

Equality Impact Assessment Form

Equality Impact Assessments are carried out whenever you plan, change or remove a service, policy or function. The process should be used as a health check – a way of consolidating knowledge you have on your service.

Name of service, policy, procedure, function or project to be assessed:	Council Tax Reduction Scheme (April 2013) This assessment is intended to form the basis for SHBC to write and publish a new locally proposed Council Tax reduction scheme – as set out under section 13A(1)(a) of the Local Government Finance Act.
Is this a new or existing function or policy?	The existing nationally regulated Council Tax Benefit scheme will be discontinued from 1 April 2013 when all Local Authorities (LA) will be expected to have developed a new localised Council Tax Support scheme of their own design – or they will have a default scheme imposed upon them.
Key purpose/ objective of this service, policy, procedure, function or project to be assessed:	<p>This new scheme, referred to as Council Tax Support, is set out as a number of proposals that are dependent on:</p> <ol style="list-style-type: none"> 1. The outcome of a consultation on this scheme; 2. The Local Government Finance Act 2012 and subsequent secondary legislation; 3. Regulations pursuant to the Local Government Finance Act 2012. <p>In this document ‘the new scheme’ means the proposed Council Tax Support scheme (CTS).</p> <p>In this document ‘the current scheme’ means the existing Council Tax Benefit scheme (CTB).</p> <p>The key purpose for SHBC is to adopt a new Council Tax Support scheme for April 2013.</p> <p><i>It must be noted that within this document a number of relevant statistics and data have been used – for example the number of customers in receipt of Council Tax Benefit. These figures must be understood by the reader to be fluid, in that customers come on and off benefits. All information and data is provided in good faith as a ‘snap-shot’, and it is acknowledged that proposals are made using the best possible available information – which is often rounded.</i></p>
Lead Officer – inc. contact details	Kelvin Menon – Executive Head of Finance kelvin.menon@surreyheath.gov.uk

Executive Head of Service	Kelvin Menon Executive Head of Finance
Other stakeholders – list all involved	<ul style="list-style-type: none"> • All SHBC residents (85,000¹) and owners of the 35211 domestic properties • Around 3,440 current CTB customers (9.7% of households) • The Equalities Forum and other associated groups <i>et al</i> [see Step 4: Consultation stage below] • SHBC preceptors Surrey Police and Surrey County Council
Start date	In late 2011 Councils received information from Central Government on proposals to change the existing Council Tax Benefit scheme. SHBC has been duly considering impact assessment around this subject for some time. With further guidance from Central Government filtering through, this process is now becoming formalised – prior to any policy decisions.
End date	The new scheme must be in place by 31 January 2013, or a central Government default scheme will be imposed. In order to ratify any new scheme however, two relevant SHBC meetings are scheduled – Executive on 7 th January and Full Council on 22 nd January 2013.

¹ Local authority population statistics mid 2010 Office for National Statistics
AGENDA\COUNCIL\22Jan13

Step 1: Identify why you are undertaking a Equality Impact Assessment

From April 2011 the previous separate equality duties on public bodies covering race, disability and gender *et al* were replaced by the present single Public Sector Equality Duty, or 'PSED' (Equality Act 2010, s.149 onwards).

At the heart of PSED is the 'general duty' which requires public authorities to have 'due regard' to the need to:

- eliminate unlawful discrimination, harassment, victimisation;
- advance equality of opportunity between those with a protected characteristic and others;
- foster good relations between these groups.

SHBC must have 'due regard' to the community and equality impact when drafting and implementing a new local CTS scheme; particularly as it involves a potential reduction in services and/ or entitlements to residents, and may disadvantage any one of the 'protected characteristics' such as race, age, gender, disability etc.

The Department for Communities and Local Government (DCLG) specifically state:

“The Government has been clear that, in developing local council tax reduction schemes, vulnerable groups should be protected. The Government Response sets out the Government’s intention to put protection for applicants of state pension credit age on a statutory footing. It confirmed that the Government did not intend to prescribe the protection that local authorities should provide for other vulnerable groups, but would consider what guidance was needed to ensure local authorities were able take into account existing duties in relation to vulnerable groups in designing their schemes.”

DCLG produced further detailed guidance, and reminded Local Authorities of their duties under:

- the public sector Equality Duty (The Equality Act 2010);
- the welfare needs of disabled people (The Disabled Persons Act 1986);
- the duty to mitigate effects of child poverty (The Child Poverty Act 2010); and
- the duty to prevent homelessness (The Housing Act 1996).

Furthermore, the Local Government Finance Act specifies that, before adopting a scheme, the billing authority must in the following order:

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

[a-c all completed by 25 November 2012]

This new CTS scheme comes at a time when other radical changes and developments are taking place within the welfare system. Managing these changes in a way that reduces the impact on the most vulnerable is a part of the Council's 'Safer and Stronger Communities' key priority. In preparation for the new CTS scheme, SHBC must undertake a Equality Impact Assessment (EIA) to gauge the impact on those who are likely to be affected. If the EIA contains insufficient data or evidence on the impact of any proposals, it runs the risk of being subject to legal challenge. The EIA must also:

- inform the policy formulation process;
- be undertaken prior to actual implementation;
- make use of existing equalities monitoring data;
- make use of consultation feedback;
- be sufficiently robust;
- be considered by Members as part of the final decision, and
- be appended to the final decision report.

Finally, it is clear that this new scheme will affect a large number of SHBC residents – if not potentially all residents, and so it is vital for SHBC to gauge the views of those affected/ potentially affected.

Step 2: Identify the proposed changes to your service

Describe the possible changes your proposal will have on your service. Also outline the possible affect(s) it may have on the **protected characteristics**. Following your initial assessment if it is absolutely obvious that your changes will not have any effect on any of the **protected characteristics**, no further analysis or action is necessary. In this event, you must clearly record how you came to this conclusion.

