

Council Tax Support Equality Impact Assessment (EIA) with Health assessment – APPENDIX 6

(NB: use [hyperlinks](#) in the document to go to the relevant sections or external websites.)

Why we are changing the Council Tax Benefits system?

The Government has decided that there will no longer be a national Council Tax Benefits system from 1 April 2013. Instead the council needs to introduce its own local Council Tax Support system. The planning process for this new system commenced with a report to Cabinet on 14th April 2012 and a draft scheme approved by Policy & Resources Committee on 12th July 2012. The council needs to consider a wide range of policy and financial issues in the design of the new system.

The Law

The [Equality Act 2010](#) says that we (and all statutory services) must work to eliminate discrimination, advance equality of opportunity and foster good relations between groups ([community cohesion](#)). The law says we must do this across a range of 'protected characteristics': [age](#), [disability](#), [ethnicity](#) (or race), [gender](#) (or sex), [gender reassignment](#), [religion or belief](#), [sexual orientation](#), [marriage or civil partnership](#), [pregnancy or maternity](#). The council assessments also cover [other relevant groups](#) and the overall effect on [Families and Children](#).

What this means in practice is that we consider the needs of all individuals in our day to day work – in shaping policy, in delivering services, and in relation to our employees.

The legal duties support us in good decision-making and our commitment to equality. We focus on understanding how different people will or might be affected by our activities so that policies and services are appropriate and accessible to all and meet different people's needs. This means that our services and practices will be fairer, easy to access and make a real difference. They will also be more effective and efficient.

Equality Impact Assessment and Health Assessment

It is recognised that this Council Tax benefit change requires a robust and detailed Equality Impact Assessment (EIA), including consideration of health and well-being impacts. Whilst some consideration of the wider impacts of welfare reform has been included and actions identified (see below) this EIA focuses on this change. The current document contains data derived from both the current Council Tax Benefit caseload and citywide data. Initial consultation has taken place through the Community and Voluntary Sector Forum to identify issues for all groups to complement data collected on claimants.

Following publication of the draft scheme, formal consultation commenced in July 2012, utilising a combination of the council's on-line consultation portal, CVSF facilitated engagement events and press releases directing the public to the on-line consultation documents. At this point consultees would find it easier to comment on specific equalities issues arising from more detailed proposals rather than principles. Later, letters were sent to all those currently in receipt of council tax benefit to let them know how to comment on the proposals.

Consideration has been given to the needs of different stakeholders in the process. Each of these has been considered in relation to how the changes might differently and / or adversely affect people because of their protected characteristics. Mitigating [actions](#) to avoid negative

impacts or reduce/provide alternatives to them have been identified as part of the on-going process and an assessment has been made on how significant the potential impact is.

1. Background and summary of proposed changes

Title of EIA	The Council Tax Reduction Scheme (Brighton & Hove City Council) 2013	Ref No.	
Delivery / Resource / Finance Unit or Intelligent Commissioning name			
Aim of policy or scope of service	<p>The Government has decided that there will no longer be a national Council Tax Benefits system from 1 April 2013. Instead the council will need to introduce its own local Council Tax Support system. The Government's assumption following the last Comprehensive Spending Review is that there will be at least a 10% reduction in expenditure through these changes from 1 April 2013 and that it will be for local authorities to determine how to manage that funding reduction. Initial indications were that Brighton & Hove City Council would receive at least £2.5m less money from Government as a result of this change, although subsequently the Government has announced that a one year transition grant will be available for schemes which meet certain criteria. The Council is being recommended to adjust its proposals so that it is eligible for this grant.</p> <p>Currently Council Tax Benefit is a national system for low income households. You may get Council Tax Benefit if you pay Council Tax and your income and capital (savings and investments) are below a certain level. You may apply whether you rent or own your home, or live rent-free. You could qualify if you are out of work, or in work and earning a wage. Individuals apply for Council Tax Benefits through a single application process for Housing & Council Tax Benefits. If you are eligible for council tax benefits you will receive a reduction in your council tax bill and the council has previously received grant from national government to pay for this.</p> <p>The government has stated that council tax support for older people will not be reduced as a result of the introduction of this reform. This is because the government wants to ensure that low income pensioners, who would struggle to pay council tax without additional support, and whom the government does not expect to work to increase their income, will continue to receive support for their council tax. Pensioner protection will be achieved by keeping in place national rules.</p>		

The council needs to give consideration to vulnerable groups in the design of a new system. The government's consultation response appears to be less prescriptive about how this should be done than perhaps originally envisaged. Rather the government draws councils' attention to existing responsibilities including the Child Poverty Act 2010, the Disabled Person Act 1986 and the Housing Act 1996 as well as the public sector equality duty in section 149 of the Equality Act 2010.

A full copy of the draft scheme for Brighton and Hove can be found on the council's website.¹ The full scheme is proposed to be made at a meeting of full Council on 13th December, the report will include a copy of the scheme itself. This section of the EIA will be updated once Council has made a decision on the scheme.

Brighton & Hove's preferred draft scheme is based on the following principles:

- Support will be in the form of a discount to Council Tax bills, with entitlement assessed by a means test so that people with the least money will receive the most help. The means test will be based on income and savings, similar to how Council Tax Benefit is worked out now.
- Support will be distributed as widely as possible among people eligible to claim the discount.
- The council will set up a discretionary fund to help the most vulnerable residents get extra support in exceptional circumstances.
- The scheme will support people moving into, and on low paid, work by increasing the earnings disregard for a single person to £10 per week.
- The scheme will be reviewed every year and we'll be able make urgent changes if required by legislation to make sure the switch to the new system is as simple as possible for residents.
- The council will provide clear and accessible information to all residents affected by the ending of Council Tax Benefit.
- The council will ensure people affected can access additional advice and support.
- People currently receiving Council Tax Benefit will have their eligibility for the new scheme assessed without having to reapply to the council, unless their circumstances change.

¹ www.brighton-hove.gov.uk/draft-cts-scheme

- The council will put a limit on the amount any household has to pay in the first year to £3 extra, unless their circumstances change.
- Since further Welfare Reforms are expected to come into effect over the next few years, the annual review described above will consider the additional and cumulative impact of these changes.

