

# Equality Analysis Form

# 1. Introduction

## 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

Directorate	Resources
Title of proposed change	Review of Council Tax Support Scheme
Name of Officer carrying out Equality Analysis	Catherine Black

### 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Prior to 1<sup>st</sup> April 2013 Central Government provided full funding to local authorities for council tax benefit, which was administered by the authorities under a single national scheme. As part of the Spending Review 2010, the Government announced its intention to decentralise council tax benefit (CTB). From April 2013, national funding was reduced by 10%. Under the new arrangements, each authority had the flexibility to design their own council tax reduction scheme in accordance with the Local Government Finance Act 1992 as amended. Croydon adopted a Council Tax Support (CTS) scheme from 1<sup>st</sup> April 2013 and the scheme remains unchanged to date. The agreed scheme proposed significant estimated cost to Croydon Council of £4.84m per annum from April 2013, with additional increased costs each year as a consequence of increased demand on CTS. CTB and CTS are means tested benefits that were designed to support our most vulnerable residents and help with payment of Council Tax, for those on low or no income. The Government confirmed to local authorities that Pensioner claims would not be impacted by local CTS schemes, they are to remain 100% protected, as if they were still in receipt of CTB. The CTS scheme affected only working age residents. The CTS scheme adopted in 2013 was designed on 6 key principles following a public consultation.

- **Principle 1: Council tax support should be paid to those with minimal savings**
- **Principle 2: Council tax support should be property related, with no-one receiving more support than you would receive for a band D property**
- **Principle 3: Everyone should pay something**
- **Principle 4: Everyone in the household should contribute something**
- **Principle 5: Work should pay**
- **Principle 6: The vulnerable should be protected**

The Council recognised that some people may be affected more than others. The groups listed below were identified by the Council to be affected by the new CTS scheme:

- Families with children
- Lone parents
- Carers
- Full time and part time workers
- Single people and couples without children
- Recipients of Universal Credit
- Multi-generational households

In the absence of relevant data, it is not possible at this time to determine whether there is a correlation between the aforementioned groups who may be more affected by the scheme and the equality characteristics. It is noted that consultation took place with other interested stakeholders such as Citizens Advice Bureau, Money Advice and Pension Service, South West London Law Centre along with groups providing welfare advice to residents. Following the consultation and feedback received with regard to the characteristics of service users of these support organisations a further review was carried out to understand how the impact on these groups could be reduced and changes made to the scheme being proposed.

A review of the current CTS scheme needed, to ensure the scheme is still achieving the aims of protecting our vulnerable residents, whilst ensuring that it is affordable to the Council in the light of its current financial difficulties. The number of residents in receipt of CTS is increasing with the current caseload being 30,057 and expenditure (or Council Tax Revenue foregone) being £35,039,913. We have therefore looked at what other Local Authorities are administering in terms of their local CTS schemes and members will be asked to consider moving to an income banded scheme from 1<sup>st</sup> April 2022. By moving to an income banded scheme will mean significant savings for the Council, between £7.3m and £10.5m (including the GLA element), depending on which scheme is agreed. The impact to working age residents of all protected groups may mean they will receive less CTS and they will be asked to pay more towards their Council Tax. If we move to an income banded scheme the Council will award less CTS, collect more in Council Tax and reduce/eliminate the funding gap that currently exists between the amounts of CTS we award and the grant funding received through the Revenue Support Grant.

To offset the impact for the most vulnerable the Council is also looking to create a hardship fund to support residents negatively impacted by the proposed changes to the CTS scheme and who are struggling to pay their Council Tax.

### 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

#### 3.1 Deciding whether the potential impact is positive or negative

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Residents who are pensionable age are protected from any changes to the Council Tax Support scheme.	Some working age residents will receive less support than they do currently and they will be asked to contribute more towards payment of their Council Tax. The extent of the impact will depend upon the scheme selected by Members. The current scheme is means tested and the changes proposed is to move to an income banded scheme. So residents who earn	According to the 2011 census, Croydon Borough contains the largest population of all London boroughs (363,400 residents). The population has grown to 386,710 and by 2021 the population will be over 445,000. The borough also contains the largest number of children and young people in London, with approximately 95,000 with wards in the north and south east having the greater numbers of young people and children. Between the ages of 18 and 64 years, there are 238,582 the 3 <sup>rd</sup> highest in London. There are overall more women (51.4%) than men (48.6%) living in the borough. Over the last ten years Croydon has seen an increase in population of 10%, almost 3% higher than the national average.  The greatest number of elderly people live in the south of the borough. There is a much higher proportion of females over the age of 60 than males, with almost double the amount of women over 85, compared to males. By 2026, it is estimated that there will be a

more will receive less support than those who earn less. Any negative impact will be in relation to working age claimants between the ages of 18-64 years.

