial Strategy. If the Council agrees the final scheme in line with the agreed principles then it is expected to be broadly cost neutral although there will be uncertainties regarding recovery rates and the impact upon the Collection Fund until the scheme is actually in operation.

Author: **Simon Freeman, Head of Finance**

Housing

None Specific

Author: **Andrew Murray, Head of Housing**

Community Wellbeing (includes Equalities and Social Inclusion)

Contained within the report at this stage. The implications of the final scheme will be assessed for impact on vulnerable groups, as outlined in the report

Author: **Jane Greer, Head of Community Wellbeing**

Governance (includes HR)

The Council must have the LCTSS in place by 31 January 2016 and having carried out a consultation exercise it will minimise the risk of challenges to the Council.

Author: **Brian Keane, Head of Governance**

Background Papers

Harlow <http://www.harlow.gov.uk/council-tax-support-scheme-2014-15pdf>

<http://www.audit-commission.gov.uk/2013/11/protecting-the-public-purse-2013/>

<https://www.gov.uk/government/publications/annual-fraud-indicator--2>

Glossary of terms/abbreviations used

CTB – Council Tax Benefit

LCTS – Local Council Tax Support

APPENDIX 1

Essex Schemes 2015/16

Appendix
A

| | Basildon | Braintree | Brentwood | Castle Point | Chelmsford | Colchester | Epping Forest | Harlow | Maldon | Rochford | Southend-on-Sea | Tendring | Thurrock | Uttlesford |
|--|----------|-----------|-----------|--------------|------------|------------|---------------|--------|--------|----------|-----------------|----------|----------|------------|
| Minimum council tax payment? | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| % Minimum council tax payment level 2013/14 | 15 | 20 | 20 | 30 | 20 | 20 | 20 | 24 | 20 | 20 | 25 | 15 | 25 | 8.5 |
| % Minimum council tax payment level 2014/15 | 25 | 20 | 20 | 30 | 23 | 20 | 20 | 24 | 20 | 20 | 25 | 15 | 25 | 12.5 |
| % Minimum council tax payment level 2015/16 | 25 | 20 | 20 | 30 | 23 | 20 | 20 | 24 | 20 | 20 | 25 | 20 | 25 | 12.5 |
| Savings limit | 16000 | 16000 | 16000 | 6000 | 6000 | 6000 | 6000 | 6000 | 6000 | 6000 | 6000 | 16000 | 6000 | 16000 |
| Other benefits counted as income? | No | Yes | Yes | Yes | Yes | Yes | Yes | No | Yes | Yes | No | Yes | No | No |
| Second adult rebate reduced or abolished? | No | No | No | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes | Yes |
| Changes made to non-dependent deductions? | Yes | No | Yes | Yes | Yes | Yes | No | No | Yes | Yes | No | Yes | No | No |
| Support restricted to a particular council tax band? | Yes | Yes | Yes | Yes | Yes | No | Yes | No | Yes | Yes | No | No | No | No |
| Council Tax band support is restricted to | D | D | D | D | D | - | D | - | D | D | - | - | - | - |

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|--|-------|-----|-----|-----|-----|-----|-------|-----|-----|-----|-----|-----|-----|-------|
| Introduce minimum council tax support payment? | Yes | No | No | No | No | No | Yes | No | No | No | No | No | No | Yes |
| Minimum weekly council tax support payment | £2.50 | - | - | - | - | - | £0.50 | - | - | - | - | - | - | £2.00 |
| Taper rate | 20% | 20% | 15% | 20% | 20% | 20% | 20% | 20% | 20% | 20% | 20% | 20% | 20% | 20% |
| Changes made to backdating rules? | No | No | No | Yes | Yes | No | Yes | Yes | Yes | No | No | No | No | Yes |
| Changes made to conditions around starting work? | No | No | Yes | Yes | Yes | No | No | Yes | No | No | No | No | Yes | Yes |
| Hardship fund | Yes | Yes | Yes | Yes | Yes | No | Yes | Yes | Yes | Yes | Yes | No | No | Yes |

LCTS Consultation Results

Consultation Closed 25 October 2015.