The following table summarises the impact on protected groups of the change between the Council Tax Benefit scheme as it currently exists and the proposed The Council Tax Reduction Scheme (Brighton & Hove City Council) 2013. Details of the data used and the mitigations are set out in section 2 onwards. This table demonstrates that all current working age Council Tax Benefit recipients fall into at least one protected characteristic; it also demonstrates that each case is affected in the same way, as such there is no direct disproportionate impact on any particular group. Using all available data we have assessed potential impact. Where potential negative impacts are identified mitigating actions have been developed – see the “potential actions” columns in the other tables below and in particular note that although the standard loss of benefit is to the value of 8.5% of liability, there will be a cap on the maximum detriment that any household faces of £3 per week from 2013 to 2014 as a result of the replacement of council tax benefit with the council’s scheme, assuming there are no changes in circumstances.

Total Households currently claiming CTB	27,809	
Total people in households claiming CTB	49,360	
adults	36,915	
dependent children	12,445	
		<u>How these groups are affected?</u>
households unaffected by changes		
Pensioners households	10,421	Unaffected
households affected by changes		
Non-pensioner households	17,388	Loss of benefit to the value of 8.5% of liability

<u>Impact per protected group</u>	<u>Percentage</u>	<u>Claimant number</u>	
Table 1: CTB claimant age profile – under 65 years			
16 to 18	0.05%	8	Loss of benefit to the value of 8.5% of liability
18 to 24	7%	1,304	Loss of benefit to the value of 8.5% of liability
25 to 34	19%	3823	Loss of benefit to the value of 8.5% of liability
35 to 49	30%	6004	Loss of benefit to the value of 8.5% of liability
50 to 64*	43%	8691	Loss of benefit to the value of 8.5% of liability
*(not all families in this category will be affected because of the shifting pension age, 2,442 are unaffected due to one or member of the household being pension age)			
ethnicity (extrapolated)			
White: British	81%	14084	Loss of benefit to the value of 8.5% of liability
All BME	19%	3303	Loss of benefit to the value of 8.5% of liability
White: Irish	1%	173	Loss of benefit to the value of 8.5% of liability
White: Other White	6%	1043	Loss of benefit to the value of 8.5% of liability
Mixed	2%	347	Loss of benefit to the value of 8.5% of liability
Asian or Asian British	5%	869	Loss of benefit to the value of 8.5% of liability
Black or Black British	2%	347	Loss of benefit to the value of 8.5% of liability
Other	2%	347	Loss of benefit to the value of 8.5% of liability
pregnancy		72 households	Loss of benefit to the value of 8.5% of liability
Disabled		19%	3303
Severely disabled		12%	2086
sex (of claimant of CTB)			
men	43%	7476	Loss of benefit to the value of 8.5% of liability
women	56%	9737	Loss of benefit to the value of 8.5% of liability

sexual orientation (Lesbian, Gay, Bisexual) (extrapolated)	14%	2434	Loss of benefit to the value of 8.5% of liability
transgender There are no existing figures for % of the population who are transgender as an individual figure			Loss of benefit to the value of 8.5% of liability
religion or belief (extrapolated)			
Christian	59%	10258	Loss of benefit to the value of 8.5% of liability
Muslim	1.50%	260	Loss of benefit to the value of 8.5% of liability
Jewish	1.40%	243	Loss of benefit to the value of 8.5% of liability
Buddhist	0.70%	121	Loss of benefit to the value of 8.5% of liability
Hindu	0.50%	86	Loss of benefit to the value of 8.5% of liability
Sikh	0.10%	17	Loss of benefit to the value of 8.5% of liability
other relevant groups: Carers, people experiencing domestic violence, substance misusers, homeless people, looked after children etc % of CTB cases receiving carers allowance the council does not hold any other data on these categories	4%	695	Loss of benefit to the value of 8.5% of liability

2. Record of data/engagement; impacts identified; and potential actions to meet the Duties.

	Data ¹ that you have	Community engagement exercises or mechanisms ²	Impacts identified from analysis (actual and potential)	Potential actions to advance equality of opportunity, eliminate discrimination, and foster good relations (You will prioritise these below)
<p>Consider:</p> <ul style="list-style-type: none"> • <i>How to avoid, reduce or minimise negative impact (if you identify unlawful discrimination, including victimisation and harassment, you must stop the action and take advice immediately).</i> • <i>How to promote equality of opportunity. This means the need to:</i> <ul style="list-style-type: none"> – <i>Remove or minimise disadvantages suffered by equality groups</i> – <i>Take steps to meet the needs of equality groups</i> – <i>Encourage equality groups to participate in public life or any other activity where participation is disproportionately low</i> – <i>Consider if there is a need to treat disabled people differently, including more favourable treatment where necessary</i> • <i>How to foster good relations between people who share a protected characteristic and those who do not. This means:</i> <ul style="list-style-type: none"> – <i>Tackle prejudice</i> – <i>Promote understanding</i> 				
	<p>Note – There are gaps in the equality data collected on CTB claimants. Ways to request and collect equalities data on all ‘protected characteristics’ will be explored as part of the development of the new system.</p>			

¹ ‘Data’ – combination of existing CTB caseload data extracts and Brighton & Hove city wide data as held by the Council Performance & Analysis Team

² The Council has engaged and worked alongside the CVSF and Advice Strategy project on the pre-consultation stage of this policy work. It is a complex subject and very difficult to engage those who are not already familiar with the language of welfare benefits. However, a sector conference was held on 13 June 2012 and presentation was made to the Children & Young People’s Network on 20 June. A briefing and a survey was also circulated to the CVSF membership and to the Advice Services Network. The comments from this pre-consultation work were collated into a report by the CVSF and are attached to this document. Unless stated otherwise the comments included within ‘Community engagement exercises or mechanisms’ come from this report.

