

FLINTSHIRE COUNTY COUNCIL

REPORT TO: **CABINET**
DATE: **TUESDAY, 22 JANUARY 2013**
REPORT BY: **HEAD OF FINANCE, CHIEF EXECUTIVE**
SUBJECT: **ADOPTION OF COUNCIL TAX SUPPORT SCHEME -
APRIL 2013**

1.00 PURPOSE OF REPORT

1.01 The report explains the change from Council Tax Benefit to the Council Tax Reduction scheme, addresses the funding implications and the requirement to adopt the scheme by 31st January 2013.

2.00 BACKGROUND

2.01 The current Council Tax Benefit Scheme is to be replaced from 1 April 2013 with a Council Tax Reduction Scheme. In Wales, there will be a national scheme (in contrast to England, where schemes are local to each billing authority.)

2.02 The Council Tax Reduction Scheme in Wales is set by Regulations made under Schedule 1B of the Local Government Finance Act 1992 (as inserted by the Local Government Finance Act 2012). On 19 December 2012, the Welsh Assembly approved two sets of regulations:

- the Council Tax Reduction Schemes (Default Schemes) (Wales) Regulations 2012 ("the Default Scheme Regulations");¹ and
- The Council Tax Reduction Schemes and Prescribed Requirements (Wales) Regulations 2012 ("the Prescribed Requirements Regulations").²

These Regulations prescribe the main features of the Scheme to be adopted by all Councils in Wales.

2.03 Although the Act had given the Welsh Ministers discretion to allow Welsh local authorities to determine the content of their own schemes, the Government took a decision to establish a national framework for the provision of Council Tax Support in Wales. This will avoid what has been termed a "postcode lottery" whereby eligibility for particular groups could be different in different council areas.

¹ These can be accessed: <http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-laid-docs.htm?act=dis&id=241510&ds=1/2013>

² These can be accessed: <http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-laid-docs.htm?act=dis&id=241510&ds=1/2013>

- 2.04 Although a national scheme has been approved, within the Prescribed Requirements Regulations, there is limited discretion given to the Council to apply additional discretionary elements that are more generous than the national scheme and which provide for additional administrative flexibility. These are:
- The ability to extend the standard period of 4 weeks during which council tax reduction will continue after someone starts work;
 - A discretion to increase the amount of War Disablement Pensions and War Widows Pensions which is to be disregarded when calculating the income of the claimant;
 - A discretion to permit claims for council tax reduction to be submitted at offices other than County Hall/Flintshire County Council buildings;
 - A discretion to enhance the process for notification of decisions above the minimum requirements; and
 - The ability to backdate the award of council tax reduction for longer than the new standard period of three months, where a claim has been submitted late.
- 2.05 The Prescribed Requirements Regulations require the Council to adopt a Council Tax Reduction Scheme by 31 January 2013, regardless of whether it applies any of the discretionary elements. If the Council fails to make a scheme, then a default scheme will apply under the provisions of the Default Scheme Regulations. The Council can only apply discretion if it makes its own scheme under the Prescribed Requirements Regulations.
- 2.06 Whether or not the Council wished to adopt any of the above discretionary elements it was obliged to carry out consultation on the adoption of a scheme, even though the provisions were set by the Welsh Government. Because of the tight timescales between the making of the Prescribed Requirements Regulations and 31 January 2013 (by which date the scheme has to be adopted), consultation has been truncated in Flintshire County Council between 17th December 2012 and 14th January 2013. The consultation exercise has been applied by all Welsh Councils and has been based upon the best information available at the time.

3.00 CONSIDERATIONS

- 3.01 The Council's recommended approach to the available discretions is to apply them as outlined in Appendix 2.
- 3.02 It should be noted that there are no additional monies available from the Welsh Government to fund the discretionary elements. The cost of funding similar discretionary elements under the current council tax benefit scheme is outlined in Appendix 2 .
- 3.03 The Council continues to have powers to support hardship on an individual basis or in respect of a defined group. Such arrangements cannot, however, form part of the Council Tax Reduction Scheme itself.

4.00 RECOMMENDATIONS

- 4.01 To note the making of the Council Tax Reduction Scheme and Prescribed Requirements (Wales) Regulations ("the Prescribed Requirements Regulations") by the Welsh Assembly on 19 December 2012.
- 4.02 To note the outcome of the consultation exercise undertaken by the Council on the introduction of the Council Tax Support Scheme.
- 4.03 To adopt the Scheme as set out in Appendix [1].

5.00 FINANCIAL IMPLICATIONS

- 5.01 The Council needs to manage the cost of Council Tax Support within its budget. The amount of government support is limited to £8,772,518 and is provided on a fixed basis rather than the demand-led basis of support to council tax benefit. The Council needs to recognise also that as well as receiving a reduced amount of government support, it is anticipated that there will be an increase in non-collection rates as a result of the increased burden on claimants.
- 5.02 The Council has a duty to recover all outstanding Council Tax balances so that debts owed to the Council are kept to a minimum. With this in mind, the recent introduction of a Corporate Debt Policy should help to minimise the impact of non collection. The policy will ensure fairness for all in that every debtor will have an obligation to repay their debt owed so that future services do not suffer.
- 5.03 Critically, the policy will also ensure the Council and partner organisations will treat all debtors fairly and, where possible we will promote free debt advice services. Where appropriate, payment agreements will be put in place to assist debtors in adverse financial circumstances. Where a customer makes contact to discuss payment difficulties their circumstances will be considered fairly and objectively with a view to agreeing a reasonable payment arrangement, minimising recovery action and avoiding potential additional costs.
- 5.04 The decision to agree a repayment timetable will be influenced by the willingness of the customer to take advantage of the debt advice. Proportionate measures will be deployed to develop a culture of payment and early intervention while encouraging those in need of help to get in touch with the Council at an early stage.

6.00 ANTI POVERTY IMPACT

- 6.01 Wales has been argued to be the most deprived country in the UK. It has also been highlighted that the deprivation present in Wales is comparable to only parts of England, in which a similar "post –industrial setting is found". It may be regarded that Wales faces more significant impacts as a result of changes to the systems of welfare which begin in earnest next year.

- 6.02 The Welfare Reform Programme has recognised the need for proactive work and support to try and mitigate as much as possible the effects on vulnerable residents in Flintshire. Residents may not only be affected by changes to Council Tax Support but may also be affected by other changes to other welfare benefits which are happening at the same time.

7.00 ENVIRONMENTAL IMPACT

- 7.01 None specifically associated with the content of this report.

8.00 EQUALITIES IMPACT

- 8.01 The replacement of Council Tax Benefit with the national support scheme will impact upon many of our low income residents including those in vulnerable groups.

The Council has undertaken a consultation exercise in the limited time available The consultation assists the Council in satisfying the public sector equality duty in the Equality Act.

The Welsh Government has compiled an equalities impact assessment following its consultation³. A local equalities impact assessment has been carried out by the Council and a summary is contained in Appendix 4.

9.00 PERSONNEL IMPLICATIONS

- 9.01 None specifically associated with the content of this report.

10.00 CONSULTATION REQUIRED

- 10.01 Yes

11.00 CONSULTATION UNDERTAKEN

- 11.01 The Welsh Government undertook consultation on Providing Support for Council Tax between February and April 2012. A technical consultation was carried out between 21 September and 19 October on the draft Default Scheme Regulations. No specific consultation has been carried out nationally on the Prescribed Requirement Regulations. An Equality Impact Assessment has been carried out and was submitted to the Minister for Local Government and Communities for consideration alongside the draft regulations.

- 11.02 Local consultation has taken place between 17th December 2012 and 14th January 2013. A summary of the consultation results is contained at Appendix 3.