1. I have reviewed the background information about the Council Tax Support Scheme.

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes | | 53 | 78% |
| No | | 7 | 10% |
| Total Respondents | | | 68 |
| (skipped this question) | | | 160 |

2. The basis of the current Council Tax Support scheme is that it is 'self-funding' - it is intended that it costs the same as the amount of Government grant the Council receives. Do you agree that the Council should continue with a scheme, which is, as far as possible, self funding?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes | | 20 | 57% |
| No | | 10 | 29% |
| Don't know | | 5 | 14% |
| Total Respondents | | 35 | 100% |
| (skipped this question) | | | 193 |

3. Comments

| | |
|--|-----|
| As I along with many others do not understand the scheme it is difficult to comment | |
| I just can't keep up with my council tax on my low income | |
| Central government has been elected with a mandate to reform welfare. Local government should support this, rather than demanding that local council taxpayers subsidise it. | |
| it's not always possible to completely self fund. | |
| Why should the less well-off have to pay more than those who are better-off? | |
| Total Respondents | 5 |
| Skipped this question | 223 |

4. If the current Council Tax Support Scheme was to cost more than the level of grant the Council receives from Government, do you think the Council should adopt any of the following options to help fund the scheme. Please select one answer for each source of funding

| | Yes | No | Don't know | Response Total |
|---|-------------|-------------|------------|----------------|
| Increase the level of Council Tax | 34.29% (12) | 57.14% (20) | 8.57% (3) | 35 |
| Reduce the funding available for other Council Services | 37.14% (13) | 51.43% (18) | 11.43% (4) | 35 |
| Total Respondents | | | | 35 |
| (skipped this question) | | | | 193 |

5. Comments

| | |
|---|-----|
| Council Tax is high enough without adding more to it. It is also unfair to ask if you should cut other services without giving examples. Don't house refugees and save the money there. The council tax scheme only helps people with no money already! | |
| You will only be making the poor poorer!! | |
| spreading the cost for all residents by raising council tax is the fairest way to support people, it would probably equate to a less than 2% rise which is pittance for everyone rather than even more to be paid by the poorest | |
| The scheme should be designed within the envelope of funding provided by central government, and should cover it's fill costs (i.e. including all recharges and officer time). | |
| the rich in large properties should pay more. | |
| Unfair on working people to put up council tax | |
| Total Respondents | 6 |
| Skipped this question | 222 |

6. All working age residents eligible to receive Council Tax Support are currently required to pay a minimum of 24% of their council tax bill. Do you agree with the principle of every working age person having to make a minimum payment?

| | Response Total | Response Percent |
|------------|----------------|------------------|
| Yes | 17 | 49% |
| No | 14 | 40% |
| Don't know | 4 | 11% |

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| | | |
|-------------------------|-----|------|
| Total Respondents | 35 | 100% |
| (skipped this question) | 193 | |

7. If you do agree, what level of minimum payment do you think should be applied?

| | | Response Total | Response Percent |
|-------------------|---|----------------|------------------|
| Less than 24% |  | 10 | 38% |
| Less than 30% |  | 7 | 27% |
| Over 30% |  | 5 | 19% |
| Don't know |  | 4 | 15% |
| Total Respondents | | 26 | 100% |

8. Comments

| | |
|---|-----|
| 50 % would be fair | |
| People will budget if they have to. Maybe it needs to be a tier payment. You cannot always punish workers that are struggling to pay Council Tax & whom are always on the borderline of getting any help. | |
| Everybody benefits from the services provided by the council so everybody should pay something. | |
| The amount should be determined based on the level of funding received from central government. | |
| I do not see why this only applies to people of working age | |
| Incentive to get a job | |
| Total Respondents | 6 |
| Skipped this question | 222 |

9. If you do disagree, how should the shortfall in funding for the scheme be met? Please select one answer for each source of funding;

| | Yes | No | Don't know | Response Total |
|---|-------------|-------------|------------|----------------|
| Increase the level of Council Tax | 52% (13) | 32% (8) | 16% (4) | 25 |
| Reduce the funding available for other Council Services | 43.48% (10) | 43.48% (10) | 13.04% (3) | 23 |
| Total Respondents | | | | 26 |
| (skipped this question) | | | | 202 |

10. Comments

| | |
|---|-----|
| The costs and benefits of paying council tax are to be shared by all. At present some only pay 24% of the real cost This could be raised to a maximum of 50% | |
| The books will just have to be balanced. | |
| Stop spending money on stupid stuff! Like what is that park and the stupid red plant lots in town? They are shocking and not needed waste of money!!! Many councils else where charge a lot less on council tax and get by, look at your own spending as you are clearly wasting money else where! You are already taking all our services!! So what are we paying for!! Get rid of kier! They are useless and costing us tons! | |
| the rich should keep the poor as they need us as much as we need them | |
| That way, everybody pays an increase | |
| Total Respondents | 5 |
| Skipped this question | 223 |

11. Option 1 – Setting a Minimum Income Floor for Self Employed Persons.

In order to align the Council's Council Tax Support scheme with Universal Credit, , the Council proposes to use a minimum earned income figure for those who are self- employed in line with the UK minimum wage of £7.20* per hour for 35 hours per week. Any income above this amount would be taken into account based on the actual amounts earned. This minimum would not apply for a designated start-up period for new self-employed business start-ups.

*£7.20 is the minimum wage level from April 2016.

The benefits of doing this are:

- Council Tax Support will be brought into line with Universal Credit;
- It will incentivise working age applicants to grow and expand their business

The drawbacks of doing this are:

- Where a working age resident is in self-employment and continues to run a business where their income is below the minimum level, they will be assumed to earn at least minimum wage (based on a 35 hour week) after a start-up period.

Do you agree with the proposal to set a minimum income floor for self-employed persons?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes |  | 19 | 59% |
| No |  | 9 | 28% |
| Don't know |  | 4 | 12% |
| Total Respondents | | 32 | 100% |
| (skipped this question) | | | 196 |

12. Comments

| | |
|---|-----|
| I work full time on my own with 2 kids I can't keep up with my council tax ever can't afford it | |
| times are hard and lots of small businesses can't afford minimum wage | |
| many many self employed people earn less than the minimum wage including farmers. IT WOULD BE TOTALLY UNFAIR AND REPREHENSIBLE to assess people as having an income which they do not in fact have. Far from being an incentive (why would someone pay them selves less than min wage if they didn't HAVE to?) it will bring despair to struggling businesses | |
| Use actual income not a made up figure | |
| Unfortunately it seems that many people that are self employed under report their income for tax avoidance reasons therefore it would seem to be sensible to assume that they all earn at least the minimum wage | |
| Self-employed generally earn far more than they ever declare and a lot say they are self-employed when they aren't really just to get Tax Credits | |
| Total Respondents | 6 |
| Skipped this question | 222 |

13. Option 2 - Removing the Family Premium for all new working age claimants

The removal of Family Premium from 1st April 2016 for new claims will bring the Council Tax Support Scheme in line with the changes in Housing Benefit announced by Central Government. The Family Premium is part of how we assess the 'needs' of any claimant and is included in their Applicable Amount,

which is compared with their income. Family Premium is normally given when a claimant has at least one dependent child or young person. Removing the Family Premium will mean that when we assess a claimant's 'Applicable Amount' it would not include the Family Premium (currently £17.45 per week). This change would not affect those claimants on Universal Credit, Income Support, Income Related Employment and Support Allowance or Income Based Jobseeker's Allowance.

The benefits to the Council of doing this are:

- To bring the Council Tax Support Scheme in line with Housing Benefit changes proposed by Central Government;
- It is a simple alteration to the scheme.

The drawbacks of doing this are:

- New working age residents may see a reduction in the amount of support they receive.

Do you agree with the proposal to remove the Family premium for new claims?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes |  | 20 | 62% |
| No |  | 9 | 28% |
| Don't know |  | 3 | 9% |
| Total Respondents | | 32 | 100% |
| (skipped this question) | | | 196 |

14. Comments

| | |
|---|--|
| Sounds like a good idea but would like more detail | |
| Its an additional premium not needed | |
| This is a terrible policy on a national level, child poverty is a problem in this country, this will exacerbate this | |
| many many self employed people earn less than the minimum wage including farmers. IT WOULD BE TOTALLY UNFAIR AND REPREHENSIBLE to assess people as having an income which they do not in fact have. Far from being an incentive (why would someone pay them selves less than min wage if they didn't HAVE to?) it will bring despair to struggling businesses | |
| Use actual income not a made up figure | |
| Unfortunately it seems that many people that are self employed under report their income for tax avoidance reasons therefore it would seem to be sensible to assume that they all earn at least the minimum wage | |
| Self-employed generally earn far more than they ever declare and a | |

| | |
|---|-----|
| lot say they are self-employed when they aren't really just to get Tax Credits. | |
| Total Respondents | 6 |
| Skipped this question | 222 |

15. Option 3 – Reduce backdating to 4 weeks

Currently claims for Council Tax Support for working age claimants can be backdated for up to 3 months where a claimant can prove that there was 'good cause' that they could not claim at an earlier time. From April 2016 Central Government will be reducing the period for Housing Benefit claims to 4 weeks. It is proposed that the Council's Council Tax Support Scheme be aligned with the changes for Housing Benefit. The benefits to the Council of doing this are: To bring the Council Tax Support Scheme in line with Housing Benefit changes proposed by Central Government. It is a simple alteration to the scheme and simplifies the administration. The drawbacks of doing this are: New working age claimants may see a reduction in the amount of support they received if they are unable to claim on time.

