

WIRRAL COUNCIL

CABINET

19 JULY 2012

SUBJECT	WELFARE REFORM: LOCALISED COUNCIL TAX REDUCTION SCHEME
WARD/S AFFECTED	ALL
REPORT OF	HEAD OF FINANCIAL SERVICES / DEPUTY S151 OFFICER
RESPONSIBLE PORTFOLIO HOLDER	COUNCILLOR PHIL DAVIES
KEY DECISION	YES

1.0 EXECUTIVE SUMMARY

- 1.1 The Authority is required to establish a replacement, Localised Support Scheme, for Council Tax Benefit (CTB) from April 2013. This is a key strand of the Government's wider Welfare Reform review.
- 1.2 The Scheme brings with it reduced funding from Central Government, with the need for Wirral to consider how to address this reduction assessed at £3.15 million based on current, and increasing, CTB spend.
- 1.3 This report sets out the background and the options available and requests direction from Members on the type of Localised Scheme to be focused on for detailed consideration and adoption.

2.0 BACKGROUND AND KEY ISSUES

- 2.1 In the Spending Review of 2010 the Government announced the Council Tax Benefit Scheme would be abolished and a framework for localised support schemes for Council Tax would be introduced and operative from 2013/14. At the same time it was announced that Government support would be reduced by 10% of current year spend. For Wirral the spend is currently £31.5 million which with increasing take-up of 2% per annum.
- 2.2 The Local Government Finance Bill and the Welfare Reform Act 2012 impose a duty on billing authorities to design and introduce a Localised Council Tax Reduction Scheme (CTR) by 31 January 2013 for operation for 2013/14.
- 2.3 At the time of drafting this report the Department for Communities and Local Government (DCLG) have simultaneously issued the Draft Finance Bill and a "Statement of Intent", and the web-links are shown in Section 9 of this report. The Statement of Intent is the Government's view as to how they expect the system to be operated when the Bill becomes an Act along with attendant Regulations and is issued to give administering authorities an outline view of government thinking as to how the legislation will work.

- 2.4 The Government see this change giving local authorities a significant degree of control over how a 10% reduction in expenditure is achieved or mitigated. This allows authorities to balance local priorities and financial circumstances whilst fully acknowledging this reduction is a contribution to the overall programme to address the deficit. This change is seen to give authorities a financial stake in the provision of support for Council Tax and a greater stake in the economic future of their local area. It supports the Government agenda to enable stronger balanced economic growth across the country and is expected to allow Authorities to create incentives to get people back into work, supported by the work incentives that are planned within the Government Universal Credit. This is seen as reinforcing local control over Council Tax with decisions taken locally and is consistent with greater local financial accountability and decision making.
- 2.5 The central premise for Welfare Reform including the Council Tax Support Scheme is that more people will move into work and therefore earnings would offset any loss in income from benefits. However, if that does not occur there is a loss in household income and consequently a loss of income in the local economy.

Localised CTR Scheme Scope – Pensioners and Vulnerable Groups

- 2.6 The Government has prescribed that local schemes must offer protection to certain groups, which will include eligible pensioners, based on the same factors that have determined their eligibility and award under the current Council Tax Benefit (CTB) scheme. Unlike most other groups, pensioners cannot be expected to seek out paid employment to increase their income and are proposed as a vulnerable group and protected from any reduction in Council Tax support so low income pensioners should not lose or gain relative to the current system. Pensioners currently account for 41.5% of the Council caseload. As current chargepayers meet the age criteria this would increase the numbers being protected.
- 2.7 The Government have also indicated that a local scheme should also look to support to the same level as now other “vulnerable groups”, these are currently not defined, as well as ensuring that the adopted scheme supports the Welfare Reform programme aim of supporting people back into work.
- 2.8 Potential vulnerable groups include a household where there may be a resident child or an adult that is disabled, or there is a carer resident, or someone is resident who receives informal care. The DWP Family Resources 2009/10 Survey estimated that nationally 48% of Council Tax Benefit recipients may have at least one adult or child that is disabled; 18% may have at least one adult with caring responsibilities and 17% may have at least one adult requiring informal care. This indicates the possible scale of protection that could be considered for a group defined as vulnerable and the impact that would have on the remainder of the recipients who would face a bigger potential reduction in their support and increase in Council Tax to be paid.