With the abolition of the national Council Tax Benefit scheme (CTB), all Councils are required to develop and adopt a new local Council Tax Support scheme (CTS). The Government has also set out details of a localised 'default scheme' that is based on the existing national scheme, and this will be imposed on any Council that does not adopt its own new scheme by 31 January 2013.

Alongside this, significant financial changes are also being imposed by Central Government in relation to funding for the new schemes. Under the current national scheme, correctly awarded CTB is reimbursed in full – regardless of how many customers claim the benefit. This will change to become a partially funded scheme, where authorities' will be awarded an upfront grant amounting to 90% of the Governments estimated expenditure for each authority in 2013/14 – leaving a deficit of around 10%. However based on indicative grant already published for 2013/14 the reduction is likely to be nearer 17% as there is no provision for increased numbers of claimants

Due to very tight timescales involved, SHBC has taken the view that the new scheme proposal will have to be based on the existing scheme with various options developed to potentially make savings required. The scheme must be reviewed annually and can be further developed or indeed replaced.

In overall terms, the cost of providing CTB in the Borough last year was in the order of £3.6 million (out of total Council Tax revenue of £56 million). In SHBC, around £1.8 million is awarded to around 1,872 'Working Age'² households, whilst £1.8 million is awarded to around 1,568 elderly customers. With 'Pensioners'³ being fully protected by Government from the 10% cut, in real terms, in SHBC – as across all of Surrey, this means that a reduction in CTS for Working Age customers could be around 30% - in order to find the anticipated shortfall in subsidy.

One option open to each Council is to continue to award the same amounts of support by either implementing or following the 'default scheme'. If SHBC choose this option, or fail to act and have this option imposed, the 10% cut in funding will fall on other areas within the Council, County Council and Police [either cutting or reducing other services and/ or charging all residents more Council Tax].

In common with most other Local Authorities, many features of the current scheme will be carried forward into the new scheme. SHBC, working with the other Surrey authorities, has developed a set of amendments that can be applied to the new local CTS scheme.

² 'Working Age' means those who have not attained the qualifying age for state Pension Credit

³ 'Pensioners' means those who are entitled to claim Pension Credit (from 2010 the age from which someone is entitled to Pension Credit gradually changes from 60 to 65, in line with the change to women's State Pension Age)

The Six Proposed Framework Options are:

- **Option 1** – Remove the existing Second Adult Rebate scheme (27 current recipients);
- **Option 2** – Remove or restrict ‘backdating’ of awards for customer delay (95 awards made in 2011/12)
- **Option 3** – Restrict the maximum award to a specified Council Tax Band (183 claims from Band E to Band G);
- **Option 4** – Introduce a new weekly minimum award of support; (84 awards at £4.99 per week or less)
- **Option 5** – Introduce a lower capital ‘cut-off’ limit (currently set at £16,000); (67 claims with £6000 or more in capital)
- **Option 6** – Introduce a restricted award below 100% of the Council Tax liability.

In addition the Council also considered two further options

- **Option 7** – Include child benefit as income for calculation purposes
- **Option 8** – Include maintenance payments as income for calculation purposes

The first five proposals could affect around 456 of the 1,872 Working Age households by reducing the amount of benefit they currently receive towards their Council Tax.

The sixth proposal is an across the board cap that could affect all 1872 Working Age households by reducing all awards by a percentage.

The seventh and eight proposals would affect 515 of working age households

Step 3: Assessment of data and research

Identify what data and research is available to inform the impact of your proposals on service users and/ or staff. Where there are data gaps you should include this as an action within your **Community Impact Assessment Action Plan – Step 7**.

SHBC propose to use existing national data alongside localised data as we go through this assessment.

The Department for Communities and Local Government (DCLG)

DCLG have undertaken some relevant national impact assessment work themselves, and have produced two relevant papers for Councils to consider. They reinforce the following points:

- The spending review announced measures... ensuring that it promotes work and personal responsibility while controlling expenditure
- Continue to support the most vulnerable while ensuring all sections of society who are able to do so contribute to deficit reduction... preserving key benefits for older and vulnerable people...
- Sharing responsibility by localising power and funding, including by removing ring fencing around resources
- This reform will create stronger incentives for Councils to get people back into work and so support the positive work incentives that will be introduced through the Government's plans for Universal Credit
- It is not expected that this policy will disproportionately affect any particular gender or ethnicity
- The adverse impacts are justified by positive impacts of the policy [the Government's policy]
- Reducing the costs of support for Council Tax is a contribution to the Government's vital programme of deficit reduction

DCLG also produced a number of relevant up to date statistics:

- 5.9 million Council Tax Benefit customers as at April 2012
- 3.3 million Working Age Council Tax Benefit customers (55%)
- 2.7 million Pensioner Age Council Tax Benefit customers (45%)
- Some 48% of CTB recipients aged under 65 may have at least one adult or child who is disabled
- Some 18% of CTB recipients aged under 65 report caring responsibilities
- 3.9 million Council Tax Benefit customers receive a 'Passported' benefit (66%)

- Of the 3.9 million 'Passported' recipients, 55% are Working Age
- DCLG's Localising Council Tax Equality Impact Assessment paper is available at:
<http://www.communities.gov.uk/publications/localgovernment/lqfblocalcounciltaxeia>
- DCLG's Localising Support for Council Tax Vulnerable People – key local authority duties paper is available at:
<http://www.communities.gov.uk/publications/localgovernment/lscvtvulnerablepeople>

The Institute for Fiscal Studies (IFS)

The IFS reported on the proposals [<http://www.ifs.org.uk/events/780>] that:

- 5.9 million households receive CTB nationally (more than any other 'means tested' benefit), but only two thirds of those entitled to CTB claim the benefit
- £4.9 billion is awarded each year (2.4% of total benefit and tax credit expenditure) at an average £15.69 per claimant per week
- Financial risks to authorities facing shortfall (or surplus) if cost is higher (or lower) than expected. If there is a shortfall, only option is to draw on reserves or cut spending
- Councils will have incentives to reduce the cost of rebates through encouraging increased employment, but also by discouraging claimants from living in their area, discouraging development of low value properties, not promoting take up of schemes, reducing payments due to fraud and error and by reducing council tax rates
- Also, incentive to focus disproportionately on minimising admin costs, even at the expense of other objectives within two tier areas
- As with all reforms that reduce council tax rebate entitlement, poorest lose most – reducing maximum entitlement to 85% of council tax liability involves slightly lower losses for the poorest fifth and slightly higher losses for those slightly richer
- Those in higher Band properties (who tend to be families with children), may not be as poor as low current income suggests in all cases – as living in more expensive properties
- In summary: All options for cutting support for council tax tend to hit poor the most. Reforms that save 10% typically involve reducing support for those entitled to maximum amount, and does require Councils to collect some tax from those with the lowest incomes. More aggressive means-testing can protect the poorest, but to save the full 10%, cuts must be so severe that some people would be worse off after a pay rise. Localisation has advantages but adds complexity to the system and gives Councils undesirable incentives as well as desirable ones.

The Joseph Rowntree Foundation (JRF)

JRF also comment on the proposals [<http://www.jrf.org.uk/sites/files/jrf/council-tax-reform-summary.pdf>]:

- Localisation will strengthen councils' incentives to promote employment and growth, but will also give them an incentive to discourage low-income families from living in the area, and a disincentive to encourage take-up of support. Having schemes that vary across the country will reduce transparency and increase bureaucracy.
- Unless councils find additional money from elsewhere, a requirement to protect pensioners in England will imply a 19% cut in support for working-age claimants, on average.
- 85% of CTB goes to the lower-income half of households, and almost half of CTB goes just to the lowest-income fifth, any cuts to it are bound to hit predominantly poorer families.
- Reforms that would save councils the full 10% typically involve reducing support for the poorest claimants. The poll tax experience showed how difficult it can be to collect small amounts of tax from low-income households. Options that protect the poorest claimants either fail to generate large savings, or significantly weaken work incentives, or both.
- Having a separate means test for council tax support, varying across the country, could easily undermine the simplification and rationalised work incentives that were central to the idea of Universal Credit.
- Those designs that protect the poorest claimants are those that lead to the weakest work incentives.

Children's Charities

Action for children, the NSPCC and the Children's Society predicts that 'vulnerable families' could be £3,000 a year worse off by 2015, as a result of public spending cuts. The third sector groups estimate that the number of children living in 'extremely vulnerable families', currently less than 50,000, will almost double by 2015 – to 96,000.

The Department for Work and Pensions (DWP)

The DWP undertook an Equality Impact Assessment – with consultation – in relation to Universal Credit [www.dwp.gov.uk/consultations/2010/21st]

[century-welfare/](#) where some parallels can be drawn:

- The current system of benefits is of particular importance to people who are covered by equality legislation. This may be due to:
 - Having characteristics that make someone more or less likely to take up a particular benefit (such as a greater likelihood of being out of work)
 - The length of time they stay on benefit and destinations after leaving benefit
 - The evolving benefits system and policy change
 - The effects of the economy (for example when in downturn)
 - Take up and differential outcomes
- Barriers to employment can mean that some groups are out of work for longer and may have greater need to rely on the benefits system. For example data on employment rates show that:
 - Women's employment rates are below those of men (68.8% compared to 75.4%)
 - Ethnic minority groups have a lower employment rate than white groups (60.2% compared to 73.9%)
 - Employment rates are lower for disabled than non-disabled people (48.4% compared to 77.5%)
- Associated with this, poverty affects certain groups disproportionately. For example:
 - The risk of a disabled adult living in poverty is higher than for adults with no disability and is particularly high for workless disabled adults
 - Individuals of Pakistani/ Bangladeshi ethnic background have a significantly higher risk of being in poverty when they are in work than any other group
- The structure of the current welfare system has developed piecemeal to meet the needs and reflect changes in society (for example, support for children, for extra disability-related costs, and lone parents). These categories do not necessarily read across to equality groups:
 - The definition of disability under the Equality Act does not coincide with eligibility for disability related benefits, but the vast majority of people receiving those benefits would be likely to fall under the Equality Act definition
 - As a result, complexity may affect certain groups because of the range of overlapping payments that might be available to meet needs
- The way the current system works can also be a disincentive to work. For example:
 - Complexity can be a particular problem for some people from ethnic minority groups (for example those whose first language is not English)
 - In headline terms, making work pay and improving the prospects of these groups with lower employment rates is one of the most important things the Government could do to promote equality of opportunity

Surrey County Council (SCC) Local Area Profile (Surreyi)

This profile includes data from the first release of the 2011 Census data, the **Community Well-being** data collection and the **Joint Strategic Needs Assessment** (JSNA). It provides just a fraction of the available data that is held on the Surreyi web pages and each headline indicator can be clicked through online to link back to the relevant data page. Please note that the figures relate to the general population – rather than being specific to just those who claim Benefit. More information can be found at: www.surreyi.gov.uk

