

1 Equality Scheme: ANNEX 3



Equality Impact Assessment Record Form 2012-16

This form is to be used for recording the Equality Impact Assessment (EIA) of Council activities. It should be used in conjunction with the guidance on carrying out EIA in **Annex 2** of the Equality Scheme. The activities that may be subject to EIA are set out in the guidance.

EIA is particularly important in supporting the Council to make fair decisions. The Public Sector Equality Duty requires the Council to have regard to the need to eliminate discrimination, harassment and victimisation, advance equality of opportunity and foster good relations.

Using this form will help Council officers to carry out EIA in an effective and transparent way and provide decision-makers with full information on the potential impact of their decisions. The purpose is to avoid inadvertent disadvantage or discrimination resulting from decisions.

EIA is not a fixed process – it will vary according to the scale and type of activity. The form and guidance are designed to cover all eventualities. Officers should not be discouraged by the form, but should use their discretion in using it flexibly according to the activity they are assessing.

EIA does not happen at a single point in time. It is an ongoing and integral part of the development of the activity or proposal. This EIA template should be kept open and live as a planning document, and updated as the activity or proposal progresses.

Section 1 – Service Details and Summary of EIA Activity

Title of activity:	Council Tax Support (CTS) scheme 2016/17
Lead Officer responsible for this EIA:	Anthony Sandys, Head of Revenues and Benefits
Telephone:	X6926
Service Group:	Neighbourhood Services and Resources
Service or Team:	Revenues and Benefits
Assistant Director accountable for this EIA	Pauline Mitchell, AD Housing and Building Services
Who else will be involved in carrying out the EIA:	Wendy Tarelli, Revenues and Benefits Manager

What stage has the EIA reached?

This table provides a 'cover note' of progress to be maintained as the EIA is developed over time.

Stage categories 1-3 listed below refer to the funnel model. Note the stage reached and any consultation or engagement carried out. Simple activities may not need all these stages. Provide details of population/individuals affected in Section 2

Stage	Date	Summary of position
Stage 1: Initial Officer Assessment. Whole Population likely to be affected identified		<i>All residents within Darlington who are liable to pay Council Tax</i>
Stage 2: Further Assessment. Target Population likely to be affected identified		<i>All current working aged CTS recipients</i>
Stage 3: Further Assessment. Individuals likely to be affected identified		<i>All current working aged CTS recipients affected by the welfare reforms from April 2016</i>
Stage 4: Analysis of Findings		There was a mix of responses from the people who responded to the survey about the proposed changes to the CTS scheme in 2016/17. Some respondents believe

		<p>that it is unfair that some individuals will be negatively impacted by these proposals. Other respondents believe that any changes to government policy should be mirrored in the CTS scheme and that the impact on other Council Tax payers should be taken into account, if the changes would increase CTS expenditure. Some groups are treated differently in the assessment of their CTS entitlement, as certain types of income are disregarded in the process and these proposals will only affect certain groups of people. However, the Council takes a fair and equitable approach to Council Tax recovery and will take into account a person's means to pay, where they are making reasonable attempts to pay their Council Tax. In addition, a discretionary Council Tax discount scheme is available to people receiving CTS who are suffering hardship and applications for this are dealt with on an individual basis.</p>
Stage 5: Sign-Off		
Stage 6: Reporting and Action Planning		

Section 2 – The Activity and Supporting Information

Details of the activity (including the main purpose and aims)

From April 2013, the Government replaced the national Council Tax Benefit scheme with new local CTS schemes, designed and administered by local authorities. Grants are paid to local authorities to fund the new scheme, but the overall amount has been cut from projected expenditure levels.

The Council were required to design and publish a new scheme by 31 January 2013, in time to implement for annual Council Tax billing in 2013/14. A full public consultation exercise and an equality impact assessment were undertaken on the proposals.

On 24 January 2013, members approved the CTS scheme for 2013/14, which included a 20% reduction in the amount of Council Tax relief available for working age people on low incomes. Pensioners are protected from any cuts under a national set of regulations.

On 28 November 2013, members approved the CTS scheme for 2014/15, with no significant changes from the 2013/14 scheme. On 4 December 2014, members approved the CTS scheme for 2015/16, again with no significant changes from the 2014/15 scheme.

A number of welfare reforms were announced in the 2015 summer budget that could potentially impact on CTS recipients and expenditure in 2016/17.

A number of questions were put to residents as part of the consultation exercise about the proposals to change the CTS scheme for 2016/17. These were:

- Whether to freeze working age CTS applicable amount rates
- Whether to remove the Family Premium for new CTS claims and changes
- Whether to give protection for people affected by a change in the Benefit Cap threshold
- Whether to change the way CTS is worked out for people claiming Universal Credit

Who will be affected by the activity?

See the guidance on carrying out equality impact assessment within the Equality Scheme 2012-16. Provide details of the groups and numbers of people affected below, updating the table as the EIA develops and the understanding of who will be affected emerges in more detail.

Whole population

Potentially all residents in Darlington who are liable for Council Tax could be affected by these proposals. If the Council were to decide to protect individuals from these reforms, the additional CTS expenditure would be met by the Council. Other Council budgets may then need to be reduced to accommodate the additional expenditure. This could result in a reduction in services and/or an increase in Council Tax to meet the shortfall.

Target population

Some of the current recipients of CTS would be affected by the changes, although pensioners are protected by any reduction in support. Not all working aged CTS recipients would be affected as some are receiving passported benefits that entitles them to the maximum 80% support.

Individuals

Certain working age recipients of CTS could be affected by the changes, if the Council decides to change the scheme in 2016/17 (see below).

What data, research and other evidence or information is available which is relevant to the EIA?

The following information is currently available:

A freeze on working age CTS rates

Working age applicable amounts in CTS are part of the local scheme and have previously been increased by rates of inflation that have been used to increase other welfare benefits set by the government. However, the government has announced that these rates will be frozen for the next 4 years. This change does not impact on CTS recipients who are receiving passported benefits that entitles them to the maximum 80% support. The change will impact on working aged people receiving CTS, where their total income is above the applicable amount in CTS. Although their CTS will be increased to cover any increase in the Council Tax in 2016/17, their applicable amounts (which are used to calculate CTS entitlement) will not be increased.

Potentially up to 1,999 current CTS recipients could be affected by this change (18% of all CTS recipients) including 459 with children under 5, 888 working 16 hours or more each week and 652 other households, including those with disabilities.

If CTS applicable amounts were increased by 2%, for example, the increase in CTS expenditure is estimated as £158k in 2016/17.

Removal of the Family Premium for new CTS claims and changes

The Family Premium is part of the applicable amount used to calculate CTS entitlement to households with dependant children. Again, this change does not impact on CTS recipients who are receiving passported benefits that entitles them to the maximum 80% support. The government plans to remove the Family Premium from Housing Benefit entitlement for working aged people making a new claim from April 2016 or where the first child is born after that date. Existing CTS recipients entitled to the Family Premium will be unaffected by this change.

Potentially up to 458 new working aged CTS recipients could be affected by this change (4% of all CTS recipients) including 208 with children under 5, 186 working 16 hours or more each week and 64 other households, including those with disabilities.

If the Family Premium were to be removed in this way, the decrease in CTS expenditure is estimated as £41k in 2016/17. If no changes were made to the scheme, CTS expenditure would be unaffected, although Housing Benefit and CTS for affected recipients would be administered differently.

Protection for people affected by a change in the Benefit Cap threshold

The benefit cap is an overall limit that has been set by government on the maximum amount of benefit that some working age people can receive, which is currently £26k per year for couples, lone parents and families.

This change will not have any direct impact on CTS entitlement, although affected households will see reductions in their Housing Benefit or Universal Credit, which may affect their ability to pay Council Tax. In some cases there may be significant reductions with some households losing nearly all of their Housing Benefit.

Currently, only 25 households are subject to the Benefit Cap in Darlington. The majority of these are large families (5 or more children), 11 in Council accommodation, 2 in Housing Association accommodation and 12 in privately rented accommodation.