0 -17 year olds, are the least likely to be impacted as they have no earned income.

3% of total working age claims are in the 19-24 year old age band and they are ranked 4<sup>th</sup> likely to be impacted out of 5 age bands, they have the lowest weekly earnings after the residents in the 0-18 year old age band.

24% of total claims are in the 25 – 34 age band and they are ranked 3<sup>rd</sup> likely to be impacted out of 5 age bands, and they are almost twice as likely to be affected than the 19-24 year olds, because of their average earned income value.

5% increase in the proportion of elderly people across the borough, whilst there will be a 4% reduction of children and young people. Overall, this means that the population will remain steady.

The age breakdown for the borough, according to the 2011 census is as follows:

Age	2011 Census Estimates	2011 % of total population
0-19	97,000	26.9%
20-59	204,200	56.2%
60+	61,400	16.9%

The table below demonstrates the number of working age claimant in certain age bands who are not deemed as vulnerable, the % of claims in the age band, the average weekly earned income of that age band, and the Impact Ranking of the age band.

working age not vulnerable				
age range	count	% in age range	earned income per week	impact ranking
18 and under	3	<1%	£0.00	5
19-24	448	3%	£33.46	4
25-34	3481	24%	£66.42	3
35-49	6593	45%	£91.39	1
50-64	4021	28%	£80.18	2

There are a number of claimants (305) who are earning however they are over 65 and are pensioner claimants. Pensioner

45% of total claims are in the 35-49 age band and they are ranked 1<sup>st</sup> likely to be impacted out of 5 age bands, due to their average earned income value which is nearly 3 times more than the 19 – 24 year olds

28% of total claims are in the 50 – 64 age bands and they are 2<sup>nd</sup> likely to be impacted out of 5 age bands due to their average weekly earnings

claimants are unaffected by review of the Council Tax support scheme. The proposed changes to the Council Tax Support scheme will impact on working age residents only.

The latest Office of National Statistics indicates that 1 in 4 Croydon residents (24.5%) is aged between 0-17 years. 76% of children achieve a good level of development at early years, which will have a positive impact on the future demand of Council Tax Support.

current case load of customer		
age range	count	% in age range
18 and under	4	<1%
19-24	492	1%
25-34	4130	14%
35-49	8823	29%
50-64	8064	27%
65+	8561	28%

Disability

There is a decision to be made by elected members that could protect Council Tax Support claimants who have a disability, and they are not expected to work, so they are not impacted by any changes to the Council Tax Support scheme.

Between the ages of 19 – 24 residents with disabilities earn approximately half of what non-disabled residents earn each week.

In the age band 25 – 34 residents with disabilities earn approximately one quarter when comparing to non-disabled residents average weekly income.

There is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day to day activities limited a lot, whilst 28,134 had their day to day activities limited a little.

Out of 21,513 working age Council Tax Support claimants 7325 have a vulnerable status due to disability, we cannot establish if the disability is due to physical disability or mental health disability. The table below demonstrates the average weekly income for these claimant types.

In the age band 35 – 49 residents earn just over one quarter when comparing to non-disabled residents average weekly income

In the age band 50 – 64 disabled resident earn less than 20% of non-disabled residents, in the same age band.

As disabled residents earn less than non-disabled residents they will be less effected by any changes to the Council Tax Support scheme.

If not protected from changes to the scheme the impact of having less support and/or having to contribute more will be felt more keenly amongst this protected group because of the lower earning capacity.

all Vulnerable		
age band	count	average weekly income
19-24	44	£16.37
25-34	649	£17.01
35-49	2227	£24.84
50-64	3970	£13.95
65+	435	£7.66

Of the 7,325 disabled claimant 6464 are not expected to work and elected Members may opt to protect them from any review of the Council Tax Support scheme.

The table below confirms the number of claimants in age bands and the % of claimants in the age bands who are not expected to work.

vulnerable not working		
age range	count	% in age range
18 and under	0	0%
19-24	38	<1%
25-34	560	9%
35-49	1849	29%
50-64	3609	55%
65+	408	6%

Gender

It is not possible to determine at this point in time.

It is not possible to determine at this point in time.

Data on gender identity is not routinely captured. A person's innate sense of their own gender, whether male, female or something else may or may not correspond to the sex assigned at birth.