	Click on an indicator to see more details	SHBC value	Local Authority Average in Surrey	Local Authority Lowest in Surrey	Local Authority Highest in Surrey
Population	1. Total population Census (10 years), 2011 Census	86,144	102,945	75,102	137,835
	2. Male/female split - % female Census (10 years), 2011 Census	50.24%	51.02%	50.24%	51.62%
	4. Number of households Census (10 years), 2011 Census	33,546	41,436	29,784	55,423
	5. Average persons per household Census (10 years), 2011 Census	2.52	2.43	2.34	2.52
Age	6. % of population under 5 Census (10 years), 2011 Census	5.95%	6.3%	5.39%	7.34%
	7. % of population under 15 Census (10 years), 2011 Census	18.28%	18.08%	16.17%	20.1%
	8. % of population aged 15-24 Census (10 years), 2011 Census	10.84%	11.41%	9.37%	15.44%
	9. % of population aged 25-64 Census (10 years), 2011 Census	54.16%	53.34%	51.27%	55.66%
Housing	21. Average number of children per household Census (10 years), 2001 Census	1.81	1.83	1.78	1.87
Demography	6. People living in a same-sex couple Census (10 years), 2001 Census	108	143	72	198
	34. Lone parent households Census (10 years), 2001 Census	4.2%	4%	3.32%	4.73%

	Click on an indicator to see more details	SHBC value	Local Authority Average in Surrey	Local Authority Worst in Surrey	Local Authority Best in Surrey
Economy	1. % of population claiming job seekers allowance Month, Aug 2012	1.66%	1.62%	2.0%	1.33%
	2. % of Working Age population claiming DWP benefits Calendar Quarter, 2011/Q4	6.86%	7.45%	9.51%	6.43%
Children & Young People	10. Child well-being index Indices of Deprivation (3 years), 2009 CWI	55.68	71.79	101.2	50.77
	11. % of children living in poverty - All Children Calendar Year, 2010	9%	10.2%	14.1%	7.9%
	12. Number of Young people Not in Education, Employment or Training (NEET) Month, Mar 2012	70	76	115	52
	13. % of lone parent households with dependant children Census (10 years), 2001 Census	4.2%	4%	4.73%	3.32%
Deprivation	1. Children in Poverty Calendar Year, 2010	9%	10.2%	14.1%	7.9%
	4. Index of Multiple deprivation (score) Indices of Deprivation (3 years)	6.88	8.88	11.2	6.88
Specific Conditions	54. People claiming Disability living allowance Calendar Quarter, 2012/Q1	2.5%	2.82%	3.3%	2.24
	72. QOF prevalence 18+: learning disabilities Financial Year, 2010/11	0.21%	0.36%	0.7%	0.21%

Within the SHBC draft CTS Framework, modelling has taken place to assess what affects each change may have on a current benefit customer. Furthermore, we have undertaken analysis to best inform the Proposed Options. Some local statistics have been produced:

Surrey Heath Borough Council data (snapshot taken in 30 November 2012)

Of 35,211 SHBC domestic properties:	3440 households receive Council Tax Benefit (9.7%)
Of the 3440 households	1568 are claims from pensioners and are protected from any savings/ cuts (45.6%)
In addition the 1568 claims from pensioners	14 Second Adult Rebate claims from pension age claimants are protected
Of the remaining 1872 working age households:	27 are Second Adult Rebate claims
Of the remaining 1845 working age households	1060 are from 'Passported'⁴ households
Of the remaining 785 working age households:	313 are single parents (40%) 211 are single (27%) 203 are couples with children (26%) 58 are couples (7%)
Of the 1845 working age households:	1262 (68%) are not employed whilst 583 (32%) do undertake work
Of around the 1060 'Passported' ⁵ households:	Disability information is not always available where a customer is in receipt of a 'Passported' benefit: (NB – For a customer to receive 'Passported' benefits they will be working minimal hours with low earnings or not working at all, and have income and savings at or below the Government's assessment of their household's need. Those receiving 'Passported' benefits receive a maximum benefit entitlement without the need for the Local Authority to collect or verify their personal data. SHBC therefore does not hold complete information relating to this group). DCLG suggest nationally, around 48% of those in receipt of a 'Passported' benefit may

⁴ 'Passported' means those in receipt of Income Support, Employment Support Allowance (Income Related) or Job Seekers Allowance (Income Based)

⁵ 'Passported' means those in receipt of Income Support, Employment Support Allowance (Income Related) or Job Seekers Allowance (Income Based)

	also have a disability of some sort.⁶
Of the remaining 785 'Non-Passported' ⁷ households:	<p>Disability information is available where a customer is not in receipt of a 'Passported' benefit:</p> <p>28 receive a severe disablement premium (4%)</p> <p>138 receive a long term disability premium (18%)</p> <p>12 include a disabled child premium (2%)</p> <p>(NB – The definition of disability for equality legislation is wider than any everyday notion of 'disability' or eligibility for disability payments. For example, people are protected against discrimination from the point of diagnosis for certain conditions (for example cancer or HIV) but this is not necessarily the point at which people would gain eligibility for disability related benefits).</p>
Of the 1845 working age current households:	<p>Taken together, between 23% and 48% of benefit households are likely to include someone with a disability.</p> <p>Nationally, take up statistics suggest that disabled people are no less likely to take up benefits to which they are entitled than those who are not disabled.⁸</p>

⁶ Taken from DCLG 'Localising Council Tax Equality Impact Assessment', January 2012

⁷ 'Non-Passported' means those not in receipt of a 'Passported' benefit

⁸ Taken from DWP 'Equality Impact Assessment Universal Credit: welfare that works', November 2010

Step 4: Consultation

The six proposed Framework Options, along with demographic information (such as questions around benefit entitlement, household composition, and potential 'protection' issues) and equalities data – were developed into the form of a structured CTS Consultation Questionnaire.

The CTS Questionnaire, along with a CTS Information Booklet and Draft Scheme, were made available to all residents on the SHBC web site as part of the formal public consultation which ran from 24th September to 25th November 2012.