However, when the Benefit Cap threshold is reduced to £20k per year, significantly more households in

Darlington will be affected. Initial analysis has identified 200 households will be affected by this change, including some families with 3 or more children; 56 in Council accommodation, 25 in Housing Association accommodation and 119 in privately rented accommodation.

The Benefit Cap only applies to working age households and doesn't apply if they receive certain benefits including Disability Living Allowance and Personal Independence Payments.

The government has announced that the Discretionary Housing Payment (DHP) grant available to Councils to help with shortfalls in Housing Benefit will be increased in 2016/17, so could potentially be used to offset some of the decreases as a result of this change. DHPs can only be used to top-up Housing Benefit, not CTS.

Protection (by allowing up to 100% CTS) could be achieved by formally protecting this group within the CTS scheme. Alternatively, the Discretionary Council Tax Discounts scheme could be used to make up the shortfall in these cases and entitlement would be assessed on an individual basis.

The 200 households affected are mainly living in 3 or 4 bedroomed properties. Therefore, if they are currently paying 20% of a Council Tax band C charge (assuming a 2% increase in Council Tax) this would increase CTS expenditure by approximately £55k for 2016/17.

Changes for people claiming Universal Credit

Universal Credit will start to be rolled out in Darlington from 23 November 2015. Only new claims for single people who would otherwise have claimed Jobseekers Allowance will initially be able to claim Universal Credit and numbers are expected to be low in the first year. The Department for Work and Pensions has estimated that 688 people will be receiving Universal Credit by March 2015, although the majority of these will not be liable for Council Tax (i.e. adults living at home with parents).

The CTS scheme for 2016/17 will need to be amended to take into account people receiving Universal Credit. Working aged people not in receipt of a passporting benefit (income based Jobseekers Allowance, Income Support or income related Employment and Support Allowance) have their CTS calculated by comparing their income with their applicable amount. It is suggested that people in receipt of Universal Credit should have their CTS calculated by comparing their income, as provided by Universal Credit, plus their Universal Credit award, with their Universal Credit maximum award. This is not expected to significantly affect CTS expenditure. As most CTS recipients claiming Universal Credit in 2016/17 will be Jobseekers Allowance type of claims, it is likely that the impact of this change will be minimal.

Check: before proceeding to the officer assessment, have you obtained all the data and information that is currently available?

Section 3: Officer Assessment

Use this table to record your views on potential impact on Protected Characteristics. As the activity and the assessment develop your views may change – record them here. It is important to be searching and honest about this – many Council activities are planned to be of positive benefit to identified target groups but can often have the potential for inadvertent effects on other groups.

Protected Characteristics	Potential Impact Positive/Negative/ Not Applicable			Potential level of impact				Summary of Impact
Age		N			M			Pensioners are not affected by the CTS scheme and are protected from any reduction in entitlement. Pensioners are defined as people who have not yet attained the qualifying age of state pension credit, which will be 63 in April 2016. Therefore, everyone of working age are treated differently from pensioners, although only certain groups of working aged CTS recipients will be negatively impacted by these changes.
Race			NA				nil	There are no impacts specifically relating to a person's race.
Sex			NA				nil	There are no impacts specifically relating to a person's gender.
Gender Reassignment			NA				nil	There are no impacts specifically relating to a person's gender.
Disability (summary of detail on next page)		N			M		nil	Potentially, anyone of working age with a disability could be affected by these changes. However, disabled people are treated differently in the assessment of CTS, as some incomes, such as Disability Living Allowance and Personal Independence Payments are disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempt them from the effects of the Benefit Cap.
Religion or belief			NA				nil	There are no impacts specifically relating to a person's religion or beliefs.
Sexual Orientation			NA				nil	There are no impacts specifically relating to a person's sexual orientation.