<p>Overall actions to reduce and/or mitigate negative impacts</p>	<p>Impacts on all current claimants</p> <p>A direct consequence of the changes to support for Council Tax will be increased pressure on individual and family incomes. This change comes in conjunction with other changes to welfare provision including reductions in general levels of Housing Benefit for people who live in private sector accommodation which started in April 2011; restrictions to the amount of benefit single people who are under 35 can receive from January 2012; restrictions to Housing Benefit from April 2013 for people who live in social accommodation where they have spare bedrooms and an overall cap on benefit to £26,000 per year for families who are not working.</p> <p>Summary of actions to mitigate / reduce negative impacts</p> <p>The Council is working to mitigate the impacts of these changes in a variety of ways from case by case support for the most significantly affected, general publicity and communications, staff and third sector training, specific communications to those affected, agreeing and providing advice and support signposting information with the Advice Services Network; commissioning advice to address some of the specific changes and rationalising what discretionary support options are available through the local authority. It should be noted however that the scope of this EIA is focused on the changes to Council Tax Support and the mitigations available are limited to the provisions of the scheme and the changes the council can influence within this.</p> <p>Advice and support</p> <p>Financial advice and support will be a key support element for those people who will be faced with the change from Council Tax Benefit to the local Council Tax Support provision. In addition to advice on budgeting and priority payments it will be essential for customers to have access to good quality free banking products so payment methods such as direct debits and standing orders can be used to enable people to meet their new financial commitments which the changes to Council Tax support will create. There will be provision in place by April 2013 to assist customers in accessing these facilities. Information which has been provided as part of the consultation and information which has been identified as part of this process will help create the specification for the commissioning of advice services. This information is available in different formats to meet different needs. For example, we have produced a short film on the Council's You Tube site that provides a short summary of the scheme: http://www.youtube.com/user/BrightonandHoveGovUk?gl=GB&hl=en-GB</p> <p>Collection and recovery processes</p> <p>The changes in their present draft form will mean that approximately 10,000 people who receive full council tax benefits because they are on government means tested benefits will now have to pay a contribution; another 3000 people on low incomes currently receive full council tax benefits, (although their award fluctuates through the year meaning they normally have to pay something at some points during the year) will have to make an increased contribution; and another 4000 people working/on a low income receive partial awards will also have to make an increased contribution.. On the whole the amounts owed are likely to be small. The Revenues department within the Council will review its collection and recovery processes to make sure they fit with this type of bill profile because historically the average bill profile will have been significantly higher. This will mean a review of internal processes and methods of communications and working with collection partners in the City, for example the magistrates courts.</p>
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	Data that you have	Community engagement	Impacts identified	Potential actions
<p>Community Cohesion (what must happen in all communities to enable different groups of people to get on well together.)</p>	<p>Council Tax Benefit (CTB) is a household benefit in which one adult makes a claim on behalf of a given household.</p> <p>There are 27,809 households in the city claiming CTB, approximately 23% of all households. 7,278 (26%) of those households contain at least one dependent child.</p> <p>49,360 people live in households in receipt of CTB, 18% of the city's population. This comprises of 36,915 adults, 12,445 dependent children of which 11,830 are aged under 18. This is 17% of the city's adult population and 22% of children aged under 18.</p> <p>All current and potential CTB claimants are protected by the Equality Act 2010 in relation to their protected characteristics. Therefore in developing the new, local scheme we aim to avoid disproportionate negative impact related to protected characteristics.</p> <p>The work to consult on the changes and then communicate the chosen option will include explanation of the rationale and evidence that every effort has been made to develop a fair system. This enables us to explain our legal duty to give 'due regard' to the</p>	<p>The primary concern from consultation has been to protect vulnerable groups and make the scheme as fair as possible and communicate it effectively so that people understand it. There have been no concerns expressed that relate to community cohesion.</p> <p>The only potential cohesion issue has been in relation to students (not a protected group in their own right): pre-consultation via the CVSF revealed concern about students not paying council tax, however there is indirect payment via rent levels and landlord's obligations. Information about this may be included in any publicity about the new scheme to avoid</p>	<p>When introducing a new scheme it is important to ensure that it is fair and is perceived to be fair by people with a stake in it. This EIA is part of the process of evidencing that we have considered the needs of all groups covered in law and others who may be affected by the change, to ensure that no group faces disproportionate impact. Communicating this process and the reasoning behind the scheme agreed at the end of the process will be an important element in increasing acceptance of it across communities.</p> <p>Concerns have been expressed in the consultation about the fairness of the national government proposals and suggestions made that they should be contested. Whilst not a role for local government officers, policy-makers and members should be aware of these concerns and able to respond to them</p>	<p>Our preferred option aims to limit the impact of the government's reduction on the most vulnerable households and keep the switch as simple as possible. The preferred scheme distributes the funds available as widely as possible, will mean people who are less well off will pay the least, and puts a limit on how much existing claimants will pay in the first year.</p> <p>It will be important locally to provide accurate factual information to encourage an informed debate on this subject and to prevent a negative impact on community cohesion.</p> <p>A similar process of accurate information provision will need to occur to ensure that no positive or negative bias is identified based on 'protected characteristic' (these are the groups covered by the Equality Act 2010 and listed below).</p>

	Data that you have	Community engagement	Impacts identified	Potential actions
	<p>needs of 'protected characteristics' groups.</p> <p>Geographical distribution of CTB is also potentially important to community cohesion, in relation to the possible impact on large percentages of ward populations. Distribution of households in receipt of CTB is not evenly distributed across the city. More than two out five households in East Brighton ward (42%) get CTB compared to only one in ten households in Hove Park ward (10%). See Table 6 at the end of this document.</p>	misconceptions.	appropriately.	
Age (people of all ages)	<p>Age data is only available for the CTB claimant and their partner (32,825, 89% of all adult household members).</p> <p>The government has decided that people of pension age are protected from the changes which means that there is no adverse impact on them. The table below shows only claimants aged under 65 years (total 19,830 people).</p> <p>For details of the impact on children please see the families and children</p>	<p>At the CVSF conference significant weight was given to the effect of the overall welfare reforms on young people (aged 16-35). Reference was made to single young people now being one of the most vulnerable groups. On the day feedback indicated that a large proportion of attendees felt that younger people would be more affected by</p>	<p>Feedback from the community and voluntary sector suggests a shift in which benefit claimants may be considered vulnerable. As well as impacts on disabled people and out of work families with children the CVS consultees suggested that single job seekers are also likely to experience negative impacts.</p> <p>Single job seekers do not receive levels of protection afforded in terms of</p>	<p>Discretionary fund of £100,000 to be established to help those in exceptional hardship. Guidance will be given to staff administering the scheme to ensure that claims from under 35's are supported appropriately.</p> <p>We will also work with relevant CVS organisations to ensure information about the scheme is communicated effectively.</p> <p>Increase in the earnings disregard for single people from £5 to £10 per week</p>