³ This may be accessed through the following link (Page 16 Appendix A): <http://www.assemblywales.org/bus-home/bus-business-fourth-assembly-laid-docs.htm?act=dis&id=241515&ds=1/2013>

12.00 APPENDICES

Appendix 1 – Summary of the Scheme

Appendix 2 – The Discretionary Elements

Appendix 3 - Summary of Public Consultation

Appendix 4 - Equalities Impact Assessment

LOCAL GOVERNMENT (ACCESS TO INFORMATION ACT) 1985

BACKGROUND DOCUMENTS

Schedule 1B of the Local Government Finance Act 1992 (as inserted by the Local Government Finance Act 2012

Council Tax Reduction Schemes (Default Schemes) (Wales) Regulations 2012 (“Default Scheme Regulations”)

Council Tax Reduction Schemes and Prescribed Requirements (Wales) Regulations 2012 (“Prescribed Requirement Regulations)

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Appendix 1 – Cabinet report

Summary of the Scheme

The Council Tax Reduction Scheme takes all its principal elements from the Council Tax Benefit scheme it replaces. It is a “means tested reduction” but it exists outside the legal framework for other Social Security benefits.

As such the new scheme compares an applicant’s “needs” with regard to age, disability and responsibility for a partner, children, or as a carer to their assessable income and capital. There are disregards from earned income and of some disability benefits, and the capital limit is £16, 000

Applicants with an income in excess of their needs will have their maximum Council Tax Reduction withdrawn at the rate of 20%.

The principal difference to CTB is that the maximum Council Tax Reduction available is limited to 90%, meaning that all applicants, even those on the lowest of income will have to pay at least 10% of their Council Tax bill.

Appendix 2 – Cabinet report

The Discretionary Elements

There are five distinct areas of discretion within the new Regulations and Flintshire County Council proposes to exercise these as follows;

1. Not to increase the “extended reduction period” to more than four weeks when an applicant starts work. This rule currently acts as a good work incentive measure under CTB, and it makes sense to maintain it in line with the Housing Benefit (HB) Extended Payment, which will continue at four weeks. FCC paid Council Tax Benefit (CTB) Extended Payments to the value of £19, 223 in 2011/2012
2. To continue to disregard all War Disablement and War Widows Pensions as income. This measure resulted in £30,297 of CTB expenditure in 2011/2012 and to continue this discretion would follow a long precedent and maintain the link with the Authority’s treatment of this income for HB purposes
3. Not to “designate” non Local Authority offices for the receipt of CTRS forms, as it is thought that this would not improve the service with regard to the security and speed of processing and it may prove difficult to guarantee Welsh language assistance to applicants
4. To maintain the current, extensive provision of information contained in notifications of awards
5. To maintain the standard three month backdating provisions for pensioners (in line with current CTB and HB arrangements) and to use the discretion to increase the period for which working age peoples claims can be backdated from 3 to 6 months when a good reason for failing to claim is shown. This reflects the current position with regard to CTB and HB, and in 2011/2012 FCC awarded backdated CTB claims to the value of £33, 078.

Appendix 3 – Cabinet report

Summary of Public Consultation

1. Consultation took place between 17th December 2012 to 14th January 2013. The consultation took the form of a consultation document and survey (in English & Welsh). It was available on the Councils website. It was also distributed to AMs, MPs, Members and Town & Community Councils. Posters were printed and distributed. There was some face to face meeting with some disability groups and other forums. All 13000+ current Council Tax Benefit customers were written to and informed of the consultation and proposed changes.
2. FCC received telephone 300+ calls from the public following the start of the consultation period and the despatch of the letters.
3. 20 residents asked for the documentation in hard format.
4. FCC received 18 survey documents regarding the consultation survey. 16 “online” and 2 in paper format. Only one was from an organisation and the others from individuals. All were in the medium of English.
5. A number of individual “letters” have been received and concerns are being addressed,
6. A number of general comments were made;

“Benefits exist as people can’t afford a decent standard of living. A reduction is a disgrace and shows how uncaring the government is. Tax the bankers”

“According to the paper can’t touch OAPs. Awful that the poorest are targeted so they have nothing to live on”

“Councils in England and Wales are protecting OAPs, Scotland no change”

“This is fair in the circumstances”

“Low income families depend on Benefits – higher fuel bills – many in Deeside are struggling”

“Unfair on pensioners who have limited income – sounds like you are blaming the UK government for a decision to limit to 90%”

“States 10% this year but what happens next year 20% then 30%.”

“It is intended that the poor in our society is to be squeezed”

“Benefit claimants are on a limited income, budget 10% will impact – people are in fuel poverty...”

“I am diabetic and disabled and need a special diet – 10% will have gone on fuel and food, I will have to go in to hospital and that will cost more”

“I am a single parent with a 2year old with cerebral palsy – I receive DLA highest rate for him so I can’t work”

“As Benefit is already means tested where does the extra income come from?”

“If payments are made to individuals and not landlords – what will be the safety net?”

“HELP! I am struggling to put food on the table and heat my home. Disabled and getting DLA. Every penny counts”

“I think this is crazy – people are already struggling – more depression for low income families”

“Where I am supposed to find the 10% - can I claim this back on my pension credit?”

7. Not many comments were made on the areas of discretion. The Royal British Legion commented that the status quo should be kept for the treatment of War Widows, Disablement Pensions and payments. There was one comment about designated offices that this should be considered. There were 3 comments about extended payments and consideration should be given to 6 weeks, 8 weeks and 6 months respectively. Backdated claims should be 6 months for all.

Flintshire County Council:

**The Council Tax Reduction Scheme in Wales:
The Impact Assessment for Flintshire**

Draft Version 1.0

January 2013

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Executive Summary

The UK government is now undertaking some of the most substantial changes to national welfare benefits in more than 30 years. One of the key elements of these changes, and which is amongst the first to be implemented, is the replacement of Council Tax Benefit from April 2013.

Under Government rules, Council Tax Benefit is repealed, and is replaced by Council Tax Reduction. The changes to this benefit have two critical elements: firstly that responsibility for the determination of local schemes is delegated to a local level; and secondly that a funding cut of 10% of the cost of awards is applied. The funding cut, for the whole of Wales is in the region of £24m for 2013/14.

Wales has been argued to be the most deprived country in the UK. It has been argued that the deprivation present in Wales is comparable to only parts of England, in which a similar "post-industrial" setting is found. Accordingly, there are high levels of household dependency upon welfare benefits, and it may be argued that Wales faces more significant impacts as a result of changes to systems of welfare which begin from next year.

In Wales, the Welsh Government has determined to introduce a common scheme for Council Tax Reduction which will apply throughout the country. Under the scheme proposed, the funding cut of 10% will be passed to those in receipt of Council Tax Reduction, through the use of a 90% maximum amount of Council Tax Reduction rather than the 100% maximum which has been possible under Council Tax Benefit.

All of the Welsh Authorities have co-operated on this Impact Analysis, and there is as a direct consequence a strong opportunity to make comparisons with the Impact Analysis which has already been completed in respect of Wales by the Welsh Government. Throughout Wales, it has been possible to reach some conclusions on the same protected characteristics as within the whole Wales assessment. However with access to each Council's data, it is also possible to examine the potential impacts on those Characteristics at an individual Council level.

While for the whole of Wales the conclusions are similar to those of the Welsh Government, there are variations at a local level. For the Council, the key variations from the whole Wales findings are in terms of Age, Disability, Race and Gender. The specific findings in support of these overarching conclusions are explored in section 4 following.

The purpose of this report is to consider the effect on different groups who are protected under the Equality Act by discussing the potential effects of the proposed changes on such groups, and to ensure that the Council meets its public sector equality duty.

January 2013

1 Introduction and Overview

1.1 Background

The Government is committed to implementing the most significant changes to national welfare systems that have been seen in more than thirty years. The change programme begins in earnest from next year, and the changes to Council Tax Benefit will take effect from 2013. The implementation timetable is extremely demanding.

1.2 The Protected Characteristics

Under the Equality Act 2010, public authorities will consider the potential impact of proposed policy changes with regard to the following statutory Protected Characteristics:

- Age;
- Disability;
- Gender;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race
- Religion or belief;
- Sexual orientation.

