

# Equality Impact Assessment

## 1. Tell us about your service

My Directorate	Corporate Services
My Service	Revenues and Benefits
My team / section	Business Development Team
The name of the function being analysed	Council Tax Support scheme – proposed changes to the scheme from 1 April 24
Who is completing the assessment?	Amy Brickland
Who is the lead manager for the assessment?	Matthew Hassall

## 2. Tell us about the activity that you're analysing

Briefly describe the main aims and objectives of your policy, project, service redesign or strategy, including outlining at a high level if it has implications for other areas of the Council's work and priorities.

We know some residents are struggling due to the cost-of-living pressures. We are proposing to provide support for some of the poorest households in Manchester as part of the Council's wider response to the challenges facing people in the city. The Council's present Council Tax Support scheme pays up to 100% of the bill for pension-age people and 82.5% for working-age people. We want to increase the level of support we provide for working-age residents to 85%. We currently have a Council Tax Support banded scheme for households who receive Universal Credit. We want to increase the bands of support by 2.5% so that those on Universal Credit do not lose out on the increase in support. We are also proposing to increase backdating for working and pension-age households to one year. These proposals would change the scheme from 1 April 2024. We estimate the changes would cost between c£700k to c£770k. There are currently 47,702 households in Manchester who receive Council Tax Support, 32,326 of these are working-age households.

**TIP:** briefly summarise the key points and keep your answer under 500 words.

**TIP:** try not to duplicate information that's available elsewhere; you can easily use this space to signpost to other sources of background information instead of rewriting them here.

## 3. Analysing the impact on equality

Will the policy, strategy, project, service redesign being assessed here... (Tick all that apply):

Remove or minimise disadvantages suffered by individuals or groups because of their characteristics	yes
Meet the needs of people from protected or disadvantaged groups where these are different from the needs of other people	yes
Promote diversity and encourage people from protected or disadvantaged groups to participate in activities where they are underrepresented	no

Describe how you've reached your conclusion and what evidence it's based on (500 words max).

The increase to the maximum Council Tax Support we pay will be applied to all working-age households who receive Council Tax Support. This will not disadvantage groups or individuals based on their characteristics.

The increase to the length of time we can backdate Council Tax Support for working-age and pension-age households is likely to support individuals who have been unable to make a claim for Council Tax Support earlier. This may include residents who have a continuing health condition or those who may have needed support to make their claim.

Manchester's present scheme is primarily based on the default provisions offered by the government in 2012 and where possible uses the DWP assessment of income and needs, minimising the need for further means-testing by the local authority.

This assessment provides for additional financial support for people with disabilities, caring responsibilities and those responsible for children.

Although Universal Credit does not entirely match the detail of legacy benefits, it does make provision for people with disabilities and caring responsibilities; it makes provision for children; it helps with rent, and it provides work incentives. In 2019 the banded scheme was introduced for those on Universal Credit. At the time it was concluded that it would be appropriate to align Manchester's Council Tax Support scheme with Universal Credit, particularly where it enables the Council to draw on the assessment work carried out by DWP to minimise costs and reduce the need for claimants to provide the Council with the same information and evidence they have already provided to DWP.

A Discretionary Council Tax Payment scheme is available to residents who have anomalous or complex situations which result in them struggling to pay their Council Tax. Support through the scheme is also made available to households who have been hardest hit by the Welfare Reform agenda.

Considering which group/s you have identified the policy, project, strategy or service redesign as being relevant to, complete the table below. Be brief with your answers and only complete them for the group/s relevant to your activity. If you identify any

actions to address impacts, list these in Annex 1 along with responsible officers and timescales for each action.

	<b>1. What is the impact of your proposal on this group?</b>  1) does your proposal remove or minimise disadvantage for each group 2) does it meet needs that are different from other people's 3) does it promote diversity or encourages participation	<b>2. What evidence have you used to reach this assessment?</b>  Evidence could include customer profile data, demographic information, research, or engagement and consultation outcomes	<b>3. What actions could be taken to address the impacts?</b>  1) to what extent does this proposal meet our equality duties 2) should or could this be improved
<b>Age (older people)</b>	<p>The increase in the maximum Council Tax Support award from 82.5% to 85% does not affect pension-age households. They already receive support up to 100% of their bill.</p> <p>The increase in the backdating period does not disadvantage this group, it will provide increased support for those who have a good reason for not being able to make a claim sooner.</p>	<p>15,376 pension-age households receive Council Tax Support in Manchester. This is 32% of those who receive Council Tax Support. Data from the 2021 Census showed that 9.2% of those who live in Manchester are aged 65 or over. This data suggests that those who are over pension-age are more likely to be entitled to Council Tax Support than those who are working-age.</p>	<p>Pension-age households will remain entitled to receive Council Tax Support up to 100% of their bill. If they delay making a claim for Council Tax Support we will be able to consider backdating the claim for 12 months rather than the current three month limit.</p> <p>Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>

