
REPORT OF COUNCILLOR WILLIAM HINDS,
LEAD MEMBER FOR FINANCE AND SUPPORT SERVICES

TO
COUNCIL

ON
26 February 2020

TITLE: Review of the Council Tax Reduction Scheme 2020/21

RECOMMENDATIONS:

That Council:

1. Notes the outcome of the consultation on proposed revisions to the Council Tax Reduction Scheme, which ran from 18 October 2019 to 20 December 2019
 2. Agree that the council's Local Council Tax Reduction Scheme is amended from 1 April 2020 to include the following:
 - the minimum our lowest income working age households have to pay is 12% of their total council tax liability: and
 - the introduction of a new de-minimis rule so that entitlement will only be adjusted if the new entitlement is £2 per week more or less than the previous entitlement
 3. Commend the revised Council Tax Reduction Scheme to Council.
-

EXECUTIVE SUMMARY:

As a billing authority, Salford City Council is required to have a Council Tax Reduction Scheme (CTRS) which provides a council tax discount to residents it considers to be in financial need. Each year, the council must consider whether to change its scheme for working age claimants and consult residents on any proposed changes prior to implementation.

In summer 2019, the council undertook a comprehensive review of its CTRS and modelled several options for revising Salford's scheme. Cabinet considered these options on 8 October 2019 and agreed that two options be subject to consultation prior to potential implementation.

This consultation took place from 18 October 2019 to 20 December 2019. Following analysis of the consultation results, which is considered below, it is proposed that the council introduces the following changes.

- Increase CTRS support to a maximum of 88% from 85%, so that the minimum our lowest income working age households have to pay is 12% of their total council tax liability, instead of 15%
- To reduce the frequency that a household may receive revised bills, introduce a new de-minimis rule so that in the event of a change in a households income or personal allowance, if the adjustment in entitlement is £2 per week (more or less), the entitlement will remain unchanged.

BACKGROUND DOCUMENTS:

- [Salford City Council – Council Tax Reduction Scheme Policy – 2019/20](#)
- [The Council Tax Reduction Schemes \(Default Scheme\) \(England\) Regulations 2012](#)

KEY DECISION: Yes

DETAILS:

1. Introduction

- 1.1 The council has been operating a localised Council Tax Reduction Scheme (CTRS) in accordance with section 13A and Schedule 1A of the Local Government Finance Act 1992 (amended) since 1 April 2013.
- 1.2 The CTRS provides crucial help for residents on low incomes to pay their council tax bills. Under the current scheme, the council provides a discount to eligible working age households of up to 85% of their council tax bill. Recipients who have income at or below the applicable amount are entitled to the maximum reduction available and are only expected to pay 15%. Recipients with income above their applicable amount will receive a reduction up to the maximum 85% - so may be expected to pay more than 15% of their bill.
- 1.3 The budget for the CTRS has to fund the entitlements of both pensioners and working age low income households. Pensioner entitlements are more generous and are determined under a scheme provided by central government, which the council cannot change. Pensioner households can receive a reduction of up to 100% of their bill. The council has a duty to provide a scheme for low income working age households only, within the budget available covering both pensioner and working age household schemes.

- 1.4 The CTRS covers the whole council tax charge including GM precepts. Consequently any decisions made concerning the scheme impact upon both the council and the other preceptors – police, fire and GM mayoral services. The amounts included within the report reflect the overall cost of the scheme however the council's proportion of this is estimated to be 84.6% for 2020/21.
- 1.5 Despite the council's on-going financial challenges and budget reductions, the CTRS has remained the same for the past five years, which is already a considerable achievement; particularly as many local authorities continue to cut their schemes to make financial savings.
- 1.6 The council is legally required to review its scheme each year and consult with residents on any proposed changes. As part of the on-going work under the city's anti-poverty strategy (No One Left Behind: Tackling Poverty in Salford), the CTRS has been thoroughly reviewed to:
- Analyse its current performance, understanding current spending patterns, and the profile of people accessing the scheme.
 - Identify options for an alternative CTRS in 2020/21, with analysis of the financial and social impact of any changes.
- 1.7 The broad aims and objectives of the review were to:
- Find ways to better deploy the total available spending on the CTRS to benefit low income working age households, without significantly increasing the overall cost of the scheme to the council.
 - Simplify the CTRS from a claimant perspective by reducing the levels of avoidable contact and creating stability for claimants by reducing the number of bills they receive in a year.
 - Reduce the administrative costs of the CTRS to mitigate the reduced funding available from central government to administer the scheme.
 - Consider the impacts of the full roll out of Universal Credit (UC) on the CTRS that began in Salford from September 2018.
 - Support the wider aims of Salford's Tackling Poverty Strategy and Locality Plan to consider the impact of the CTRS on poverty and health and ensure actions to mitigate its effects are given priority when making decisions.

2. Salford's current Council Tax Reduction Scheme

- 2.1 The current CTRS is largely based on the default scheme (also called the prescribed scheme) set out in The Council Tax Reduction Schemes (Default Scheme) (England) Regulations 2012. It provides for a maximum award of up to 85% of the council tax bill, with recipients of the maximum award having to pay the remaining 15% of their bill. Recipients of less than the maximum award pay upwards of 15% of their bill (subject to some other factors that may affect the level of the award in certain circumstances).
- 2.2 Salford's localised scheme was last revised in 2015/16, when the amount of tax payable by working age claimants was increased from 12% to 15%. The table

below provides detail of the value of awards since 2013 and reflects the full council tax charge including police, fire and mayoral precepts.

| Year | CTR (%) | Working | | Pensioner Claim | Pensioner Scheme cost (£m) | Total claimants | Total cost for all preceptors (£m) |
|-----------|---------|--------------------|------------------------------|-----------------|----------------------------|-----------------|------------------------------------|
| | | Working Age Claims | Working Age scheme cost (£m) | | | | |
| 2013/2014 | 8.5% | 17,865 | 13.904 | 12,001 | 9.735 | 29,866 | 23.639 |
| 2014/2015 | 12% | 16,912 | 12.589 | 11,227 | 9.171 | 28,139 | 21.760 |
| 2015/2016 | 15% | 16,157 | 11.537 | 10,774 | 8.581 | 26,931 | 20.118 |
| 2016/2017 | 15% | 16,291 | 11.669 | 10,203 | 8.478 | 26,494 | 20.147 |
| 2017/2018 | 15% | 16,321 | 12.063 | 10,068 | 8.521 | 26,389 | 20.584 |
| 2018/2019 | 15% | 15,969 | 12.778 | 9,277 | 8.570 | 25,246 | 21.348 |

- 2.3 The latest estimated cost of the scheme for 2019/20 is £23.2m. This figure includes estimates for property growth for the rest of the financial year and the ongoing effects of the transition to Universal Credit. As noted in paragraph 1.4 this also includes the impact upon preceptors. For 2019/20, the estimated share of the cost of the scheme to the council is £19.8m. Within the council's settlement funding we receive a notional grant of £11.5m to contribute towards the cost of our CTR scheme. This means that the council must fund the remaining cost of £8.3m.
- 2.4 It should be noted that pensioners continue to be protected and are not affected by any proposed changes to the localised scheme. Pensioners will continue to receive a maximum award of 100% if they are on a passported benefit such as pension credit guarantee or their income is below their personal allowances and premiums (applicable amount). At present, of the 24,979 CTR households, 9,147 (37%) are pensioner households and 15,832 (63%) are households of working age. 40% of the total cost of CTR is currently on pensioner households and 60% is on working age households.
- 2.5 The current scheme also provides personal allowances and premiums within the means tested assessment calculation to take into account the additional costs associated with: household composition; disabilities; and caring responsibilities. These are updated annually in line with other social security benefits to ensure that applicants continue to receive the same level of support between financial years.

Cost of retaining current scheme for 2020/21

- 2.6 If the council opted to retain the CTRS in its current form for 2020/21, the **projected cost would be £24.8m**. This assumes that:
- The current case load may grow by up to 2% in 2020/21, partly attributable to a growth in new properties in the city
 - Council tax charges (including precepts) for 2020/21 may increase by 4.7%

2.7 The current scheme has become generally well accepted and understood, and provides support towards the higher end of the scale in terms of its maximum award level, compared to the other ten Greater Manchester authorities (**see Appendix 1**). However, it doesn't currently address the problem of a UC CTR claimant receiving monthly revised bills even when the new calculation of entitlement is only marginally different from the previous month's entitlement. It also doesn't provide any group of working age claimant with an entitlement to full support with their entire bill.