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	<p>section below.</p> <table border="1"> <caption>Table 1: CTB claimant age profile – under 65 years</caption> <thead> <tr> <th>Age</th> <th>Number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>16 to 18</td> <td>8</td> <td>0.05%</td> </tr> <tr> <td>18 to 24</td> <td>1,304</td> <td>7%</td> </tr> <tr> <td>25 to 34</td> <td>3,823</td> <td>19%</td> </tr> <tr> <td>35 to 49</td> <td>8,038</td> <td>30%</td> </tr> <tr> <td>50 to 64*</td> <td>8,691</td> <td>43%</td> </tr> </tbody> </table> <p>With the likely cumulative impact of the wider welfare changes affecting young people (under 35) the impact of changes to CTB is of particular concern. Nearly 30% of people affected by the change are under 35.</p> <p>*(not all families in this category will be affected because of the shifting pension age, 2,442 are unaffected due to one or member of the household being pension age)</p>	Age	Number	%	16 to 18	8	0.05%	18 to 24	1,304	7%	25 to 34	3,823	19%	35 to 49	8,038	30%	50 to 64*	8,691	43%	the change than some other groups.	<p>premiums, earnings disregards, child care assistance and a generally sympathetic approach from discretionary schemes, which may benefit disabled people and out of work families with children. Therefore they are particularly vulnerable to relatively small reductions in income.</p> <p>Present levels of unemployment amongst individuals who are under 25 in this group are also limiting the option of finding work as a way of mitigating against these changes.</p>	<p>Transitional Protection for the first year fixed at £3 extra per week, which may allow some young people more time to adjust to the new system.</p>
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Disability (a person is disabled if they have a physical or mental impairment which has a substantial and long-term	<p>Disability data is only available for the CTB claimant and their partner (32,826 or 89% of all adult household members). In this instance a person is defined as disabled if they are in receipt of Disability Living Allowance</p>	<p>People with mental health problems and people with learning difficulties were identified as two groups that would potentially be affected by the change. Concern was raised about communicating</p>	<p>Research² suggests that the cumulative impacts of this change and other national benefits changes will have a disproportionately larger impact on disabled people (and carers, see below) than others.</p> <p>Disabled people are</p>	<p>There is no change to the government requirement of a 100% exemption on grounds of severe mental impairment.</p> <p>Communicating these changes as early and as clearly as possible will allow disabled people and their families time to prepare and adapt.</p>																		

	Data that you have	Community engagement	Impacts identified	Potential actions																																													
adverse effect on their ability to carry out normal day-to-day activities ¹)	<p>(DLA), Severe Disability Allowance and / or Attendance Allowance.</p> <p>Table 2: CTB claimant by age and disability</p> <table border="1"> <thead> <tr> <th></th> <th colspan="2">Disabled</th> <th colspan="2">Severely disabled</th> </tr> <tr> <th>Age</th> <th>N</th> <th>% of age group</th> <th>N</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>16 - 18</td> <td>2</td> <td>18%</td> <td>2</td> <td>18%</td> </tr> <tr> <td>18 - 24</td> <td>147</td> <td>10%</td> <td>102</td> <td>7%</td> </tr> <tr> <td>25 - 34</td> <td>479</td> <td>10%</td> <td>315</td> <td>7%</td> </tr> <tr> <td>35 - 49</td> <td>1,702</td> <td>18%</td> <td>1,049</td> <td>11%</td> </tr> <tr> <td>50 - 64</td> <td>2,048</td> <td>28%</td> <td>1,227</td> <td>17%</td> </tr> <tr> <td>65 and over</td> <td>2,269</td> <td>22%</td> <td>1,714</td> <td>17%</td> </tr> <tr> <td>Total</td> <td>6,647</td> <td>20%</td> <td>4,409</td> <td>13%</td> </tr> </tbody> </table> <p>A fifth of adult living in a CTB household (6,647, 20%) are disabled with 4,409 (13%) severely disabled.</p> <p>One in ten adults (626, 10%) aged 18 to 34 living in a CTB household are disabled (417 (7%) severely disabled).</p> <p>More than a quarter of adults aged 50 to 64 (2,048, 28%) living in a CTB household are disabled. Proportionally this is more than for adults aged 65 and over (2,269, 22%).</p> <p>Among the 7,278 CTB households with at least one dependent child, 577</p>		Disabled		Severely disabled		Age	N	% of age group	N	%	16 - 18	2	18%	2	18%	18 - 24	147	10%	102	7%	25 - 34	479	10%	315	7%	35 - 49	1,702	18%	1,049	11%	50 - 64	2,048	28%	1,227	17%	65 and over	2,269	22%	1,714	17%	Total	6,647	20%	4,409	13%	with vulnerable groups especially in families with multiple vulnerability.	<p>particularly affected by the difficult economic climate as a result of lower income, higher costs, fewer support services, and unpredictable health conditions.</p> <p>Reductions in funding affecting both statutory and CVS services can leave disabled people without support.</p> <p>People with mental health issues and/or Learning Disabilities are likely to need additional support to understand these changes and how to appropriately respond to them, through support workers, carers and families.</p>	Discretionary fund of £100,000 to be established to help those in exceptional hardship.
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	households (8%) have at least one dependent child who is who is receipt of disability related benefits.																	
Gender reassignment (a transsexual person is someone who proposes to, starts or has completed a process to change his or her gender. A person does <u>not</u> need to be under medical supervision to be protected)	<p>No information is collected on the gender reassignment status of CTB claimants.</p> <p>Local Count Me In Too research and national data show that Trans people experience higher levels of disadvantage and social / financial exclusion.</p>	Survey circulated via LGBT Health Inclusion Project (LGBT HIP) and through the Equalities Network – comments and suggestions included in the EIA.	Trans people experience high levels of disadvantage and vulnerability. They are more likely to be on low incomes and therefore likely to be in receipt of benefits including CTB.	<p>Ways to request and collect equalities data on all 'protected characteristics' will be explored as part of the development of the new system.</p> <p>Discretionary fund of £100,000 to be established to help those in exceptional hardship.</p> <p>We will work with relevant CVS organisations to ensure that Trans people are aware of this scheme and able to apply.</p>														
Race (this includes ethnic or national origins, colour or nationality, including refugees and migrants; and Gypsies and Travellers)	<p>There is no robust and or comprehensive data available from the CTB database about a claimant's ethnicity.</p> <p>Estimated resident population by broad ethnic group mid-2009:</p> <table border="1"> <thead> <tr> <th rowspan="2">Table 3</th> <th colspan="2">Brighton and Hove ethnicity</th> </tr> <tr> <th>number</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>All persons</td> <td>256.4</td> <td></td> </tr> <tr> <td>White: British</td> <td>208.1</td> <td>81%</td> </tr> <tr> <td>All BME</td> <td>48.3</td> <td>19%</td> </tr> </tbody> </table>	Table 3	Brighton and Hove ethnicity		number	%	All persons	256.4		White: British	208.1	81%	All BME	48.3	19%	<p>Survey circulated via Black and Minority Ethnic Community Partnership (BMECP) and through the Equalities Network – comments and suggestions included in the EIA.</p> <p>Feedback also from FFT (Friends, Families and Travellers)</p>	<p>Members of some ethnic groups are less likely to be well networked and therefore less easily able to learn about changes like this. They are also less likely to find it easy to access support schemes or advice. Where people have English as an additional language completing official forms can be a significant barrier.</p> <p>The Council Tax change will</p>	<p>Ways to request and collect equalities data on all 'protected characteristics' will be explored as part of the development of the new system.</p> <p>Discretionary fund of £100,000 to be established to help those in exceptional hardship. We will work with relevant CVS organisations and through other means to ensure that BME people are aware of this scheme and able to apply.</p>
Table 3	Brighton and Hove ethnicity																	
	number	%																
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White: British	208.1	81%																
All BME	48.3	19%																

