# Stage 1: Initial screening

Lead Officer:	Caroline Lee
People involved in completing EIA:	Caroline Lee 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, 2017/18 and 2018/19. This EIA is for the scheme for 2019/20 onwards.

# **General Information**

1a	Which service does this project, policy, or proposal relate to?	This proposal relates to the Council Tax Reduction (CTR) scheme which is the responsibility of the Revenues and Benefits service within the Finance Directorate. The CTR scheme is administered by the Unity Partnership Ltd on behalf of the Council.
1b	What is the project, policy or proposal?	The proposal is the approval of Oldham's CTR scheme for 2019/20 onwards. From 2013/14, all Local Authorities were placed under a duty to agree a localised Council Tax Support Scheme for those of working age at full Council to replace Council Tax Benefit (CTB) by 31 <sup>st</sup> January 2013.
		Previously, the CTB scheme was administered nationally.
		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 financial position of the Authority.
		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.
		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 2019/20 no later than 10 March 2019. For Oldham, this is the 27 February 2019 Budget Council Meeting.
		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.
		Since 2015/16, apart from updated prescribed changes to the CTR scheme, there have been no further changes.
1c	What are the main aims of the	There are three key aims of the proposals:
	project, policy or proposal?	1. To continue to use a scheme that is affordable. As at January 2019, 85% of claimants have made some payment towards their 2018/19 bills suggesting a collection rate of approximately 80%. Weekly monitoring of the collection rate is being maintained to manage the risk of non-collection. One perceived risk is that claimants begin to find it harder to make payments as the Government's welfare reform agenda progresses. If the amount of disposable income claimants have to meet Council Tax and other financial commitments reduces, this could have the impact of increasing the risk of arrears from those who are currently paying their Council Tax.
		The Authority continues to face significant challenges in order to balance the budget in 2019/20. We are therefore once again looking to maintain a local scheme that is affordable and balances the impact of welfare reforms against the cost of providing a local Council Tax reduction scheme.
		We are acutely aware that shortfalls in Council Tax collection mean creating a budget pressure that has the potential to require further savings to be made from

	within Council services.			
	2. To continue to use a scheme that limits the financial impact across all Council Tax Reduction recipients.			
	The protection of pensioners must be kept in place in line with the current national scheme, and the cost of doing this needs to be aligned with our need to protect vulnerable groups and provide incentives to work.			
	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:			
	The Equality Act 2010 Child Poverty Act 2010 The Housing Act 1996			
	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. This Council continues 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.			
	<ul> <li>A report in January 2015 on the impact of welfare highlighted the following groups as particularly vulnerable:</li> <li>Single people, in particular young single people in rented accommodation</li> <li>Younger people in general</li> <li>Older people with disabilities.</li> </ul>			
	A report in August 2015 looking at the new Government proposals for welfare and tax reform (now the 2016 Welfare Reform and Work Act) 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 referm on the debt and finances of least passion
		welfare reform on the debt and finances of local people.
		These findings are factored in 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 2018/19 are approximately 80%. However, the impact of the roll out of the full service of Universal Credit which began on 26 April 2017 is still being felt across the borough and this could impact on CTR take up and outturn collection levels. The number of recipients of working age CTR has reduced from 16,206 when the scheme was agreed in December 2013 to 14,144 in January 2019 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. A Council Tax Collection Strategy was launched in 2018 aimed at encouraging early payment by engaging with residents more pro- actively, identifying vulnerable people early in the Council Tax recovery process and signposting to partners and stakeholders where wider support is needed. We have also signed the CAB debt protocol supporting ethical collection methods and have partnered with the debt charity Stepchange to provide support. We have also started to use the Money Advice Service's recommended Standard Financial Statement (SFS) which standardises affordable repayment arrangements with residents.
1d	Who, potentially, could this project, policy or proposal have a detrimental effect on, or benefit, and how?	The proposal for the 2019/20 scheme is to change 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. All the proposed changed either maintain the status quo i.e. maintain the maximum award at 85% of Council Tax for a Band A property or are financially beneficial to residents.
		The recommendations are:
		<ol> <li>The continuation of limiting support to a maximum of 85% of Council Tax of a Band A Property.</li> </ol>

	<ol> <li>2) The application of disregards for Bereavement Support Allowance and post graduate master's degree loan and special support payments in the assessment of CTR</li> <li>3) The introduction of support for UC/CTR claimants including earnings disregards, use of DWP information as an intention to claim and incorporation of housing costs in the UC maximum</li> </ol>
	award.