3. Proposal for an alternative CTR schemes for 2020/21

3.1 To build a comprehensive picture of the current spend of the CTRS and how potential changes would impact the council and different low income groups, detailed household level analysis was undertaken to estimate the overall cost and impact of each model.

3.2 In total, 83 different scenarios were modelled based on consideration of a wide range of different scheme changes that have been implemented by other local authorities across the country including options to both reduce and increase entitlement. Examples include:

- Varying the minimum amount payable by all eligible working age households at different levels between 0% and 20%.
- Applying additional % discounts for different financially vulnerable groups.
- Introducing a de-minimis rule that would only change the amount of CTR paid onto a customer's account if the recalculation changed the weekly CTR entitlement over or under an agreed threshold.
- Introducing a Minimum Income Floor (MIF) for working age self-employed people that assumes a self-employed resident earns the equivalent of someone working 35 hours per week on the national living wage (less an amount to reflect income tax and national insurance)
- Changing the capital (savings) limit from current level of £16,000 to a lower amount (above which there is no eligibility).
- Changing the deduction rate for a non-dependent (a person over the age of 18 living in the claimant's household who doesn't own or rent the property)
- Including Child Benefit in the calculation of income – it is currently disregarded.
- Removing the family premium from the applicable amount for families with children.
- Limiting the personal allowances of a family with children to the two child limit irrespective of how many children they have

- 3.3 Following extensive analysis into the financial and social impact of each of the different scenarios, the following modelled options have been identified for 2020/21 that most closely align with the aims and objectives of the review:
- **Model 1: Introduce a 12% minimum payment contribution for all eligible households (a 3% reduction in the contribution required from eligible households, which is set at 15% in the current scheme).**
 - **Model 2: Introduce a 'de-minimis' threshold that would only change a customer's bill if the recalculated weekly CTR entitlement was above or below a set tolerance level.**
- 3.4 It should be noted that the options proposed are intended to decrease in the percentage of their council tax bill a low income households pays, whilst also eliminating the potential for stress and confusion that could result from the issuing of bills following frequent recalculations of entitlements. Our benchmarking shows that many local authorities require payment contributions above 15% (and in many cases above 20%). In Salford these options have not been considered as they would be contrary to the aims and objectives of this review.
- 4. Model 1: Reduce minimum payment contribution from 15% to 12% for all working age households.**
- 4.1 To provide extra support for all households on a low income we propose to reduce the minimum payment contribution to 12% for all households
- 4.2 The **projected cost of this model is £25.3m meaning an estimated additional annual cost of £0.532m** (council's share being £0.450m). Based upon our projections 15,832 households would benefit from this change.
- 4.3 This model would provide all CTR households with more CTR. Households with income levels at or below the value of their personal allowance and premiums could receive up to 88% CTR so their contribution to their bill would be reduced to 12%. Those households whose income levels are above their applicable amount would continue to see their entitlement tapered up to a maximum 88% of their bill. All households on the scheme would receive more than they currently do and, on average, households would be better off by around £33.76 a year in 2020/21.
- 5. Model 2: Introduce a 'de-minimis' threshold that would only change a customer's bill if the recalculated weekly CTR entitlement was above or below a set tolerance level.**
- 5.1 As described previously in the report, the roll out of UC has increased the administration costs of the CTRS. This is because UC is reassessed monthly, leading to a requirement for benefits staff to reassess CTR on the same frequency. As a result, customers can receive frequent new bills - even when the change in the CTR entitlement is minor; causing an increased amount of

customer contact and confusion and delays in the collection of Council Tax due.

- 5.2 To help overcome this issue, the software used to calculate council tax and CTR has a function available called the 'De-Minimis rule'. This rule won't prevent the need to reassess a claimant's entitlement to CTR each time income changes, but can be used to minimise the incidences on which the reassessment changes the households Council Tax bill, their payment plan instalments and a new bill is issued.
- 5.3 Under this proposal, a new bill would only be issued if the CTR reassessment increased or decreased the claimant's weekly entitlement by an agreed tolerance level of (+/-) £2.