- 2.9 Authorities, will have to balance the support the Localised Scheme could give to such vulnerable groups needing to acknowledge the defined and established responsibilities in relation to, and awareness of, 'vulnerable groups' through its responsibilities under:
- The Child Poverty Act 2010, which imposes a duty on authorities to have regard and address child poverty to reduce and mitigate the effects of child poverty in their area.
 - The Disabled Persons (Services, Consultation and Representation) Act 1986 and the Chronically Sick and Disabled Act 1970 which includes a range of duties relating to the welfare needs of disabled people.
 - The Housing Act 1996 which gives authorities a duty to prevent homelessness with special regard to vulnerable groups.
- 2.10 A potential advantage of maintaining some of the features of the existing CTB scheme in the design of a Localised Scheme is that the current scheme does make provision for many vulnerable groups, through such as income disregards, and could thereby address to some degree equality issues and show how protection is offered to vulnerable groups.
- 2.11 The Act is expected to introduce powers to impose a national default support scheme, which will take effect if a billing authority has not made a Localised Scheme by 31 January 2013. The imposition of such a scheme, yet to be defined, will remove the need for an authority to undertake public consultation. Any associated penalties of relying on such a scheme are at this stage not known but any cost of the default scheme over the likely grant will be a direct cost to the Council.

Funding the Localised CTR Scheme

- 2.12 The Government will allocate funding separately to billing and precepting authorities, in proportion to their Council Tax charge, to support the provision of Localised Schemes. For Wirral this will see the Council receiving 85% of available funding with the Police and Fire and Rescue Services the balance. The grant will not be ring-fenced to use for the Localised Scheme so authorities can decide its scale as long as any statutory levels are met.
- 2.13 The grant will be a reduction of 10% on previous CTB grant funding. This will be based upon the May 2012 caseload and reassessed at November 2012 so will take no account of any ongoing increase in caseload. For Wirral this is currently showing a 2% per annum increase and each 1% increase in benefits paid will cost the Council £300,000. Those authorities with a high proportion of people on benefits face higher risks than those serving less deprived areas, as do those with an ageing population, both at a time of unprecedented resource reduction for all authorities.

- 2.14 CTB currently reduces the net Council Tax payable whereas the 25% single person discount reduces the gross sum payable and is taken into account in the annual Council Tax Base calculation used to calculate the level of Council Tax. The new Localised Scheme will be viewed as reducing the gross sum due (the same as the single person discount calculation) and thus reduce the Council Tax Base. The total budget requirement to be raised from Council Tax is reduced by the Government grant which is set at 90% in respect of the previous CTB awards.
- 2.15 As the Council Tax base and amount to be raised reduce the charge per Council Tax Band should be equivalent to 2012/13 bar for the 10% reduction. The Government view is that authorities are then free to make up any or all of the 10% reduction and if the full sum is found (£3.15 million for Wirral) the Council Tax level would stay the same.

Timescales

- 2.16 The implementation timescales are short, particularly given the need to consult with a variety of stakeholders including precepting authorities:

Spring 2012	National - Primary legislation started its passage through Parliament - Government preparing and publishing draft secondary legislation and Statement of Intent as guidance.
June 2012	Local - Council Tax Benefits system profiling tools made available to support LA scheme design and identify options and costs. Agree likely limitations of new scheme along with implementation timetable.
Summer 2012	National – Primary legislation passed. Secondary legislation prepared. Local - authorities start to design and consult on local schemes – a 12 week consultancy period is advised. Engagement with software companies on scheme outlines. Assess costs and practicalities inc staffing
Autumn / Winter 2012	National – Secondary legislation passed and grant allocations published. Local – submit tax base calculation on revised process to DCLG in October. Authorities establish local schemes - IT systems, application regimes, administration and begin notifying claimants of changes and use information to set Budgets. Scrutiny takes place and Cabinet approval by December
January 2013 onwards	Local - schemes formally approved by Council and in place by 31 January or Government default scheme imposed. Allowing readiness for February budget setting and March 2013 billing for 2013/14 Council Tax.