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		$\square$			
Particular ethnic groups		$\square$			
Men or women (include impacts due to pregnancy / maternity)		$\square$			
People of particular sexual orientation/s	$\square$				
People in a Marriage or Civil Partnership					
People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	$\boxtimes$				
People on low incomes		$\square$			
People in particular age groups		$\boxtimes$			
Groups with particular faiths and beliefs		$\boxtimes$			
Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?					
E.g. vulnerable residents, homeless people, individuals at risk of loneliness, carers or serving and ex-serving members of the armed forces		$\square$			

# If the answer is "negative" or "not sure" consider doing a full EIA

1f. What do you think that the overall NEGATIVE	None / Minimal	Significant
impact on groups and communities will be?	$\square$	
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.		

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 🗌 No 🖂
1h	How have you come to this decision?	The proposal for the 2019/20 scheme is to maintain the support provided through the scheme or to increase the financial help available through the CTR scheme. On this basis it felt that there will be no disproportionate impact to those with protected characteristics from the propose revision to the scheme.

Stage 5: Signature		Ô
Lead Officer: Yvette Maguire	Date: 20.11.18	
Approver signature: Caroline Lee	Date: 4.1.19	
EIA review date: October 2019		

The source of all data contained within this Appendix was the live benefit database as at 4 January 2019 unless otherwise stated.

# What we know about those currently claiming Council Tax Reduction?

#### **Current Council Tax Reduction claimants**

As of 4 January 2019, the number of claimants was 21,953

The breakdown of claims by Council Tax band is as follows:

Council Tax Band	Α	В	С	D	Е	F	G
Number of claimants	17,056	2,710	1,690	357	96	33	11

This data shows that the overwhelming majority of CTR claimants live in Band A properties. A restriction in the maximum award to 85% of those in a Band A property affects 22% of the CTR caseload some of whom will be pensioners and therefore not subject to the maximum award.

#### Potential impact on people of a particular age

The breakdown of claims by claimant type as at 4 January 2019 is as follows:

Type of recipient	Number	%
Pension age	7,809	35.57%
Working age - passported benefits	6,118	27.87%
Working age – UC	4,452	20.28%
Working age – other	3,574	16.28%
TOTAL	21,953	100.00%

This shows that those people of working age (64% of the entire claimant group) are adversely affected, particularly since there is a mandatory requirement to protect those of pension age. Therefore the number of claimants of working age subject to the 85% restriction is 14,144.

# Impact of using DWP information about UC as a claim for CTR

This proposed action has no detrimental impact on any of the protected groups as it simply mitigates against residents omitting to claim CTR (and free school meals) separately from Universal Credit as quickly as possible in order to maximise entitlement. It is a positive move to support early entitlement to CTR for those in receipt of Universal Credit.

# Impact of applying earnings disregards to Universal Credit claims

At the time of introduction of the CTR scheme in 2013, earnings disregards were not included in the default scheme (largely as a result of the generous work allowances planned for UC).

This proposal introduces some or all of the earnings disregards applicable in Housing Benefit and the non UC CTR caseload. It mitigates against the loss/reduction of work allowances to manage work incentives for UC cases.

Earnings	Weekly CTR	Increased CTR per
Disregard	increase	annum
£5.00	£0.85	£44.32
£10.00	£1.70	£88.64
£20.00	£3.40	£177.29
£25.00	£4.25	£221.61

# Impact of using housing costs in the assessment of UC/CTR

The inclusion of housing cost as income and also in the UC maximum award will in the vast majority of cases result in no change to UC/CTR entitlement. The proposed change corrects an anomaly where those (on low earnings) do

not qualify for support unless housing costs are factored into the calculation. The overall cost of implementing this results in £41k of additional CTR across the claimant base.

e.g. A single UC claimant earning £600 per month would be entitled to an extra £1.91 per week CTR, £123.13 per annum.

# Impact of applying income disregards to CTR already made law within Housing Benefits

This proposal has no detrimental impact on those with protected characteristics. The change aligns changes in legislation already made in Housing Benefit to the CTR scheme. All result in a disregard of income that will increase entitlement to CTR. This change affects a minimal number of residents and is estimated to cost less than £10k in 2019/20

# Impact on those on low incomes

The impact of Universal Credit has on levels of Council Tax Support will, for the most part, be on working households.