6. Consultation

- 6.1 Before implementing a new scheme, the council is required to consult with residents on the proposed changes. To meet this requirement, Salford undertook a nine week consultation from 18 October 2019 to 20 December 2019.
- 6.2 The consultation took the form of a questionnaire, which was hosted on the *Have Your Say* section of the council's website, and included a mixture of closed and open questions. Residents were encouraged to take part in the consultation using various methods, including: homepage adverts on both the internet and intranet, posts on the council's social media pages, and council tax staff with tablets approaching residents in gateway centres to encourage them to complete the questionnaire.
- 6.3 In total, 348 people took the time to complete the consultation. This was a self-selecting sample and the council did not seek to control for demographic characteristics.
- 6.4 We do not believe that the consultation results reveal any reason not to proceed with the proposals. Overall, 61% of respondents to the consultation support the proposal to increase the CTR support to 88% and 49% of respondents support the introduction of the de minimis rule.
- 6.5 Full details of the results of the consultation are available as an appendix. Highlight results are available below:

| Question | Yes | No | Don't Know / prefer not to say |
|---|-------------|--------------|--------------------------------|
| 1. Do you currently receive Council Tax Reduction Scheme support? | 64 (19%) | 273 (78%) | 11 (3%) |
| 2. The maximum Council Tax | 211 | 101 | 36 |

| Question | Yes | No | Don't Know / prefer not to say |
|---|--------------------------------|------------------------------|--------------------------------|
| Reduction we can award to people of working age is 85% of their council tax bill. Do you think we should increase the support to a maximum of 88%, so the minimum working age households have to pay is 12% rather than 15%? | (61%) | (29%) | (10%) |
| 3. To simplify the administration, the council proposes that if a person's CTR scheme entitlement is reviewed because of a change in their income or personal allowance, a bill will only be issued if the change causes their weekly CTR scheme entitlement to increase or decrease over a threshold. Do you agree with the proposal not to amend the Council Tax Reduction scheme calculation if the result of the adjustment is £2 per week more or less? | 170 (49%) | 93 (27%) | 85 (24%) |
| 4. Do you think the council should retain the existing CTR scheme with a 15% minimum payment contribution? | 122 (35%) | 155 (45%) | 71 (20%) |
| 5. Do you have any other suggestions how the CTR scheme can be changed? | 96 (28% of all respondents) | 8 (2% of all respondents) | n/a |

7. Recommendations

7.1 For the reasons outlined in the body of the report, it is recommended that Lead Member for Finance and Support Services approves the recommendation of a revised CTRS for 2020/21 based on the following:

- **Model 1: Introduce a 12% minimum payment contribution for all eligible households (a 3% reduction in the contribution required from eligible households, which is set at 15% in the current scheme).**

- **Model 2: Introduce a ‘de-minimis’ threshold that would only change a customer’s bill if the recalculated weekly CTR entitlement was above or below a set tolerance level.**

7.2 Adopting these two models in a revised CTRS would:

- Cost the fund a projected £0.532m extra per year with the impact on the council being £0.450m. Whilst this is within medium term financial projections of the costs of the CTR scheme it reduces the council’s flexibility to support the revenue budget.
- Continue to minimise the financial impact for other low income households by maintaining one of the lowest minimum payment requirements of any local authority in Greater Manchester.
- Reduce the administrative costs associated with issuing new monthly bills for claimants in receipt of UC.

KEY COUNCIL POLICIES: Tackling Poverty Strategy, Great Eight

EQUALITY IMPACT ASSESSMENT AND IMPLICATIONS:

A full CIA has been completed for the proposal which found that the new scheme will not disproportionately impact any residents with protected characteristics – see appendix 2.