We will attempt to collect data on all protected characteristics when we transition onto a new supplier for Council Tax Support

			<p>online application forms. The estimated time line for this is during the financial year 2022/23.</p> <p>It should be noted that we cannot mandate residents to complete this data request, however we will positively encourage residents to do so.</p>
Gender Reassignment	It is not possible to determine at this point in time	It is not possible to determine at this point in time	<p>Data on gender reassignment is not routinely captured. A person's innate sense of their own gender, whether male, female or something else may or may not correspond to the sex assigned at birth.</p> <p>We will attempt to collect data on all protected characteristics when we transition onto a new supplier for Council Tax Support online application forms. The estimated time line for this is during the financial year 2022/23.</p> <p>It should be noted that we cannot mandate residents to complete this data request, however we will positively encourage residents to do so.</p>
Marriage or Civil Partnership		<p>Married couples/civil partnership, as well as those living with partners, could be adversely affected by changing the Council Tax Support scheme, as the scheme proposed would take into consideration their combined income, and if their combined income is over £450 per week, they may not qualify for support, this is as opposed to a single person where we will consider the value of income for only one person. This concept already exists within</p>	<p>Of our 21,513 working age Council Tax Support claims, approximately 4391 are either married or living with a partner (20%) and 17,122 are single people (80%)</p>

		<p>the existing scheme. Conversely a single person does not pay as much Council Tax as a married couple due to being in receipt of a single person discount = 25% of their Council Tax liability.</p> <p>Single people may still be impacted, depending on their income band, and which scheme members approve.</p>	
Religion or belief	It is not possible to determine at this point in time	It is not possible to determine at this point in time	<p>Just over half (56.4%) of respondents to the 2011 census in Croydon stated that they were Christian. About 1 in 5 (20%) stated that they had no religion. Significantly 7.6% of respondents did not state their religion.</p> <p>Data on religion or belief is not routinely capture when a resident makes a claim for Council Tax Support.</p> <p>We will attempt to collect data on all protected characteristics when we transition onto a new supplier for Council Tax Support online application forms. The estimated time line for this is during the financial year 2022/23.</p> <p>It should be noted that we cannot mandate residents to complete this data request, however we will positively encourage residents to do so.</p>

Race

White residents are less likely to be in receipt of CTS compared to the census data e.g. 47.3% of the population are white but only 30% are in receipt of CTS.

Black residents are more likely to be in receipt of CTS. The census data is 8.6% of the population is Black Caribbean and 8% Black African, however 17% and 16% of CTS recipients in Croydon are either Black Caribbean or African, so a total of 33% are Black recipients.

Vulnerable residents who are in receipt of Council Tax Support are more likely to be White with 45% declaring this ethnicity, compared to 33% of vulnerable residents being Black Caribbean/African/Other.

This is against a background other societal inequities including a higher propensity to be in lower paying jobs. The council is proposing a hardship fund to sit alongside this scheme to support the most vulnerable within this

13,111 claimants out of 30,074 have confirmed their Ethnicity to us, please see the table below. Just over 30% of our claimants are White British, with 17% being Black British Caribbean, and 16% being Black British African. 9% of claimants are Other White background with 5% being Asian British Pakistani and 5% being Asian or British Any other Background. 4% are Black British Other and 3% are White and Black Caribbean, 3% are Asian British Indian, 2% White and Asian, 2% Asian Mixed Background, 1% Asian British Bangladeshi, <1% Chinese. At least 37% of CTS claimants have identified as being either Black Caribbean/African/Other, with 42% identifying as White British/Other.

Comparing this data to the 2011 Census data and GLA projections where the Census data projections are 47.3% of claimants are White British with 16.6% are Black Caribbean/African. Compared to GLA projections where they anticipated that 36.8% of claimants would be White British and 18.5% Black Caribbean/African.

ethnicity	total CTS	CTS%	2011 Census	GLA housing ethnic group projections
White British	4410	32%	47%	37%
White: Any other White background	1214	9%	9%	8%
Mixed: White and Black Caribbean	384	3%	3%	3%
Mixed: White and Asian	227	2%	1%	2%
Mixed :Any other mixed background	217	2%	2%	2%
Chinese	62	1%	1%	1%
Black-Black British:Other	472	4%	4%	5%
Black-Black British:Caribbean	2278	17%	9%	9%
Black-Black British:African	2112	16%	8%	6%
Asian or British : Any other Background	615	5%	5%	5%
Asian or Asian British: Pakistani	606	5%	3%	4%
Asian or Asian British: Indian	351	3%	7%	8%
Asian or Asian British: Bangladeshi	164	1%	1%	1%

and other protected groups.