Do you agree with the proposal to reduce backdating to 4 weeks?

| | | Response Total | Response Percent |
|-------------------------|---|----------------|------------------|
| Yes |  | 18 | 56% |
| No |  | 12 | 38% |
| Don't know |  | 2 | 6% |
| Total Respondents | | 32 | 100% |
| (skipped this question) | | | 196 |

16. Comments

| | |
|---|--|
| Would like more detail although does sound a better idea | |
| HB applicants could apply for DHP to make up the difference | |
| It should be worked out from claim start date | |
| Claimants should not be allowed to backdate at all. Cases of exceptional reasons, which should be truly exceptional only, should be dealt with under discretionary decisions and not provided for as a matter of course | |
| Sometimes its hard to sort everything on time especially if internet connection is not available | |
| this will affect people who have 'good cause'. What benefit will it be to put vulnerable people (these most likely to have a 'good cause') into significant debt which they will struggle to potentially for years | |

| | |
|---|-----|
| No, unless the Council agrees not to backdate overpayments by the same amount | |
| More than enough time to claim | |
| Total Respondents | 8 |
| Skipped this question | 220 |

17. Please use the space below to make any other comments or suggestions you have about our proposed changes or the scheme in general:

| | |
|---|-----|
| Council tax should be set at the level to provide basic services, however other forms of funding should be sort to provide other services that make the town a great place to live | |
| Stop targeting low earners to make more money for yourselves!! With the bedroom tax on top most of us are already at breaking point! | |
| Council tax should be means tested in every household. Council tax bands need to be abolished as they are out of date | |
| Special consideration should be given to disabled people who CANNOT work because of their disability. It is hard enough coping with a disability without the stress of having to find money they don't have. Everyone seems to be pooled into one category and labelled as "doesn't work, doesn't want to work" Reduce the amount disabled people have to pay and an increase for the people who can work but do not. Disabled people struggle with discrimination every day without central and local government doing it too. | |
| A major issue here seems to be landlords charging excessive rents because they know the council (council tax payers) will pay. The Council and the government should actually do something about this rather than let them get away with it or make tenants pay. This is about exploiting poor people who have little choice and then blaming them and penalising them for someone else's greed. | |
| The percentage rate in Harlow is already one of the highest in the country so do not make it even higher. | |
| Total Respondents | 6 |
| Skipped this question | 222 |

18. Please use the space below if you would like the Council to consider other options

| | |
|---|--|
| Partnering on non-essential services to keep bills low services, | |
| Yeah stop being greedy. Didn't I read in the paper you under spent by | |

| | |
|---|-----|
| 6million last year! And ur going in about making more cuts!! Shane on you!! | |
| Help with my rent and council tax | |
| People claiming and of working age for a set time should be reviewed from time to time. This would make sure they are actively seeking work and don't fall into a trap of continually claiming. Harlow should look at getting rid of the claim culture. | |
| The council should consider outsourced and shared service arrangements for revenues and benefits administration. This has generated savings for similar local authorities such as Stevenage and East Herts. | |
| go back to old rates system so the larger the house the more you pay and if you own other properties you should have to pay extra this would stop a lot of private renting | |
| I'm afraid I don't know enough about the constant changes and complications of the benefits system to give alternative options. I understand that other councils pay Council Tax benefit to the full amount of the housing cost - I am confused by how they can do this and Harlow Council can not. | |
| Total Respondents | 7 |
| Skipped this question | 221 |

19. Are you responding to this survey as a..

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Resident |  | 26 | 100% |
| Organisation | | 0 | 0% |
| Total Respondents | | 26 | 100% |
| (skipped this question) | | | 202 |

21. Does your name appear on the Council Tax Bill for your household?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes |  | 23 | 92% |
| No |  | 1 | 4% |
| Not sure |  | 1 | 4% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

22. Does your household receive Council Tax Support?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes |  | 6 | 24% |
| No |  | 19 | 76% |
| Not sure | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

23. Does your household receive any other benefits?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Yes | | 8 | 32% |
| No | | 17 | 68% |
| Not sure | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

24. If you selected 'Yes', please state which benefits you receive in the box below

| | |
|---|-----|
| Bereavement allowance | |
| Housing benefit | |
| Income support | |
| Child benefit and child tax plus working tax but that's only a extra 20 pound | |
| housing benefit | |
| IS, CA & PIP. | |
| one member gets pension credit | |
| Housing benefit, ESA. | |
| Total Respondents | 7 |
| Skipped this question | 221 |