ASSESSMENT OF RISK: Low

LEGAL IMPLICATIONS Supplied by: Melinda Edwards, Principal Lawyer

In accordance with section 13A of the Local Government Finance Act 1992 (‘the Act’) each billing authority in England must make a scheme (referred to as a “council tax reduction scheme”) specifying the reductions which are to apply to amounts of council tax payable, in respect of dwellings situated in its area, by—

- (a) persons whom the authority considers to be in financial need, or
- (b) persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

Schedule 1A of the Act (which contains provisions about the above schemes) has effect. In that regard, for each financial year, each billing authority must consider whether to revise its scheme or to replace it with another scheme. The authority must make any revision to its scheme, or any replacement scheme, no later than 11 March in the financial year preceding that for which the revision or replacement scheme is to have effect. If any revision to a scheme, or any replacement scheme, has the effect of reducing or removing a reduction to which any class of persons is entitled, the revision or replacement must include such transitional provision relating to that reduction or removal as the authority thinks fit.

Before making a scheme, the authority must (in the following order) —

- (a) consult any major precepting authority which has power to issue a precept to it
- (b) publish a draft scheme in such manner as it thinks fit, and
- (c) consult such other persons as it considers are likely to have an interest in the operation of the scheme.

A council tax reduction scheme, or any revision of such a scheme, may be challenged by way of judicial review proceedings. It is therefore vital to ensure that a scheme has been implemented lawfully, that the content of the scheme is lawful, and that the scheme does not discriminate unlawfully. In that regard, a community impact assessment is attached to the report (which confirms that the scheme will not have a disproportionate impact on any groups who share protected characteristics). The report also describes in detail the consultation exercise undertaken between October and December 2019 and the responses received accordingly.

FINANCIAL IMPLICATIONS Supplied by: David Eden – Finance Manager

The estimated cost of the proposals have been factored into the council's council tax base for 2020/21 and have therefore been assumed within council tax income estimates contained within the council's 2020/21 budget report and medium term financial strategy.

PROCUREMENT IMPLICATIONS Supplied by: N/A

HR IMPLICATIONS Supplied by: N/A

OTHER DIRECTORATES CONSULTED: People, Service Reform

CONTACT OFFICER:
Penny Higgins

TEL NO:
0161 793 3640

WARDS TO WHICH REPORT RELATES: All wards in Salford

Appendix 1: What are other councils doing?

Latest figures from the Institute of Fiscal Studies (Jan 2019) show that the most widespread schemes continue require a minimum payment for working age households, with the most common being 20% (a quarter of all councils).

Another fifth of councils have minimum contribution to council tax of over 20%, with the highest being 50% in North Lincolnshire. The research also shows that more deprived councils, are more likely to introduce minimum payments than other councils – but only because they received larger cuts to CTS funding from central government.

In Greater Manchester, Salford's 15% minimum payment for low income households continues to be towards the lower end of the scale compared to the other ten GM authorities

| Authority | CTR (%) | Change |
|-------------------|--|---------------|
| Bolton | 12.5% | No |
| Bury | 20% | No |
| Manchester | 17.5% | No |
| Oldham | 15% | No |
| Rochdale | 15% | No |
| Wigan | 20% | No |
| Stockport | 100% - but awards limited to Band A or B | |
| Tameside | 25% minimum of Band A charge | |
| Trafford | Up to 100% restricted to Band D (but with other restrictions on entitlement) | |

In addition, according to the New Policy Institute only nine other local authorities (from 326) offer an income banded scheme that has the possibility of a 100% discount for working age households on low incomes. These are: Cheltenham Chichester Cotswolds, Oxford; Sandwell; West Oxfordshire; South Cambridgeshire and St Albans.

Along with a minimum payment, some councils have made other changes to their local council tax support schemes. The graph below shows the number of councils that have introduced a particular change. Some local authorities introduced more than one new measure (for example reducing the second adult rebate and introducing a band cap), so councils may be counted more than once.

Appendix 2

Community Impact Assessment (CIA)

| | |
|-------------------------------------|---|
| Title of proposal: | Review of Council Tax Reduction Scheme 2020/21 |
| Service Group/ Team: | Service Reform |
| Date of assessment: | 7 January 2020 |
| Lead CIA Officer: | Penny Higgins |
| Officers in Assessment Team: | Penny Higgins, Jonathan Stancombe, Chris Howl, Peter Rogerson |
| Review Date: | 31 March 2021 |

The findings of your CIA MUST be included within the report for decision and this document attached as evidence of your consideration of potential impact on communities.