Ethnicity of Claimants who have a vulnerability status due to disability  
See table below for ethnicity break down of working age Council Tax Support claimants who are vulnerable/disabled.

Ethnicity	CTS for most vulnerable	%
White British	1258	45%
White: Any other White background	174	6%
Mixed: White and Black Caribbean	76	3%
Mixed: White and Asian	38	1%
Mixed :Any other mixed background	44	1%
Chinese	6	<1%
Black-Black British:Other	125	4%
Black-Black British:Caribbean	473	17%
Black-Black British:African	321	12%
Asian or British : Any other Background	93	3%
Asian or Asian British: Pakistani	93	3%
Asian or Asian British: Indian	54	2%
Asian or Asian British: Bangladeshi	24	<1%
<b>total</b>	<b>2779</b>	

We do not currently collect this data and therefore, it is not possible to determine at this point in time

Sexual orientation was not capture by the 2011 Census. Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual. This was higher than the national average of 1.6%

Data on sexual orientation is not routinely capture when a resident makes a claim for Council Tax Support.

We will attempt to collect data on all protected characteristics when we transition onto a new supplier for Council Tax Support

Sexual Orientation

We do not currently collect this data and therefore, it is not possible to determine at this point in time

			<p>online application forms. The estimated time line for this is during the financial year 2022/23.</p> <p>It should be noted that we cannot mandate residents to complete this data request, however we will positively encourage residents to do so.</p>
Pregnancy or Maternity		<p>Residents in the age band 25 – 34 will be impacted more than residents in the age band 19 – 24 and 34 – 49, as their average weekly income is more in comparison. This needs to be given some context – claimants in this protected group may be impacted because of their lower earning capacity – however they may also be protected by the proposed hardship fund.</p>	<p>We have 29 Council Tax Support claimants who are in receipt of Maternity Allowance or State Maternity Pay</p> <p>1 claims are in the age band of 19 – 24 with average income of £131.05 per week.</p> <p>13 claims are in the age band of 25 – 34 and their average income is £133.38 per week</p> <p>15 claims are in the 34 – 49 age band and their average income per week is £115.39</p>
<p><b>Important note:</b> You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts. When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. <b>Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact</b></p>			

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings			Information source	Date for completion
<b>Please see time table below</b>				
June	2021	Identify, Proposals & Options at an officer level including financial implications		
July	2021	Take options to savings review		
October	2021	Report Proposed consultation to cabinet		
October	2021	Six week consultation Period		
December	2021	Analyse consultation draft cabinet report		
December/January	2021/22	Re-draft the scheme to reflect the changes & ensure that it is legally secure		
January	2022	Report through full council & cabinet (the Act states the new schemes must be approved by the 31st January )		
January	2022	Submit CTS scheme to the GLA by 31st January 2022		
February	2022	Publish the new scheme prior to annual billing		
<p><b>The consultation took place during November/December and captured protected characteristics as part of the feedback to better aid our understanding. We will also ensure that when we move to a new provider of our on-line application form that data surrounding all protected characteristics is captured.</b></p>				

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

#### Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

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**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	2	2	4
Disability	2	2	4 – this is in relation to residents who have a vulnerability status and whom are expected to work.
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	2	2	4

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council’s ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

- Advancing equality of opportunity between people who belong to protected groups
- Eliminating unlawful discrimination, harassment and victimisation
- Fostering good relations between people who belong to protected characteristic groups X

**Important note:** If the proposed change adversely impacts the Council’s ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Residents who have a disability and are expected to work will be impacted by any change to the Council Tax Support scheme.	A hardship fund will be set up as part of the new Council Tax Support scheme, this will be used to support residents who are struggling to pay their Council Tax as a result of the new scheme.	Head of Payments Revenues Benefits & Debt	Ongoing

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Race	Black people are more likely to be in receipt of Council Tax Support than white people.	A hardship fund will be set up as part of the new Council Tax Support scheme, this will be used to support residents who are struggling to pay their Council Tax as a result of the new scheme. We will also support residents to increase their employment opportunities, and support with budgeting and debt advice. We are partner with Money Advice and Pension Service (MAPS) to provide external support for residents	Head of Payments Revenues Benefits & Debt  Gateway/Housing  MAPs	Ongoing
Sex (gender)	Unable to determine	We will also ensure that when we move to a new provider of our on-line application form that data surrounding all protected characteristics is captured.	Head of Payments Revenues Benefits & Debt	Ongoing
Gender reassignment	Unable to determine	We will also ensure that when we move to a new provider of our on-line application form that data surrounding all protected characteristics is captured.	Head of Payments Revenues Benefits & Debt	Ongoing
Sexual orientation	Unable to determine	We will also ensure that when we move to a new provider of our on-line application form that data surrounding all protected characteristics is captured.	Head of Payments Revenues Benefits & Debt	Ongoing
Age	Residents who are in the 35 – 49 age bracket will be most affect by a change to the Council Tax Support Scheme. The scheme will have no	A hardship fund will be set up as part of the new Council Tax Support scheme, this will be used to support residents who are struggling to pay their Council Tax as a result of the	Head of Payments Revenues Benefits & Debt  Gateway/Housing	Ongoing