25. Please select below which best describes your household:

| | | Response Total | Response Percent |
|--|--|----------------|------------------|
| A family with one or two dependent children | | 2 | 8% |
| A family with three or more children | | 1 | 4% |
| A lone parent household | | 3 | 12% |
| A carer | | 0 | 0% |
| A household with full and/or part time workers | | 8 | 32% |
| A household that includes someone who is disabled | | 2 | 8% |
| A single person household or a couple without children | | 5 | 20% |
| None of the above | | 4 | 16% |
| Don't know | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

26. Are you a war widow/widower?

| | Response | Response |
|--|----------|----------|
| | | |

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| | | Total | Percent |
|-------------------------|--|-------|---------|
| Yes | | 1 | 4% |
| No | | 23 | 96% |
| Don't know | | 0 | 0% |
| Total Respondents | | 24 | 100% |
| (skipped this question) | | | 204 |

27. Please tell us your age:

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Under 16 | | 0 | 0% |
| 16 - 24 | | 0 | 0% |
| 25 - 44 | | 7 | 28% |
| 45 - 64 | | 12 | 48% |
| 65+ | | 5 | 20% |
| Prefer not to say | | 1 | 4% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

28. Do you consider yourself to have a disability?

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| No | | 18 | 69% |
| Physical Impairment | | 1 | 4% |
| Mental Health condition | | 0 | 0% |
| Learning disability | | 0 | 0% |
| Long term illness | | 4 | 15% |
| Sensory Impairment | | 1 | 4% |
| Other, please specify | | 0 | 0% |
| Total Respondents | | 26 | |
| (skipped this question) | | | 202 |

29. Please tell us your Ethnicity:

| | | Response Total | Response Percent |
|------------------------------------|--|----------------|------------------|
| White British | | 21 | 84% |
| White Irish | | 0 | 0% |
| White Other | | 1 | 4% |
| Gypsy / Roma | | 0 | 0% |
| Traveller of Irish Heritage | | 0 | 0% |
| Black or Black British | | 0 | 0% |

APPENDIX 1

| | | | |
|----------------------------------|------------|-----------|-------------|
| African | | | |
| Black or Black British Caribbean | | 0 | 0% |
| Mixed White/Black African | | 0 | 0% |
| Mixed White/Black Caribbean | | 0 | 0% |
| Black Other | | 0 | 0% |
| Asian or Asian British Pakistani | | 0 | 0% |
| Asian or Asian British Indian | | 0 | 0% |
| Asian or Asian British Other | | 0 | 0% |
| Mixed White/Asian | | 0 | 0% |
| Asian Other | | 0 | 0% |
| Chinese | | 0 | 0% |
| Mixed Other | | 0 | 0% |
| Not Known | | 0 | 0% |
| Prefer not to say | ██████████ | 3 | 12% |
| Other, please specify | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

30. Are you married/in a Civil Partnership?

| | | Response Total | Response Percent |
|--------------------------------|--|----------------|------------------|
| Yes | ██ | 13 | 54% |
| No | ██ | 11 | 46% |
| Prefer not to say | | 0 | 0% |
| Total Respondents | | 24 | 100% |
| (skipped this question) | | | 204 |

31. What is your religion/faith?

| | | Response Total | Response Percent |
|-----------|--|----------------|------------------|
| Christian | ██ | 13 | 52% |
| Hindu | | 0 | 0% |
| Muslim | | 0 | 0% |
| Buddhist | | 0 | 0% |

APPENDIX 1

| | | | |
|--|---|----|------|
| Sikh | | 0 | 0% |
| Jewish | | 0 | 0% |
| None |  | 11 | 44% |
| Don't know | | 0 | 0% |
| Prefer not to say | | 0 | 0% |
| Other, please specify view |  | 1 | 4% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

32. Please tell us your gender:

| | | Response Total | Response Percent |
|-------------------------|--|----------------|------------------|
| Male |  | 10 | 40% |
| Female |  | 15 | 60% |
| Transgender | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

33. Do you consider yourself to be...:

| | | Response Total | Response Percent |
|--------------------------|--|----------------|------------------|
| Heterosexual or straight |  | 19 | 76% |
| Gay or lesbian |  | 1 | 4% |
| Bisexual |  | 2 | 8% |
| Prefer not to say |  | 3 | 12% |
| Other, please specify | | 0 | 0% |
| Total Respondents | | 25 | 100% |
| (skipped this question) | | | 203 |

Council Tax Support 2016/17**Proposed Changes to Assessment of Self – Employed Income****Current Assessment**

Mr Smith advises the Council's Revenues & Benefits service on 1 May 2015 that he started self-employed work on 21 April 2015 as a window cleaner, working 40 hours per week.

