

Community and Equality Impact Assessment

As an authority, we have made a commitment to apply a systematic equalities and diversity screening process to both new policy development or changes to services.

This is to determine whether the proposals are likely to have significant positive, negative or adverse impacts on the different groups in our community.

This process has been developed, together with **full guidance** to support officers in meeting our duties under the:

- Equality Act 2010.
- The Best Value Guidance
- The Public Services (Social Value) 2012 Act

About the service or policy development

Name of service or policy	Revenue & Benefits – Revised Council Tax Support scheme 2021/22
Lead Officer Contact Details	James Johnston (Senior Housing Benefit officer) & Donna Radley (Head of Benefits) James.johnston@lbbd.gov.uk Donna.radley@lbbd.gov.uk

Why is this service or policy development/review needed?

The Welfare Reform Act in 2012 abolished Council Tax Benefit (CTB) from April 2013 and, in its place, support took the form of a local Council Tax Support Scheme (CTS). The Local Government Finance Act 2012 contains provisions for the setting up of local support schemes. The current scheme in Barking & Dagenham has been based around the Default CTS scheme.

The CTS scheme helps residents on low incomes to pay their Council Tax. Under the current scheme, a working-age household liable for Council Tax could get up to 75% of the charge paid through the scheme, dependent upon their circumstances. (Working age is anyone under Pension Credit age).

The Council's CTS scheme for 2021/22 requires administrative changes to improve its clarity, general administration and to assist in reaching those that are entitled to support.

The scheme requires updating so it is aligned better, is more compatible and has greater clarity in its interactions with Universal Credit as this caseload continues to increase, replacing existing legacy welfare benefits.

The administrative changes to the CTS scheme will also enhance access for those eligible for CTS entitlement.

By replacing some paper application forms with electronic Universal Credit new claim applications received from the Department for Work & Pensions, we can further support residents who have been identified as eligible for entitlement to CTS but who, due to a number of reasons such as IT literacy, language barriers and understanding, are not applying. This also reduces the print requirement of LBBDD and simplifies administration.

Access to the CTS scheme for low income residents is also increased by the automatic granting of CTS entitlement if eligible, for new Universal Credit claimants.

Further administrative changes are technical in nature and are designed to improve the overall administration of the scheme.

The CTS scheme for 2021/22 therefore requires administrative updates to continue to provide the best access and support for the most vulnerable residents in the borough.

1. Community impact (this can be used to assess impact on staff although a cumulative impact should be considered).

What impacts will this service or policy development have on communities?
Look at what you know. What does your research tell you?

Please state which data sources you have used for your research in your answer below

Consider:

- National & local data sets
- Complaints
- Consultation and service monitoring information
- Voluntary and Community Organisations
- The Equality Act places a specific duty on people with 'protected characteristics'. The table below details these groups and helps you to consider the impact on these groups.
- It is Council policy to consider the impact services and policy developments could have on residents who are socio-economically disadvantaged. There is space to consider the impact below.

Demographics**➤ Local communities in general**

Barking & Dagenham is a diverse borough as outlined by the following demographic trends below.

➤ Age

Barking & Dagenham currently has a total population of 212,906. Of this population currently 63.4 % (135,145) are considered of working age (16 – 64) & 9.2 % (19,780) are considered of pension age (over 65).

There are currently 16,611 live CTS cases, of which 11,810 (71%) are working age and 4707 (29%) are of pension age.

The CTS working age caseload is currently 8.7% of the working age population of the borough.

The CTS pension age caseload is currently 23.7% of the pension age population of the borough.

CTS expenditure for the financial year 2020/21 is currently £15,784,638.00.

Of this expenditure £10,810,644.76 (69.5%) is against working age claimants and £4,993,994.00 (31.5%) is against pension age claimants.

Working age claimants currently make up 63.4% of the population and account for 71% of the CTS caseload and 69.5% of the total CTS expenditure.

Pension age claimants currently make up 9.2% of the population and account for 29% of the CTS caseload and 31.5% of the total CTS expenditure.

(CTS case load data extraction 15.12.2020)

➤ **Disability**

Barking & Dagenham currently has 9093 people of working age (16-64) claiming disability allowance.

(DWP Nomis 2020)

➤ **Gender reassignment**

Barking & Dagenham is currently estimated to have approximately 40 people in the borough who have or who will undergo gender reassignment.