1.3 This Report

This report is constructed to enable an informed decision making process, and with reference to the following sections:

- **At section 2:** A summary of the statutory changes which must be implemented from April 2013, and under which Council Tax Benefit is repealed, and replaced by Council Tax Reduction;
- **At section 3:** A summary of the relationship between each Council's Impact Analysis, and the scheme which is proposed for the whole of Wales, and the consequent Impact Analysis of the Welsh Government;
- **At section 4:** A summary of the equality impacts of those options within the Council;
- **At section 5:** A summary of analysis of the overall trends within the Council's Council Tax systems, and to begin planning and forecasting for the cost of the Council Tax Reduction scheme;

- **At section 6:** A summary of the mitigating steps which may be considered as appropriate; and
- **At section 7:** Overall conclusions and recommendations.

2 The Council Tax Reduction Scheme

2.1 Overview

This section explains the key points about the Council Tax Reduction scheme which must be implemented from April 2013, within the context of what is currently known about the changes underway within the national welfare benefits system. It is to be stressed that the Government is attempting the most significant changes to welfare that have been seen for at least 30 years. Indeed the Institute for Fiscal Studies have argued in their study for the options for Wales that the changes to be faced are the greatest in 40 years.

While the broad scale of change is not disputed, some of the detail of proposed change is not yet known. An additional complicating factor is the speed with which the change programme is being attempted. There is an extent to which, therefore, the changes to Council Tax operate within a context of wider welfare reform that is very much still under development.

In summary, the key changes to welfare may be considered as follows:

- From **April 2013**, Wales will implement the replacement scheme for Council Tax Benefit;
- From **April 2013**, new approaches will also apply for welfare support, under which one-off payments for specific purposes are managed, including some currently managed by the Department for Work and Pensions (DWP) which is currently responsible for the administration of Crisis Loans and Social Fund payments. In Wales, a common national scheme will apply, administered by a partnership of Northgate Public Services, Family Fund trading & Wrexham County Borough Council;
- From **October 2013**, the Government's flagship changes to national welfare payments under Universal Credit begin in earnest.

It is anticipated that as the above implementations proceed, and as the necessary policy changes to "fine tune" systems are identified, that further changes may be applied by the Government.

As a consequence of the volatile change environment which is described here, the Welsh Government has determined to implement a scheme of Council Tax Reduction which will initially apply for only one year from April 2013.

2.2 The Council Tax Reduction Scheme

Overview

The UK Government currently administers the appropriate provisions for reductions in Council Tax payments through two different Departments, the Department for Work and Pensions (DWP), and the Department for Communities and Local Government (DCLG). The DCLG have driven the programme for the reform of Council Tax Benefit.

Currently, Government grant for Council Tax Benefit is designed to largely match actual expenditure, and is claimed at the end of the year through the Council Tax Benefits Subsidy system. Grant for the Council Tax Reduction scheme will be cash limited, and is intended to cost the Government 10% less than the current scheme. Local schemes are therefore expected to be less generous than the current scheme.

Although the UK Parliament enacted primary legislation for these changes in November, much of the detail of the schemes is provided via Regulations, which could not be laid until the overarching primary legislation was passed. In Wales, the National Assembly for Wales was recalled on the 19th December to determine the main scheme regulations.

Overall Financial Impact

Under current arrangements, which have applied since 1993, the lowest income households identified by a statutory means test are entitled to a maximum of 100% benefit award against Council Tax Liability.

The UK Government has decided to make savings in the cost of awards for Council Tax Benefit, and has calculated a 10% cut **in the overall cost of Council Tax Benefit** which will be applied to each Council.

Under the scheme for Wales, the 10% cut will be passed across to those receiving Council Tax Reduction from April 2013 by applying a 90% maximum eligible amount of Council Tax. The key impacts of this approach on customers may be summarised:

- All of those households currently receiving Council Tax Benefit will be required to contribute something towards the cost of their Council Tax, including those households currently receiving 100% relief;
- Some households, currently receiving smaller awards of reduction because of earned income will receive no relief at all under the 90% maximum eligible amount of Council Tax award policy;
- Pensioners will not receive automatic protection from the Scheme in Wales, and will be applicable to the Wales scheme in the same way as Working Age households.

Overall Financial Impact: Claim Groups

The overall value of claims for the Council is summarised as follows:

Table 1: Claims distribution, Working and Pension Age:

Claim type	Value (£)	%
Working Age	4,788,348	50.5%
Pension Age	4,705,263	49.5%
Total	9,493,611	

The overall value of claims, as at December 2012 is £9.5m, of which £4.78m is paid in respect of Working Age claims and £4.71m in respect of Pensioner claims.

2.3 Other Changes in Welfare from 2013

From October 2013, the DWP's proposed changes to national welfare payments under the Universal Credit system begin in earnest.

Under current government plans, transitional arrangements to the new Universal Credit system will begin from October 2013, with a phased implementation by claim type. New claimants from October 2013 will be the first to go through the new system, with other claim groups including existing claimants of working and of pensionable age coming later. Under current government proposals, Universal Credit will be a single payment to successful claimants for all living costs, including for rent where applicable.

2.4 Context to the Impacts: A Brief Reminder on National Welfare Reforms

Council Tax Reduction is only a part of wider changes to welfare reform which are being completed by the Government. As the Council considers the potentially significant impacts of proposed changes to local welfare which must be considered, a brief reminder of that national context is summarised:

- The UK Government is committed to the most significant review of welfare that has been seen, possibly for 30 years and arguably since national systems of welfare were originally conceived after the Second World War. While the CTR is implemented from April 2013, this is not the only change in welfare which is underway;
- All the changes which are to be made to national welfare systems cannot yet be fully assessed, and indeed some of the details are not yet known. However it might be argued that some broad principles are emerging, as follows:
 - The UK Government appears to be positioning future policy to apply more cuts to the welfare budget;

- Some independent policy specialists have indicated that a prolonged period of reductions in Government spending may well now apply until 2020⁴;
- Whoever follows the coalition, it is now difficult to see how further cuts cannot be envisaged. The policy choice is simply where they will be applied;
- Current Government policy appears, in particular to be targeting cuts to households which are larger households; are longer term recipients of Welfare; are younger; or are otherwise in receipt of larger value awards;
- Recent policy announcements from the Government appear to be significantly strengthening the position which is proposed for welfare for families in longer term receipt of welfare and for those families making life choices while on welfare. Such "life choices" may include decisions which currently have the effect of increasing welfare payments, for example having additional children.

⁴ Tony Travers, Director, Greater London Group, London School of Economics. Conference paper to the Institute of Revenues, Rating and Valuation October 2012.

3 The Options Summary

3.1 Overview

This section summarises the relationship between the approach taken for the Council, and the adoption of the whole Wales scheme.

3.2 Key Decisions and Responsibilities

The pattern of changes to welfare reform which begins from April covers a series of measures for which different parties have responsibility. As regards the Council Tax Reduction Scheme the key responsibilities and relevant parties may be summarised as follows:

- The UK **Department for Communities** have determined to repeal rules for the administration of Council Tax Benefit, and replace those systems of welfare with Council Tax Reduction from April 2013;
- The **Welsh Government** have implemented an overall scheme of Council Tax Reduction which applies for the whole of Wales, and which will apply a scheme with a maximum eligible Council Tax set at 90%; and
- **Billing Authorities**, including the Council must implement and administer the local schemes.

3.3 The Wales Scheme

The Welsh Government has determined to implement a scheme for the whole of Wales, and which will apply as follows:

- That the maximum eligible amount of Council Tax Reduction which will apply is 90%;
- That no Second Adult Rebate will apply; and
- That the scheme will apply for one year only from April 2013.

In addition, the Scheme allows for the determination of some elements of the scheme by the local Billing Authority, and as follows:

- The approach to extended payment;
- The rules for backdating of awards
- The rules for the treatment as income of specified payments in respect of War Widows or Armed forces compensation; and
- The approach in respect of notifications of awards.

3.4 Underpinning Evidence and Impact Assessment for Wales

The Welsh Scheme as developed and implemented by the Welsh Government is supported by separate analysis and published supporting evidence, which should be considered together with the Impact Analysis of the Council. That underpinning evidence for the whole Wales scheme includes:

- The report of the Institute of Fiscal Studies completed for the Welsh Government and the Economic and Social Research Council, "Reforming Council Tax Benefit, Options for Wales"; and
- The Impact Analysis completed by the Welsh Government and published October 2012 for the Impact Assessment of the proposed changes.