Mr Smith stated that he doesn't have many clients and is spending a lot of time advertising his services. This means that his company is currently running at a loss. Mr Smith's Council Tax Support claim is assessed using a self-employed income of £0.00 from the Monday following the date the business started.

Mr Smith's Council Tax Support claim would continue to be based on an income of £0.00 until he informs the council that he is now making a profit.

Proposed change from 1 April 2016

Mr Smith informs the Council's Revenues & Benefits service on 1 May 2015 that he started self-employed work as a window cleaner on 21 April 2015, working 40 hours per week.

Mr Smith states that he does not have many clients and is spending a lot of time advertising his services, and as a result his business is currently running at a loss. For the first year of trading Mr Smith's Council Tax Support claim is based on his declared earnings and his Council Tax Support claim is assessed based on a net income of £0.00 per week from the Monday following the date the business started.

After one year Mr Smith informs the Revenues & Benefits service that business has not improved, and his company is still making a loss, even though he is still working for 40 hours per week.

Mr Smith's Council Tax Support claim is assessed using an income based on 40 hours per week at the minimum wage (£7.20 per hour from 1 April 2016), which is an income of £288.00 per week from the Monday following 21/04/2016, a year after the business began.

Mr Smith contacts the Council and declares that he has had to reduce his hours to 10 hours per week from 19 June 2016. This is below the minimum income floor of 16 hours per week. Mr Smith's Council Tax Support claim is assessed using 16 hours per week at the minimum wage of £7.20, resulting in an assessed income of £115.20 per week from the Monday following the date of the change in circumstances.

HARLOW DISTRICT COUNCIL

EQUALITY IMPACT ASSESSMENT – LOCAL COUNCIL TAX SUPPORT SCHEME

This provisional Equality Analysis has been made to provide decision makers with a provisional idea of the potential effect of these proposals ahead of the consultation process. A further Equality Impact Assessment will be made once the consultation is closed and the results known.

| | |
|---|--|
| <p>Name of service, function or policy being assessed</p> | <p>Localised Council Tax Support Policy 2016-17</p> <p>This Equality Impact Assessment has been developed considering the following national Equality Impact Assessments:</p> <ul style="list-style-type: none"> • Local Government Finance Bill: Localising support for council tax • Local Government Finance Bill: Technical reforms to council tax • Local Government Finance Bill: Summary impact assessment |
| <p>Service/Department</p> | <p>Finance, Revenues and Benefits</p> |
| <p>Names and roles of officers completing the assessment (indicate Lead officer)</p> | <p>Donna Beechener, Revenues and Benefits Manager (Lead Officer)</p> |
| <p>Contact telephone number of Lead officer</p> | <p>01279 446245</p> |
| <p>Date assessment completed</p> | <p>12 November 2015</p> |

1. Aims of the policy/service/function and how implemented

| | Key Questions | Notes |
|-----|--|---|
| 1.1 | Is this a new policy/service/function or a review of an existing one? | This is a review of an existing policy and function |
| 1.2 | Briefly state the main purpose of the policy/service/function? | To help people with low incomes to afford their Council Tax liability, in line with the Local Government Finance Act 2012. |
| 1.3 | Briefly state the main activities of the policy/service/function? | Payment of Council Tax Discounting of Council Tax |
| 1.4 | Who are the main beneficiaries? Whose needs is it designed to meet? | Those liable for Council Tax within Harlow. Adults on a low income with low savings Any authority that can levy a Council Tax |
| 1.5 | Which staff carry out the policy/service/function? | Revenues And Benefits assessment staff |