	Data that you have	Community engagement	Impacts identified	Potential actions																		
	<table border="1"> <tr> <td>White: Irish</td> <td>3.3</td> <td>1%</td> </tr> <tr> <td>White: Other White</td> <td>15.7</td> <td>6%</td> </tr> <tr> <td>Mixed</td> <td>5.9</td> <td>2%</td> </tr> <tr> <td>Asian or Asian British</td> <td>12.5</td> <td>5%</td> </tr> <tr> <td>Black or Black British</td> <td>5.8</td> <td>2%</td> </tr> <tr> <td>Other</td> <td>5.1</td> <td>2%</td> </tr> </table> <p>We know that employment patterns and earning levels are different for different ethnic groups.</p> <p>We don't know the ethnicity of people locally claiming CTB, but we would expect that members of some ethnic groups will be disproportionately represented as claimants.</p>	White: Irish	3.3	1%	White: Other White	15.7	6%	Mixed	5.9	2%	Asian or Asian British	12.5	5%	Black or Black British	5.8	2%	Other	5.1	2%		<p>affect Travellers living on permanent sites, as they will pay Council Tax and may, like other groups, need practical support to do this. Similar issues as for other BME communities may apply, in relation to awareness of the changes and networks to support them.</p>	<p>We will ensure that language is not a barrier for people seeking to make claims for the Discretionary Fund.</p> <p>The increase in the earnings disregard for single people from £5 to £10 per week will potentially help people in the lowest paid jobs.</p> <p>Communicating these changes as early and as clearly as possible will allow BME people and their families time to prepare and adapt.</p> <p>A specific outreach programme to the permanent site to explain Council Tax Support to be established working with FFT and other relevant agencies.</p>
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Religion or belief (religion includes any religion with a clear structure and belief system. Belief	Over a quarter of our residents said they had no religion in response to the 2001 census. 59% of our residents (146,466) were Christian, 1.5% were Muslim (3,635), 1.4% were Jewish (3,558), 0.7% were Buddhist (1,747), 0.5% were Hindu (1,300) and 0.1%	Survey circulated via the 'religion and belief' rep on the Equalities Network – comments and suggestions included in the EIA.	As with ethnicity some religious groups are more effectively linked into statutory and support services and therefore will know more about the changes and be able to	<p>Ways to request and collect equalities data on all 'protected characteristics' will be explored as part of the development of the new system.</p> <p>Discretionary fund of £100,000</p>																		

	Data that you have	Community engagement	Impacts identified	Potential actions																																												
means any religious or philosophical belief. The Act also covers lack of religion or belief.)	<p>were Sikh (237).</p> <p>We have no data on the religion or belief of CTB claimants locally and the census data for 2011 will not be available in time for this project. However, as for ethnicity, some religious groups experience different levels of disadvantage</p>		access support better.	<p>to be established to help those in exceptional hardship. We will work with relevant CVS organisations to ensure that people from different faith groups and of no faith are aware of this scheme and able to apply.</p> <p>Communicating these changes as early and as clearly as possible will allow people of all faiths and none time to prepare and adapt.</p>																																												
<p>Sex (both men and women are covered under the Act)</p>	<p>Gender data is only available for the CTB claimant and their partner (32,805, 89% of all adult household members)</p> <table border="1"> <thead> <tr> <th rowspan="2">Table 4 Age</th> <th colspan="2">Male</th> <th colspan="2">Female</th> </tr> <tr> <th>n</th> <th>%</th> <th>n</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>16 - 18</td> <td>4</td> <td></td> <td>7</td> <td></td> </tr> <tr> <td>18 - 24</td> <td>479</td> <td>32%</td> <td>1,032</td> <td>68%</td> </tr> <tr> <td>25 - 34</td> <td>1,751</td> <td>37%</td> <td>2,980</td> <td>63%</td> </tr> <tr> <td>35 - 49</td> <td>4,141</td> <td>44%</td> <td>5,234</td> <td>56%</td> </tr> <tr> <td>50 - 64</td> <td>3,504</td> <td>49%</td> <td>3,591</td> <td>51%</td> </tr> <tr> <td>65 and over</td> <td>3,888</td> <td>39%</td> <td>6,200</td> <td>61%</td> </tr> <tr> <td>Total</td> <td>13,763</td> <td>42%</td> <td>19,037</td> <td>58%</td> </tr> </tbody> </table> <p>Among CTB claimants and their partners, 58% are female and 42% male. This compares to a city profile of residents aged over 16 of 50% males</p>	Table 4 Age	Male		Female		n	%	n	%	16 - 18	4		7		18 - 24	479	32%	1,032	68%	25 - 34	1,751	37%	2,980	63%	35 - 49	4,141	44%	5,234	56%	50 - 64	3,504	49%	3,591	51%	65 and over	3,888	39%	6,200	61%	Total	13,763	42%	19,037	58%	<p>Lone parents are a group that loses a particularly large amount from tax and benefit changes to be introduced after 2012–13. Because more than 90% of lone parents are women this drives the overall difference in the impact of reforms between single men and single women. Much of the remaining difference between single men and women without children arises because of</p>	<p>There are differences in women's employment and earnings patterns including the continuing national gender pay gap. This as well as the fact that women head up around 90% of lone parent families can lead to a socio-economic disadvantage and increased reliance on state support.</p> <p>Women also still tend to hold the main responsibility for child care and other caring responsibilities which can limit their ability to seek employment.</p>	<p>Communicating these changes as early and as clearly as possible will allow women and their families time to prepare and adapt.</p> <p>We will ensure that all Children Centre staff are well informed of the changes and work with partners to offer appropriate advice and share knowledge of support services.</p> <p>We will work with women's sector organisations in the city and men's groups to publicise these changes and the support available.</p> <p>Discretionary fund of £100,000</p>
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	Data that you have	Community engagement	Impacts identified	Potential actions
	<p>and 50% females.</p> <p>Nearly two-thirds of adults in CTB households aged under 35 yrs are women (64%).</p> <p>The vast majority of single parent families in receipt of CTB in the city are headed by women: 94.4%. In one in twenty single parent households (263, 5.4%) the single parent is male.</p> <p>See also the section below on Families and Children.</p>	<p>differences in the average income of men and women living alone: women tend to do fewer hours of paid work than men, on average, and earn less per hour of paid work.</p> <p>Domestic violence which disproportionately affects women was highlighted as an additional vulnerability</p>		<p>to be established to help those in exceptional hardship.</p>