3.5 The Financial Envelope

The Government is imposing a reduction in the funding of Council Tax Reduction at the same time as localising decision making for the scheme of awards. The reduction proposed is significant, and if the Council chooses not to pass on the cost of the cut, then that money must be found from other sources.

Although the systems must be implemented very soon now, we still do not yet have final funding figures from the DCLG. The draft methodology which the DCLG and Welsh Government have together applied is summarised:

1. Take the overall estimated cost of Council Tax Benefit which the DWP have calculated for 2013/14;
2. Take the actual awards of Council Tax Benefit made by Billing Authorities during 2011/12, as calculated by DWP;
3. Share the 2013/14 budget out in the proportions of spend for 2011/12;
4. Apply the whole Wales scheme reduced maximum amount of Council Tax Reduction of 90%.

While the calculation removes 10% of the estimated cost at a national level, the impact locally is expected to be very different. This is for the following reasons:

The proposed approach takes no account of:

- Any increase in tax which may be applied in 2013/14;
- The increase in the costs of awards under the scheme, and as claimants increase, or as claimants become eligible for more help (and to the extent that the experience in the Council differs from the national assumptions made by the OBR, DWP and DCLG); and

- Provision for bad debt which should be calculated for this part of the Council Tax, and which is likely to be at a much higher percentage than for Council Tax Payers generally.

The trend analysis which begins to inform how this budget may behave from next year is commenced at section 5 below.

3.6 The Impacts by Options within the proposed Scheme

Under the Welsh scheme, local discretions are enabled in four areas, briefly described in the following table with reference to any potential links with protected characteristics.

Table 2: Impacts of options within draft scheme:

Element of proposed Local Scheme	No. Claims Affected	Equality Issue for consideration	Protected Characteristic of those affected
1. Backdating	TBA	It may be argued that people with no familiarity with UK benefits systems are more likely to require backdating.	Race
2. Extended payments	TBA	None identified	None identified
3: War Widows allowances	TBA	None identified	None identified
4. Notification letters	TBA	None identified	None identified

3.7 Local schemes: The Impact of allowances for War Widows

The incidence of allowances in respect of War Widows pensions and so on in the claims population suggests the following value of claims:

Table 3: The Value of claims and War Widows allowances

	No.	Value
War Widows Pension, pre 1973	5	3,884
War Widows Pension	7	5,008
War Widows Disablement pension		
War Pensions Mobility Supplement	3	3,022
War Widows supplementary pension		
War disablement pension	50	43,244
Payments under Armed Forces Compensation scheme	1	697
Total	66	55,855

4 Overall Impact Assessment

4.1 Overview

This section attempts to summarise the key impacts which may arise from the Council's proposed Local Scheme of support. The approach attempts to consider those impacts, where it is possible, with reference to the "Protected Characteristics" which the Council has a duty to consider.

The remainder of this section is organised as follows:

- At para 4.2- 4.4 below, a brief explanation of the relationship with the Wales Impact Assessment, and of the approach to the analysis;
- At paras 4.5- 4.10 below a discussion of the potential incidence of the Protected Characteristics within the claim population;
- At paras 4.12- 4.15 overall interim conclusions are introduced.

4.2 Relationship between Impact Assessments

Although the data sources utilised are different, there is significant common ground over the extent which data can be gathered to reach conclusions in respect of Protected Characteristics. Both the Welsh Government's Impact Analysis, and the impact analysis of the Council have been able to capture and analyse data which has enabled the determination of possible impacts in relation to the following Protected Characteristics:

- Age;
- Disability
- Race; and
- Gender.

Insufficient information has been determined to enable initial conclusions in respect of gender reassignment; marriage and civil partnership; pregnancy and maternity; religion or belief; and sexual orientation. While the changes proposed under the Council Tax Reduction scheme are not designed or intended to militate against people within any protected characteristic, the Council does not, as regards these protected characteristics have sufficient information to reach any conclusions about the way in which the proposed changes may impact upon them.⁵

4.3 Approach to data

There are two main sources of data which have been used to complete this initial assessment, as follows:

- For a detailed analysis of the individual Council records which underpin Benefits administration currently, the Datatank analytical

⁵ Welsh Government Equality Impact Assessment for the Council Tax Reduction, December 2012

product which has been procured for Wales has been used to complete that assessment. This provides an analysis of “real time” data, which is accurate at December 2012, and which is an analysis of all Council records of claims in payment at that date; and

- In some instances, it has been possible to use published sources of nationally available information, and to support the Impact Analysis in aspects of the data which are not otherwise available from individual Council records. In particular, it has been possible to use:
 - published data from the DWP to enable profiling of Council Tax Benefit costs per authority, and profiling of the increase in the cost of awards over recent years; and
 - separately information from the Office of National Statistics (ONS) which has enabled higher level information regarding ethnic background of the population of Wales, as well as to provide information explaining the incidence of Welsh Language skills.

In all regards, it to be stressed that, insofar as this initial data analysis is concerned:

- The change to Council Tax Reduction from next year, including particularly the change in funding which passes a significant part of the cost of awards to the local authorities means that for the first time, Billing Authorities are responsible for, and bear the cost of part of the awards;
- There a very significant extent to which local Councils now bear a part of the risk of any increase in costs which occurs; and
- For the first time, planning for and managing the profile of claims under Council Tax Reduction will impact directly upon the costbase of Billing Authorities. It is therefore highly likely that Councils will have a significant interest in monitoring and managing forecasting of the cost of awards.

4.4 Data Sources: Wales and Local Council Analysis

The analysis which has been completed for the Welsh Authorities shows many similarities with the analysis which has also been completed for the whole of Wales by the Welsh Government. Although some of the actual percentages calculated vary, the broad conclusions of which protected characteristics may be subject to the calculation of an impact; and in which regard the incidence of such characteristics is present within the population is common.

It is suggested that there are two key reasons which are likely to account for differences in some values:

- The extent to which the data used within the Council analysis represents live data analysed at December 2012, as opposed to survey data from 2007-2010 and modelled for the whole of Wales;

- The extent to which, as the IFS and the Wales Impact assessment already conclude, that the Family Resources Survey contains a limited sample of Welsh data; and
- Natural differences which will occur over the time between some of the earliest data which has been used within the Whole Wales Impact Analysis at 2007 and 2012.

4.5 Summary of Impacts by Household Type

Within the following table, we summarise the impacts which may be considered in relation to segments of the local population eligible to receive Council Tax Benefit and Council Tax Reduction. There are some impacts of the overall scheme which are likely to be common to all people receiving Council Tax Reduction under the Council's Local Scheme from April 2013, and those are shown below.

The Council's summary of impacts shown in this section is underpinned by a variety of data sources, including:

- The research which has been completed by the Council to support the preparation of the Impact Analysis of the Council Tax Reduction scheme;
- Other sources of appropriate external and internal research which are where referenced specifically explained with footnotes or otherwise.

Table 4: Impacts by Household Type:

No.	Household Type	Equality Issue for consideration	Protected Characteristic of those affected	No.
Pensioner Age Claimant Households				
1.	Pensioner Claims (All)	Under the national Wales scheme, pensioner households will be liable for increases in tax in the same way as Working Age claimants	Age	6,340
People with responsibility for young children				
2.	Households with children	People with responsibility for children under five years People with responsibility for children under 16	Age	1,581 3,466
Disabled Households				
3.	Working Age , people with	The whole working Age population bears the proposed impacts of the scheme equally. However some	Disability	1,543

No.	Household Type	Equality Issue for consideration	Protected Characteristic of those affected	No.
	disability	groups with protected characteristics face the greatest barriers to work and as such are disproportionately represented within the claims population. This includes people with disabilities.		
4.	Pensioner Age, people with disability		Disability, Age	1,650
Single parents				
5.	Working Age, Single Parent, female	Single parent families have higher numbers of claimants who are female. Women who are single parents and receiving CTR may therefore disproportionately receive the impacts of payment of the tax, and of enforcement actions taken to recover unpaid tax. ⁶ 93% of single parents within the Council's claim population are female	Gender	2,316

There are additional protected characteristics under the Equality Act which could also be dis-proportionally represented within the claims population because of barriers they are likely to experience to work, but for which the Council currently does not have sufficient data within Revenues and Benefits records to reach any conclusions. These include gender reassignment; pregnancy and maternity; religion or belief and sexual orientation.

