

Initial Equalities Screening Record Form

Date of Screening: 21/01/2016	Directorate: Corporate Services		Section: Revenue Services
1. Activity to be assessed	Imposition of £70 penalties in respect of Council Tax and Local Council Tax Support Scheme where a taxpayer knowingly fails to provide information relating to their liability without reasonable excuse.		
2. What is the activity?	<input checked="" type="checkbox"/> Policy/strategy <input type="checkbox"/> Function/procedure <input type="checkbox"/> Project <input type="checkbox"/> Review <input type="checkbox"/> Service <input type="checkbox"/> Organisational change		
3. Is it a new or existing activity?	<input checked="" type="checkbox"/> New <input type="checkbox"/> Existing		
4. Officer responsible for the screening	Sarah Kingston, Shanaz Alam		
5. Who are the members of the screening team?	Sarah Kingston, Shanaz Alam		
6. What is the purpose of the activity?	To ensure that taxpayers are aware of the requirement to report changes in their circumstances that affect their Council Tax liability in a timely manner, to deter repeat offences of failure to report changes which will help ensure a value for money service for all residents.		
7. Who is the activity designed to benefit/target?	Any taxpayer who knowingly fails to report a change in their circumstances that affects their Council Tax liability.		
Protected Characteristics	Please tick yes or no	Is there an impact? What kind of equality impact may there be? Is the impact positive or adverse or is there a potential for both? If the impact is neutral please give a reason.	What evidence do you have to support this? E.g equality monitoring data, consultation results, customer satisfaction information etc Please add a narrative to justify your claims around impacts and describe the analysis and interpretation of evidence to support your conclusion as this will inform members decision making, include consultation results/satisfaction information/equality monitoring data
8. Disability Equality – this can include physical, mental health, learning or sensory disabilities including conditions such as dementia.	Y	There could be some difficulty in understanding the policy and its potential impacts if a person has learning difficulties, inability to read/write and/or reduced mental capacity.	The main way in which the council interacts with its residents is in writing – whether that be by post or digitally – it is likely to involve reading and digesting information which people with disabilities may find difficult. In order to mitigate these factors we would look to engage with adult social care/social workers who may be supporting these individuals. We would also look to ensure that the information is as well publicised as possible to both residents and staff using methods such as posters, leaflets in libraries, surgeries and leisure centres, publication in Town and Country and making direct contact with stakeholders. A sentence will also be

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			included on the Council Tax bill to advise of the policy. There is also an element of discretion within the policy to take exceptional circumstances into account when deciding whether a penalty should be imposed.
9. Racial equality	Y		There could be a potential impact for any residents where English is not their first language. There could be a language barrier which could mean that the recipient may not understand the communications and the need to report changes. In order to mitigate this we would look to include a statement on each communication stating that the information can be provided in a different language or format on request. Also by making contact with community groups, via Involve, who may represent these groups. There is also an element of discretion within the policy to take exceptional circumstances into account when deciding whether a penalty should be imposed.
10. Gender equality		N	Neutral No impact identified at this time
11. Sexual orientation equality		N	Neutral No impact identified at this time
12. Gender re-assignment		N	Neutral No impact identified at this time
13. Age equality		N	Neutral No impact identified at this time
14. Religion and belief equality		N	Neutral No impact identified at this time
15. Pregnancy and maternity equality		N	Neutral No impact identified at this time
16. Marriage and civil partnership equality		N	Neutral

		No impact identified at this time	
17. Please give details of any other potential impacts on any other group (e.g. those on lower incomes/carers/ex-offenders, armed forces communities) and on promoting good community relations.	<p>There could be an adverse impact on those with low incomes as the addition of a penalty would increase their bill.</p> <p>There could be a minimal impact on the armed forces community who may be paying Council Tax for the first time and have little understanding of the process and the necessity to report changes. The Council can raise awareness of this change working with the Royal Military Academy Sandhurst.</p> <p>Some of the households who would be affected by the proposed implementation of civil penalties will be on low incomes. The housing and benefit service has been redesigned to ensure that households receive advice on benefit/discount entitlement and also on how and why changes in circumstances should be informed to a case worker. This should mitigate the impact of the penalties.</p> <p>Again, there is the element of discretion within the policy to take exceptional circumstances into account when deciding whether a penalty should be imposed.</p>		
18. If an adverse/negative impact has been identified can it be justified on grounds of promoting equality of opportunity for one group or for any other reason?	<p>The introduction of this policy will demonstrate that the council is aiming to provide a value for money service to its residents by endeavouring to reduce the administration and financial implications associated with late notification of changes.</p>		
19. If there is any difference in the impact of the activity when considered for each of the equality groups listed in 8 – 14 above; how significant is the difference in terms of its nature and the number of people likely to be affected?	<p>The impact on the two groups identified is of a similar nature. It is not possible to give an estimation of the number of residents within those groups will be directly affected as we do not hold this information on the Revenues or Benefits systems and it would not be possible to estimate the number that may forget or choose not to advise of any changes. There is, however, an element of discretion written in to the policy to ensure that those with genuine difficulties or reasons for not notifying of changes are not penalised.</p>		
20. Could the impact constitute unlawful discrimination in relation to any of the Equality Duties?		N	There are mitigating factors, as explained above, to help to minimise the impact on those adversely affected.
21. What further information or data is required to better understand the impact? Where and how can that information be obtained?	Not applicable.		
22. On the basis of sections 7 – 17 above is a full impact assessment required?		N	There are mitigating factors, as explained above, to help to minimise the impact on those adversely affected and it is not expected that the use of penalties will be a regular occurrence. The element of discretion will also help to minimise any adverse impacts where it is deemed necessary.
23. If a full impact assessment is not required; what actions will you take to reduce or remove any potential differential/adverse impact, to further promote equality of opportunity through this activity or to obtain further information or data? Please complete the action plan in full, adding more rows as needed.			
Action	Timescale	Person Responsible	Milestone/Success Criteria

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Develop a consultation communications plan to incorporate the actions noted above to ensure that impacts are mitigated,	31/03/2016	Sarah Kingston/ Shanaz Alam	Ensuring that the implications of the policy are as widely acknowledged and understood as possible.
Monitoring the imposition of penalties in line with the policy and ensuring that the element of discretion is being used correctly.	Ongoing	Sarah Kingston/ Shanaz Alam	Reassurance the policy is being implemented correctly and achieving its aim to deliver value for money and awareness from taxpayers.
24. Which service, business or work plan will these actions be included in?	Revenue Services and Benefits Service Business Plan		
25. Please list the current actions undertaken to advance equality or examples of good practice identified as part of the screening?	Please list: Wide publication of the scheme, ability to offer documentation in alternative languages, engagement with stakeholders such as CAB and Bracknell Forest Homes.		
26. Chief Officers signature.	Signature:		Date: