

## **DUNDEE CITY COUNCIL**

**REPORT TO: POLICY & RESOURCES COMMITTEE – 20 MAY 2013**

**REPORT ON: REVIEW OF CONCESSIONS AND PROMOTION OF DISCOUNTED SWIMMING PRICES**

**REPORT BY: DIRECTOR, LEISURE AND COMMUNITIES**

**REPORT NO: 234-2013**

### **1. PURPOSE OF REPORT**

The purpose of the report is to share the findings of a review of current policy on concessions, and to seek agreement for ways in which concession policy should be developed to assist with implementation of Dundee's Fairness Strategy.

### **2. RECOMMENDATIONS**

Following on from report 168-2013 approved on 22 April 2013 it is recommended that:

- 2.1 To simplify the criteria for income related concession, all people living in households (address data held in Citizen Account/CRM system in customer services) entitled to Council Tax reduction should be accepted as eligible for concessionary benefits.
- 2.2 Dundee City Council increases its promotion of the National Entitlement Card (NEC) as a key mechanism for verifying entitlement to concessions.
- 2.3 The National Entitlement Card should be extended to children under the age of twelve, through the implementation of the KIDZ Card.
- 2.4 City Council departments develop more targeted approaches, such as social prescribing, as identified in the Lochee Pathfinder, for delivery using the NEC Card, and ask NHS Tayside/Dundee CHP to work with the Council on these approaches.
- 2.5 A concession discount scheme for swimming admission be introduced for those living in households entitled to Council Tax reduction (Appendix B).
- 2.6 The Concession Policy be extended to any current or former member of the Armed Forces entitled to the Community Covenant (and who is not already receiving concession through one of the other existing categories).
- 2.7 The Council and its partners should adopt a pro-active approach to ensuring that individuals and households eligible for concessions are advised and assisted to obtain these.

### **3. FINANCIAL IMPLICATIONS**

- 3.1 The difficulty of producing an accurate financial model of the impact and costs of changing current concessions has been examined by a task group. Any change brings with it certain risks and it is likely that the policy will require to be further amended in the light of experience. However, there is also evidence to suggest that benefits such as leisure concessions are unlikely to be taken up at a full level, and that actual financial impact of a concessions policy is going to be far lower than the theoretical maximum demand.
- 3.2 Rather than delay implementation and try and predict outcomes, it is advocated that certain enhanced concessions be introduced and that these be continuously costed and their impact evaluated on an open book basis to ensure that both the City Council and Leisure & Culture Dundee can monitor uptake and financial consequences.
- 3.3 In the first instance it will be necessary to set aside sum to cover additional costs (or income

reductions) arising from the implementation of the Concessions Policy.

3.4 The additional financial subsidy (as detailed in Appendix A) is based on (Appendix B):

- reducing the admission price for all citizens living in households in receipt of Council Tax reduction;
- reducing the price for all primary school age children in receipt of a KIDZ Card;
- extending early years discounts from under 3 years to under 5 years of age.
- introducing discounted rates for ex-service personnel.

This sum of up to £100,000 in a full financial year can be met from contingencies budget.

#### 4. BACKGROUND

A group was formed in April 2012 to review the current concessions under which those on low incomes or other eligible citizens receive a discount on the normal price for services provided by Dundee City Council and Leisure & Culture Dundee.

The group examined:

- current policy context;
- current concessions and eligibility;
- proposals for improved targeting and means of delivering concessions;
- recommendations to the way in which concessions policy should be reconfigured.

##### 4.1 Policy Context

The group quickly established that there was no single document which brought together Dundee City Council's policies with regard to concessions.

A number of different policies existed between Council departments and Leisure & Culture Dundee.

The Director of Corporate Services sought information from other Scottish Councils and it was established that very few Councils had an adopted concessions policy which assisted them in the targeting of services to those facing greatest financial hardship.

There are three components to a concessions system:

- the entitlement criteria;
- the actual concession level (price or additional customer benefit);
- the customer's verification of entitlement at the point of sale.

Traditionally:

- entitlement has been by age, disability, income or employment status;
- the price is a simple discount on the spot price;
- proof was by showing a document issued by the state.