Furthermore, SHBC directly promoted the consultation as widely as possible through a number of ways, such as:

- Creation of a specific SHBC CTS web page – linking to the CTS Information Booklet, Draft Scheme and Questionnaire
- Introducing front page links on the SHBC web site
- Paper copies available at the Surrey Heath House
- Specific targeting of the 2098 current Working Age Council Tax Benefit recipients with an informative letter and link to the questionnaire
- Publicising the proposed changes and consultation in the local newspaper and also in the Councils magazine "Heathscene"
- Producing news and media release(s)
- And taking note of any other proportionate ideas or recommendations from interested parties.

All of the feedback received has been analysed and a report has been produced.

Step 5: Impact Assessment

Use the data, research and consultation results to consider the positive and negative impacts of the proposals in respect of the three aims;

- Eliminate unlawful discrimination, harassment and victimisation;
- Advance equality of opportunity; and
- Foster good relations

and the protected characteristics of the Equality Duty. Don't forget to consider staff as well as service users. Please use the template below.

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
-----------------	--	--------------------------------------	-----------	---

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Age – Older People⁹ (e.g. older people, younger people and children)	Yes			Prescribed Government regulations state that older people (those of pension credit age – ‘Pensioners’) must be protected. Their award under CTS must be calculated in the same way as their current award is calculated. This group should not be affected.
			None	Second Adult Rebate – Under the new scheme, entitlement remains unchanged for Pensioners. <i>SCC adds: “Second Adult Rebates are commonly paid where there is a single adult with a parent living with them. Some older people may therefore be living in a household that benefits from a Second Adult Rebate and could be disproportionately affected by this change. In this circumstance, even if the older person has reached pensionable age, they would not benefit from the Government’s proposed universal protection for pensioners; as they are not the householder they would not be making the claim.”</i> <i>SHBC stats (see page 13-14) show that: 1 of 27 (4%) Second Adult Rebate Working Age claims include a Second Adult who is a pensioner. Any liable Council Tax customer losing their Second Adult Rebate can still claim CTS in their own right.</i>
			None	Backdating – Under the new scheme, entitlement remains unchanged for Pensioners.
			None	Band Restriction – As above.
			None	Minimum Award – As above.
			None	Capital Limit – As above. <i>SCC adds: “People add to savings throughout their life. The older a person is, the more likely they are to have accumulated savings that exceed the threshold.¹⁰ Therefore people in later middle age who are currently entitled to Council Tax Benefit may have their entitlement</i>

⁹ SHBC stats (see page 13-14) show that: 1,400 of 3,400 (41%) claims are made by Pensioners and are protected from any savings/ cuts

¹⁰ HSBC found that the average ‘savings pot’ by age group was £4,048 at 16-24, £8,103 at 25-34, £9,087 at 35-44, £17,305 at 45-54 and £30,356 for the over 55s. Taken from HSBC: ‘Savings map of Britain: A snapshot of the state of the nation’s savings’, 2011

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
				removed if the threshold is lowered.” <i>SHBC stats (see page 13-14) show that: Of 67 Working Age claims with capital over £6,000: 22 (33%) households are aged 45 to 54 and 14 (21%) households are aged 55 and over.</i>
			None	Maximum Award – Under the new scheme, entitlement remains unchanged for Pensioners.
Age – Younger People (age 17 to 25)	Yes			SHBC has chosen to retain the earnings disregards for those that work – to encourage employment.
			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
		Yes (low)		Backdating – Younger people may have less experience or knowledge of the benefits system, and so may therefore more often qualify for ‘backdating’, and so losing this element could have a negative impact. <i>SHBC stats (see page 13-14) show that: 9% of successful Backdated benefit claims were awarded to someone with a disability premium.</i>
			None	Band Restriction – No negative impact specific to characteristic has been identified.
			None	Minimum Award – No negative impact specific to characteristic has been identified.
			None	Capital Limit – As above.
			Yes (high)	

¹¹ DWP research found that: 58% of 18 to 24 year olds are employed compared to 80% of 25 to 49 year olds. Taken from DWP ‘Equality Impact Assessment Universal Credit: welfare that works’, November 2010
AGENDA\COUNCIL\22Jan13

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Age – Children ¹²	Yes			<p>SHBC has chosen to retain a number of advantageous aspects of the outgoing scheme such as providing higher applicable amounts (needs assessment) through specific child allowance(s) and family premiums, whilst Child Benefit and Child Maintenance will be disregarded as an income in full.</p> <p>Furthermore, child care costs will be used to positively affect a calculation, and working lone parents will also receive a higher disregard of their earnings.</p> <p>This is consistent with the Council's duty to safeguard and promote the welfare of children.</p>
			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
			None	Backdating – As above.
		Yes (low)		<p>Band Restriction –</p> <p><i>SCC adds: "Families with a higher number of children may be more likely to live in larger homes to accommodate their family size. Larger homes, in turn may be more likely to be in a higher Council Tax Band."</i></p> <p><i>SHBC stats (see page 13-14) show that: Of 183 Working Age claims in Band E to H 82 (35%) contain at least one or more children.</i></p>
			None	Minimum Award – No negative impact specific to characteristic has been identified.
			None	Capital Limit – As above.
			None	Maximum Award – As above.
Disability ¹³	Yes			SHBC has chosen to retain a number of advantageous aspects of the outgoing scheme such as

¹² *EEBC stats (see page 13-14) show that: 1,215 of 2,000 (61%) Working Age claims include a child in the household. 830 of these households are single parents. 440 of these households contain at least one child under five years old*