Pregnancy or maternity		N			M		<p>Potentially, anyone of working age could be affected by these proposals. However, families with children are treated differently in the assessment of CTS, as some incomes, such as child maintenance and Child Benefit are disregarded in the assessment of CTS entitlement. Withdrawal of the Family Premium in CTS will impact on some CTS with children, although existing recipients will be protected. The lowering of the Benefit Cap threshold will impact on larger families with 3 or more children.</p>
Marriage/ Civil Partnership			NA			nil	<p>There are no impacts specifically relating to a person's marital status.</p>

Section 3: Officer Assessment - continued

The Council must have due regard to disabled people’s impairments when making decisions about ‘activities’. This list is provided only as a starting point to assist officers with the assessment process. It is important to remember that people with similar impairments may in reality experience completely different impacts. Consider the potential impacts and summarise in the Disability section on the previous page. Officers should consider how the ‘activity’ may affect a disabled person.

<p>Mobility Impairment</p>		<p>N</p>			<p>M</p>		<p>Working age people with mobility impairments and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with mobility impairments may find it more difficult to obtain paid work to improve their income. However, the mobility elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap.</p>
<p>Visual impairment</p>		<p>N</p>			<p>M</p>		<p>Working age people with visual impairments and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with visual impairments may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap.</p>
<p>Hearing impairment</p>		<p>N</p>			<p>M</p>		<p>Working age people with hearing impairments and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with hearing impairments may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap.</p>

Learning Disability		N			M		<p>Working age people with a learning disability and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with a learning disability may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap. Many people with a learning disability are exempt from paying Council Tax.</p>
Mental Health		N			M		<p>Working age people with mental health problems and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with mental health problems may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap. Some people with mental health problems are exempt from paying Council Tax.</p>
Long Term Limiting Illness		N			M		<p>Working age people with long-term limiting illnesses and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with long-term limiting illnesses may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap. Some people who receive long term care may be exempt from paying Council Tax.</p>
Multiple Impairments		N			M		<p>Working age people with multiple impairments and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS</p>

								entitlement. People with multiple impairments may find it more difficult to obtain paid work to improve their income. However, the care elements of Disability Living Allowance and Personal Independence Payments are fully disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap. Some people with multiple impairments may be exempt from paying Council Tax.
Other – Specify (war disabled)		N		M				Working age ex-forces personnel with disabilities and in receipt of CTS may be negatively impacted by these proposals as all working age people could potentially see a reduction in CTS entitlement. People with disabilities may find it more difficult to obtain paid work to improve their income. However, War Disablement Pensions are fully disregarded in the assessment of CTS entitlement. In addition, receipt of War Disablement Pension exempts them from the effects of the Benefit Cap.

Cumulative Impacts

The officer responsible for this EIA should seek input from the Corporate Equalities Group on the potential for this activity to combine with other recent, current or proposed activities, both Council and in the external environment, to result in more severe impacts on people with Protected Characteristics through their cumulative effects. The Corporate Equalities Group will advise on the content for this section of the EIA.

Change activities

Potential cumulative impacts

Welfare reforms from April 2016

- Tax Credits taper rate increased to 48%
- Tax Credits income threshold decreased to £3,850 per year
- Jobseekers Allowance, Income Support and Employment and Support Allowance work-related activity group rates frozen for 4 years
- Child Benefit rates frozen for 4 years
- Housing Benefit applicable amounts and Local Housing Allowance rates frozen for 4 years
- Family Premium removed from Housing Benefit for new claims and certain changes of circumstances
- Benefit Cap threshold reduced to £20,000 per year for couples, lone parents and families, and to £13,400 per year for single people.

Where a person's income reduces as a result of these changes (such as a reduction in Tax Credits), this could increase CTS entitlement (even if CTS applicable amounts are frozen).

Section 4: Engagement Decision

The decision about who to engage with, and how and when to engage, is the key to effective EIA. Please see Annex 2 of the Equality Scheme for guidance on the engagement decision.

Is engagement with affected people with Protected Characteristics required, now or during the further development of the activity?	Yes
If YES, proceed to the next section. If NO, briefly summarise below the reasons why you have reached this conclusion.	