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	impact on the under 18s and over 65s are protected.	new scheme. We will also support residents to increase their employment opportunities, and support with budgeting and debt advice. We are partner with Money Advice and Pension Service (MAPS) to provide external support for residents.	MAPs	
Religion or belief	Unable to determine	We will also ensure that when we move to a new provider of our on-line application form that data surrounding all protected characteristics is captured.	Head of Payments Revenues Benefits & Debt	Ongoing
Pregnancy or maternity	Of the 29 claimants in receipt of maternity allowance the residents in the age band 24 – 34 will be most affected by any change to the Scheme	A hardship fund will be set up as part of the new Council Tax Support scheme, this will be used to support residents who are struggling to pay their Council Tax as a result of the new scheme.	Head of Payments Revenues Benefits & Debt	Ongoing
Marriage/civil partnership	Some married couples may not qualify for Council Tax Support under the new scheme, due to the combined income they receive. .	A hardship fund will be set up as part of the new Council Tax Support scheme, this will be used to support residents who are struggling to pay their Council Tax as a result of the new scheme. We will also support residents to increase their employment opportunities, and support with budgeting and debt advice. We are partner with Money Advice and Pension Service (MAPS) to provide external support for residents	Head of Payments Revenues Benefits & Debt  Gateway/Housing  MAPs	Ongoing

### 6. Decision on the proposed change

# Equality Analysis

Based on the information outlined in this Equality Analysis enter <b>X</b> in column 3 ( <b>Conclusion</b> ) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review.	<p>Response to the consultation closely mirrored the caseload for CTS. Whilst this was not an exact match, the results received reflected those who would be impacted by changes to the scheme.</p> <p>54.6% of those who responded confirmed their ethnicity to be white (British, Irish or any other white background, 5% confirmed their ethnicity to be Asian (Indian, Pakistani, Bangladeshi Chinese's or any other Asian background), 22% stated they regarded their ethnicity to be black (Caribbean, African or any other black background), 14.9% preferred not to declare their ethnicity and 3.5% confirmed their ethnicity to be other.</p> <p>The Caseload for CTS 42.9% of Council Tax Support recipients are of a white background, 13.24% have declared their ethnicity to be Asian and 37.08% are Black. It has to be stated almost 50% of Council Tax Support recipients do not complete details regarding ethnicity and 14.2% of those responding to the consultation chose not to declare their ethnicity</p>

# Equality Analysis

		<p>Whilst the demographic of respondents does not exactly mirror the council tax support caseload we can be confident that our responses are reflective of a diverse population and reflects the make-up of our authority.</p>
<p>Adjust the proposed change</p>	<p>We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b></p>	<p><b>Following the conclusion of the consultation, we re-modelled the scheme and adjusted how certain incomes were treated, such as Universal Credit, Child Care Costs, Child Maintenance and Carers Allowance, which increased the amount of CTS we could award, when compared to the initial scheme we consulted upon.</b></p> <p><b>If members wish to implement an income banded scheme, some residents will have more Council Tax to pay than they do currently. Where this is the case, and the resident is not able to make payment of their Council Tax the council will administer a hardship fund to pay some, or all of the Council Tax for the resident.</b></p> <p><b>In addition to this we will support the resident into a position where they can pay in the future. This might be supporting with budgeting, income and expenditure, and/or repayment of debt. Maximising income and employment</b></p>

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		<b>opportunities, referring residents to partner agencies to support them e.g. MAPs, CAB, SWLLP</b>
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	<b>To be updated after Members make a decision</b>
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	<b>To be updated after Members make a decision</b>
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet January 2022 Date: 13 January 2022

## 7. Sign-Off

Officers that must approve this decision	
Equalities Lead	<p><b>Name:</b> Denise McCausland <b>Date:</b> 13 January 2022</p> <p><b>Position:</b> Denise McCausland, Equalities Programme</p>
Director	<p><b>Name:</b> Richard Ennis <b>Date:</b> 13 January 2022</p> <p><b>Position:</b> Interim Corporate Director of Resources (Section 151 Officer)</p>