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<p><b>Age (children and young people)</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support for working-age people. The increase in the backdating period does not disadvantage this group, it is likely to be a benefit.</p>	<p>In Manchester there are 12,508 households who receive Council Tax Support and are responsible for a child or young person. Of these, 12,318 are working-age households. 26% of those households who receive Council Tax Support are responsible for a child or young person. Data from the 2021 Census showed that 16.9% of households in Manchester included a child or young person. The data suggests that people who are responsible for a child or young person are more likely to receive Council Tax Support than those who aren't responsible for a child or young person. Therefore, increasing the Council Tax Support award will provide increased support for this group.</p>	<p>Working-age households with children or young people will receive Council Tax Support up to the same maximum level as all working-age households. The Council Tax Support calculation for these families includes an amount in respect of the children who are part of the household although in some cases this is limited to a maximum of two children. Universal Credit and Tax Credits also provide support for children. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>

<p><b>Disability (including continuing health conditions)</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support for working-age people with disabilities and/or health conditions. The increase in the backdating period is likely to benefit this group as it will allow for backdating where health problems have delayed a resident making a claim.</p>	<p>Council Tax Support data show that of the 32,326 working-age households receiving support, 14,827 receive additional support from the Department for Work and Pensions in respect of a disability or health condition. These include people receiving Personal Independence Payments, Employment and Support Allowance or the Limited Capacity for Working or Limited Capacity for Work Related Activity in their Universal Credit assessment.</p> <p>Data shows that of the 15,376 pension-age Council Tax Support cases, 6,610 of these receive an additional amount of support in their Council Tax Support calculation or their Pension Credit calculation in respect of a disability.</p> <p>In total, 21,986 of the Council Tax Support cases have an indicator showing that either the applicant or partner receives additional benefits due to a disability. This is 46% of the cases receiving Council Tax Support.</p> <p>Data from the 2021 census shows that 34% of households in Manchester contained at least one person with a disability.</p>	<p>Households with a disability will receive Council Tax Support up to the same maximum level as other households. They will be receiving additional financial support for their health condition from the Department for Work and Pensions and in some cases they will also receive extra support in the way their Council Tax Support is calculated. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>
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		It therefore appears that those with a disability or health condition are more likely to be in receipt of Council Tax Support than other households.	

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<p><b>Race</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We ask residents to provide details of their ethnicity on the Council Tax Support application form. Providing this information is optional. The options residents can select are set by the Department for Work and Pensions. They do not directly correspond to the information collected in the census or other data the council may hold. We have 47,702 live Council Tax Support claims, we hold ethnic information for 36,045 of these.</p> <p>This data shows that 59% of Council Tax Support claims are from White;British residents, 7.4% are from Asian/Asian British: Pakistani residents, 4.6% are from black/black British : African residents, 3.1% are from White: Irish residents. Other ethnicities represented less than 3% of those claiming Council Tax Support.</p>	<p>Households receive Council Tax Support up to the same maximum level regardless of their race. The increase in the backdating period is likely to provide support to residents who may have struggled to make a claim sooner, for example because they needed help to make their claim in another language. If people need help to claim in another language then they are directed for support from Citizens Advice Manchester or to local support groups who can provide assistance. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>

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<p><b>Sex</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>The data shows that of the 47,702 live cases, 40,052 of these are claims from single people. Of these 25,143 (63%) are claims from women and 14,909 (37%) are from men. The census data shows that across Manchester 49.7% of the population are female and 50.3% are male. It therefore appears that woman are more likely than men to receive Council Tax Support and are therefore more likely to benefit from the proposed increases from April 2024.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents regardless of their gender. This is in line with other Department for Work and Pensions benefits. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>

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<p><b>Sexual Orientation</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not hold data about the sexual orientation of those who receive benefits. The census data shows that, in Manchester, 6.6% of the population identify as one of the following; Gay or Lesbian, bisexual, pansexual, queer, or asexual. This compares with national data that shows 3.16% of the population identified as falling into one of these groups.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents regardless of their sexual orientation. This is in line with other Department for Work and Pensions benefits and support payments. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>

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<p><b>Marriage / civil partnership</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not hold data on how many people are married or in civil partnerships. We do hold data showing how many people claim as a single person and how many are a couple.</p> <p>The data shows that the majority of the Council Tax Support claims we have in payment are for single households rather than couples. We have 7,650 (16%) claims from couples and 40,052 (84%) claims from single people. These figures may reflect that fact that households with two incomes are less likely to qualify for benefits than single households.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents claiming as a couple, regardless of whether they are married or in a civil partnership. This is in line with other Department for Work and Pensions benefits and support payments. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>