If you have come to the conclusion that engagement is not required, seek ratification from the Corporate Equalities Group through your service Equalities Co-ordinator.

If engagement is not required but the officer assessment has identified changes that should be made to the activity, please complete Sections 7 and 8. If not the assessment can be signed-off at Section 9.

Any reports to decision-makers during the development of the activity, for example feasibility or options appraisal reports, should include content on the latest thinking and findings of the EIA even though, like the activity, further development of the EIA may be required before final reporting.

The findings of the officer assessment should be included in any reports to decision-makers. These may be feasibility or options appraisal reports where the activity is at an early stage of development, but it is essential that any equality findings are taken into account in formal decisions at all stages of development of the activity.

2 Section 5 – Involvement and Engagement Planning

Has the assessment shown that the activity will treat any groups of people with Protected Characteristics differently from other people? Yes
<p>If yes, please state which groups and how</p> <p>Although all working age people will potentially be impacted by these changes;</p> <ul style="list-style-type: none">• Disabled people are treated differently from other people as some of their income, such as Disability Living Allowance and Personal Independence Payments are disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap.• Households with children may be treated differently from other people as some of their income, such as child maintenance and Child Benefit are disregarded in the assessment of CTS entitlement. However, the removal of the Family Premium will affect some households with children and more families will be affected by the Benefit Cap.• War pensioners and people leaving the armed forces due to a disability may be treated differently from other people as some of their income, such as War Widows Pension, War Disablement Pension and other armed forces compensation schemes are disregarded in the assessment of CTS entitlement. In addition, receipt of these benefits exempts them from the effects of the Benefit Cap <p>Potentially the Council does have the option to protect certain groups who are negatively impacted by these proposals, although this could have an even greater impact on other non-protected groups, and may increase CTS expenditure, impacting on all residents of Darlington.</p>
Will the differential treatment advance equality for people with Protected Characteristics? Yes
<p>If yes, please state which groups and how</p> <p>As above.</p>
Will the differential treatment cause or increase disadvantage for people with Protected Characteristics? No
<p>If yes, please state which groups and how</p>

From the above, prepare a simple plan using the template overleaf for involving and engaging with the organisations, groups and individuals likely to be affected by the activity.

There may be several stages of involvement and engagement, particularly for more complex activities. Initially it may be possible to identify and engage only with stakeholder and representative organisations for the people with Protected Characteristics who may be affected. Further development of the activity may be required before the individuals who will be affected can be identified.

The Involvement and Engagement Plan should evolve accordingly, with new engagement proposals added as they are identified.

Section 6: Engagement Findings

	Date/summary of engagement carried out	Summary of impacts identified
Age	August to September 2015	There were no impacts identified. Pensioners are already protected from any changes to the CTS scheme as their entitlement is calculated using national rules. Potentially all working aged CTS recipients could be affected by these changes, but there were no specific issues raised about a particular age group.
Disability	August to September 2015	There were no specific impacts identified. Some of the comments from respondents indicated that disabled people should be protected from the negative impacts of the changes, although no specific details were given.
Mobility Impairment	August to September 2015	
Visual impairment	August to September 2015	
Hearing impairment	August to September 2015	
Learning Disability	August to September 2015	
Mental Health	August to September 2015	
Long Term Limiting Illness	August to September 2015	
Multiple Impairments	August to September 2015	
Other - Specify		
Race	August to September 2015	There were no impacts identified
Sex	August to September 2015	There were no impacts identified
Gender Reassignment	August to September 2015	There were no impacts identified
Religion or belief	August to September 2015	There were no impacts identified
Sexual Orientation	August to September 2015	There were no impacts identified
Pregnancy or maternity	August to September 2015	There were no impacts specifically identified for women who are pregnant. Some of the comments from respondents indicated that families would be adversely affected by the changes and that they are restricted in the work they can apply for.
Marriage / Civil Partnership	August to September 2015	There were no impacts identified

Section 6: Engagement Findings – Continued

Drawing on the engagement findings and your understanding of the effects of the activity, indicate how it will contribute, if at all, to the three strands of the Public Sector Equality Duty.

a) How will the proposal help to eliminate discrimination, harassment and victimisation?

