

## APPENDIX 1

### Stage 1: Initial screening

Lead Officer:	Caroline Lee
People involved in completing EIA:	Caroline Lee Amanda Cawdron Yvette Maguire
Is this the first time that this project, policy or proposal has had an EIA carried out on it? If no, please state date of original and append to this document for information.	No  An EIA on the 2013/14 scheme accompanied the scheme for approval to Council on 12 December 2013. An EIA was also completed for the review of the scheme for 2014/15, 2015/16, 2016/17 and 2017/18. This EIA is for the scheme for 2018/19 onwards.

### General Information

1a	Which service does this project, policy, or proposal relate to?	This proposal relates primarily to the revenue and benefits section of the Customer Service Team (which works with the Council Tax Reduction Scheme). There are also close links into the finance team on this project.
1b	What is the project, policy or proposal?	<p>The proposal is the approval of Oldham's Council Tax Reduction Scheme for 2018/19 onwards.</p> <p>From 2013/14, all local authorities were given a duty to agree a localised Council Tax Support Scheme at full Council to replace Council Tax Benefit (CTB) by 31<sup>st</sup> January prior to the start of the financial year. Previous to this, the Council Tax Benefit Scheme was administered nationally.</p> <p>There was additional complexity in developing a scheme given that the resource envelope, in which we had to deliver any scheme, was 10% smaller than the funding we had received to cover CTB the previous year. The Councils desire was to ensure the scheme was self-financing to ensure no additional burden to the Authority's financial position.</p> <p>The scheme was calculated to generate an amount of funding that when taken alongside the direct grant received and additional income from technical reforms made the scheme viable. The CTR element of this calculation works on the basis of a presumed collection rate.</p>

		<p>There is an obligation within existing the legislation (Local Government Finance Act 2012) on the council to consider whether to review this scheme on an annual basis. If the Council wants to revise the scheme, any revised scheme for 2018/19 needs to be approved by full Council on a date before 31st January 2018.</p> <p>The council made a change to the Council Tax Reduction Scheme in 2015/16 increasing the maximum reduction awardable from 80% of the Band A rate of Council Tax to 85%. That meant an extra £53.43 per year for someone who is entitled to the maximum award. This was agreed by Full Council in December 2014.</p> <p>There is currently no proposal to amend the scheme.</p>
1c	<p>What are the main aims of the project, policy or proposal?</p>	<p>There are three key proposals:</p> <p>1. To continue to use a scheme that is affordable. As in 2017/18, Oldham is once again aiming to put in place a scheme that is affordable. The 2017/18 council tax reduction scheme assumed a collection rate of 70%. We estimate that this will at least be the same in 2018/19.</p> <p>The Authority continues to face significant challenges in order to balance the budget over the next financial year, having already saved over £200m over the last 9 years, Oldham Council still cannot afford to increase its financial pressures. We are therefore once again looking to maintain a local scheme that is affordable and balance the impact against the cost of providing a local council tax support scheme.</p> <p>2. To continue to use a scheme that limits the financial impact across all Council Tax benefit recipients We will maintain our protection of pensioners in line with the current scheme, and maintain our consideration of protecting vulnerable groups and providing incentives to work.</p> <p>Whilst not providing a specific definition for vulnerable groups, the Government did advise that authorities should consider their duties under specific legislation when designing a scheme, namely:</p> <ul style="list-style-type: none"> <li>• The Equality Act 2010</li> <li>• Child Poverty Act 2010</li> <li>• The Housing Act 1996</li> </ul>

Whilst we have no legal duty to protect people on low incomes (this was revoked in December 2010), as a borough with a number of deprived areas, Oldham still chooses to continue considering the impact of any decisions on this group. Oldham continued to consider people on low incomes as part of our equality impact assessment (EIA) process.

We have undertaken in-depth research into the scale of the impact of welfare reforms on Oldham and its people.

A report in January 2015 on the impact of welfare highlighted the following groups as particularly vulnerable:

- single people, in particular young single people in rented accommodation
- younger people in general
- older people with disabilities

A report in August 2015 looking at the new government proposals for welfare and tax reform (now the 2016 Welfare Reform and Work Act) shows showed that those not in work, especially those with children as well as lone parents overall and families with only one earner will be the most heavily affected by the latest changes.

In January 2016, we looked in detail into one of the groups most affected by these reforms, namely those aged between 18-24

In September 2016, we investigated the impact of welfare reform on the debt and finances of local people

The findings of this need to be considered when identifying those who are most vulnerable under the scheme.