There is currently no monitoring data available within the CTS case load data to distinguish claimant's by gender reassignment.

(Gender Identity Research and Education Society advice 2016)

➤ **Marriage & civil partnership**

Barking & Dagenham currently has 41.9% of the population aged 16 and above as registered as married, 38.8% are single and not married, and 0.2% are in a same sex civil partnership.

There is currently no monitoring data available within the CTS case load data to distinguish claimant's by civil status.

(Census 2011)

➤ **Pregnancy & maternity**

Teenage pregnancy rates are significantly higher than average. The under 18 conception rate in 2018 was 20.3 per 1,000 females aged 15 to 17, which was the 4th highest in London.

(LBBD teenage conception data 2018)

➤ **Race and ethnicity**

The proportion of the population identifying as coming from black and minority ethnic backgrounds increased from 19.1% to 50.5% between the 2001 and 2011 censuses, whilst those identifying as White British reduced from 80.9% to 49.5%.

Ethnic projections available from the GLA forecast 66% of the borough population identifying as coming from black and minority ethnic backgrounds in 2020 compared to 34% identifying as White British.

There is currently no monitoring data available within the CTS case load data to distinguish claimant's by race or ethnicity.

(GLA population projections)

➤ **Religion**

56% of the population identify as Christian, 18.9% identify with no religion and 13.7% identify as Muslim.

There is currently no monitoring data available within the CTS case load data to distinguish claimant's by religion.

(Census 2011)

➤ **Sex/Gender**

Currently 51.5% of the borough's residents are female, and 49.6% are male.

(Census 2011)

➤ **Sexual orientation**

Between 10,000 – 14,000 people in Barking & Dagenham are lesbian, gay and bisexual.

There is currently no monitoring data available within the CTS case load data to distinguish claimant's by sexual orientation.

(Stonewall estimates)

➤ **Socio-economic disadvantage**

Council Tax Support is means tested across low income socio-economic groups.

All claimants will be in a lower socio-economic category.

There are currently 16,611 live CTS cases of which 11,810 (71%) are working age and 4707 (29%) are of pension age.

The total CTS case load of 16,611 is 7.8 % of the total borough population of 212,906.

(CTS case load data extraction 15.12.2020)

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Potential impacts	Positive	Neutral	Negative	What are the positive and negative impacts?	How will benefits be enhanced and negative impacts minimised or eliminated?
Local communities in general	X	X		The overall impact of the CTS scheme changes is either neutral or positive.	There are no negative impacts from the CTS scheme changes.
Age	X	X		<p>Pension age claimants are unaffected by the changes and will not fall under new application processes. Support remains in place from the Visiting & Welfare outreach service to assist pension age claimants with the application process.</p> <p>Working age new Universal Credit claimants will benefit from automatic awards where eligible.</p>	<p>Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.</p> <p>Working age claimants in receipt of Universal Credit will benefit from an easier application process for CTS, that will automatically award entitlement where eligible, and will also re-award entitlement to CTS within a 3-month period if entitlement previously ends.</p> <p>Working age legacy benefit claimants are unaffected by the changes.</p> <p>There are no negative impacts from the proposed changes to the CTS scheme.</p>
Disability	X	X		<p>Pension age claimants are unaffected by the changes.</p> <p>Working age new Universal Credit</p>	<p>Pension age claimants are protected and will continue to receive full support.</p> <p>Working age claimants in receipt of Universal Credit limited capacity for work elements (disability elements) will benefit from an easier application process for CTS, that will automatically award entitlement</p>