Summary of Community Impact Assessment

Brief summary of proposal or what you are impact assessing

- This CIA considers the review of Salford's Council Tax Reduction Scheme (CTRS), which – subject to approval – will be implemented from 1 April 2020.
- Salford proposes to introduce a new CTRS which will: increase the amount of support available for claimants from 85% of their total council tax bill to 88%. This will mean that claimants will be expected to pay 12% of their bill as opposed to the current 15%

How did you approach the CIA and what did you find?

This CIA documents some of the details of the review proposal, which took place during summer 2019.

The CIA has been informed by a consultation of residents which took place from 18 October 2019 to 20 December 2019. The consultation questionnaire included closed questions to assess resident support for the individual proposals. Along with an open question, which sought residents' suggestions / feedback for how Salford's council tax support should operate. Responses to the questionnaire were analysed to identify any equalities issues and equalities data was gathered from respondents, with questions relating to ethnicity, age, sexual orientation, marital / relationship

status, and religion / belief.

Additionally, the following evidence has been considered:

- Results of a residents' consultation in late 2019
- Results of an analysis of the council tax claimant database carried out by Salford University

What are the main areas requiring further attention?

We have been unable to identify any disproportionate impacts on any groups with protected characteristics that would require further attention. If adopted, the proposals would have a positive impact on claimants qualifying for the new scheme, through reducing the amount of council tax they would have to pay and through reducing the frequency of council tax liability recalculations the number of council tax bills that claimants receive.

These will be universal benefits for all working age households. However, there is some evidence to suggest that the proposals are likely to have a disproportionate positive impact on some groups with protected characteristics: research done in preparing Salford's Anti-poverty strategy showed that disabled people and BAME communities are more likely to experience poverty in Salford. By extension, people with these protected characteristics may benefit disproportionately from the proposed new scheme.

Summary of recommendations for improvement

At this stage, we do not believe that there ought to be any recommendations for improvement. As the council tax reduction scheme is reviewed annually, there will be further opportunity to identify recommendations for changes when the next scheme review begins.

1. The proposal

This section should outline details of the proposal. This could include (where applicable)

- Description of the current service (policy, procedure, strategy, function)
- Explanation of the proposal
- Reason for the proposal
- Aim or purpose of the proposal
- Who should benefit from the proposal
- Who are the key stakeholders
- What outcomes are required from the proposal
- Details of other services on which the proposal could impact
- Social value considerations

The council has been operating a localised Council Tax Reduction Scheme (CTRS) in accordance with section 13A and Schedule 1A of the Local Government Finance Act 1992 (amended) since 1 April 2013.

The CTRS provides crucial help for residents on low incomes to pay their council tax bills. Under the current scheme, the council provides a discount to eligible working age households of up to 85% of their council tax bill. Recipients who have income at or below the applicable amount are entitled to the maximum reduction available and are only expected to pay 15%. Recipients with income above their applicable amount will receive a reduction up to the maximum 85% - so may be expected to pay more than 15% of their bill.

The budget for the CTRS has to fund the entitlements of both pensioners and working age low income households. Pensioner entitlements are more generous and are determined under a scheme provided by central government, which the council cannot change. Pensioner households can receive a reduction of up to 100% of their bill. The council has a duty to provide a scheme for low income working age households only, within the budget available covering both pensioner and working age household schemes.

The council is legally required to review its scheme each year and consult with residents on any proposed changes. As part of the on-going work under the city's anti-poverty strategy (No One Left Behind: Tackling Poverty in Salford), the CTRS has been thoroughly reviewed to:

- Analyse its current performance, understanding current spending patterns, and the profile of people accessing the scheme.
- Identify options for an alternative CTRS in 2020/21, with analysis of the financial and social impact of any changes.

A review of the scheme was completed in-house in summer 2019. Following extensive analysis that modelled 83 different potential revisions to the scheme, Salford is proposing to make the following changes to its CTRS from 1 April 2020:

- Introduce a 12% minimum payment contribution for all eligible households (a

3% reduction in the contribution required from eligible households, which is set at 15% in the current scheme).

- Introduce a 'de-minimis' threshold that would only change a customer's bill if the recalculated weekly CTR entitlement was above or below a set tolerance level.