3. To continue to maintain a scheme that will enable the Council to collect as much Council Tax as possible, whilst supporting residents to meet their payments. Early indications are that collection rates on the debt due for 2017/18 are 75% and this suggests a collection rate above the estimated 70% and an outturn position which could be as high as 80% for working age CTR cases. An additional 5% collection could result in an extra £225k in Council Tax receipts for 2017/18. However, the impact of the roll out of the full service of Universal Credit which began on 26 April 2017 has still yet to be felt across the borough and this could impact

		<p>on CTR take up and collection levels. The number of recipients of working age CTR has reduced from 16,206 when the scheme was agreed in December 2013 to 14,450 in November 2017 and this could indicate that there is less overall requirement for financial support. Once again, through this process we will endeavour to do things differently, to do things co-operatively, which will help the residents of Oldham and in doing so, enable the Council to collect the funds it needs to continue to provide services. We are acutely aware that shortfalls in Council Tax mean creating a budget pressure that has the potential to require further savings to be made from within Council services.</p>
1d	<p>Who, potentially, could this project, policy or proposal have a detrimental effect on, or benefit, and how?</p>	<p>The proposal for the 2018/19 scheme is to maintain the current support provided through the CTR scheme, on this basis there will be no disproportionate detrimental impact on equality groups from the proposal put forward.</p> <p>There will be a small number of claimants who will be affected by changes to housing benefit which have not been aligned with the CTR scheme.</p> <ul style="list-style-type: none"> <li>• Disregard of Bereavement Support payments which were introduced in April 2017. This replaced Bereavement Allowance and is paid at a rate of £350 per month (children) or £100 per month (no children)</li> <li>• Disregard payments received from the We Love Manchester Emergency Fund (WLMEF) and the London Emergencies Trust (LET) set up following the terrorist attacks in Manchester and London</li> </ul> <p>It is proposed that any disproportionate impacts of these changes will be mitigated by the use of the Exceptional Hardship Fund.</p>

1e. Does the project, policy or proposal have the potential to <u>disproportionately</u> impact on any of the following groups? If so, is the impact positive or negative?				
	None	Positive	Negative	Not sure
Disabled people	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Particular ethnic groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Men or women (include impacts due to pregnancy / maternity)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People of particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in a Marriage or Civil Partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in particular age groups	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groups with particular faiths and beliefs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?				
<i>E.g. vulnerable residents, homeless people, individuals at risk of loneliness, carers or serving and ex-serving members of the armed forces</i>		<input checked="" type="checkbox"/>	<input type="checkbox"/>	

**If the answer is “negative” or “not sure” consider doing a full EIA**

1f. What do you think that the overall NEGATIVE impact on groups and communities will be? <u>Please note that an example of none / minimal impact would be where there is no negative impact identified, or there will be no change to the service for any groups. Wherever a negative impact has been identified you should consider completing the rest of the form.</u>	None / Minimal	Significant
		<input checked="" type="checkbox"/>

1g	Using the screening and information in questions 1e and 1f, should a full assessment be carried out on the project, policy or proposal?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
1h	How have you come to this decision?	The proposal for the 2018/19 scheme is to maintain the support provided through the scheme, on this basis it felt that there will be no disproportionate impact from the proposal or the scheme.

**Stage 5: Signature**



**Lead Officer: Amanda Cawdron Date: 01.12.17**

**Approver signature: Caroline Lee Date: 01.12.17**

**EIA review date: April 2018**



Activity	Update
<p>Further develop the Welfare Rights Service to support residents to maximise their income</p>	<p>One of the key actions for Oldham Council's Welfare Rights Service for 2017/18 is to ensure a consistent and targeted approach towards communicating with service users through greater proactivity and enhanced partnership working, in order to increase public engagement with the service.</p> <ol style="list-style-type: none"> <li>1. Increase uptake of welfare benefits and raise awareness of the Welfare Rights Service</li> <li>2. Help tackle poverty and improve health and wellbeing amongst the most vulnerable groups</li> </ol> <p>A number of potential communications initiatives have been identified which are primarily designed to increase awareness of the team's presence and will contribute to increased public engagement which includes:</p> <ul style="list-style-type: none"> <li>• Regular activity to publicise changes to benefit rules</li> <li>• Regular activity to publicise success stories</li> <li>• Increased social media efforts</li> <li>• Support for increased number and quality of public engagement sessions</li> <li>• Support for increased partnership working with potential resulting communications activity</li> </ul> <p>In addition, the service has developed and produced 'Make The Most Of your Money' packs, which are being distributed at community events and we have produced a quarterly newsletter which is distributed to our stakeholders.</p> <p>The team has continued to be extremely successful and has again this year exceeded its target of £1million income generation, and has generated additional income for the residents of Oldham of over £2.5 million</p>
<p>Work with partner organisations to provide targeted support to residents</p>	<p>Dedicated welfare reform and financial inclusion working groups are in place, delivering coordinated action in partnership with the Council, DWP and the voluntary sector.</p>
<p>Continue to monitor the collection rates on a weekly basis</p>	<p>This allows swift action to be taken if collection slows. Oldham has introduced SMS texting to remind people at an early opportunity to pay on time. It is anticipated that this will improve collection.</p>