This report, which should be read in conjunction with Report Number 168-2013 (approved on 22 April 2013) aims to simplify the entitlement criteria in the short term, while exploring more targeted social prescribing models and making the NE Card the customer access to the concession. This will set up an infrastructure that enables better delivery of a stigma free approach to delivering concessions.

## 4.2 Analysing and Responding to Need

Dundee's Fairness Strategy (approved Policy & Resources Committee 25 June 2012) has reviewed and analysed the pattern of need in Dundee.

The causes and impacts of poverty are complex and are often inter-related.

Previous analysis has confirmed that poverty:

- impacts on individuals and families;
- it can be concentrated in specific neighbourhoods;
- specific population groups are more vulnerable and at greater risk of falling into poverty than others. These include:
  - lone parents with dependent children;
  - single working age people without children, who are either in receipt of benefit or in low paid work;
  - single pensioner households;
  - households in receipt of benefits or in low paid work where there are more than two young children;
  - individuals affected by disability, including mental health problems;
  - children who are looked after by or who are leaving the care system;
  - the homeless;
  - households which are directly affected by drug and alcohol misuse;
  - offenders, ex offenders, and their families.

Dundee's Fairness Strategy sets out a range of actions which are intended to tackle poverty and inequality.

One of the specific actions contained within this strategy is to review and improve the targeting of concessions to ensure that those who are most vulnerable and least able to afford access to opportunities which improve their quality of life are given targeted assistance.

As part of the group's work to review concessions, it was established that the current level of benefit uptake in Dundee is as follows:

## 4.3 Numbers of Claimants in Dundee

Housing Benefit	18,980 (February 2012)
Disability Living Allowance	11,290 (late 2011)
Incapacity Benefit	7,500 (late 2011)
Severe Disablement Allowance	1,120 (late 2011)
Jobseekers Allowance	5,094 (late 2011)
Carers Allowance	3,470 (late 2011)
Attendance Allowance	4,790 (late 2011)
Child Benefit	16,725 (late 2011)
Employment Support Allowance	1,740 (late 2011)
Income Support	7,050 (late 2011)

*Source - DWP, Rights Advice Scotland Data for Dundee.*

Educational Maintenance Allowances	699 (2011/12)
Council Tax reduction	20,065 (November 2012)
Population living in households in receipt of Council Tax reduction	38,533 (November 2012)
Population living in SIMD areas	40,000

The group also established that, through the use of Geographic Information System (GIS) mapping, the City Council and its partners were able to clearly identify those neighbourhoods within which there was the greatest concentration of need.

#### 4.4 Core Proposition

The group recognised, through feedback from the Dundee Anti-Poverty Forum and other initiatives that the issue of stigma was, in some cases, as damaging as the financial hardship brought about by living on a low income and being dependent on benefit.

**Our proposition is that “Dundee City Council’s corporate approach should be based on ensuring that those entitled to benefit are given that entitlement, and that those facing particular needs are, wherever possible, assisted to meet those needs.”**

To implement this, it is essential that the City Council takes advantage of Dundee’s status in Scotland as the authority which has gone further than any other in developing the National Entitlement Card, and that it extends further the use of the card as a way of verifying entitlement to concessions and other benefits.

The Education Department have decided that, as part of delivering the Fairness Strategy, the National Entitlement KIDZ Card should be extended to children aged 5-12. This does not hold a photograph, but is the same in every other respect. 37% of this age group live in households in receipt of Council Tax reduction, which is the highest proportion of any age group.

To ensure that the issue of a KIDZ card is not stigmatised as being a concessions card, the Education Department are introducing cashless catering and online cash top ups to primary schools and Leisure & Culture Dundee will be promoting automatic library membership and the leisure membership scheme to children and families as an integrated marketing approach to the launch of the KIDZ card.

Currently, there is an NEC Development Group looking at streamlining the NEC process and integrating it with leisure and Library membership which will significantly reduce the administrative burden on the process.

The range of discounts and services accessed by the card should also be expanded.

#### 4.5 Key Challenges

One of the key challenges in expanding the use of the National Entitlement Card is the absence of “real time data”.

Using Council Tax reductions as the trigger benefit means the Council already has the data to verify if someone lives in a household that is in an eligible category.

A closer working relationship with the Department of Work and Pensions may lead to a situation where the concession policy was tied into the implementation of universal credit. The aim would be to reduce the journey someone would have to take to claim all benefits they were entitled to. However, this is a longer term aim.

Implementation of the concessions policy is, therefore, dependent on the expansion of access to the National Entitlement Card and the appropriate IT support to achieve integration with the Council’s own citizen account system and services systems such as, in Leisure & Culture Dundee’s case, its MRM system. Testing this is already underway and can be deployed by June 2013.

Those undertaking this review came to the conclusion that there needs to be targeted initiatives which address the impacts of multiple deprivation in neighbourhoods, and that this will be dealt with as part of the regeneration strategy for the City.

There also needs to be targeted initiatives which look at the specific needs of vulnerable groups and, where appropriate, through better access to card based services, targeted concessions could be delivered as appropriate.

Finally, the concessions policy requires to be linked to income deprivation and to the need to overcome the barriers of financial hardship for those individuals and households who would otherwise be excluded from being able to have a full life within the City.

## **5.0 POLICY IMPLICATIONS**

5.1 This report has been screened for any policy implications in respect of Sustainability, Strategic Environmental Assessment, Anti-Poverty, Equality Impact Assessment and Risk Management.

5.2 An Equality Impact Assessment is attached to this Report.

## **6.0 CONSULTATION**

6.1 The Chief Executive, Director of Corporate Services, Head of Democratic and Legal Services, and the Finance Committee and Management Team of Leisure & Culture Dundee, have been consulted on this report.

## **7.0 BACKGROUND PAPERS**

7.1 Towards a Fairer Falkirk – Tackling Poverty and Inequalities (2011-21)  
Renfrewshire Corporate Concessions Policy – 2 March 2011  
For Fairness in Dundee – approved by Dundee City Council 25 June 2012

**STEWART MURDOCH**  
**DIRECTOR, LEISURE AND COMMUNITIES**  
**15 May 2013**

## FAIRNESS STRATEGY – SWIM CONCESSION: IMPACT MODEL

Based on the proposals contained in this report, the following models attempt to predict the financial consequences of introducing concessionary prices for all those living in households eligible for Council Tax reduction.

The main assumptions and financial implications of implementing discounted charges in relation to Swimming under the Fairness Strategy are detailed below (and based on the proposed schedule of charges as set out in Appendix B):

- Visitor figures – based on actuals for 2011-12
- The infant category has been increased from under 3 to under 5. This results in a decrease in the number of visits at the standard Child rate of £3.80 and an increase in the number of child visits at £1.40, net loss is £2.40 per visit.
- The introduction of the KIDZ Card and the agreement to extend the Young Scot discounted entry charge to all 5-11 year old children at Dundee primary schools. Resulting discounts ranging from 20p - 30p per visit.
- Retired visitors – the number of people in receipt of statutory pension receiving discounted entry is likely to increase, as a result of the use of NEC card. At present a concession card is required to obtain discounted entry. The proposal to use NEC cards will make it easier to access discounts, and the number of NEC cardholders is significantly higher than the numbers with Concession card holders.
- Growth – assume 3% for Leisure & Culture Dundee to meet increased income targets. Total estimated growth 6% overall. This equates to an additional 12,793 visits per annum.
- Out-of-town Visitors:

	Adults	Children
Olympia Leisure Pool	10%	10%
Olympia Weekday 4.00 pm – 8.00 pm	10%	n/a
Olympia Training Pool	10%	0%
Lochee Pool	2%	2%
St Paul's	0%	0%
Grove	2%	2%

### Implications:

**Overall estimated cost - £98,812**

## CONCLUSIONS

Based on implementing the Concessions Policy (and changes set out as in Appendix B), the introduction of the KIDZ Card and the extension of access discounts to children aged between 3 and 5, the financial impact on Leisure & Culture Dundee Business Plan has been projected to be 98,812. Given the speculative nature of these models, a prudent provision of £100,000 in a full financial year should be signalled as the maximum potential draw on the Dundee City Council contingencies budget in a full financial year.

