



Appendix E



**Equality Impact Assessment (EIA)**

Name of Policy or Practice	Council Tax Premiums - Long Term Empty Properties & Second Homes		
Head of Service responsible for the Policy or Practice	Andrew Kirkham/ Susan Plumb		
Name of officer (s) completing impact assessment form	Susan Plumb		
Service	Revenues & Benefits Assessment Service	Date of Assessment	03.03.16

EIA Completed by :		EIA Agreed by Head of Service :	
Date	03.03.2016	Date	03.03.2016
Name(s)	Susan Plumb	Name	Andrew Kirkham
Signature(s)		Signature	

## STEP 1 – Identify the Main Aims and Objectives of the Policy or Practice

1. What is being assessed? (*Please double click on the box and select 'checked' as appropriate to cross X*)

- New and revised policies or practices
- New procedures (which modify service delivery or employment practices)
- Service review or re-organisation proposals which affect the community and/or staff
- Efficiency or saving proposals
- Setting budget allocations for new financial year
- Decisions affecting service users, employees or the wider community
- New project proposals affecting staff, communities or accessibility to the built environment, eg, new construction work or adaptations to existing buildings
- Other please explain in the box below :

2. What are the overall aims and objectives of the policy or practice ?

The discretion given to local authorities to charge a premium is intended to be a tool to help local authorities to:-

- Bring long-term empty homes back into use to provide safe, secure and affordable homes; and
- Support local authorities in increasing the supply of affordable housing and enhancing the sustainability of local communities.

The proposal is likely to assist with the building of resilient communities, this links in with outcome 3 of the Council's Corporate Plan - people in Conwy live in safe and appropriate housing. Councils are to be encouraged by the Welsh Government to channel any additional revenue towards addressing local problems related to the provision of affordable housing.

3. Who is the policy or practice intended to help or benefit (stakeholders) ?

Residents of Conwy -The proposal is likely to assist with the building of resilient communities, this links in with outcome 3 of the Council's Corporate Plan -people in Conwy live in safe and appropriate housing. Councils are to be encouraged by the Welsh Government to channel any additional revenue towards addressing local problems related to the provision of affordable housing.

4. Who are the main consultative groups or communities of interest ?

Owners of second homes or long-term empty homes together with residents of Conwy county.

## **STEP 2 - Consider Existing Information and What This Tells You**

When completing this section, you need to consider if you have sufficient information with which to complete your EIA, or whether you need to undertake a period of engagement/consultation before continuing. The legislation relating to the EIA process requires you to **engage and involve people who represent the interests of those who share one or more of the protected characteristics and with those who have an interest in the way you carry out your functions**. This needs to be proportionate to the policy or practice being Equality Impact Assessed. You may have already recently undertaken consultation specifically on this policy or practice. Other officers within CCBC may have carried out engagement work which will be relevant to this EIA and you can review the Community Involvement Database to find out what engagement activities have taken place in Conwy and establish if this is relevant. If you have very little or no information from previous engagement that is relevant to this EIA, you should consider undertaking some engagement work with your stakeholders and with relevant representative groups to ensure that you do not unwittingly overlook the needs of each protected group.

5. What do you already know about the impact on each protected characteristic from your experience of current service delivery or previous engagement or consultation? You could refer to the Initial Equality Impact Assessment Screening Form and the Community Involvement Database.

<b>Protected Group</b>	<b>Relevance of the policy / practice by protected characteristic</b>
Race	N/A
Disability	N/A

Sex	N/A
Age	N/A
Religion & Belief	N/A
Sexual Orientation	N/A
Gender Reassignment	N/A
Marriage & Civil Partnership	N/A
Pregnancy & Maternity	N/A
Welsh Language	N/A
Other (please state)	The legislation allows for discretion in relation to hardship in accordance with the Council's policy. This will be developed when all of the guidance becomes available from Welsh Government.

6. Summarise the additional relevant data, research and performance management information you already have:

<b>Data / Information</b>	<b>Examples</b>
<p>A consultation has been conducted on the Council's website which closed on 2<sup>nd</sup> March 2016, together with two prompts on the Council twitter page. The consultation provided varied feedback with support for charging the premiums on long term empty homes rather than second homes. A further in targeted consultation is planned in the summer months of 2016 prior to returning the initial determination back to Council for consideration.</p>	<p>Initial EIA Screening Complaints Compliments Service User data Service User Feedback Inspections or Audits</p>
<b>Research or Comparative Information</b>	<b>Examples</b>
<p>Comparative investigations with other authorities have been done to assess consistency across North Wales in the levels of premiums. Conwy can learn from the experiences in Scotland and England in relation to the issues arising following the introduction of their premiums. Consultation feedback on the proposed premiums can also be utilised.</p>	<p>Service User Surveys Studies by Government departments or professional bodies Census data Service based projects and research How Fair Is Wales (EHRC data)</p>

7. Have you complied with the duty to Engage as described at the start of this section and are you sufficiently informed to proceed?

**STEP 4 - Assessing the Impact**

10. Is there any evidence of higher or lower take-up or satisfaction by any group(s), and if so, how is this explained?

NO

11. Does the geography or demography of any groups reveal anything?

NO

12. Do any rules or requirements or the way the policy or practice is delivered prevent or reduce the likelihood of any groups from use or access or are any other barriers created for them?

Eg: due to limited income, location, times of availability, access to buildings, information or language, eligibility rules, dress code, cultural issues

NO

13. Can any of these limitations be justified on the grounds of advancing equality of opportunity or fostering good relations between those who share a protected characteristic and those who do not?

NO

14. Do any of these limitations amount to unlawful discrimination?

Yes  No  Not Sure   
*(please cross as appropriate X)*

If you answered Yes or Not Sure, please state on the table below, which protected group(s) it applies to and if possible explain why (including likely impact or effects of this proposed change):

Race N/A	Black Minority Ethnic groups Gypsies / Travellers Language
Disability N/A	Mobility Dexterity Blind or Visually impaired Deaf or Hearing impaired Mental Health Learning Disabilities
Sex N/A	Men Women
Age N/A	Older People Children Young People
Religion & Belief N/A	Faith communities
Sexual Orientation N/A	Gay Lesbian Bi-sexual Heterosexual
Gender Reassignment N/A	A person who proposes to, starts or has changed his or her gender
Marriage & Civil Partnership N/A	
Pregnancy & Maternity N/A	

<p>Human Rights N/A</p>	<p>Right to Education, Private and Family Life, Protection of property, etc</p>
<p>Welsh Speaking Communities N/A</p>	
<p>Other socially excluded groups or communities (please state)</p>	



15. If you answered No to Question 14, do the barriers and limitations amount to a differential impact for certain groups?

Yes  No  Not Sure   
*(please cross as appropriate X)*

16. If you answered Yes or Not Sure to Question 15, please give details in the box below and explain why

17. Do you have enough information to make an informed judgement?  
Yes  No  *(please cross as appropriate X)*

If you answered Yes, please justify:

Whilst an initial consultation was undertaken prior to the initial determination being made, as referred to section 6 and 7, a further targeted consultation will be undertaken.

If you answered No, what information do you require about protected groups?

18. Is it possible to get the information needed quickly and easily, or should data collection be included in the action plan? Please give details below:

Further data will be collated where possible prior to the determination being reviewed by Council.

## **STEP 5 – Dealing with Adverse or Unlawful Impact and Strengthening the Policy or Practice**

In this section, you will consider whether there are any measures to reduce or remove any adverse impact. You should also explore other ways of achieving the same goal and / or alternative means of delivering a service to meet the needs of different groups.

19. What measures can you introduce to the policy or practice which could reduce or remove any unlawful impact or disadvantage?