4.6 Summary of the Overall Value of claims by Protected Characteristic

The following table summarises, in addition to the number of households which may be present within the claims population with protected Characteristics, the value of such claims:

Table 5: Summary of claims value and Protected Characteristic:

⁶ Warwick Business School and Coventry Women's' Voices, 2012

	No.	Value
Age: a) Pensioner Claims	6,340	4,705,263
b) Working Age claims	6,761	4,788,348
c) All claims	13,101	9,493,611
Age: young children, a) Under 5:	1,581	1,158,811
b) Under 16:	3,466	2,587,816
Disability: working age households in which specified benefits in payment	1,543	1,143,739
Disability: Pensioner households in which specified benefits in payment	1,650	1,246,809
Gender: Single Parents, a) female	2,316	
b) male	128	

4.7 Analysis of protected characteristic: Age, Working and Pensioner Age

The table below shows the distribution of working and pension Age claims for the Council, together with the anonymised details of the other participating Councils in Wales.

Table 6: Working and Pension Age Claims

Council	Working Age		Pensioner Age		Total	
	No	Value	No	Value	No	Value
Council A	17,602	12,992,508	12,241	9,196,939	29,843	22,189,447
Council B	11,771	7,809,146	8,778	5,708,226	20,549	13,517,372
Council C	3,153	2,427,071	2,776	2,324,741	5,929	4,751,812
Council D	6,180	4,362,377	5,843	4,471,071	12,023	8,833,448
Council E	5,859	4,821,670	5,120	4,488,446	10,979	9,310,116
Council F	5,428	4,108,392	5,811	4,795,451	11,239	8,903,843
Council G	9,862	6,183,513	6,089	3,921,379	15,951	10,104,892
Council H	6,545	5,030,079	4,579	3,727,459	11,124	8,757,538
Council I	11,338	9,069,057	7,956	6,565,470	19,294	15,634,527
Council J	5,230	3,873,948	5,198	4,191,063	10,428	8,065,011
Council K	7,948	5,504,081	6,111	4,563,464	14,059	10,067,545
Council L	3,585	2,549,773	3,375	2,561,145	6,960	5,110,918
Council M	6,359	4,978,157	4,292	3,282,446	10,651	8,260,603
Council N	9,431	7,539,136	6,298	5,103,729	15,729	12,642,865
Council O	10,103	7,491,693	8,649	6,709,762	18,752	14,201,455
Council P	4,860	3,611,677	3,020	2,251,146	7,880	5,862,823
Council Q	6,265	3,652,971	5,392	3,470,388	11,657	7,123,359
Council R	15,867	10,707,329	11,205	8,196,356	27,072	18,903,685
Council S	3,519	3,098,553	3,277	2,951,343	6,796	6,049,896
Council T	6,485	4,681,756	4,643	3,336,680	11,128	8,018,436
Flintshire	6,761	4,788,348	6,340	4,705,263	13,101	9,493,611
Total	164,151	119,281,235	126,993	96,521,967	291,144	215,803,202

Interim Conclusions:

- The Council's overall value of claims is towards the average cost of claims in Wales. The Councils with the larger caseloads may be argued to bear a consequently larger share of the financial risk which is being delegated to local government under the changes in funding for Council Tax reduction, and in the event that claims costs increase but funding does not;
- The Council has a total of 13,101 customers currently receiving Council Tax Benefits, which have been calculated under current rules with reference to the 100% maximum eligibility. Under the changes from this April adopted by the Welsh Government, the maximum eligible Council Tax for the calculation of Council Tax Reduction for all of these customers will be 90%;
- 6,761 of these customers are Working Age, and 6,340 are pensioner households.

Table 7: Percentage of Working and Pension Age Claims, by value

Council	Working	Pensioner
	% Value	% Value
Council A	58.55%	41.45%
Council B	57.77%	42.23%
Council C	51.08%	48.92%
Council D	49.38%	50.62%
Council E	51.79%	48.21%
Council F	46.14%	53.86%
Council G	61.19%	38.81%
Council H	57.44%	42.56%
Council I	58.01%	41.99%
Council J	48.03%	51.97%
Council K	54.67%	45.33%
Council L	49.89%	50.11%
Council M	60.26%	39.74%
Council N	59.63%	40.37%
Council O	52.75%	47.25%
Council P	61.60%	38.40%
Council Q	51.28%	48.72%
Council R	56.64%	43.36%
Council S	51.22%	48.78%
Council T	58.39%	41.61%
Flintshire	50.44%	49.56%
Total	55.27%	44.73%

Interim conclusions:

- The Council has a lower than average incidence of Working Age claims, at 50.44%; and
- Consequently, a higher than average incidence of pensioner claims at 49.56%;
- The Council's overall share of pension age claims is towards the highest in Wales.

4.8 Analysis of protected characteristic: Age, Households with Children

The table below shows the distribution of working and pension Age claims for the Council, together with the anonymised details of the other participating Councils in Wales.

Table 8 Age: Households with responsibility for Children

Council	Households with children under 16			
	Total No.	Value	Total Claims	%
Council A	8044	6,081,093	22,189,447	27.41%
Council B	5478	3,745,059	13,517,372	27.71%
Council C	1219	998,430	4,751,812	21.01%
Council D	2780	2,062,746	8,833,448	23.35%
Council E	2736	2,377,108	9,310,116	25.53%
Council F	2424	1,888,087	8,903,843	21.21%
Council G	4740	3,134,123	10,104,892	31.02%
Council H	3274	2,589,722	8,757,538	29.57%
Council I	4846	3,981,814	15,634,527	25.47%
Council J	2063	1,598,718	8,065,011	19.82%
Council K	3841	2,697,193	10,067,545	26.79%
Council L	1522	1,119,147	5,110,918	21.90%
Council M	2562	2,092,947	8,260,603	25.34%
Council N	4269	3,522,202	12,642,865	27.86%
Council O	4428	3,433,616	14,201,455	24.18%
Council P	2142	1,588,766	5,862,823	27.10%
Council Q	2812	1,710,783	7,123,359	24.02%
Council R	6508	4,497,720	18,903,685	23.79%
Council S	1536	1,410,278	6,049,896	23.31%
Council T	2852	2,130,786	8,018,436	26.57%
Flintshire	3466	2,587,816	9,493,611	27.26%
Total	73542	55,248,154	215,803,202	25.60%

Interim Conclusions:

- The Council has a higher than average number of households with responsibility for children aged under 16 years of age, when considered with reference to the percentage of households in which there are children under 16.

4.9 Analysis of protected characteristic: Disability

The Office for National Statistics (ONS) have published, as part of the 2011 Census, data confirming the high incidence in Wales of people with a long term health problem or with disabilities. Data published in 2012 by the ONS confirms that 23% of residents in Wales have indicated a long term illness or disability, which is the highest percentage of any region in England and Wales.

The barriers which are faced to work by people with disabilities are likely to mean that there will be higher numbers of people with disabilities within the claims population. Using a test of counting people with a "qualifying benefit" to understand the numbers of people with disabilities

which may be present within the claims population allows an estimate to be made of the incidence within the claims population of people with disabilities. In the following table, the qualifying benefit which has been counted are:

- Care component of a Disability Living Allowance (Low, Middle or High);
- Attendance Allowance;
- Support component of Employment Support Allowance; and
- Incapacity Benefit.