2. Information Gathering and Data Collection

| | Key Questions | Notes | If further data collection is needed – state by whom, when and how is it going to be done? |
|-----|--|---|---|
| 2.1 | <p>What quantitative (numerical) data do you already have (e.g. national and local demographic data, equality monitoring data, employee data, customer profile data etc) about those who use or will use the policy or service? What gaps are there in the data? What else do you need?</p> <p>NB. Attach copies of the relevant data that you are using for this assessment</p> | <p>The scheme has been modelled based on existing costs, taking account of a potential council tax increase, demand for the scheme and the reduction Revenue Support Grant. The scheme was originally modelled to be cost neutral, but current estimates are that the scheme costs more than the current level of grant received. .</p> | <p>It is not possible to identify the actual grant received to support the scheme as this has been subsumed into Revenue Support Grant.</p> |
| 2.2 | <p>What qualitative data do you already have (e.g. results of customer satisfaction surveys, results of previous consultations, staff surveys, analysis of customer complaints/comments, feedback from community groups or individuals etc) about those who use or will use the policy or service? What gaps are there in the data? What else do you need?</p> | <p>The proposed scheme for 16 /17 for working age claimants varies little from the current scheme apart from proposals to;</p> <ol style="list-style-type: none"> 1) Change the assessment of self-employed income 2) Align with Housing Benefit changes in regards to the removal of the family premium for new claims 3) Align with Housing Benefit changes to reduce the period that a claim can be backdated. <p>The majority of respondents to the consultation agreed that with the concept that all people of working age should have to pay some council tax, currently set at a minimum of 76%, and with the three proposals for change</p> | |

3. Consultation

| Please state below what formal or informal consultation has taken place or that you are planning to hold with appropriate stakeholders in relation to this policy/function | | | |
|--|---|--|--|
| | Key Questions | Notes | If further consultations are needed/ planned – state with whom, by whom, when and how is this going to be done? |
| 3.1 | What consultations have been held and with whom did you consult? What were the main issues raised? | A public consultation was conducted for a period of six weeks, commencing on 14 September 2015 and closing on 25 October 2015. The consultation was conducted by way of an online questionnaire. The consultation was publicly announced. | The scheme will be reviewed annually, and if changes are proposed, then further public consultation will be conducted. |
| 3.2 | What consultations were held specifically with the equality target groups? What were the main issues raised? | In introducing a local council tax support scheme in 2013, representatives of equality target groups were identified and contacted electronically alerting them to the consultation and asking them to participate. Locally and nationally concerns were raised about the new liabilities created for those unable to work due to disability. We have addressed these by confirming that the current system of applicable amounts which protect these groups will remain in place. | As 3.1 |
| | Key Questions | Notes | If further consultations are needed/ planned – state with whom, by whom, when and how is this going to be done? |

| | | | |
|------------|---|---|---------------|
| <p>3.3</p> | <p>Is the Council working in Partnership with other organisations to implement this policy/function? Should this be taken into consideration? (E.g. Agreeing the equalities monitoring categories) Should the partnership arrangements have an EIA?</p> | <p>All major precepting authorities in Essex, which are working together to devise the support scheme. HDC – Corporate Housing; Resource Management Department for Work and Pensions Department for Communities and Local Government .</p> <p>Each LA participating in the Essex project will conduct their own EQIA. DWP & DCLG have undertaken EQIA's which are publicly available.</p> | <p>As 3.1</p> |
|------------|---|---|---------------|

Note

- It is a legal requirement that consultation takes place with appropriate stakeholders as part of the EIA process.
- You must ensure that you record all the main areas of concern raised by equality and customer groups during consultations and how you aim to address these concerns.

4. Assessment of Impact

| | | |
|--|--|---|
| <p>Based on the data you have analysed and provided, and the results of the consultation or research you have undertaken, list below how the policy or function will or does work for each of the following equalities groups.</p> <p>Identify any differential impact and consider whether the policy/function meets any particular needs identified for each of the six equalities groups.</p> <p>NB:If you do identify any adverse impact you must: a) Seek appropriate advice as to whether it is highlighting unlawful discrimination or is potentially discriminatory, and b) Identify steps to mitigate any adverse impact</p> <p>Include any examples of how the policy or function helps to promote race, disability, age and/or gender equality.</p> | | |
| | | State evidence of impact or potential impact/How helps to promote equality |
| 4.1 | <p>Gender – identify the impact/potential impact of the policy/function on women, men and transgender people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | None identified |
| | | State evidence of impact or potential impact/How helps to promote equality |
| 4.2 | <p>Disability – identify the impact/potential impact of the policy on disabled people (ensure consideration of a range of impairments including visual and hearing impairments, mobility impairments, learning disability etc)</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | <p>All Disability Living Allowance Benefits will continue to be disregarded thereby protecting those with specific long term conditions who fall within this group. People with disabilities will continue to receive additional premiums as part of the calculation.</p> <p>The above helps to “advance equality of opportunity between people who share a protected characteristic and those who do not.”</p> |