	Data that you have	Community engagement	Impacts identified	Potential actions
<p>Sexual orientation (the Act protects bisexual, gay, heterosexual and lesbian people)</p>	<p>We have no data on the sexual orientation of CTB claimants locally.</p> <p>Brighton & Hove's State of the City report estimated that at least 14% (38,000 of the 2011 census population) of Brighton & Hove's adult residents are lesbian, gay, bisexual or transgender.</p>	<p>Count Me In Too research and national data demonstrate that many LGB people experience higher levels of disadvantage and financial exclusion than other groups.</p> <p>Survey circulated via LGBT Health Inclusion Project (LGBT HIP)</p>	<p>Many LGB people experience significant social exclusion and vulnerability due to hate crime and harassment. This can have an impact on their education, employment and earning ability and can therefore increase their likelihood of social-economic disadvantage.</p> <p>It can also increase their vulnerability to mental health issues and impact upon their capacity to work, thereby increasing their likelihood of claiming benefits.</p>	<p>Ways to request and collect equalities data on all 'protected characteristics' will be explored as part of the development of the new system.</p> <p>Discretionary fund of £100,000 to be established to help those in exceptional hardship. We will work with relevant CVS organisations to ensure that LGB people are aware of this scheme and able to apply.</p> <p>Communicating these changes as early and as clearly as possible will allow LGB people and their families time to prepare and adapt.</p>

	Data that you have	Community engagement	Impacts identified	Potential actions
Marriage and civil partnership (only in relation to due regard to the need to eliminate discrimination)	NB: figures below for single households where the person is aged over 65 (therefore will not be affected by the CTB changes are shown separately and for reference only.			
	Table 5: Household composition			
		N	% of all households	
	Single person households aged under 65 yrs	9,540	34%	
	<i>Single person households aged over 65 yrs</i>	6,432	23%	Issues for single parents are addressed in the 'families and children' section below.
	Two or more adults with at least one dependent child	2,437	9%	No impacts are identified relating to marriage or civil partnership status.
	Single parent with at least one dependent child	4,845	17%	
	Two or more adults with no dependent children	4,559	16%	
				No actions identified.

	Data that you have	Community engagement	Impacts identified	Potential actions
	More than a half (57%) of all households in receipt of CTB are single person households, of which 6,104 (22%) are single pensioner households.			
Pregnancy and Maternity	Among all household in receipt of CTB, for 72 households at least one person is also in receipt of statutory maternity pay.		Issues related to single parents and families and children are identified and addressed in other sections of this document.	See other relevant sections.
Other relevant groups eg: Carers, people experiencing domestic violence, substance misusers, homeless people, looked after children etc	<p>Among all household in receipt of CTB, for 1,071 households (4%) at least one person is also in receipt of Carers Allowance.</p> <p>Research suggests that the cumulative impacts of this change and other national benefits changes will have a disproportionately larger impact on disabled people (see above) than others. This has an impact on carers too.</p> <p>We have no data locally on these issues for CTB claimants.</p>		Issues such as caring responsibilities, substance misuse, domestic violence, being ex-armed forces, or an ex-offender can also have a significant impact on income and other aspects of financial exclusion.	<p>Discretionary fund of £100,000 to be established to help those in exceptional hardship. We will work with relevant CVS organisations to ensure that all potentially vulnerable people are aware of this scheme and able to apply.</p> <p>Communicating these changes as early and as clearly as possible will allow potentially vulnerable people and their families time to prepare and adapt.</p>
Effect on Families and Children (including	The latest figures for children living in poverty (2009) show 22% of children in Brighton and Hove live in poverty; approximately 10,555 children. Of those 72.8% live in lone parent	The Brighton & Hove Child Poverty Needs Assessment 2011 and the Brighton & Hove Child Poverty	The Brighton & Hove Child Poverty Commissioning Strategy identifies welfare reform as a key imminent pressure on family income	<p>Operational actions:</p> <ul style="list-style-type: none"> • Welfare reform briefings for key Children Centre staff • Children's Centre programme with Brighton

	Data that you have	Community engagement	Impacts identified	Potential actions
Child Poverty)	<p>households and 77.5% live in out of work families.</p> <p>East Brighton ward has the highest poverty with 46.9% percent of children living in poverty. The Brighton & Hove Child Poverty Needs Assessment 2011 shows in addition that some families have a higher risk of living in poverty, most notably families with a child or parent with a disability, families with larger numbers of siblings, and some BME families.</p>	<p>Commissioning Strategy 2012-15 included an extensive consultation on the drivers and the experience of poverty in the City with statutory and CVS organisations supporting children and families and through CVS organisations with families and young people.</p>	<p>and family health. This was based upon both local consultation as detailed previously. There is also significant national research about both the effects of poverty and persistent poverty on children and families (there are medium and long term impacts of deep and persistent poverty on children's cognitive development, their educational attainment and their health and wellbeing); and specifically the disproportionate impact of welfare reform on children and families.</p> <p>JSNA highlights links between child poverty and families with disabled children e.g. higher proportion of children with disability in East Brighton and Moulsecoomb and Bevendean</p>	<p>Housing Trust advice team to advise on money issues</p> <ul style="list-style-type: none"> • Money Matter campaign pilot using the Family Information Service and health professionals • Family Information Service pilot of health visitor referral for targeted families. • Children's Centre Programme to undertake joint training with Housing and Social Exclusion staff to improve joint knowledge of services. • Promote uptake of free school meals and breakfast clubs in most affected areas. • Promotion of Brighton and Hove Living Wage. <p>Strategy and Planning actions:</p> <ul style="list-style-type: none"> • Identification of vulnerable children and families as a group facing significant pressures as a result of welfare reform within: EIAs, Strategies, Plans and Actions that seek to mitigate the impact of welfare reform. • Considering cumulative impacts of changes, and medium/long term impacts of deep and persistent poverty.