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
(Long-term health impairment could include mental health problems, asthma, heart conditions, chronic fatigue etc.)				<p>applying higher disregards and higher applicable amounts for those who receive a disability related benefit or Carers Allowance, in recognition of their potentially higher living costs.</p> <p>SHBC has also chosen to retain the higher earnings disregards for disabled people who work. This is consistent with the Council's duty to protect and promote the welfare needs of disabled people.</p>
		Yes (low)		<p>Second Adult Rebate – It may be the case that some residents with disabilities do have a second adult in the household – and so are entitled to this rebate. Losing this element could have a negative impact on this group.</p> <p>In some instances, it could be the case that the second adult themselves has a disability, and so may not be able to increase their income to cover the 25% element of this rebate.</p> <p><i>SCC adds: "On average, disabled people's income is less than half that earned by non-disabled people.¹⁴ Disabled people may therefore be more likely to meet the 'low income' criteria applied to second adults and could be disproportionately affected by this change."</i></p> <p><i>SHBC stats (see page 13-14) show that:</i> None of the 27 Working Age Second Adult Rebate claims include a Second Adult who would qualify for a disability premium.</p>
		Yes (high)		<p>Backdating – Certain disabilities can affect a person's ability to claim at the correct time.</p> <p><i>SCC adds: "A person suffering a long-term illness or having had an accident that causes disability may be unable to make an immediate claim due to their personal circumstances. Currently they would be able to make a backdated claim at a later date; this proposal could remove or limit this opportunity."</i></p> <p><i>SHBC stats (see page 13-14) show that:</i> 9% of successful Backdated benefit claims were awarded to someone with a disability premium.</p>

¹³ *EEBC stats (see page 13-14) show that:* Of 1,000 Working Age non pass-ported claims: 38 (4%) receive a severe disablement premium, 106 (10%) receive a long term disability premium & 37 (4%) include a disabled child premium [181 (18%) in total]. Of the remaining 1,000 Working Age non-passported claims, between 18% and 48% of households are likely to include someone with a disability

¹⁴ Disability Rights Partnership: *Localising Support for Council Tax in England: Disability Rights Partnership Response*, 2011

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
		Yes (low)		<p>Band Restriction – Some disabled households are larger as extra accommodation space may be required by the resident.</p> <p>A Disabled Band Reduction can be granted in certain prescribed circumstances on the Council Tax liability which reduces the charge to that of a property in the next Council Tax Band down – a customer could however still be affected by this proposal if the reduced Band remains higher than any implemented restriction.</p> <p><i>SCC adds: “People with a disability may live in larger homes to accommodate equipment or property adaptations required to manage their disability. Larger homes, in turn may be more likely to be in a higher Council Tax Band.”</i></p> <p><i>SHBC stats (see page 13-14) show that: Of 183 Working Age claims in Band E to H households: 1 (0.4%) receive a severe disablement premium, 10 (5%) receive a standard disability premium & 4 (2%) include a disabled child premium.</i></p>
			None	Minimum Award – No negative impact specific to characteristic has been identified.
			None	Capital Limit – As above.
		Yes (high)		<p>Maximum Award – This group could be impacted due to reduced household income through the need to pay some/ more Council Tax and may find it more difficult to increase their income through undertaking work/ increased hours.¹⁵</p> <p><i>SHBC stats – together with DCLG guidance – (see page 13-14) show that: Of 2,000 Working Age claims: Between 18% and 48% of benefit households are likely to include someone with a disability.</i></p>
Gender ¹⁶	Yes			SHBC has chosen to retain higher earnings disregards for Lone Parents that work – to encourage employment.

¹⁵ DWP research found that: employment rates for those defined as disabled under equality law (48%) are substantially below the average employment rates (72%). Taken from DWP ‘Equality Impact Assessment Universal Credit: welfare that works’, November 2010

¹⁶ EEBC stats (see page 13-14) show that: Of 700 Working Age single person claims: 370 (53%) are made by a male. Of 830 Working Age single parent claims: 790 (95%) are made by a female
AGENDA\COUNCIL\22Jan13

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
(male, female)		Yes (low)		<p>Second Adult Rebate –</p> <p><i>SCC adds: “Women are more likely to be single parents¹⁷ so are more likely to have an adult child who has remained living with them or has returned to live with them. Single parents living with an adult child are common claimants of the Second adult Rebate so women could be disproportionately affected by this proposal.”</i></p> <p><i>SHBC stats (see page 13-14) show that: Of 27 Working Age Second Adult Rebate claims: 23 (85%) are made by a female.</i></p>
			None	<p>Backdating – No negative impact specific to characteristic has been identified.</p>
			None	<p>Band Restriction – As above.</p>
			None	<p>Minimum Award – As above.</p>
			None	<p>Capital Limit – As above.</p> <p><i>SCC adds: “Men are more likely to save than women.¹⁸ Therefore they may be more likely to have accumulated savings that exceed the proposed savings threshold.”</i></p> <p><i>SHBC stats (see page 13-14) show that: Of 67 Working Age claims with capital over £6,000: 1 (1%) single customers are female, 0 (0%) are female and 66 (99%) are couples.</i></p>
<p>Race (Minority ethnic communities e.g. colour, ethnic or national origin,</p>			None	<p>Second Adult Rebate – No negative impact specific to characteristic has been identified.</p> <p><i>SCC adds: “In some communities it is more common for parents to live with their adult children or for adult children to remain living in their parents’ home for longer periods (for example until they are married). These are common circumstances in which a Second Adult rebate is claimed.”</i></p>

¹⁷ In the 2011 Census there were 4,802 lone female parent households in Surrey, in comparison to 707 lone male parent households.