As of August 2018 (latest available figures) Oldham West and Royton UC rollout was 31% complete in terms of the number of households claiming UC compared to "legacy" benefits. 5,770 households claimed UC of which 40% were households with children and around 13,000 claimed "legacy" benefits.

As of August 2018 (latest available figures) Oldham East and Saddleworth UC roll-out was 34% complete in terms of the number of households claiming UC compared to "legacy" benefits. 5,280 households claimed UC of which 43% were households with children and around 10,000 claimed "legacy" benefits.

#### Impact on those with a disability

Of the 14,144 working age claimants, 5,687 (42.05%) have a disability premium within their benefit calculation. Whilst this indicates that the individual or child within the household is considered to have some form of disability, it does not tell us the nature or extent of the disability. The proposals included in the scheme for 2019/20 do not negatively impact on those with a disability. Those with a limited capability for work but who are working or carers will benefit from the earnings disregard of £20 per week.

# **Collection rates**

As at 4 January 2019, the collection rate for CTR customers was 70.05% as opposed to 67.74% as at 5 January 2018, which indicates that people are paying and the payment provisions in place are sufficient.

# **Recovery Activity**

Of those claimants who received Council Tax Reduction in 2018/19 3,964 accounts are now subject to recovery action, which has decreased since 2015/6 where 7,752 accounts were in recovery.

The breakdown below shows those accounts broken down by property band.

Band	А	В	С	D	E	F	G	Total
Number	6,569	690	369	89	22	10	3	7,752

#### 2016/17

2010/17								
Band	A	В	С	D	Е	F	G	Total
Number	6,457	678	329	80	21	8	2	7,575

#### 2017/18

Band	А	В	С	D	E	F	G	Total
Number	5,595	579	302	75	19	5	4	6,579

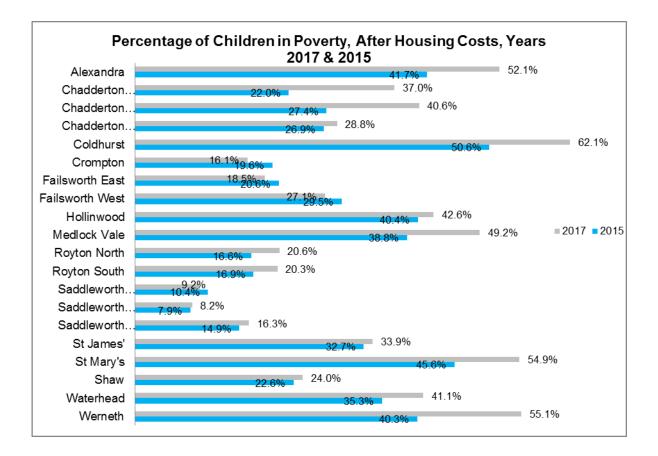
#### 2018/19

Band	Α	В	С	D	Е	F	G	Total
Number	3,367	336	201	45	12	2	1	3,964

These figures are proportionately in-line with the overall number of claimants in each band, which indicate that since the local CTR scheme was introduced people in higher bands are not finding it more difficult to pay than those in lower bands.

#### Other financial impacts

- Oldham child poverty by ward In 2017, 40.7% (24,425) of Oldham children are living in poverty after taking into account housing costs.
- This has increased from 33.0% in 2015
- 16,369 (27.3%) Children are living in poverty if housing costs are not taken into account
- Coldhurst Ward has the highest level of child poverty (62.1%)
- Lowest levels of child poverty are in Saddleworth South (8.2%)
- Oldham has the 7<sup>th</sup> highest level of child poverty in the UK
- Two-thirds (64%) of children growing up in poverty live in a family where at least one member works



### **Causes of Child Poverty:**

One of the most significant hidden cuts to support for children through the benefits system in recent years has been the repeated reductions in support relative to the rising costs of living, either through below-inflationary increases (such as a three-year 1 per cent cap on increases in benefit rates from April 2013).

Until recently, the local housing allowance, which determines the amount of Housing Benefit for people renting in the private rented sector, was based on average rents and was increased in line with rises in local rental prices. This ensured that as local rents rose, people were still able to afford to live and work in their own communities.