We believe that both proposals will have a positive impact for all residents who qualify for CTRS, including those with protected characteristics. Subject to approval, from 1 April 2020, claimants will see a 3% reduction in the amount they are expected to contribute to their council tax bills. Additionally, the implementation of de minimis rule is designed to reduce the number of council tax bills received by claimants in the event of changes to their income, by limiting the need to issue a new bill only if the change to their entitlement is (+/-) £2.

2. Evidence and research

What equality information (qualitative and quantitative), research or other intelligence have you used to develop this proposal?

This can include; equality monitoring information, census data, customer satisfaction surveys and feedback, inspection reports, desktop research (local, regional and national), professional journals, feedback from individuals and groups. Details of information considered when assessing the impact should be published (whilst ensuring individual confidentiality).

| Information source | What has this told you? | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|---|-----------|---------|--------|---------------|-------|----|-------------|-----|----|-------------------|-------|----|---------------|-----|----|-----------------|-----|----|--------------|-----|----|------------------|--|--|-----------------|------------------------------|--|-----------------|---------------------------------|--|
| Resident consultation | Analysis of the responses to the open questions included in the consultation is inconclusive. Some of the comments do have an equalities dimension – for example, suggesting that more efforts should be made to support single person households, pensioners, or people / families with children. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Benchmarking against other CTR schemes in Greater Manchester | <p>Salford’s scheme has been benchmarked against that of other GM Authorities. Salford’s scheme has consistently offered comparatively generous levels of support to residents:</p> <table border="1"> <thead> <tr> <th>Authority</th> <th>CTR (%)</th> <th>Change</th> </tr> </thead> <tbody> <tr> <td>Bolton</td> <td>12.5%</td> <td>No</td> </tr> <tr> <td>Bury</td> <td>20%</td> <td>No</td> </tr> <tr> <td>Manchester</td> <td>17.5%</td> <td>No</td> </tr> <tr> <td>Oldham</td> <td>15%</td> <td>No</td> </tr> <tr> <td>Rochdale</td> <td>15%</td> <td>No</td> </tr> <tr> <td>Wigan</td> <td>20%</td> <td>No</td> </tr> <tr> <td>Stockport</td> <td colspan="2">100% - but awards limited to Band A or B</td> </tr> <tr> <td>Tameside</td> <td colspan="2">25% minimum of Band A charge</td> </tr> <tr> <td>Trafford</td> <td colspan="2">Up to 100% restricted to Band D</td> </tr> </tbody> </table> | Authority | CTR (%) | Change | Bolton | 12.5% | No | Bury | 20% | No | Manchester | 17.5% | No | Oldham | 15% | No | Rochdale | 15% | No | Wigan | 20% | No | Stockport | 100% - but awards limited to Band A or B | | Tameside | 25% minimum of Band A charge | | Trafford | Up to 100% restricted to Band D | |
| Authority | CTR (%) | Change | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bolton | 12.5% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Bury | 20% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Manchester | 17.5% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Oldham | 15% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Rochdale | 15% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Wigan | 20% | No | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Stockport | 100% - but awards limited to Band A or B | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Tameside | 25% minimum of Band A charge | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Trafford | Up to 100% restricted to Band D | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Data Analysis of council tax data – University of Salford | The University of Salford were asked whether they could identify whether certain households struggled more than others to pay their council tax liability. Using anonymised data provided by SCC on the payment activity of those households in receipt of CTR, the university reported that some households with one, two or three children having a higher risk of not paying their Council Tax bills. | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |

3. Engagement / Consultation

When considering your proposal, you should be engaging with individuals and groups covering the following protected characteristics (You can use evidence from existing consultations if this evidence is relevant to your proposal):

- **Age**
- **Disability**
- **Gender**
- **Gender reassignment**
- **Marriage and Civil Partnership**
- **Pregnancy and maternity**
- **Race**
- **Religion and belief**
- **Sexual orientation**

We also advise you to consult people on a low income, carers, ex-offenders, refugees and people seeking asylum, gypsies and travellers, where appropriate.