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<p><b>Pregnancy / maternity</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not collect information on whether a resident is pregnant. If a resident has a reduction in their income while pregnant, for example because they are unable to work as many hours as usual or because their income drops while on maternity leave, then this would be taken into account when calculating their Council Tax Support entitlement.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents regardless of whether they are pregnant. This is in line with other Department for Work and Pensions benefits and support payments. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>
<p><b>Gender Reassignment</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not collect information on whether a resident receiving Council Tax Support has undertaken gender reassignment. Census data for Manchester shows that 1.2% of the population have a different identity was different to their sex registered at birth. This compares with 0.5% of the population nationally.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents regardless of whether they have undertaken gender reassignment. This is in line with other Department for Work and Pensions benefits and support payments. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>

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<b>Faith / religion / belief</b>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not collect data on the faith/religion/belief of residents who claim Council Tax Support.</p>	<p>The current scheme and the proposed scheme provide the same level of support to residents regardless of their religion. This is in line with other Department for Work and Pensions benefits and support payments. Any household that is struggling to pay their Council Tax can apply for extra support through the Discretionary Council Tax Payment scheme.</p>
<b>Additional Characteristics</b>			

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<b>People living in poverty</b>	The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. This is likely to support people who are living in poverty and have low incomes as it will mean they have less to pay towards their Council Tax bill. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner. This will allow us to reduce or clear outstanding Council Tax bills which is likely to be a support to those who are living in poverty.	All of those who receive Council Tax Support are on a low income and therefore likely to be classed as living in poverty. These changes will provide extra support for these residents.	Discretionary Council Tax payments are also available to households who are struggling to pay their Council Tax.

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<p><b>Carers</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>Council Tax Support data shows that 6,702 households receive additional support in their benefit calculation in respect of being a carer and receiving Carers Allowance. This is 14% of the households receiving Council Tax Support. Census data does not provide a direct comparison on those who are carers in Manchester. The census data does show that a total of 22,584 residents in Manchester provide over 20 hours of care each week. This is 4% of residents in Manchester. These figures show that people with caring responsibilities in Manchester are more likely to receive Council Tax Support in Manchester than those who do not.</p>	<p>Households with caring responsibility will receive Council Tax Support up to the same maximum level as other households. They will be receiving additional financial support in the form of Carers Allowance from the Department for Work and Pensions. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>

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<p><b>Homeless people</b></p>	<p>The changes to Council Tax Support will primarily impact on residents who are liable for Council Tax and therefore who have a home. However, the increase in support will reduce the amount of Council Tax that would otherwise be owed. Council Tax debts are something that homeless residents may struggle with when they are rehomed.</p>	<p>Census data on how many people were homeless is not yet available. Data published by Shelter on 2022 homeless figures showed that in Manchester as at 30 June 2022 there were 7,450 people who were homeless. This included people who were living in temporary accommodation. Their figures showed that Manchester was in the top 30 of local authorities for the number of people who were homeless.</p>	<p>Households with experience of homelessness will receive Council Tax Support up to the same maximum level as other households. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>

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<p><b>Ex-Armed Forces veterans and families</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. Pension-age residents already receive support up to 100% of their bill. The increase in the backdating period is likely to provide extra support for those who were unable to apply for support sooner.</p>	<p>We do not hold data on how many residents claiming Council Tax Support are ex Armed Forces veterans. Census data shows that Manchester has 1.8% of residents aged 16 and over have previously served in the armed forces. This is lower than the national average of 3.8%.</p>	<p>Ex-Armed Forces veterans and family households will receive Council Tax Support up to the same maximum level as other households. Many incomes paid to those who have left the armed forces are disregarded when calculating Council Tax Support and Universal Credit. Discretionary Council Tax Payments are also available if a household is experiencing significant hardship and unable to pay their Council Tax bill.</p>
<p><b>Care-experienced young people and care-leavers</b></p>	<p>The increase in the maximum Council Tax Support award to 85% will provide increased support to working-age people. The council provides additional support to care leavers through its discretionary payment scheme. All care leavers received an additional payment through the discretionary scheme to clear their Council Tax bill up to the age of 25. If they live with others then their share of the bill is covered.</p>	<p>In 2022/23 we awarded additional help with Council Tax to 490 care leavers. Up to 1 November 2023 we have awarded additional help with Council Tax to 528 care leavers.</p>	<p>Care Leavers receive additional support through our care leaver scheme. This means that they are not required to pay Council Tax up to the age of 25.</p>

#### 4. Quality Assurance - Equality, Diversity and Inclusion Team

<b>EDI Team: Name</b>	Barry Young	<b>Date reviewed:</b>	7 December 2023
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#### 5. Head of Service Approval

Your completed analysis needs to be signed off by your Head of Service.

<b>Name:</b>	Matthew Hassall	<b>Date:</b>	12 December 2023
<b>Job title:</b>	Head of Corporate Assessments	<b>Signature:</b>	Matthew Hassall