Steps have been taken to appropriately identify the homes that will be affected by the Council Tax premiums. Further targeted consultation will be undertaken with these identified home owners, in addition to consulting with the residents of Conwy.

20. What measures could be included to strengthen the policy/practice and foster good relations and advance equality of opportunity?

The decision is to be made by full Council adding strength to the determination.  
Ensuring that taxpayers are aware of the implementation of the premiums through the Conwy website and the determination is published in accordance with the legislation. Once a further consultation has been undertaken, the views of those directly affected by the premiums and those of the residents will be returned to Council to review the determination.

21. What actions could you take to achieve the same goal by an alternative means?

N/A

## **STEP 6 – Action Plan**

Please outline below the actions you will take to progress your proposal. These might involve carrying out additional Engagement/Involvement activities, collecting Equality data where this was not readily available to help with this EIA, undertake data analysis from future data obtained to monitor the impact of this policy/practice on an ongoing basis, any actions you need to take to ensure procurement complies with the General Duty, any arrangements you need to put in place to monitor and review the impact of this policy/practice in future, and so on.

<b>Action</b>	<b>Measure of Success</b>	<b>Timeframe</b>	<b>Lead Responsibility</b>	<b>Add to Service Plan (✓)</b>
<b>Actions to be taken before EIA and policy/practice can be signed off</b>				
Consider the consultation results	Feedback given by taxpayers.	With immediate effect.	Susan Plumb	N/A
<b>Actions after EIA and policy/practice signed off</b>				
Ensure that the appropriate legislation is followed when implementing the proposed premiums.	Legislation is adhered to.	12 months	Susan Plumb	Yes

**STEP 7 – Decision To Proceed**

22. Using the information you have gathered in steps 1 – 5 above, please state on the table below whether you are able to proceed with the policy or practice and if so, on what basis?

*(please cross as appropriate X)*

Decision		Action
<input checked="" type="checkbox"/> Yes	Continue with policy or practice in its current form	Complete the Monitoring and Review section (Step 8) to ensure the outcomes are monitored and regularly reviewed
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments for improvement	Complete Action Plan and Monitor and Review sections (Steps 6 & 8) to continually assess impact
<input type="checkbox"/> Yes	Continue with policy or practice but with amendments to remove any areas of adverse impact as identified in Step 5	Complete Action Plan (Step 6) to address any areas of adverse impact and Monitor and Review (Section 8) to continually assess impact
<input type="checkbox"/> No	Abandon this policy or practice as it is not possible to address the adverse impact, and consider alternative ways of addressing the issues	Complete Action Plan to address any issues resulting from abandoning policy and to deal with the adverse impact identified

## **STEP 8 – Arrangements for Monitoring Outcomes and Reviewing Data**

The EIA process is an ongoing one that doesn't end when the policy/practice and EIA is agreed and implemented. There is a specific legal duty to monitor the impact of policies/practices on equality on an ongoing basis to identify if the outcomes have changed since you introduced this new policy or practice.

23. Please outline below what arrangements you will make to monitor and review the ongoing impact of this policy or practice :

<b>Monitoring and Review arrangements</b> (including where outcomes will be recorded)	<b>Timeframe &amp; Frequency</b>	<b>Lead Responsibility</b>	<b>Add to Service Plan (✓)</b>
Consider further consultation with taxpayers and neighbouring authorities.	5 months	Susan Plumb	Yes
Review potential increase in hardship applications and Valuation Tribunal appeals.	Following implementation of the premium in 2017/2018 & 2018/2019.	Susan Plumb	Yes
Review tax avoidance measures and dwellings moving from Council Tax to National Non Domestic Rates.	Following implementation of the premium in 2017/2018 & 2018/2019.	Susan Plumb	Yes

### **STEP 9 – Publishing the Equality Impact Assessment**

**Please arrange for this completed EIA to be agreed by your Head of Service, refer to the EIA Policy regarding publishing arrangements and return a copy to the HR and Equality Officer.**