- 2.17 The timescale for Wirral is below:
- Public consultation on draft proposals to take place August to October 2012
 - Scrutiny of draft proposals as amended by consultation in November 2012
 - Cabinet to recommend the proposed 2013/14 scheme in December 2012
 - Full Council to formally approve the 2013/14 scheme in January 2013

Wirral's Localised CTR Scheme

- 2.18 Wirral's Revenues, Benefits and Customer Services Division established an officer 'Council Tax Support Scheme Project' group which is expanding to ensure that the design and development process is duly informed by those with the appropriate skills. The group reports to a Project Board led by the Head of Service who acts as Project Sponsor. The high level implications, issues and risks associated with the development of a replacement scheme for Council Tax Benefit have been identified, as well as the requirements of designing, introducing, implementing and administering such a scheme.
- 2.19 The scheme adopted will need to be clear and representative of a scheme that will work for Wirral, at least as an initial 'year one' scheme, given the limited timescale. It will need to provide for those the authority wishes to support and ensure compliance with legislation and Government directives. Direction is now sought from Cabinet in terms of outline Policy and Members are being made aware of the consequential financial implications, the resources required to ensure timely delivery of a Wirral scheme (which meets the needs and priorities of the authority and local chargepayers) while ensuring compliance with Government directives.
- 2.20 The modelling and profiling tool produced by our current Revenues & Benefits software suppliers, CAPITA, is allowing the modelling of various scenarios within the Council Tax Benefits caseload and the impact on Council Tax.
- 2.21 There were 42,713 Council Tax Benefit claimants at 31 March 2012, 17,736 are identified as being protected from the proposed changes by the Government (pensioners). This leaves 24,977 to face any Council agreed reduction in overall benefits funding. This number will further reduce if the Council decide to protect other 'vulnerable people'. Therefore the Working Age classification of CTB claimants will bear the level of reduction the Council decides to pass on to claimants whilst the expectation is that any scheme should also incentivise employment. It is projected that a minimum 17.5% reduction to all working age recipients would be required to make up the forecasted £3.15 million shortfall. This would see a working age claimant, who in previous years had the household Council Tax met in full by Council Tax Benefit, face an annual Council Tax bill of approximately £170 for a Band A property in 2013/14. Those who were in receipt of less than 100% CTB would find their support also reduced and their Council Tax bill increased by 17.5%.
- 2.22 If the changes proposed result in people of working age on benefits becoming responsible for paying a proportion of their local taxation liability then 24,977 accounts could be brought into the collection process. This number may vary once the Council adopts its qualifying criteria for "vulnerable groups" although the % payable by those 'not vulnerable' would rise.

Localised CTR Scheme Administration

- 2.23 The Scheme adopted will affect nearly 43,000 households and will be more if changes to Council Tax discounts and exemptions are made. For working age applicants there will be a new application process. Significant publicity will be needed for the transition as many claimants and chargepayers are likely to have degrees of difficulty with the changes.

- 2.24 Whilst the likely proposal is a limited change in year one there will be significant change in developing new IT and administrative systems for applications, appeals and backdating. The extent to which individual Councils devise bespoke schemes will impact significantly on costs so by liaising authorities are better placed to deliver cost effective solutions via standard IT software.

Impacts of billing and collecting increased Council Tax bills

- 2.25 Unless the full shortfall is met from alternative sources so the Localised CTR Scheme is fully funded, Council Tax will become collected from some of our more vulnerable residents. Consequently there will be implications for collection rates with a likely reduction of 0.4% to 1% when compared to previous years.
- 2.26 A higher percentage of non-payment is inevitable, as previous 100% recipients are presented with a Council Tax bill. The level of indebtedness of these debts is projected to be in the region of 35%, around £1 million of the £3.15 million, and recovery costs will increase given the difficulties of small debt collection plus there will be additional costs for payment processing of the relatively small sums being paid. The Universal Credit Regulations are awaited to see if it will allow for deductions for non-payment of Council Tax. The current amount of deduction would take approximately 56 weeks to clear the Council Tax debt plus costs due thus leaving an increasing year-on-year level of debt.

Year One Localised CTR Scheme Options

- 2.27 To have an operable, fair, comprehensively thought out and tested scheme in place by the 31 January 2013, including 8 to 12 weeks of consultation with interested groups including preceptors is unrealistic. Even if it was achievable the major suppliers of Council Tax Benefit and Council Tax systems have said they will not have a revised system in place for 1 April 2013 and that they only envisage having revised software available during 2013 for 1 April 2014.
- 2.28 Locally Councils seem likely to largely replicate the current Council Tax Benefit system with a locally defined (and limited) amount of adjustment for 2013/14 year. The Government default scheme is expected to replicate the current scheme and acknowledges it does not make the savings required.
- 2.29 The Council could consider identifying some, or all of the £3.15 million reduction from alternative sources for year one only.
- 2.30 Whilst in year one the Scheme is likely to be a close approximation of the current CTB scheme but some design options in respect of benefits support changes for future years have already been suggested for consideration:-
- Restriction of Council Tax Support to a particular Council Tax Band e.g. no or restricted benefit for a designated set of higher value bands.
 - Top slicing of all awards to reflect the loss in grant (ie 17.5 % or 20%).
 - Reduced capital limits e.g. reduce the upper limit of £16,000 for eligibility.
 - Increased non dependent deductions (non dependants are other adults in a household over 18 years old for whom deduction is made from CTB entitlement).
 - Counting currently ignored income in a calculation (eg Child Benefit).
 - Abolition or restriction of backdating currently set at six months maximum.