¹⁸ HSBC: ‘Savings map of Britain: A snapshot of the state of the nation’s savings’, 2011

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
nationality. This includes travellers and gypsies)				No local evidence is held in relation to this issue.
		Yes (low)		Backdating – National evidence suggests that some customers across ethnic groups may encounter problems accessing services because of difficulties reading and writing English. ¹⁹
			None	Band Restriction – No negative impact specific to characteristic has been identified. <i>SCC adds: “In some communities it is more common for parents to live with their adult children or for adult children to remain living in their parents’ home for longer periods. This may require these families to live in larger homes, which in turn may fall into higher Council Tax Bands.”</i> No local evidence is held in relation to this issue,
			None	Minimum Award – No negative impact specific to characteristic has been identified.
			None	Capital Limit – As above.
			None	Maximum Award – As above.
Religion or Belief (Believing faiths/ religions e.g. Christians, Hindus, Muslims, people with no faith/religion)			None	Second Adult Rebate – No negative impact specific to characteristic has been identified. <i>SCC adds: “In some communities it is more common for parents to live with their adult children or for adult children to remain living in their parents’ home for longer periods (for example until they are married). These are common circumstances in which a Second Adult rebate is claimed.”</i> No local evidence is held in relation to this issue.
			None	Backdating – No negative impact specific to characteristic has been identified.
			None	Band Restriction – As above. <i>SCC adds: “In some communities it is more common for parents to live with their adult children or for adult children to remain living in their parents’ home for longer periods. This may require</i>

¹⁹ DWP ‘Equality Impact Assessment Universal Credit: welfare that works’, November 2010

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
				<p>these families to live in larger homes, which in turn may fall into higher Council Tax Bands.”</p> <p>No local evidence is held in relation to this issue.</p>
			None	Minimum Award – No negative impact specific to characteristic has been identified.
			None	Capital Limit – As above.
			None	Maximum Award – As above.
Sexual orientation (heterosexuals, lesbians, gay men and bisexual men or women)			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
			None	Backdating – As above.
			None	Band Restriction – As above.
			None	Minimum Award – As above.
			None	Capital Limit – As above.
			None	Maximum Award – As above.
Gender re-assignment (people who intend, are in the process of or have undergone gender reassignment)			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
			None	Backdating – As above.
			None	Band Restriction – As above.
			None	Minimum Award – As above.
			None	Capital Limit – As above.
			None	Maximum Award – As above.

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Marriage and Civil Partnership (only in respect of eliminating unlawful discrimination)			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
			None	Backdating – As above.
			None	Band Restriction – As above.
			None	Minimum Award – As above.
			None	Capital Limit – As above.
			None	Maximum Award – As above.
Pregnancy and Maternity			None	Second Adult Rebate – No negative impact specific to characteristic has been identified.
		Yes (low)		Backdating – Backdating is sometimes claimed by those experiencing life changing events, such as pregnancy and maternity, which can affect their ability to claim immediately. <i>SCC adds: "A pregnant women or new mother, particularly a lone parent, may be unable to make an immediate claim due to their personal circumstances. Currently she would be able to make a backdated claim at a later date; this proposal could remove or limit this opportunity."</i>
			None	Band Restriction – No negative impact specific to characteristic has been identified.
			None	Minimum Award – As above.
			None	Capital Limit – As above.
		Yes (high)		Maximum Award – This group could be impacted due to reduced household income through the need to pay some/ more Council Tax at a time when they may find it more difficult to increase their income through, for example, undertaking work/ increased hours.
Non-statutory Group Consideration				

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Socio-Economically Disadvantaged ²⁰ (e.g. factors such as family background, educational attainment, neighbourhood, employment status)	Yes			SHBC has chosen to retain a number of advantageous aspects of the outgoing scheme such as providing earnings and income disregards, and premiums in a customers' needs assessment.
		Yes (low)		Second Adult Rebate – Affects 1% of Working Age households and then by up to a quarter of their Council Tax bill. DCLG state: “those in receipt of Second Adult Rebate can in most cases afford to meet the liability in their own right – and if they cannot, they are eligible for support - again in their own right.” ²¹
		Yes (high)		Backdating – Affects 5% of Working Age households, however before any award is made, the customer has had to show ‘good cause’ and so on a case by case basis, losing this element would have a negative impact.
		Yes (high)		Band Restriction – Depending on the level of Band Restriction, this could affect between 1% (if restricted to Band F) and 10% (if restricted to Band D) of current Working Age households. If restrictions were set at Band D, a customer in a Band G property (currently in receipt of full benefit) would lose £1,030 a year (£20 a week) in benefit.

²⁰ *EEBC stats (see page 13-14) show that: 1,270 of 2,000 (64%) Working Age households receive an award that fully covers the cost of the Council Tax bill. 1,255 of 2,000 (63%) do not work.*

²¹ Taken from DCLG ‘Localising council tax support: transitional grant scheme: Frequently Asked Questions’, November 2012

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
		Yes (low)		Minimum Award – up to 4% of Working Age households could lose the help that they currently receive as their awards are under £5 per week. The maximum that they would need to find each year would be £260. This option would tend to affect the 33% who work (and are in receipt of reduced awards) as opposed to the 67% that are currently awarded benefit in full.
		Yes (high)		Capital Limit – By reducing the capital limit to £6000, up to 3% of Working Age households could lose all help with their Council Tax.
		Yes (high)		Maximum Award – All 1845 Working Age households would be affected by a cap to the CTS award. Setting a cap at 15% would leave the 1845 households with an average reduction of £231.90 a year/ £4.46 per week. For those in receipt of ‘Passported’ ‘out of work’ benefits such as Income Support, Job Seekers Allowance and Employment Support Allowance (who may have traditionally paid nothing towards their Council Tax bill), they too would be required to pay at least some of their bill, and may lack experience of budgeting for this. By its very nature, CTS will primarily affect the lowest income households in the borough.
People from abroad			None	Prescribed Government regulations state that foreign nationals with limited immigration status will continue to be excluded from receiving CTS in the same manner that they are currently excluded from benefit.
Refugees			None	Prescribed Government regulations state that those who have recognised refugee status, humanitarian protection, discretionary or exceptional leave to remain granted outside the immigration rules will continue to be entitled to apply for CTS – so long as their status has not been revoked.
SHBC Staff /		Yes (low)		SHBC are aware that reductions in the amount of financial help that residents have traditionally received, and the wider implication of other welfare cuts and general austerity measures, could