These changes recognise that some people with protected characteristics may need to continue to be treated differently and disregards to certain disability benefits, child related benefits and war pensions will continue to apply.

b) How will the proposal help to advance equality of opportunity?

The CTS scheme is the same for everyone of working age, although it is recognised that some of the welfare reforms being introduced from April 2016 will affect certain working age groups differently. However, there is a discretionary Council Tax discount scheme in place for anyone experiencing hardship who is unable to pay their Council tax and all claims are treated individually.

c) How will the proposal help to foster good relations?

As above.

During the engagement process were there any suggestions on how to avoid, minimise or mitigate any negative impacts? If so, please give details.

None, although some of the respondents recognised that these changes could cause hardship.

This completes the assessment, but there will be further work to do to contribute to the reporting and implementation stages of the activity. First though, it is important to draw a line under the assessment to maintain a separation between assessment of impacts and any proposals to manage those impacts. The assessment should therefore be signed-off at this stage.

Section 7 - Sign-off when assessment is completed

Officer Completing the Form:		
Signed	Name:	
	Date:	
	Job Title:	
Assistant Director:		
Signed	Name:	
	Date:	
	Service:	

Section 8 – Reporting of Findings and Recommendations to Decision Makers

The findings of the EIA may be reported to decision-makers at several stages during the development of an activity. For example, the initial officer assessment findings may be included in a feasibility report or options appraisal to be considered by the Transformation Board or Chief Officers' Executive.

Any report for formal decisions by Cabinet or Council should include the latest findings of the EIA, even if these are at a relatively early stage. The report recommending final approval of the activity should await and include the findings of the completed EIA. The report should present clearly the impacts that have been identified through the engagement process, including potential cumulative impacts.

The report may include recommendations based on the findings of the EIA, but these should be separate from the reporting of impacts. Recommendations will be developed separately from the EIA and arise from considering equalities impacts combined with other aspects of the activity such as finance, the benefits of the activity, and so on.

Based on the EIA findings, the report may consider the options in the table below, but the report must contain a clear statement of the impacts so that decision-makers can understand the effects of the decision that is being recommended.

What does the review of the information show?	
a)	No negative impact on people because of their Protected Characteristics - continue with the activity and monitor progress on implementation
b)	Negative impact identified – recommend continuing with the activity; clearly specify the people affected and the impacts, and providing reasons and supporting evidence for the decision to continue
c)	Negative impact identified - adjust the activity in light of the identified impact to avoid, minimise or mitigate the impact
d)	Negative impact identified - stop activity and provide an explanation why

Section 9 – Action Plan and Performance Management

The report to decision-makers, and the decision made may require actions to be taken to avoid, minimise or mitigate the negative impacts of the activity. Option C in the table in Section 8, combined with mitigation measures that may have been highlighted during engagement and listed in Section 6 (if adopted) will require action planning to implement them.

Any actions to address equalities impacts should be listed below, with performance management review proposals, to complete the full EIA.

What is the negative impact?	Actions required to reduce/eliminate the negative impact (if applicable)	Who will lead on action	Target completion date
Certain groups will be negatively impacted by these changes to the CTS scheme	<ul style="list-style-type: none"> Proactively promote the availability of discretionary discounts to affected people and ensure Council Tax accounts are reviewed by recovery staff before commencing enforcement action Target increased DHP grant to households affected by the lowering of the Benefit Cap threshold 	Anthony Sandys	April 2016 onwards
Recovery actions for unpaid Council Tax will impact on those affected by these proposals	<ul style="list-style-type: none"> Ensure payment arrangements are as flexible as possible Minimise court actions where customers are making genuine attempts to pay Consider writing off court costs where payment arrangements are made 	Anthony Sandys	April 2016 onwards

Performance Management	
Date of the next review of the EIA	September 2016
How often will the EIA action plan be reviewed?	Annually
Who will carry out this review?	Anthony Sandys