Table 9: Households in which specified disability payments received

	Disability		Total Claim	%
	No.	Value	Value	
Council A	13001	10329380	22189447	46.55%
Council B	8018	5567858	13517372	41.19%
Council C	2058	1732476	4751812	36.46%
Council D	3304	2575758	8833448	29.16%
Council E	3854	3558183	9310116	38.22%
Council F	3317	2799832	8903843	31.45%
Council G	4783	3253867	10104892	32.20%
Council H	4523	3841233	8757538	43.86%
Council I	9532	8304653	15634527	53.12%
Council J	4125	3407069	8065011	42.25%
Council K	3980	3073613	10067545	30.53%
Council L	2556	2006129	5110918	39.25%
Council M	4103	3344756	8260603	40.49%
Council N	4588	3823057	12642865	30.24%
Council O	8236	6622953	14201455	46.64%
Council P	3546	2818764	5862823	48.08%
Council Q	4442	3004952	7123359	42.18%
Council R	11981	8937245	18903685	47.28%
Council S	2148	2056256	6049896	33.99%
Council T	4028	3098773	8018436	38.65%
Flintshire	3193	2390548	9493611	25.18%
Total	109316	86547355	215803202	40.10%

Interim Conclusions:

- There are a number of approaches which could be taken to evaluating the scale of incidence of people with disabilities within the claims population, and each has their own advantages and disadvantages;
- The above approach has been taken to both provide a degree of clarity in the test applied, through a qualifying benefit, and to attempt to mitigate against the risk of double counting;

- Nonetheless, this is likely to be an area of the evaluation which the Council will wish to keep under review, and amend as necessary; however
- Wales, however is found by the ONS within the 2011 Census to have the highest incidence of people with disabilities or with a long term illness in England and Wales, so it is to be expected that there will be a higher incidence of People with disabilities within the claims population.
- The Council has the lowest incidence in Wales of People with disabilities, when considered by the above qualifying benefits.

4.10 Analysis of protected characteristic: Gender, Single Parents

The table below shows the distribution of single parent claims for the Council, together with the anonymised details of the other participating Councils in Wales.

Table 10: Single Parents Households

Council	Single Parents			Total Claims	% Single Female	% of whole claim
	Male	Female	total			
Council A	309	5377	5686	29843	94.57%	18.02%
Council B	197	3435	3632	20549	94.58%	16.72%
Council C	74	675	749	5929	90.12%	11.38%
Council D	125	1704	1829	12023	93.17%	14.17%
Council E	125	1663	1788	10979	93.01%	15.15%
Council F	114	1519	1633	11239	93.02%	13.52%
Council G	182	3176	3358	15951	94.58%	19.91%
Council H	121	2256	2377	11124	94.91%	20.28%
Council I	195	3191	3386	19294	94.24%	16.54%
Council J	112	1269	1381	10428	91.89%	12.17%
Council K	138	2470	2608	14059	94.71%	17.57%
Council L	75	923	998	6960	92.48%	13.26%
Council M	101	1628	1729	10651	94.16%	15.28%
Council N	165	2868	3033	15729	94.56%	18.23%
Council O	172	2518	2690	18752	93.61%	13.43%
Council P	77	1484	1561	7880	95.07%	18.83%
Council Q	105	1655	1760	11657	94.03%	14.20%
Council R	268	4478	4746	27072	94.35%	16.54%
Council S	64	963	1027	6796	93.77%	14.17%
Council T	111	1823	1934	11128	94.26%	16.38%
Flintshire	128	2316	2444	13101	94.76%	17.68%
Total	2958	47391	50349	291144	94.13%	16.28%

Interim Conclusions:

- The Council has higher than average numbers of single parents than the whole of Wales average;
- There remain very high numbers of single parents who are female;
- There is a very high consistency within the analysis of single parents for the overall findings with the whole Wales analysis.

4.11 Analysis of protected characteristic: Race

During December 2012, the Office for National Statistics published data from the 2011 census which showed the ethnicity of the population at the Census date of March 2011. The data shows the profile both at the level of each country in the UK, and as well as for each local authority. The whole Wales summary is as follows:

Table 11: Ethnic Background in Wales

	Percentage of population, by Ethnic Background						
	Total Population	White British	White other	Mixed heritage	Asian (All)	Black (All)	Other (All)
Wales	3,063,456	93.2	2.4	1.0	2.2	0.6	0.5
Isle of Anglesey	69,751	96.6	1.7	0.8	0.7	0.1	0.3
Gwynedd	121,874	94.4	2.1	0.8	1.7	0.3	0.7
Conwy	115,228	95.4	2.3	0.8	1.1	0.1	0.3
Denbighshire	93,734	95.6	1.8	0.9	1.6	0.1	0.1
Flintshire	152,506	95.9	2.7	0.6	0.8	0.1	0.1
Wrexham	134,844	93.1	3.9	0.7	1.7	0.4	0.2
Powys	132,976	96.1	2.3	0.6	0.9	0.1	0.1
Ceredigion	75,922	93.1	3.6	1.0	1.4	0.3	0.5
Pembrokeshire	122,439	95.6	2.5	0.6	1.1	0.1	0.1
Carmarthenshire	183,777	95.5	2.6	0.6	1.1	0.2	0.2
Swansea	239,023	91.5	2.5	0.8	3.2	0.8	1
Neath Port Talbot	139,812	96.9	1.1	0.7	1.0	0.2	0.1
Bridgend	139,178	96.0	1.7	0.7	1.1	0.2	0.2
Vale of Glamorgan	126,336	94.4	2.1	1.3	1.6	0.4	0.2
Cardiff	346,090	80.3	4.4	2.9	8.0	2.4	2
Rhondda Cynon Taf	234,410	96.3	1.0	0.6	1.3	0.5	0.2
Merthyr Tydfil	58,802	94.6	3.0	0.9	1.2	0.2	0.2
Caerphilly	178,806	97.3	1.0	0.8	0.8	0.2	0.1
Blaenau Gwent	69,814	97.3	1.1	0.6	0.7	0.1	0.1
Torfaen	91,075	96.9	1.1	0.7	1.1	0.2	0.1
Monmouthshire	91,323	96.1	1.9	0.8	1.0	0.1	0.2
Newport	145,736	87.0	2.9	1.9	5.4	1.7	1

Interim conclusions:

- The Office for National Statistics data summarised above is publicly available data. It is therefore possible to analyse that data for both the whole of Wales, and to show each Council's data;
- The Office for national statistics confirm, in the overarching analysis of this data table, that while London is the UK's most diverse city, the country of Wales is the least diverse region in England and Wales;
- The Council is consistent with the overall findings for Wales, and has a very high incidence of White British population, with very low incidence of diversity;
- To assist with the analysis of the data, and as overall Wales has the lowest incidence of diversity in England and Wales, the analysis of ethnicity has been taken up to a higher level, to group, for example, all types of Asian, Black, Mixed Heritage and Other backgrounds;
- It is to be noted that within the Census survey, the ONS report that the box for "White British" was labelled "White English, Welsh, Scottish, Northern Irish, British";
- Against a national average of 80.5% for England and Wales of "White English" the Wales scores are accordingly much higher throughout Wales, extending to 96.9% in both Torfaen and Neath Port Talbot Councils.

4.12 The Impacts of the proposed changes: All Households

The proposed Local Scheme seeks not to disadvantage any particular group. However, as a simple product of the profile of the overall population currently receiving Council Tax Benefit or entitled to Council Tax Reduction from April 2013, some groups with protected characteristics will be disproportionately represented within the claims population because they face greater barriers to finding work. People facing Council Tax liabilities under the changes will experience negative impacts because of the requirement that they contribute towards Council Tax. Pensioner claimants; People with disabilities; people with responsibility for young children (which includes greater numbers of women as the primary carer); and people who are very recent migrants to the UK and who may have little knowledge of English, all face greater barriers to the workplace.