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
Administration				<p>well impact on their behaviour and attitude towards those they see as responsible for such cuts.</p> <p>SHBC Front Line Staff could face:</p> <ul style="list-style-type: none"> • Greater difficulty dealing with customers (due to lower/ nil awards, a new/ more complex scheme, the increased likelihood of Council Tax arrears possibly combined with an increased inability/ difficulty in meeting this debt, and subsequent collection and recovery procedures) • Change in working practices (new/ more complex scheme) • Increased customer contact (queries, complaints and appeals) • Uncertain future (expectation that CTS will be re-modelled within several years to simplify and to save costs) • Increased recovery workload (especially from those with less/ no means to pay due to reduced awards) <p>SHBC Team Leaders, Managers and HR team could face:</p> <ul style="list-style-type: none"> • A need to increase support for Front Line Staff • An increase in complaints and appeals • Extra considerations around discretionary areas • A need to manage stress/ sick leave

Equality Strand	Positive It could benefit Yes / No	Negative Yes (High / Low) / No	No Impact	Reason Describe the person you are assessing the impact on, including identifying: details of characteristic (if relevant) e.g. mobility problems / particular religion and why and how they might be negatively or positively affected. Identify risks if negative; identify benefits if positive
-----------------	--	--------------------------------------	-----------	---

Step 6: Decision / Result

Following your analysis, you should make a decision as to whether or not your proposal will negatively or positively impact any protected characteristics. You should take into account all factors such as finance and legal in your decision. Include information about whether stakeholders agree with your findings and proposed response (action plan).

Summary of 'Negative' Impact by Characteristic

Option	Age – Younger People	Age – Children	Disability	Gender	Race	Pregnancy & Maternity	Socio-Economically Disadvantaged
Second Adult Rebate			Negative (low)	Negative (low)			Negative (low)
Backdating	Negative (low)		Negative (high)		Negative (low)	Negative (low)	Negative (high)
Band Restriction		Negative (low)	Negative (low)				Negative (high)
Minimum Award							Negative (low)
Capital Limit							Negative (high)
Maximum Award	Negative (high)		Negative (high)			Negative (high)	Negative (high)

Step 7: Community Impact Assessment Action Plan

Once you have taken all factors into account, you need to create an Action Plan using the template below. These actions should be based on the information and analysis gathered during Steps 1 to 6. It should include any gaps in the data you have identified, and any steps you will be taking to address any negative impacts or remove barriers. You should also identify positive actions. The actions need to be built into your service planning framework. Actions/ targets should be SMART, Specific, Measurable, Achievable, Realistic and Time framed.

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
<p>Age: Younger People Impact due to reduced household income through the need to pay some/more Council Tax</p>	Monitor any adverse impact reported in the first year as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the first year	Use data collected at the end of the first year of implementation to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed	At the end of the first year of implementation prior to the review of the scheme	Revs & Bens Manager
<p>Age: Children Indirect impact due to number of claims in Band E to H households – where 35% have 1 or more children resident</p>	As above	As above	As above	Revs and Bens Manager
<p>Disability: Impact due to reduced household income through the need to pay some/more Council Tax</p>	As above	As above	As above	Revs and Bens Manager
<p>Gender: Impact due to 85% of Second Adult Rebate claims being made by a female</p>	As above	As above	As above	Revs and Bens Manager

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
<p>Race: Indirectly due to possible language barriers where English is not the first language. There is not enough data at the present time to make specific recommendations but to be kept under review</p>	<p>Monitor any adverse impact reported in the first year as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the first year Provide information in other language/ format on request</p>	<p>Monitor numbers of customers requesting help, support and information in alternative formats at the end of the year as part of existing performance management framework and use such information to inform future decision making process</p>	<p>At the end of the first year of implementation prior to the review of the scheme</p>	<p>Revs and Bens Manager</p>
<p>Pregnancy and Maternity: Impact due to reduced household income through the need to pay some/ more Council Tax</p>	<p>Monitor any adverse impact reported in the first year as part of the existing performance management framework to establish base data for consideration as part of the review of the scheme at the end of the first year</p>	<p>Use data collected at the end of the first year of implementation to inform future decision making. This will be reflected in any revised CEIA when the scheme is reviewed</p>	<p>At the end of the first year of implementation prior to the review of the scheme</p>	<p>Revs and Bens Manager</p>
<p>Socio-Economically Disadvantaged: Impact due to reduced household income through the need to pay some/ more Council Tax Impact due to not having experience of paying/ budgeting for Council Tax payments Indirect impact due to wider welfare reforms impact Impact of socio-economic climate on employment and other factors</p>	<p>As above and Monitor collection rates and contact made by those who may not have previously paid Provide information, help and advice on request Specifically contact those who may not have received Council Tax bills previously</p>	<p>Monitor collection rates through the year and react accordingly Use data collected at the end of the first year of implementation to inform future decision making This will be reflected in any revised CEIA when the scheme is reviewed</p>	<p>At the end of the first year of implementation prior to the review of the scheme</p>	<p>Revs and Bens Manager</p>

Issues Identified	Actions Required	Progress Milestones	By When?	Responsible Officer(s)
Staff: Potential abuse and stress faced by staff from irate residents and increased workload	Communicate developments and progress made through proposals, consultation and decision making stages Train front line staff in the new scheme	Specifically review at monthly team meetings and take action as required	On-going and throughout the process	Revs and Bens Manager

Step 8: Sign off

	Name & Job Title	Signature **	Date
Lead Officer:	Kelvin Menon		10/12/2012
Validated By: (Head of Service)	Robert Fox – Revenues & Benefits Manager		10/12/2012
Approved By: (Equalities Lead)	Jo Hardy – Business and Community Development Officer		10/12/2012
Published on website by: (Consultation & Communication team)			

** Please type your name to allow forms to be sent electronically