| | | |
|------------|--|--|
| <p>4.3</p> | <p>Age – identify the impact/potential impact of the policy/function on different age groups</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | <p>Older people (60+); This group is specifically protected under Government Regulations.</p> <p>Younger people (17-25); 17 year olds may be disadvantaged indirectly if their parents have to pay more as a result of this policy. People over 18 of working age will be required to pay more.</p> <p>The Council has agreed an exceptional hardship fund to assist those in extreme hardship.</p> <p>Children (0-16); Removing the Family Premium for new claims, may affect those under 16.</p> |
| <p>4.4</p> | <p>Race – identify the impact/potential impact of the policy/function on different black and minority ethnic groups, including Gypsy and Traveller communities</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | <p>None identified</p> |
| | | <p>State evidence of impact or potential impact/How helps to promote equality</p> |
| <p>4.5</p> | <p>Sexual orientation – identify the impact/potential impact of the policy on lesbians, gay men, bisexual and heterosexual people</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | <p>None identified</p> |

| | | |
|-----|--|--|
| 4.6 | <p>Religion/belief – identify the impact/potential impact of the policy on people of different religious/faith groups and also upon those with no faith</p> <p style="text-align: center;">And/or</p> <p>Proposed measures to mitigate any adverse impacts</p> | None identified |
| 4.7 | <p>Socio-economic disadvantage – identify any impact on those who have a low income, or whose family circumstances/history may affect their ability to access services eg. carers and the cared for; pensioners; single-parents; long-term unemployed; history of abuse/domestic violence; benefits claimants; housebound; chronically ill;</p> | <p>The impact of the proposed scheme will be felt most by those of working age who are not disabled, some of the affects will be mitigated by more generous incentives to work.</p> <p>Removal of the family premium for new may impact on single parents / carers of children.</p> <p>The Council has agreed an exceptional hardship fund to assist those in extreme need.</p> |
| 4.8 | <p>Any other groups, if appropriate e.g. children leaving care; pregnant or breast-feeding mothers; carers etc</p> | <p>Parents will continue to receive a child allowance.</p> <p>Removal of the family premium as part of the calculation for new claims may disadvantage those with children which may be inconsistent with the Council's duty to safeguard and promote the welfare of children.</p> <p>Working parents receive a higher disregard of their earnings reflecting their childcare costs.</p> <p>The Council has agreed an exceptional hardship fund to assist those in extreme hardship.</p> <p>The above helps to “advance equality of opportunity between people who share a protected characteristic and those who do not.”</p> |
| | | Notes |

| | | |
|-----|---|------------------|
| 4.9 | Are there any additional measures that could be adopted to further equality of opportunity in the context of this policy/service/function and to meet the particular needs of equalities groups that you have identified? | None identified. |
|-----|---|------------------|

NB

Please provide a summary overview by completing the Section overleaf, ticking the relevant boxes to confirm the outcome and findings of this assessment process

It is also essential that you complete an action plan based on your assessment (see form EIA.2) and attach this to your Equality Impact Assessment form (EIA.1) form. This is a vital component of the equalities impact assessment process.

Include all of the measures that you will take to improve the policy/function for the different equalities characteristics, e.g. staff training, positive action, revisions to policy, monitoring of your action plan, etc.

Once you have completed the forms EIA.1 and EIA.2 please sign and date and:

- a) Send a copy to your Head of Service for endorsement
- b) Keep a copy as a record of the processes you have been through in carrying out the EIA
- c) Send a PDF copy of the signed and endorsed EIA form plus enclosed action plans to the Corporate Equalities Group via the HDC Community Liaison Officer equalities@harlow.gov.uk

5. Summary Overview of EIA

As a summary overview of information and findings provided in the earlier sections of this Equality Impact Assessment, please tick the relevant boxes as appropriate to denote the OUTCOME of this process for each of the Equality Characteristics.

| Equalities category | No adverse impact AND promotes equality and diversity <i>Please tick ✓ if appropriate</i> | No adverse impact BUT equality and diversity NOT promoted <i>Please tick ✓ if appropriate</i> | Evidence of adverse impact <i>Please tick ✓ if appropriate</i> |
|-----------------------------|--|--|---|
| Gender and transgender | <u>x</u> | | |
| Race | <u>x</u> | | |
| Disability | <u>x</u> | | |
| Age | | | <u>x</u> |
| Sexual orientation | <u>x</u> | | |
| Religion and belief | <u>x</u> | | |
| Socio-economic disadvantage | | | <u>x</u> |

NB: Tick relevant box as appropriate and based on information provided in section

Signed
Project Manager

Countersigned
Head of Service

Print Name

Print Name

Date

Date

Under the Freedom of Information Act, this completed EIA form will be placed on the Harloweb and be available on request to the general public.