Nonetheless the principle impacts which are faced by all claimants under the Council's proposed scheme may be summarised as follows:

- Under the Council's proposed scheme, all of those in receipt of Council Tax Reduction will be required to pay something towards their Council Tax. Under current Government proposals, claimants facing such changes will not receive any additional payments. There

will therefore be the issue of **how those households receiving Council Tax Reduction pay their Council Tax;**

- The proposed Wales scheme will not provide protection for pensioners. The scheme provided will neither provide local discretion for the determination of Vulnerable People.
- All of the households affected by the changes will be low income households. This is an inevitable impact of Government changes to national welfare systems. As a consequence there may be **issues of debt management, and how households avoid further debt burdens or additional costs through non-payment;**
- When Council Tax which becomes due under the Council's scheme is not paid, the Council will be obliged to collect and recover that tax. **The impacts of those enforcement measures may be disproportionately felt by people in the claims population with disabilities, people with responsibility for young children, women, and pensioner claimants.** This observation arises as a simple consequence of the fact that the claims population has higher numbers of people within it who face the greatest barriers to work. It is contended that, for different reasons, people with disabilities, people with responsibility for young children, and people who may struggle with English all face greater barriers to work;
- The Government's reforms intend that people in work should always be better off than people in receipt of welfare. There is a presumption that, over time, greater numbers of working age claimants who are workless will enter the paid employment workplace. However it is suggested that when the UK begins to exit the recession, the recovery will most likely be centred on London and the South East. **The location of the recovery is most likely to be centered on London, and the nature of jobs which are created may not be accessible to the Council's residents, because of that location;**
- While, therefore, some parts of the UK may receive local economic benefits from the national recovery from the recession, most likely located in London and the South East, the Council is less likely to do so. As a consequence, the expansion of the number of local jobs will be more dependent on local co-ordinated efforts to stimulate regeneration and economic development.

4.13 Adverse impacts and mitigating actions

This section has set out the likely equality issues for the range of households affected by these Council Tax changes, and the protected characteristics most affected.

Within the defined scope of the Council Tax Scheme there are no mitigating actions that can be taken that would reduce or remove the adverse equality impacts identified above. However, there are mitigating actions that the Council and its partners could take to mitigate the extent

of equality impacts predicted as a result of the implementation of the Council Tax Scheme. These are briefly summarised in section 6 of the report.

4.14 Clusters of potential common impact

The analysis of the Wales authorities has been completed on behalf of all the Welsh Authorities.

The use of a common approach, including common data handling and the same data extraction and interrogation routines enable the determination of some possible areas of common impact, which may be considered as the implementation of the Council Tax Reduction is taken forward.

[Drafting Note: To be written, and as we proceed through individual Council sign-off during January. Subject to Council comments throughout the month, there are emerging some common themes which it is important to write down, even if some of this will inevitably be “work in progress”, as the scheme becomes live and as lessons are learnt. Initial observations are:

- While the overall findings from this review are broadly consistent with the whole Wales Impact Assessment, within Wales, the individual authorities are not, I think homogenous;
- It may be possible to identify a series of “clusters” of like authorities in which there are emerging some possible similar themes, for example:
 - The extent to which there are higher numbers of single parents, and of People with disabilities within the south Wales valleys, and extending to the “old industrial” boroughs towards some of the coast;
 - By contrast, higher concentrations of pensioner claimants are seen in the more rural boroughs of Wales, and towards the north, this is coupled much higher incidence of Welsh Language skills; and
 - The main significant incidence of diversity in Wales is seen in the 3 southern coastal cities- Newport, Cardiff and Swansea.]

4.15 Interim Conclusions

The interim conclusions from the Impact Analysis of the proposed Local Scheme may be summarised as follows:

- The Government’s policy to “Localise” decision making in local welfare relief on Council Tax is proposed at the same time as a cut in funding.;
- As a consequence of the way that the UK welfare systems have operated to date, the profile of people currently receiving Council Tax Benefits contains higher numbers of households in which there is no work, or in which there is low income.

- People facing the greatest barriers to work are represented in higher numbers in the claims population. That includes people with disabilities; people with responsibility for young children; and women;
- In some parts of Wales in which there are more diverse communities, people who may struggle with English may also face those barriers to work;
- It may therefore be argued that the implication of the proposed scheme may be borne disproportionately by these groups, simply as a product of their higher representation within the claims population;
- Under the scheme for Wales, all Working Age and pensioner households currently receiving Council Tax Benefit and transferring to Council Tax Reduction will be required to pay towards their Council Tax. This will include those households in which there is currently payment of 100% relief. It is likely that all households, whether those over represented in the claim population or not, will face similar impacts;
- Those impacts include how the tax will be paid; the risks of and dealing with debt; the impacts of enforcement action taken for unpaid tax; and the extent to which it will be harder for people in Wales to get back into work than it may be for people in other cities or in London;

5 The Local context: Trend Analysis

5.1 Summary of section

This section brings together contextual analysis which is designed to demonstrate the potential impacts of the proposed local scheme for Council Tax Reduction.

5.2 Overall Approach

The overall approach which has been taken to the analysis is summarised as follows:

- At para 5.3 and 5.4 the Council explains the overall trend analysis of Council Tax Benefit and Council Tax Reduction costs, with reference to datasets made available by the DWP and DCLG;
- At para 5.5 the Council profiles the likely weekly costs for households under proposed schemes; and
- At para 5.6 the Council explores the incidence of Welsh Language skills in Wales with reference to recently available ONS data.

5.3 Increase in claims, All England and Wales

Government statistics demonstrate that the national value of awards under Council Tax Benefit has been increasing. Between 1997 and 2011, the total value of awards for Council Tax Benefit more than doubled from £2,014 to £4,299m. Within the following table, and using the Government's data, we summarise the growth in claims since 2005.⁷ It must be stressed that the figures provided by the DWP and DCLG summarise simply the overall increase in Council Tax Benefit payments, which includes increases both in claimant numbers as well as the increasing cost of Council Tax.

⁷ DWP Research published May 2012 by DCLG within "Council Tax Reduction Funding Consultation"

Table 13: Overall Council Tax Benefit Spend, England and Wales

	Total Council Tax Benefit Spend	
	England	
	£m	%
2005-06	3,230	6
2006-07	3,385	5
2007-08	3,471	3
2008-09	3,672	6
2009-10	4,095	12
2010-11	4,299	5

Table14 Overall increase in spend, Wales:

Year	CTB Award, £M	Increase, Percent
2000/01	119	
2001/02	123.7	3.9
2002/03	131	5.9
2003/04	141.9	8.3
2004/05	160.5	13.1
2005/06	176.5	9.9
2006/07	184	4.2
2007/08	189	2.7
2008/09	199.6	5.6
2009/10	222.7	11.6
2010/11	237.9	6.8
2011/12	246.1	3.4
Average		6.85

Interim conclusions:

- While DWP projections claim that the value of awards paid for Council Tax will fall from 2013, the national trend since 1997 has been that the value of awards has increased;
- The rate of increase throughout Wales over the period since 2000 has averaged 6.85% whereas in England and Wales the average rate of increase has been closer to 6%;
- If the rate of increase continues to increase, or continues to be greater than for the whole of England and Wales, and the “fixed grant” approach of the DCLG continues to apply for future years, then there will be a financial risk to the Welsh authorities.

5.4 Council Tax Benefit: The Wales Perspective

There are 22 Councils in Wales with the responsibility to administer benefit payments for Council Tax. Data published by the DWP confirms the following value of subsidised amounts of Council Tax benefit for the year 2011/12

Table 15: DWP Subsidised Awards, 2011/12, All Wales

Council	Subsidised Council Tax Benefit 2011/12 £m
Isle of Anglesey	5.03
Gwynedd	8.89
Conwy	8.65
Denbighshire	9.05
Flintshire	9.90
Wrexham	9.87
Powys	7.93
Ceredigion	4.70
Pembrokeshire	7.04
Carmarthenshire	14.26
Swansea	19.11
Neath Port Talbot	15.67
Bridgend	12.45
The Vale of Glamorgan	8.65
Cardiff	27.82
Rhondda Cynon Taff	21.69
Merthyr Tydfil	5.72
Caerphilly	13.66
Blaenau Gwent	8.15
Torfaen	7.86
Monmouthshire	6.10
Newport	9.79
Total	242.0

Table 16: Illustrative Weekly Payments

The impact of the change in Council Tax Benefit will be applied to all claimants. For the first time since 1993, there will cease to be entitlement to 100% relief from the Council Tax. Unlike the changes introduced under the Poll Tax, no additional funding is proposed to assist claimants with their household budgeting for this payment.