The rate of the maximum local housing allowance was reduced from the 50<sup>th</sup> percentile to 30<sup>th</sup> percentile meaning that the maximum rent which can be covered by Housing Benefit for those renting privately has been substantially reduced. As a result of this (and other changes), local housing allowance rates now bear little relationship to typical local rents.

As families migrate to Universal Credit there will be some households that will lose entitlement to Council Tax Support. By introducing earnings disregards in the Council scheme this will help to redress the balance.

# Appendix (i) to EIA

A number of actions identified in developing the 2019/20 scheme were intended to mitigate the impact of CTR and the wider welfare reform, below are the actions with an update under each.

Activity	Update
Continue to promote existing flexible payments method	<ul> <li>Through a range of difference communication channels</li> <li>External:- <ul> <li>Social media (Facebook and Twitter)</li> <li>Website and web banner</li> <li>Council Tax information</li> <li>Media release</li> <li>Promotion on revenues and benefits letters</li> <li>Call waiting message</li> <li>Residents Magazine</li> <li>Early text reminder</li> </ul> </li> <li>Internal communications:- <ul> <li>Articles in Team Brief</li> <li>Councillor and staff briefing</li> </ul> </li> </ul>
Review effectiveness and take up of current payment methods and introduce new payment options where appropriate	As at 4 January 2019, the collection rate for CTR customers was 70.05% as opposed to 67.74% as at 5 January 2018, which indicates that people are paying and the payment provisions in place are sufficient. Residents can elect to pay Council Tax over a range of payment dates 1 <sup>st</sup> , 8 <sup>th</sup> , 15 <sup>th</sup> and 22 <sup>nd</sup> of the month Residents can pay online, by 24/7 telephone touchtone payments, at Post Offices and Payzone outlets A fortnightly direct debit was introduced in 2013 to help customers manage their finances.
Continue to deliver energy switching campaigns and auctions	The Warm Homes Oldham service offers energy switching advice to residents in their homes. The service also offers heating and insulation upgrades, support with fuel debt and income maximisation, and other activities to reduce energy bills.
Identify and establish referral arrangements to a wider range of support services	We refer to Step Change national debt charity when residents have wider debt issues than Council Tax. We have also used the Personal Budgeting Support team (PBS) to support residents with money management and debt advice.

Activity	Update
Further develop the Welfare Rights Service to support residents to maximise their income	One of the key actions for Oldham Council's Welfare Rights Service in 2018/19 has been ensuring 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.
	<ol> <li>Increase uptake of welfare benefits and raise awareness of the Welfare Rights Service</li> <li>Help tackle poverty and improve health and wellbeing amongst the most vulnerable groups</li> </ol>
	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:
	<ul> <li>Regular activity to publicise changes to benefit rules</li> </ul>
	<ul> <li>Direct liaison with DWP link officers when resident vulnerability has been identified resulting in loss of financial support</li> </ul>
	Regular activity to publicise success stories
	<ul> <li>Increased social media efforts</li> </ul>
	<ul> <li>Support for increased number and quality of public engagement sessions</li> </ul>
	<ul> <li>Support for increased partnership working with potential resulting communications activity</li> </ul>
	<ul> <li>Stronger links with public health initiatives to encourage residents to become more independent and manage their own health more proactively</li> </ul>
	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.
	The team has continued to be 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 £2.29 million as at 31 December 2018.
Work with partner organisations to provide targeted support to residents	An Information and Advice working group is in place, delivering coordinated action in partnership with the

Activity	Update
	Council, DWP and the voluntary sector
	Strong links are in place with DWP including co- location of Benefit officers in the Job Centre to ensure take up of CTR and free school meals (these need to be claimed separately from Universal Credit)
	The Council signed the CAB debt protocol in 2018 supporting ethical collection methods. More integrative work is planned over the coming year including managing the migration of Universal Support to the CAB from the Council and debtor engagement/ mediation with CAB pilot pre-committal action.
Continue to monitor the collection rates on	This allows swift action to be taken if collection slows.
a weekly basis	Oldham has introduced SMS texting to remind people at an early opportunity (pre- first reminder) to pay on time. It is anticipated that this will improve collection and result in higher conversion to payment by direct debit.
Continue to monitor the wider impact of welfare reform ensuring effective partnership working continues to support those affected Identify and support those affected by the	• A Greater Manchester (GM) workshop was held in November 2018 to fully assess impacts of UC roll out on CTR and to consider potential changes to the GM schemes from 2020/21. The changes considered included:
future changes to welfare reform, particularly the benefit cap and Universal Credit	<ul> <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> </ul>
	<ul> <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 the level of tolerance to apply within its scheme</li> </ul>
	<ul> <li>Introduction of banded schemes. The current scheme could be replaced with one that creates a banded level of support across a wide income range.</li> </ul>