Council Tax Income Options

- 2.31 A potential area for increased income is within the proposed Council Tax regulations going through Parliament as this may give Councils power over Council Tax exemptions and discounts on empty homes and empty properties under renovation. The Government has ruled out allowing any local change to the 25% single person discount. Initial data profiling has assessed that the changes could raise up to £3.6 million. However, this takes no account of the impact on the person's ability to pay the increase and is shown for illustrative purposes.

Council Tax Exemptions and Discounts Change Exemption/Discount Class	Properties Number	Maximum £000
Class A – Vacant dwellings where major repairs or structural alterations are required underway or recently completed (up to 12 months)	655	310
Class C – Vacant dwelling i.e. empty and substantially unfurnished (up to 6 months)	16,306	2,558
Class L – Unoccupied dwelling which has been taken into possession by a mortgage lender.	281	92
Second Homes Discounts	1,514	236
Long term empty property discount – 50% premium charge after two years	5,164	400

- 2.32 The proposals would mean effectively no difference between an empty or occupied property but an occupied property could still claim the 25% single person discount and gain support from the new version of Council Tax Benefit if on a low income. This would see the current exempt periods (nil charge) of six to twelve months removed. Any proportional change to these rates would reduce the maximum sum raised.
- 2.33 There is also an opportunity to re-consider if the Wirral Local Discount given to all households who residents are over 70 (referred to as the Pensioner discount) is still appropriate. This discount is non-means tested and gives a 7.8% reduction to all age qualifying households and currently costs £1.2 million in respect of 13,774 claimants.

Options for Consideration

- 2.34 The options could be used, in any proportion or in full, to mitigate the £3.15 million reduction in funding and allow at least, for year one, no change to current recipients. The initial costings indicate that there some discretion in relation to the changes proposed in Council Tax Regulations from 1 April 2013 and could mitigate anticipated reduced collection rates if the Localised Scheme impacted upon Working Age Recipients.
- 2.35 This report seeks Cabinet direction as to which alternatives to consider in more detail to enable the cost and impacts to be fully considered and to support a more focused consultation on Council supported options. In summary the outline options for consideration are:-
- 1 A Localised Scheme that delivers £3.15 million savings but this is unlikely to have any reliable supplier software in time for January 2013.

- 2 A Localised Scheme mirroring the current CTB scheme with the current software, delivering the full level of awards and meeting the £3.15 million reduction in funding. This being delivered through increased Council Tax charges with the Council having to identify and agree which changes to Council Tax discounts and exemptions it will make, or utilise funds from other sources.
- 3 As an alternative to Option 2 a Scheme mirroring the current CTB scheme with the current software, delivering a level of savings which is less than the £3.15 million. The savings coming from Council Tax charges for which the Council will have to identify and agree or from other sources.
- 4 The Council chooses not to agree a Localised Scheme or the Government invokes its default scheme for year one. If this is the preferred option and is acknowledged then no public consultation process has to take place.

2.36 The option approved will be for one year and as the software becomes available it will be for the Council to again review what options it may wish, to increase or decrease for future years. These will be expected to be consulted upon and be in place by 31 January of the year prior to the Scheme being used.

2.37 This scheme will be dependent on an IT system and currently three national software houses provide nearly all authorities with their Revenues and Benefits systems. Software companies may not be able, other than at significant ongoing cost encompass some of the ideas which may arise at local consultation stage. It will be paramount to balance the legitimate outcomes of consultation, with minimising costs and reducing complexity.

3.0 RELEVANT RISKS

3.1 If the Council does not adopt a Localised Scheme the Government will impose its default scheme, which is yet to be specified, but is likely to result in a significant financial impact on the authority.