	Data that you have	Community engagement	Impacts identified	Potential actions
Health Impact Assessment	<p>The social model of health (see diagram below) emphasises the impacts that socio-economic factors have on peoples living and working conditions and their health, wellbeing and lifestyles. The current financial recession, welfare reforms and implications for household income and resulting health inequalities are of public health concern.</p> <p>Evidence shows that level of household income affects household health. A review of the impact of the economic downturn and policy changes indicated that the key issues are:</p> <ul style="list-style-type: none"> • Relationship between poverty and mental ill health, particularly among women. The relationship is bi-directional: those with mental health problems are more likely to get into debt and debt is associated with increased risk of mental ill health. • Impact of child poverty on the health and development of children. Including increased risk of mortality in first year of life, lesser personal social emotional development at school start; significantly increased risk of behaviour disorders. These factors consequently impact on educational attainment and mental health throughout the life course. • Impact of low income on healthy living. Households on low incomes are more likely to have insufficient resources to live a healthy life e.g. <ul style="list-style-type: none"> ○ food options/choices – may be inclined to buy more of the many highly processed ‘unhealthy’ foods which are sold at reduced prices ○ reductions in money spent in physical activity pursuits e.g swimming, ○ reductions in expenditure on hobbies, creative pastimes and social activities which have protective effects ○ increase use of unhealthy coping mechanisms to (seemingly) alleviate stress: alcohol, tobacco and drugs <p>Within the population, groups such as disabled people, those with long term conditions and households in fuel poverty are vulnerable to being disproportionately affected.</p>			
	<ul style="list-style-type: none"> • Association between income, debt and mental health (bi-directional) • Brighton and Hove Joint Strategic Needs Assessment (JSNA) highlights higher than average prevalence of mental health problems in City • JSNA and mental health needs assessment identifies needs highest in East of City where proportion of residents affected by changes is highest 		<p>Debt associated with increased risk of mental health problems e.g. stress and anxiety</p> <p>Additional stress on those already managing mental health problems</p> <p>Increased risk of unhealthy coping mechanisms e.g. alcohol, substance misuse, tobacco.</p>	<p>Communication with key health workers i.e. primary care mental health workers, Integrated Primary Care Teams, GPs, health trainers to alert them to potential impacts on people with mental health problems and the areas and population groups most affected.</p> <p>Communication on sources of advice and support, including</p>

	Data that you have	Community engagement	Impacts identified	Potential actions
	<p>JSNA identifies health and wellbeing inequalities and needs in groups identified as most affected by the implementation of council tax support scheme including:</p> <ul style="list-style-type: none"> • Vulnerable groups including LGB people, disabled people, carers • Inequalities associated with socioeconomic deprivation and areas of deprivation (e.g. East Brighton) 		<p>Stress on family relationships</p> <p>Potential increase in need / demand for primary care mental health services.</p> <p>Effect of budgeting – reductions in income forces people to invest time and effort in managing the ramifications and means they have less to spend on supportive behaviours, positive health choices for example:</p> <ul style="list-style-type: none"> • food options/choices – may be inclined to buy more of the many highly processed ‘unhealthy’ foods which are sold at reduced prices • reductions in money spent in physical activity pursuits e.g. swimming, 	<p>debt management, to key health workers.</p> <p>MIND, CRI, Carers Centres East Brighton public health commissioned services informed of changes and sources of further information.</p> <p>In longer term ensure future Mental Health Promotion Strategy under development recognises socioeconomic impacts, including debt, and targets action accordingly.</p> <p>In addition to the actions identified in the EIA, ensure effective targeting of healthy living services to most affected groups and areas e.g. active living, food projects, healthy eating on a budget information, stop smoking services.</p> <p>Integrate with other initiatives e.g.</p> <ul style="list-style-type: none"> • families with complex and multiple needs • carers needs assessments. • Promotion of free swimming for under 16s.

	Data that you have	Community engagement	Impacts identified	Potential actions
			<ul style="list-style-type: none"> • reductions in expenditure on hobbies, creative pastimes and social activities which have protective effects • increase use of unhealthy coping mechanisms to (seemingly) alleviate stress alcohol, tobacco and drugs <p>Long term impact on increased risk of development of long term conditions including diabetes and cardiovascular disease, potentially increasing health inequalities</p>	

3. Prioritised Actions:

NB: you should also highlight here if there is potential for cumulative impact across the service or for a specific group.

Action	Timeframe	Lead Unit	Evidence of progress	Success measure
ADDITIONAL / FULL DETAILS WILL BE ADDED AFTER COUNCIL APPROVAL ON 13 DEC 2012				
Case by case support for the most significantly affected.	Dec 2012 – April 13	CTS Project team	Providing advice provision	
Provide general publicity and communications, staff and third sector training.		CTS Project Team Comms Revs & Bens		
Agree and provide advice and support signposting information with the Advice Services Network.		Revs & Bens		
Use the EIA information to help create the specification for the procurement of advice services to address some of the specific changes.		Equalities & Inclusion Revs & Bens		
We will also work with relevant CVS organisations to ensure information about the scheme is communicated effectively to enable informed decision-making.	Underway	Revs & Bens		
The Revenues department within the Council will review its collection and recovery processes to make sure they fit with this type of bill profile. This will mean a review of internal processes and methods of communications and working with collection partners in the City, for example the magistrates courts.	Underway	Revs & Bens		