Activity	Update
	This would potentially create cliff edges in CTR awards which would need to be worked through.
	For all the schemes under consideration from 2020 onwards, much more detailed work would be required to determine
	The optimum level of banded/tolerance in a new scheme
	Impact on claimants
	System functionality
	Costs of scheme
	Impact on collection
	Additional work has been carried out to compare the current "as is" approach to UC/CTR in work claims across Greater Manchester.
Get Oldham working initiatives	The Council continues to encourage people into work Key achievements for Get Oldham Working between May 2013 and 31st March 2018 have included:
	7,845 work related opportunities created.
	7,252 job opportunities created and 5,791filled.
	1,155 apprenticeships created and 918 filled.
	330 traineeships created and 298 filled.
	1,173 work experience placements created and 1,047 filled
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 direct debit following text reminder exercise	Revenues and Benefits Manager	December 2018 - text reminders in place	April 2019
2	Review effectiveness and take up of current payment methods and introduce new payment options where appropriate	Increase collection rates More flexible options available – promotion of 12 month direct debit options at annual billing	Client Revenues Manager (Exchequer Client)	April 2019	July 2019
3	Warm Homes Oldham to continue to provide support with energy bills and related issues	Strong links with Welfare Rights team and Personal budgeting support team to maximise support across the three teams	Benefits and Welfare Rights Manager	Integrated support in place from December 2018	Jan 2020
4	Identify and establish referral arrangements to a wider range of support services	Maximise access to support for residents through Welfare Rights and CT collection strategy Includes CAB Step Change Use of Standard Financial Statement	Benefits and Welfare Rights Manager	April 2019	July 2019
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 thus linking support to outcomes from the Public Health Transformation Agenda.	Benefits and Welfare Rights Manager	April 2019	August 2019

6	Work with partner organisations to provide targeted support to residents	checks and refer residents for budgeting support and debt advice. Signpost to MECC support – Healthy Minds etc Early identification of residents affected by Welfare Reform changes allows support to be put in place at	Benefits and Welfare Rights Manager	April 2019	August 2019
7		the earliest point			December
7	Continue to monitor the collection rates on a weekly basis	Maximise collection rates and take swift action if collection slows Implementation of Council Tax collection strategy aimed at encouraging early engagement	Head of Revenues and Benefits	On-going	December 2019
8	Continue to monitor the wider impact of welfare reform ensuring effective partnership working continues to support those affected	Early identification of residents affected by Welfare Reform changes allows support to be put in place at the earliest point. Advice and Information group liaison	Benefits and Welfare Rights Manager	April 2019	August 2019
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 Membership of GM welfare rights group and GM Mental Health Welfare Rights advisors group	Benefits and Welfare Rights Manager	February 2019	August 2019
10	Review approach to debt collection by the Council	Increase collection rate across all debts. Agree more affordable payment arrangements with residents Implement Council Tax collection	Client Revenues Manager (Exchequer Client)	On-going programme from August 2018	December 2019

		strategy actions (6 commitments focussed on early engagement/ Identification of vulnerability).			
11	Link to Get Oldham working initiatives	Reduced number of unemployed Increase support for those in work through earnings disregards for UC claimants	Head of Lifelong Learning, Employment and Skills Service	June 2019 April 2019	September 2019 August 2019
12	Undertake an annual review of the Council Tax Reduction scheme	The scheme is reviewed in light of information gathered from the performance indicators and welfare context recommendations for changes are put to Council. Report to Council recommending any changes to the scheme.	Head of Revenues and Benefits	June 2019	December 2019
13	Identify how the breadth and quality of the data collected can be improved	A stronger, more robust and comprehensive data base. Introduction of Revenues software to support targeted debt collection approach taking into account needs of residents	Head of Revenues and Benefits	April 2019	December 2019