Many households facing this change will, in practice, budget for essential costs on a weekly basis. The following summary table therefore explains the illustrative weekly costs of the Welsh national scheme, assuming a household previously entitled to 100% reduction which now receives only 90%, and using the costs of Council Tax at Band D for 2012/13 including allowances for the Police and for Communities.

Band	Charge	Max Ben	Due	per week
A, DPR	611.11	550.00	61.11	1.18
A	733.33	660.00	73.33	1.41
B	855.56	770.00	85.56	1.65
C	977.78	880.00	97.78	1.88
D	1100.00	990.00	110.00	2.12
E	1344.44	1210.00	134.44	2.59
F	1588.89	1430.00	158.89	3.06
G	1833.33	1650.00	183.33	3.53
H	2200.00	1980.00	220.00	4.23
I	2566.67	2310.00	256.67	4.94

Source: Flintshire Council

Interim Conclusions:

- The weekly financial impact of the 90% maximum amount is shown in the above table, and to indicate the illustrative weekly cost of Council Tax, for those households which budget on a weekly basis;
- The Council has already begun to examine ways in which approaches to financial management and money advice may assist households with the budgeting which lays ahead.

5.5 Welsh Language Skills

The following table is drawn from data published by the ONS from the 2011 Census in December 2012. The table shows Welsh Language speaking skills for all Welsh authorities, and in respect of all people aged 3 years and over.

Welsh Language Speaking Skills				
	Yes	No	Total	%
Anglesey	38,568	28,835	67,403	57.22%
Blaenau Gwent	5,284	62,064	67,348	7.85%
Bridgend	13,103	121,442	134,545	9.74%
Caerphilly	19,251	152,721	171,972	11.19%
Cardiff	36,735	295,538	332,273	11.06%
Carmarthenshire	78,048	99,594	177,642	43.94%
Ceredigion	34,964	38,883	73,847	47.35%
Conwy	30,600	81,124	111,724	27.39%
Denbighshire	22,236	68,291	90,527	24.56%
Flintshire	19,343	127,597	146,940	13.16%
Gwynedd	77,000	40,789	117,789	65.37%
Merthyr Tydfil	5,028	51,595	56,623	8.88%
Monmouthshire	8,780	79,829	88,609	9.91%
Neath Port Talbot	20,698	114,580	135,278	15.30%
Newport	13,002	126,847	139,849	9.30%
Pembrokeshire	22,786	95,606	118,392	19.25%
Powys	23,990	105,093	139,083	17.25%
Rhondda	27,779	197,776	225,555	12.32%
Swansea	26,332	204,823	231,155	11.39%
Torfaen	8,641	79,203	87,844	9.84%
Vale of Glamorgan	13,189	108,829	122,018	10.81%
Wrexham	16,659	112,766	129,425	12.87%
Wales	562,016	2,393,825	2,955,841	19.01%

Interim Conclusions:

- While the overall average for Wales is 19%, the variation in different parts of the Country is significant;
- The concentration of high numbers of people with Welsh speaking skills is most clearly seen in the north of the Country, and with high concentrations in Gwynedd, Anglesey, and Ceredigion;
- In the south of Wales, Carmarthenshire also shows a high percentage of Welsh speaking skills;
- Welsh skills are at the lowest in the eastern valley Councils of Blaenau Gwent and Merthyr Tydfil.

6 Mitigation

6.1 Overview

This section summarises key steps which it is suggested must also be taken forward to enable the completion not just of a meaningful Council Tax Reduction scheme, but also that collection and enforcement policies which apply from next April are consistent with the collection requirements of this client group.

Many of the poorest households affected by this change will not be used to paying Council Tax. The last time that the UK managed a system under which the maximum local tax benefit was less than 100% was under the Community Charge, and many claimant households will not have been within the welfare systems at that time.

The key argument which applies here is that because of the disproportionate financial burden which falls on the in-scope working age population, this group may not have the means to pay in the same way as the rest of the Council Tax population, and different arrangements must be planned for.

However, the Council must also ensure that the necessary steps are taken to collect and recover sums due under the new arrangements, and using the full range of enforcement tools which are available.

6.2 Matters to be considered

As the Council moves from the phase in which a local scheme in Wales has been designed to the collection and administration of the tax due, the following matters may be considered for to review, at the appropriate time:

- The approaches to collection actions which may be appropriate, with regard to the observations made at section 4 above regarding protected characteristics;
- The approaches to enforcement actions which may be appropriate, with regard to the observations made at section 4 above regarding protected characteristics;
- The practices which may and may not apply to the application of costs and charges for those households responsible for new liabilities;

7 Conclusions

The changes to welfare benefits which begin from this April are very significant. While the introduction of the Council Tax Reduction is amongst the first of those changes to become live from April 2013, it will not be the last.

Considered together, the cumulative impact of the changes which begin from this April is considered likely to be significant. The changes will be particularly keenly felt in those parts of the UK in which there are both increased levels of deprivation or household reliance upon welfare payments, and those parts of the UK in which it will be most difficult to create and sustain local jobs. Both arguments may be made in respect of Wales.

The Council must nonetheless implement the local scheme of Council Tax Reduction which is designed for Wales.

Both the Council's assessment, and that of the Welsh Government have been able to reach some conclusions about the potential impact upon some in the claims caseload with protected characteristics. It has been possible within both studies to reach conclusions in relation to the protected characteristics of Age, Disability, Gender, and to an extent, Race. The Council does not conclude that the remaining protected characteristics are unaffected by these changes, rather that there is insufficient data to reach conclusions.

In the Council's case, it has been possible to reach some initial data based conclusions in respect of the protected characteristics of Age, Disability, Gender, and Race. There is an incidence of households with these protected characteristics within the claims population, because of the barriers to work which are faced. With regard to the remaining protected characteristics, these may well be represented within the claims population, but at the current time, the Council has insufficient evidence available to reach conclusions.

The mitigating steps that the Council may consider may include the approaches to customer management which are deemed appropriate; the approaches to collection and recovery actions which are deemed appropriate; and the approaches to support effective budgeting and household financial management which are deemed appropriate.

The planned local scheme for Council Tax reduction does not plan to militate against the interests of those with protected characteristics within the claim population, and it is considered likely that all of those within the claims population will face common impacts as a consequence of the implementation of the changes to Council Tax Benefits. However, some of those with protected characteristics face the greatest barriers to work, which includes People with disabilities, women, those with responsibility for children, and people with limited access to or knowledge of English or Welsh language. Additionally, people of pensioner Age are not within the working population any longer.

The groups may therefore be disproportionately represented within the claims population as a consequence of these barriers.

Appendix 1: Management of the Impacts from April 2013

Within the following table, the Council suggests some of the management actions that may be considered, on a quarter by quarter basis, and as the Council Tax Reduction scheme goes live from April 2013.

2013, Quarter	Actions
Quarter 1	<ul style="list-style-type: none"> • Fast – track referral arrangements with CAB have been arranged for customers to assist with Debt Management issues and CTRS queries. • Take-up Team will provide basic money advice and advice on other welfare benefits to maximise income, referred from Council Tax Teams and Contact Centre. • Take-up team will continue with initiatives to support BME communities. • Determine initial reactions from new taxpayers to issue of bills and reminders; • Consideration to proposed enforcement actions for unpaid CTRS debts; • Determine lessons learnt from first completed recovery cycle at end of quarter 1.
Quarter 2	<ul style="list-style-type: none"> • Revisions to collection and enforcement actions as appropriate; • Review number of cases referred to CAB. • Review number of cases handled by Take-up team. • Profile initial collection performance and review
Quarter 3	<ul style="list-style-type: none"> • Determine funding implications from first year of operation • Feed into financial planning

	cycle for 2014/15
Quarter 4	<ul style="list-style-type: none">• Finalise arrangements for CTR from 2014