Explore ways to request and collect equalities data on all 'protected characteristics' as part of the development of the new system.		Equalities & Inclusion Revs & Bens		
Provide accurate factual information to encourage a constructive debate on this subject, ensure that no positive or negative bias is perceived, and to prevent a negative impact on community cohesion.	Underway	Revs & Bens Comms		
Discretionary fund of £100,000 to be established to help those in exceptional hardship. Guidance will be given to staff administering the scheme to ensure that claims are supported appropriately.		Revs & Bens	Work will be undertaken in conjunction with the CVSF on the administration of the discretionary fund.	
Actions addressing potential impacts of wider welfare reform				
Continue welfare reform briefings for key children centre staff to ensure trusted workers that link with vulnerable families are aware of the arriving and expected financial pressures upon families and may better sign post to advice agencies for benefits and debt.	Complete	Sure Start	All key staff in children's centres are aware of key Welfare Reform changes	The additional knowledge has led to new initiatives e.g. initiation of Fareshare food pick up point at Moulsecoomb Children's Centre
Money Matter campaign pilot (Tarnar Children's Centre) using the Family Information Service and health professionals to gateway booked appointment with advice agencies at the Centre and in the local area.	Complete	Sure Start	Marketed campaign complete. FIS continuing to gateway advice needs with additional support from Brighton Housing Trust Advice Team in Autumn 2012	Evaluation from clients shows reduction/management of debt, additional benefits gained, reduced stress as a result.
Family Information Service pilot has tested a health visitor referral for targeted families. FIS offering a range of support, advice and signposting to advice on money matters, benefits, housing and cost of living issues.	Complete for Tarnar now extended for East Brighton to commence October 2012	Sure Start	FIS completed 3 month pilot offering targeted families using Tarnar Children's Centre services a range of support centred around	Very positive results. The work is now being extended to Roundabout Children's Centre in Whitehawk. Feasibility of expanding it to all parts of

			debt, housing, cost of living and benefit issues	the City now being considered
Children's Centre Programme to undertake joint training with Housing Needs and Social Inclusion. Staff to facilitate better joint knowledge of services and develop deeper knowledge around financial inclusion and money matters – Autumn 2012	November 2012	Sure Start Housing Needs and Social Inclusion		
Communication with key health workers i.e. primary care mental health workers, Integrated Primary Care Teams, GPs, health trainers and other health and wellbeing services to alert them to potential impacts and available support, including debt management.	January 2013	Public Health		
Mental Health Promotion Strategy under development recognises socioeconomic impacts, including debt, and targets action accordingly.	March 2014	Public Health		
Integrate with other initiatives e.g. <ul style="list-style-type: none"> • families with complex and multiple needs • Carers' needs assessments. • Promotion of free swimming for under 16s • Promote uptake of free school meals among those currently eligible 				

Signing of EIA:-

Lead Equality Impact Assessment Officer:

Tracey Wallace

Date: 9th Oct 2012

Head of Unit

Valerie Pearce

Date: 10th Oct 2012

Communities and Equality Team

Sarah Tighe- Ford

Date: 9th Oct 2012

NB: Actions must now be transferred to service or business plans

You must also complete and submit a summary of the EIA in the Publication Template (see below)

4. Attach data and/or engagement lists as appendices.

Title (of data or engagement)	Date	Main findings	Gaps in data	Contact

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Table 6

This shows that the distribution of households in receipt of CTB is not evenly distributed across the city. More than two out five households in East Brighton ward (42%) get CTB compared to only one in ten households in Hove Park ward (10%).

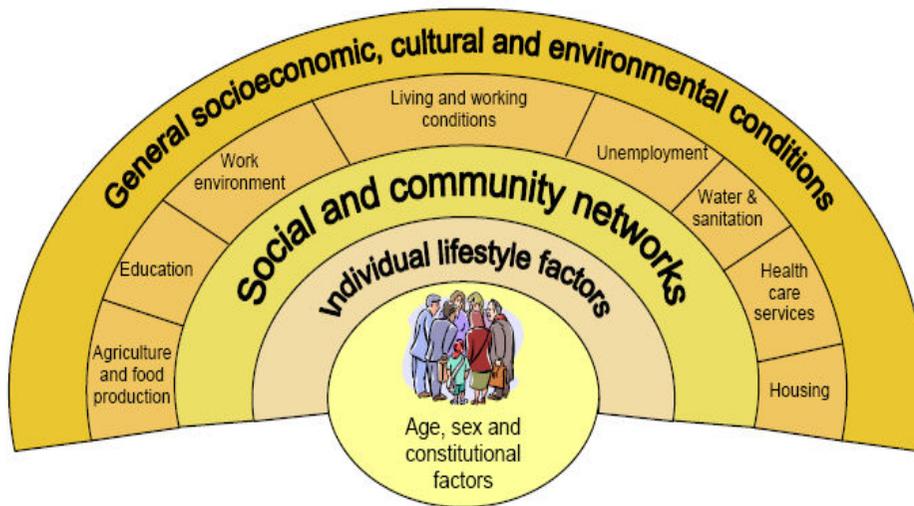
Data Source: Data extract 1578 from the CTB Database, 7 June 2012						
	Households in receipt of CTB	All household (2001 Census)	Percentage of all households	Claimants aged 65 and over	Claimant aged under 65	Percentage of households affected
East Brighton	2,706	6,468	42%	750	1956	30%
Moulsecoomb and Bevendean	1,991	5,601	36%	504	1486	27%
Hollingdean and Stanmer	1,847	5,029	37%	533	1313	26%
Queen's Park	2,580	7,408	35%	877	1702	23%
St. Peter's and North Laine	1,866	7,154	26%	388	1477	21%
Hangleton and Knoll	1,813	5,931	31%	721	1092	18%
Hanover and Elm Grove	1,449	6,101	24%	361	1088	18%
South Portslade	1,011	3,830	26%	350	660	17%
North Portslade	1,051	4,155	25%	363	688	17%
Regency	951	4,980	19%	189	762	15%
Brunswick and Adelaide	1,085	5,426	20%	260	824	15%
Westbourne	953	4,315	22%	303	650	15%
Woodingdean	957	3,822	25%	398	559	15%
Central Hove	986	5,052	20%	284	701	14%
Goldsmid	1,516	7,368	20%	496	1019	14%
Wish	865	3,899	22%	355	510	13%
Preston Park	1,032	6,142	17%	294	738	12%
Patcham	1,041	5,790	18%	430	611	11%
Rottingdean Coastal	812	5,907	14%	333	479	8%
Withdean	749	6,139	12%	294	455	7%
Hove Park	386	3,961	10%	153	233	6%
Not known	162			53	108	
Total	27,809			8689	19111	

Note: the Index of Multiple Deprivation (IMD) 2010 is considered the official measure of deprivation for England. IMD 2010 is based on the small area geography known as Lower Super Output Areas (LSOAs). There are 164 LSOAs in Brighton & Hove. 37 (22%) of Brighton & Hove's LSOAs are in the 20% most deprived areas in England.

Over a third of households (10,553, 38%) in receipt of CTB live in one of these 37 LSOAs.

The Social Model Of Health

The social model of health emphasises the impacts that socio-economic factors have on peoples living and working conditions and their health, wellbeing and lifestyles. The current financial recession, welfare reforms and implications for household income and resulting health inequalities are of public health concern.



Reference: Whitehead and Dahlgren³