## Leisure &amp; Culture Dundee Proposed Swimming Concession Prices Effective July 2013-14

The current prices are reflected in the column headed "Standard" – all other discounts are new.

Olympia Leisure Pool	Current	New	New	New
	Standard	KIDZ Card	Young Scot	Council Tax Concession
under 5's	£1.40	N/A	N/A	£1.00
5 - 11 years	£3.80	£3.50	N/A	£2.50
12-17 years	£3.80	N/A	£3.50	£2.50
18 - 25 years	£4.80	N/A	£4.50	£3.80
26- 64 years	£4.80	N/A	N/A	£3.80
65+	£3.80	N/A	N/A	£3.50
carer	£1.40	N/A	N/A	£1.00
Olympia Leisure Pool - weekday 4-8pm	Current	New	New	New
	Standard	KIDZ Card	Young Scot	Council Tax Concession
under 5's	£1.40	N/A	N/A	£1.00
5 - 11 years	£3.80	£3.50	N/A	£2.50
12-17 years	£3.80	N/A	£3.50	£2.50
18 - 25 years	£3.80	N/A	£3.80	£3.50
26- 64 years	£3.80	N/A	N/A	£3.50
65+	£3.80	N/A	N/A	£3.50
carer	£1.40	N/A	N/A	£1.00
Olympia Training Pool	Current	New	New	New
	Standard	KIDZ Card	Young Scot	Council Tax Concession
under 5's	£1.40	N/A	N/A	£1.00
5 - 11 years	£2.70	£2.50	N/A	£2.00
12-17 years	£2.70	N/A	£2.50	£2.00
18 - 25 years	£3.50	N/A	£3.20	£2.80
26- 64 years	£3.50	N/A	N/A	£2.80
65+	£2.70	N/A	N/A	£2.00
carer	£1.40	N/A	N/A	£1.00
Lochee	Current	New	New	New
	Standard	KIDZ Card	Young Scot	Council Tax Concession
under 5's	£1.40	N/A	N/A	£1.00
5 - 11 years	£2.30	£2.00	N/A	£1.50
12-17 years	£2.30	N/A	£2.00	£1.50
18 - 25 years	£2.70	N/A	£2.40	£2.00
26- 64 years	£2.70	N/A	N/A	£2.00
65+	£2.30	N/A	N/A	£2.00
carer	£1.40	N/A	N/A	£1.00
St Paul's/Grove	Current	New	New	New
	Standard	KIDZ Card	Young Scot	Council Tax Concession
under 5's	£1.40	N/A	N/A	£1.00
5 - 11 years	£2.70	£2.50	N/A	£2.00
12-17 years	£2.70	N/A	£2.50	£2.00
18 - 25 years	£3.50	N/A	£3.20	£2.80
26- 64 years	£3.50	N/A	N/A	£2.80
65+	£2.70	N/A	N/A	£2.00
carer	£1.40	N/A	N/A	£1.00

## EQUALITY IMPACT ASSESSMENT TOOL

### Part 1: Description/Consultation

<b>Is this a Rapid Equality Impact Assessment (RIAT)?</b>	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
<b>Is this a Full Equality Impact Assessment (EQIA)?</b>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
<b>Date of Assessment: 3 May 2013</b>	<b>Committee Report Number: 234-2013</b>	
<b>Title of document being assessed: REVIEW OF CONCESSIONS AND PROMOTION OF DISCOUNTED SWIMMING PRICES</b>		
<b>1. This is a new policy, procedure, strategy or practice being assessed</b> (If yes please check box) <input checked="" type="checkbox"/>	<b>This is an existing policy, procedure, strategy or practice being assessed?</b> (If yes please check box) <input type="checkbox"/>	
<b>2. Please give a brief description of the policy, procedure, strategy or practice being assessed.</b>	This policy introduces discounts for those living in households eligible for Council Tax reduction. It reviews other concessions available to Dundee Citizens.	
<b>3. What is the intended outcome of this policy, procedure, strategy or practice?</b>	To reduce the financial barrier for those living in low income households to take part in swimming. To promote a greater uptake of swimming by all young people.	
<b>4. Please list any existing documents which have been used to inform this Equality and Diversity Impact Assessment.</b>	None.	
<b>5. Has any consultation, involvement or research with protected characteristic communities informed this assessment? If yes please give details.</b>	This policy is informed by the work of the Lochee Pathfinder and consultation undertaken through the local community planning process in Dundee.	
<b>6. Please give details of council officer involvement in this assessment.</b>  (e.g. names of officers consulted, dates of meetings etc)	DCC Chief Executive, Director of Corporate Services, Director, Leisure & Communities, Corporate Improvement Manager, Performance and Improvement Manager, plus Senior Management Team of Leisure & Culture Dundee.	
<b>7. Is there a need to collect further evidence or to involve or consult protected characteristics communities on the impact of the proposed policy?</b>  (Example: if the impact on a community is not known what will you do to gather the information needed and when will you do this?)	There will be on-going monitoring of the impact of the proposed changes on usage and uptake.	