3.2 Whichever Scheme is agreed there are the risks around the impact that any Localised Scheme has upon the claimants and the Council.

4.0 OTHER OPTIONS CONSIDERED

4.1 It will be a statutory requirement to have a Localised Support Scheme For Council Tax in place by 31 January 2013 or the Government default scheme will be used as the Localised Scheme for 2013/14.

5.0 CONSULTATION

5.1 Once an outline option is agreed a formal public consultation must be undertaken by the Council. This will have to allow sufficient time to consider representations and agree a Local Scheme to be adopted by 31 January 2013.

5.2. Consultation with the precepting authorities (Police and Fire and Rescue) has recently begun through a cross Merseyside group with the same authorities liaising on scheme development to compare likely proposals.

6.0 IMPLICATIONS FOR VOLUNTARY, COMMUNITY AND FAITH GROUPS

6.1 There will be ongoing implications for all these groups as the impact of the changes are identified and roll out.

7.0 RESOURCE IMPLICATIONS: FINANCIAL; IT; STAFFING; AND ASSETS

7.1 The adoption of a Localised Scheme includes the need to change financial modelling to support the Scheme. The Government support will reduce by around £3.15 million in 2013/14 and the Council has to determine whether to meet this loss from alternative savings or to fund all, or part of this loss, from a reduction in payments to current CTB recipients. Depending upon the decision taken there could be the increased challenge of collecting the sums due.

7.2 The on-going staffing and IT requirements to administer the new scheme will depend upon the scheme agreed and will not be available for the first year of this new scheme. In terms of implementation the Government has provided £84,000 with an indication that it can be used to support the development of new schemes.

8.0 LEGAL IMPLICATIONS

8.1 The Council needs to ensure that it meets its statutory duty by consulting adequately, producing a viable and workable scheme that meets the framework set by Government, or it then adopts or has imposed the Government default scheme. Any proposed scheme needs to be submitted to public scrutiny and legal advice and support will be needed within the overall implementation timescale.

9.0 EQUALITIES IMPLICATIONS

9.1 The potential impact on equality of the proposals have been nationally considered reviewed and the DCLG hyperlink is:-
<http://www.communities.gov.uk/publications/localgovernment/lgfblocalcounciltaxeia>

The Council's current benefit related equality impact assessments are at:-;
<http://www.wirral.gov.uk/my-services/community-and-living/equality-diversity-cohesion/equality-impact-assessments/eias-2010/finance>

The introduction of a Localised Scheme will have equality implications which will be more clearly identified as the Scheme is developed. A Phase 1 Equality Impact Assessment is appended.

10.0 CARBON REDUCTION IMPLICATIONS

10.1 There are none arising directly from this report.

11.0 PLANNING AND COMMUNITY SAFETY IMPLICATIONS

11.1 There are none arising directly from this report.

12.0 RECOMMENDATIONS

- 12.1 Cabinet are asked to outline the preferred way forward for the development of the Localised CTR Scheme for 2013/14 particularly which options are prepared to be used to meet the minimum £3.15 million reduction in Government grant funding.
- 12.2 That Officers continue to analyse and monitor the impact of this reform on the residents of Wirral and the Council and present a further detailed report, for consideration, of the composition of a final scheme for 2013/14 taking account of direction from Cabinet.
- 12.3 That the timescale as outlined in this report is approved.

13.0 REASONS FOR RECOMMENDATIONS

- 13.1 To allow Cabinet to give direction as to the options to be considered in the development of initial proposals for a Localised Council Tax Support Scheme for 2013/14.
- 13.2. To allow Cabinet to recognise the timescales that are required for statutory purposes and the level of administrative and project work that will be undertaken in the remaining time to ensure compliance with the new legislation.

FNCE/138/12

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REFERENCE MATERIAL

National statistics - statistics.dwp.gov.uk
Department for Work and Pensions / Department for Communities and Local Government -
guidance and legislation

SUBJECT HISTORY

Council Meeting	Date
Cabinet	22 September 2011
Council Excellence Overview & Scrutiny Committee	16 March 2011
Council Excellence Overview & Scrutiny Committee	17 November 2011
Council Excellence Overview & Scrutiny Committee	26 March 2012

Equality Impact Assessment Toolkit (May 12)

Section 1:

EIA lead Officers: Neil Powell Revenues Manager
Nicky Dixon Benefits Manager

Email address: neilpowell@wirral.gov.uk
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Head of Service: Malcolm Flanagan

Acting Chief Officer: Tom Sault

Department: Finance

Date: July 5 2012

Section 2: What Council proposal is being assessed?