You should detail below your engagement activities (Please note; you must ensure individual confidentiality)

| Date(s) of engagement | Who was involved? | Main issues identified |
|-------------------------|---|---|
| 18/10/2019 – 20/12/2019 | The equalities monitoring data from the consultation suggests that there were multiple respondents with protected characteristics, including people from BAME communities (17% of respondents) and members of the LGBT community (8% of respondents). | No issues requiring action were identified. |

4. Assessing the impact

From your evidence gathering, you will have identified potential disproportionate negative impacts. Please provide details and your actions to overcome these below. We would also like to know if there will be any positive impacts that your proposals will make to improve equalities:

- Potential impact: If the proposal could result in some groups (including customers and/or staff) being disadvantaged or treated unfairly
- Mitigations and actions: Where there is a potential for disadvantage or unfair treatment, what are your plans to eliminate, reduce, mitigate or justify it? Could making these changes have a negative effect on any other group(s)? Explain why and what you will do about this. You should include details of who will be responsible for the actions and target dates for completion:
- Promoting Equality: Could the proposal result in an opportunity to promote equality or inclusion? Explain how.

Please note: this table will form the basis of your action plan.

| Protected characteristic or other group | Potential impact | Mitigations and actions | Responsible officer | Target date | Promoting equality |
|---|---|-------------------------|--|-------------|--------------------|
| Age | Legislation provides a 100% council tax reduction to people at state pension age who are on a low income. This is an important exemption for older people | N/A | Penny Higgins, Manager of Council Tax Service | N/A | N/A |
| Disability | N/A | N/A | | N/A | N/A |
| Gender | N/A | N/A | | N/A | N/A |
| Gender reassignment | N/A | N/A | | N/A | N/A |
| Marriage and Civil Partnership | N/A | N/A | | N/A | N/A |

| Protected characteristic or other group | Potential impact | Mitigations and actions | Responsible officer | Target date | Promoting equality |
|--|--|--------------------------------|----------------------------|--------------------|---------------------------|
| Pregnancy and maternity | The council has opted to reject any policy changes such as introducing a two child limit for the purposes of calculation CTR. | N/A | | N/A | N/A |
| Race | N/A | N/A | | N/A | N/A |
| Religion and belief | The council has opted to reject any policy changes such as introducing a two child limit for the purposes of calculation CTR. It is reasonable to assume that this will be of significance for the Orthodox Jewish Community, where large families are more common | N/A | | N/A | N/A |
| Sexual orientation | N/A | N/A | | N/A | N/A |
| Other groups | In Salford, care leavers are entitled to a council tax discount. This entitlement will be unaffected by the proposed new scheme. | N/A | | N/A | N/A |

5. Assessing the impact on community cohesion

Community cohesion is what must happen in all communities to enable different groups of people to get on well together. A key contributor to community cohesion is integration which is what must happen to enable new residents and existing residents to adjust to one another.

An integrated and cohesive community is based on three foundations:

- People from different backgrounds having similar life opportunities.
- People knowing their rights and responsibilities.
- People trusting one another and trusting local institutions to act fairly.

And three ways of living together:

- A shared future vision and sense of belonging.
- A focus on what new and existing communities have in common, alongside a recognition of the value of diversity.
- Strong and positive relationships between people from different backgrounds.

Detail below if the proposals is likely to impact on community cohesion, including if there is likely to be a positive impact.

N/A – we do not believe that the proposal will have an appreciable impact – either positively or negatively – on community cohesion. However, some feelings of resentment have been reported when residents feel that public support is not distributed in a fair manner. By annual review, including equalities considerations, being conducted and published, it is hoped that this transparency will prevent such perceptions and contribute to the third foundation of an integrated and cohesive community, as stated above.

6. Monitoring

You should ensure that any actions within your CIA are monitored and reviewed regularly within Covalent. You should review progress on your action plan annually.

7. Review

Your CIA should be reviewed after the proposals have been implemented to review actual impact. You should record an appropriate review date below.

| | |
|-------------|---------------|
| Review Date | 31 March 2021 |
|-------------|---------------|

8. Sign off

When you have completed your CIA, it must be signed off by a senior manager within your service group (Assistant Director or above).

| Name | Signature |
|------|-----------|
| | |

When your CIA has been signed off and after the decision has been made, send it to [Equalities&Cohesion Team](#) in Policy and Strategy for publishing on the [council's website](#).