**Part 2: Protected Characteristics**

Which protected characteristics communities will be positively or negatively affected by this policy, procedure or strategy?

NB Please place an X in the box which best describes the "overall" impact. It is possible for an assessment to identify that a positive policy can have some negative impacts and visa versa. When this is the case please identify both positive and negative impacts in Part 3 of this form.

If the impact on a protected characteristic communities are not known please state how you will gather evidence of any potential negative impacts in box Part 1 section 7 above.

	Positively	Negatively	No Impact	Not Known
<b>Ethnic Minority Communities including Gypsies and Travellers</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Gender</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Gender Reassignment</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Religion or Belief</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>People with a disability</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Age</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Lesbian, Gay and Bisexual</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Socio-economic</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy &amp; Maternity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Other (please state)</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### Part 3: Impacts/Monitoring

<p><b>1. Have any positive impacts been identified?</b></p> <p>(We must ensure at this stage that we are not achieving equality for one strand of equality at the expense of another)</p>	<p>Positive impacts identified for different age groups.</p> <p>Positive impact for those households identified as eligible for Council Tax reduction.</p>
<p><b>2. Have any negative impacts been identified?</b></p> <p>(Based on direct knowledge, published research, community involvement, customer feedback etc. If unsure seek advice from your departmental Equality Champion.)</p>	<p>No</p>
<p><b>3. What action is proposed to overcome any negative impacts?</b></p> <p>(e.g. involving community groups in the development or delivery of the policy or practice, providing information in community languages etc. See Good Practice on DCC equalities web page)</p>	<p>N/A</p>
<p><b>4. Is there a justification for continuing with this policy even if it cannot be amended or changed to end or reduce inequality without compromising its intended outcome?</b></p> <p>(If the policy that shows actual or potential unlawful discrimination you must stop and seek legal advice)</p>	<p>N/A</p>
<p><b>5. Has a 'Full' Equality Impact Assessment been recommended?</b></p> <p>(If the policy is a major one or is likely to have a major impact on protected characteristics communities a Full Equality Impact Assessment may be required. Seek advice from your departmental Equality lead.)</p>	<p>No</p>
<p><b>6. How will the policy be monitored?</b></p> <p>(How will you know it is doing what it is intended to do? e.g. data collection, customer survey etc.)</p>	<p>The new MRM (Member Relations Management) System introduced to manage participant data will provide an accurate basis for monitoring change going forward.</p>

**Part 4: Contact Information**

<b>Name of Department or Partnership</b>	Chief Executive's Department and Leisure & Culture Dundee
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<b>Type of Document</b>	
Human Resource Policy	<input type="checkbox"/>
General Policy	<input checked="" type="checkbox"/>
Strategy/Service	<input type="checkbox"/>
Change Papers/Local Procedure	<input type="checkbox"/>
Guidelines and Protocols	<input type="checkbox"/>
Other	<input type="checkbox"/>

<b>Manager Responsible</b>	<b>Author Responsible</b>
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<b>Signature of Director/Head of Service:</b>	Stewart Murdoch	<b>Date:</b> 9 May 2013
<b>Name of Director/Head of Service:</b>	Stewart Murdoch	
<b>Date of Next Policy Review:</b>	N/A	