The statutory requirement to replace the Council Tax Benefit Scheme with a Localised Council Tax Reduction Scheme which has to be established from April 2013.

Section 2b: Will this EIA be submitted to a Cabinet or Overview & Scrutiny Committee?

Yes This is a Phase one EIA and will be submitted to both Cabinet and Council Excellence Overview and Scrutiny Committee as the replacement scheme is developed, consulted upon and agreed.

Please add hyperlink to where your EIA is/will be published on the Council's website (see your Departmental Equality Group Chair for appropriate hyperlink)

Current Benefits EIA is <http://www.wirral.gov.uk/my-services/community-and-living/equality-diversity-cohesion/equality-impact-assessments/eias-2010/finance>

CLG national EIA is <http://www.communities.gov.uk/publications/localgovernment/lgfblocalcounciltaxeia>

Section 3: Does the proposal have the potential to affect...(please tick relevant boxes)

/ **Services**

/ **The workforce**

/ **Communities**

/ **Other** (please state eg: Partners, Private Sector, Voluntary & Community Sector)
Voluntary & Community Sector

If you have ticked one or more of above, please go to section 4.

None (please stop here and email this form to your Chief Officer who needs to email it to equalitywatch@wirral.gov.uk for publishing)

Section 4: Does the proposal have the potential to maintain or enhance the way the Council (please tick relevant boxes)

Eliminates unlawful discrimination, harassment and victimisation

Advances equality of opportunity

Fosters good relations between groups of people

If you have ticked one or more of above, please go to section 5.

/ **No** (please stop here and email this form to your Chief Officer who needs to email it to equalitywatch@wirral.gov.uk for publishing)

Section 5:

Could the proposal have a positive or negative impact on any of the protected groups (race, gender, disability, gender reassignment, age, pregnancy and maternity, religion and belief, sexual orientation, marriage and civil partnership)?

You may also want to consider socio-economic status of individuals.

Please list in the table below and include actions required to mitigate any potential negative impact.

Which group(s) of people could be affected	Potential positive or negative impact	Action required to mitigate any potential negative impact	Lead person	Timescale	Resource implications
All non pensioner groups as current Council Tax Benefit recipients	Negative if level of award is reduced and no additional income is replacing it.	Vulnerable group status to be considered Level of additional support Council may award Nationally this policy is not expected to disproportionately affect any particular gender or ethnicity	Malcolm Flanagan	January 2013 And annually thereafter	Departmental staff in assessing options, staff involved in consultation work which will be subject to regular review
Low income pensioners	Neutral as legislation will continue to protect them at current levels of support				

Section 5a: Where and how will the above actions be monitored?

Via reports to Council, Cabinet and Overview & Scrutiny and via public consultation

Section 5b: If you think there is no negative impact, what is your reasoning behind this?

The scale will be dependant on any decision taken by Council

Section 6: What research / data / information have you used in support of this process?

Department for Communities and Local Government (DCLG), national statistics and local statistics from current Council Revenues and Benefits systems

Section 7: Are you intending to carry out any consultation with regard to this Council proposal?

Yes

If 'yes' please continue to section 8.

If 'no' please state your reason(s) why:

(please stop here and email this form to your Chief Officer who needs to email it to equalitywatch@wirral.gov.uk for publishing)

Section 8: How will consultation take place and by when?

It is a statutory requirement to consult on the content of the scheme (unless it is the government default scheme) and part of that consultation will look at the equality impact of any proposal

Before you complete your consultation, please email your preliminary EIA to equalitywatch@wirral.gov.uk via your Chief Officer in order for the Council to ensure it is meeting it's legal requirements. The EIA will be published with a note saying we are awaiting outcomes from a consultation exercise.

Once you have completed your consultation, please review your actions in section 5. Then email this form to your Chief Officer who needs to email it to equalitywatch@wirral.gov.uk for re-publishing.

Section 9: Have you remembered to:

- a) **Add appropriate departmental hyperlink to where your EIA is/will be published (section 2b)**
- b) **Include any potential positive impacts as well as negative impacts? (section 5)**
- c) **Send this EIA to equalitywatch@wirral.gov.uk via your Chief Officer?**
- d) **Review section 5 once consultation has taken place and sent your completed EIA to equalitywatch@wirral.gov.uk via your Chief Officer for re-publishing?**