Activity	Update
<p>Continue to monitor the wider impact of welfare reform ensuring effective partnership working continues to support those affected</p> <p>Identify and support those affected by the future changes to welfare reform, particularly the benefit cap and Universal Credit</p>	<p>A Greater Manchester (GM) workshop was held in July 2017 to fully assess impacts of UC roll out on CTR and to consider potential changes to the GM schemes from 2018/19. The changes considered included:</p> <ul style="list-style-type: none"> <li>• Introducing a fixed income period for CTR UC claims - claims could be reassessed every three months or six months at a flat rate regardless of changes to the customer's income over that period. Extensive modelling will need to be carried out to determine the costs and benefits of implementing such as scheme and the impacts on CTR administration and the customer.</li> <li>• Introducing a 'tolerance' within the scheme to allow for multiple changes. This would continue with the current CTR scheme but changes to entitlement which would increase or decrease entitlement below an agreed level would not affect the award of CTR. The Council would need to decide</li> <li>• What level of change in financial terms would not be actioned</li> <li>• Whether the tolerance would apply to both increases and decreases in entitlement equally</li> <li>• Whether changes should be accumulated and then actioned when all changes 'add up ' to more than the tolerance level and</li> <li>• Whether the tolerance level should apply to all applicants irrespective of the income/benefits they receive</li> </ul> <p>Sharing learning with national DWP Strategy stakeholders to inform wider Universal Support policy (holistic support for vulnerable claimants)</p>

Activity	Update
Link to Get Oldham working initiatives	<p>Key achievements for Get Oldham Working between May 2013 and 31st March 2017 have included:</p> <ul style="list-style-type: none"> <li>• 5,729 work related opportunities created.</li> <li>• 5,729 job opportunities created and 4,533 filled.</li> <li>• 856 apprenticeships created and 675 filled.</li> <li>• 277 traineeships created and 249 filled.</li> <li>• 932 work experience placements created and 845 filled</li> </ul>
Undertake an annual review of the Council Tax Reduction scheme	The scheme will continue to be reviewed on an annual basis

## Appendix (ii) to EIA

No	Action	Required outcomes	By who?	By when?	Review date
1	Continue to promote existing flexible payments method	Increase collection rates Increased take up of 12 monthly and fortnightly payment	Joe Robinson	November 2017	April 2018
2	Review effectiveness and take up of current payment methods and introduce new payment options where appropriate	Increase collection rates  More flexible options available	Adam Parsey	April 2018	July 2018
3	Warm Homes Oldham to continue to provide support with energy bills and related issues	1,000 people out of fuel poverty.	James Sommerville	March 2018	Jan 2019
4	Identify and establish referral arrangements to a wider range of support services	Maximise access to support for residents	Amanda Cawdron	April 2018	July 2018
5	Further develop the Welfare Rights Service to support residents to maximise their income	Ensure the Council can provide help and assistance to those who experience difficulties linking support to outcomes from the Public Health Transformation Agenda.  Allow us to undertake benefit checks and referring residents for budgeting support and debt advice.	Amanda Cawdron	April 2018	August 2018
6	Work with partner organisations to provide targeted support to residents	Early identification of residents affected by Welfare Reform changes allows support to be put in place at the earliest point	Amanda Cawdron	April 2018	August 2018

7	Continue to monitor the collection rates on a weekly basis	Increase collection rates and take swift action if collection slows	Caroline Lee	April 2018	August 2018
8	Continue to monitor the wider impact of welfare reform ensuring effective partnership working continues to support those affected	<p>Early identification of residents affected by Welfare Reform changes allows support to be put in place at the earliest point.</p> <p>Following the announcement a report has been developed highlighting potential impact to residents from 2017 onwards.</p> <p>We will continue to monitor the implications</p>	Amanda Cawdron	April 2018	August 2018
9	Identify and support those affected by the future changes to welfare reform, particularly Universal Credit	Early identification of residents affected by Welfare Reform changes allows support to be put in place at the earliest point	Amanda Cawdron	April 2018	August 2018
10	Review approach to debt collection by the Council and seek to develop single view of the debts an individual owes to the Council	Increase collection rate across all debts. Agree more affordable payment arrangements with residents	Adam Parsey	September 2018	December 2018
11	Link to Get Oldham working initiatives	Reduced number of unemployed	Jon Bloor	June 2018	September 2018
12	Undertake an annual review of the Council Tax Reduction scheme	<p>The scheme is reviewed in light of information gathered from the performance indicators and recommendations for changes are put to Council.</p> <p>Report to Council recommending any changes to the scheme.</p>	Caroline Lee	June 2018	December 2018
13	Identify how the breadth and quality of the data collected can be improved	A stronger, more robust and comprehensive data base.	Caroline Lee	April 2017	January 2018