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			<p>claimants with disability elements will benefit from automatic awards where eligible.</p>	<p>where eligible, and will also re-award entitlement to CTS within a 3-month period if entitlement previously ends.</p> <p>Working age legacy benefit claimants are unaffected by the changes.</p> <p>There are no negative impacts from the proposed changes to the CTS scheme.</p>
Gender reassignment		X	No impact.	<p>The scheme will not treat people of different genders any differently.</p> <p>There is no CTS data held for this specific category.</p>
Marriage and civil partnership		X	No impact.	<p>The scheme will not treat people either married or in a civil partnership any differently.</p> <p>There is no CTS data held for this specific category.</p>
Pregnancy and maternity	X	X	<p>Working age new Universal Credit claimants on maternity leave will benefit from automatic awards where eligible.</p> <p>No other impact.</p>	<p>The scheme will only treat people who are on maternity leave differently in so far as considering their income & household with regards to the means testing of CTS entitlement.</p> <p>Working age claimants in receipt of Universal Credit on maternity leave will benefit from an easier application process for CTS, that will automatically award entitlement where eligible, and will also re-award entitlement to CTS within a 3-month period if entitlement previously ends.</p> <p>Working age legacy benefit claimants are unaffected by the changes.</p> <p>There are no negative impacts from the proposed changes to the CTS scheme.</p>
Race (including Gypsies, Roma and Travellers)		X	No impact.	<p>The scheme will not treat people of different ethnicity or race any differently.</p> <p>There is no CTS data held for this specific category.</p>
Religion or belief		X	No impact.	<p>The scheme will not treat people of different religion any differently.</p> <p>There is no CTS data held for this specific category.</p>
Sex	X	X	Pension age claimants are	Pension age claimants are protected and will continue to receive full support.

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			<p>unaffected by the changes.</p> <p>Working age new Universal Credit claimants will benefit from automatic awards where eligible.</p>	<p>The scheme will not treat people of different gender/sex any differently.</p> <p>All Working age claimants in receipt of Universal Credit will benefit from an easier application process for CTS, irrespective of gender/sex, that will automatically award entitlement where eligible, and will also re-award entitlement to CTS within a 3-month period if entitlement previously ends.</p>
Sexual orientation		X		<p>The scheme will not treat people of different sexual orientation any differently.</p> <p>There is no CTS data held for this specific category.</p>
Socio-economic Disadvantage	X	X	<p>Pension age claimants are unaffected by the changes.</p> <p>Working age new Universal Credit claimants will benefit from automatic awards where eligible.</p>	<p>Pension age claimants are protected and will continue to receive full support.</p> <p>Working age claimants in receipt of Universal Credit will benefit from an easier application process for CTS, that will automatically award entitlement where eligible, and will also re-award entitlement to CTS within a 3-month period if entitlement previously ends.</p> <p>Working age legacy benefit claimants are unaffected by the changes.</p> <p>There are no negative impacts from the proposed changes to the CTS scheme.</p>
Any community issues identified for this location?		X	No impact	No issues recognised

2. Consultation.

Provide details of what steps you have taken or plan to take to consult the whole community or specific groups affected by the service or policy development e.g. on-line consultation, focus groups, consultation with representative groups.

If you have already undertaken some consultation, please include:

- Any potential problems or issues raised by the consultation
- What actions will be taken to mitigate these concerns

Barking & Dagenham Council last consulted on the principles of a draft local CTS scheme on the 19th November 2014, regarding the changes to the CTS scheme applied from the 1st April 2015.

On the 19th November 2014, an online consultation was started with a link hosted on the home page of the LBBB website. A press release was given in the local newspaper "The Post" with a shortened URL (link) to the online content. Further to this, letters were sent to 15,441 working age CTS claimants on the 21st November 2014 inviting them to participate in the consultation and online survey. In addition, two public consultation meetings were held, on Thursday 4th and Thursday 11th December 2014, which were attended in total by 48 residents. Attendees were asked to fill in a paper copy of the same survey, which were collated with the online results received on the 20th December 2014.

In total 147 consultation responses were received, and the results compiled and considered in the decision-making process.

As part of the consultation process statutory government guidelines for CTS schemes were also considered.

Equality was promoted as part of the consultation by promoting changes and publicising to all groups – assistance was offered to front line offices, Children's Centres and the Revs & Bens service.

Support was put in place such as payment arrangements to help clear outstanding debt, signposting to skills training or job opportunities and debt advice.

Disabled people were identified as a group of concern in the consultation process. Organisations relevant to disabled people in the borough were directly informed so that they were able to understand the changes, and help disabled people to understand the transition.

Barking & Dagenham Council has not been required to conduct any further public consultation since November 2014 as changes to the subsequent CTS schemes from 2016/17 to date have been based on prescribed regulation changes to the default scheme, administrative changes, or positive changes to the scheme such as the increase in capital allowance limit from £6,000 to £10,000.

The changes to the CTS scheme for 2021/22 regarding the automatic CTS awards for new Universal Credit claimants and this new application process will be publicised on the Council website prior to April 2021.

This will ensure the new application process regarding new Universal Credit claimants is widely communicated and will also confirm the existing application process will also remain in place for pre-existing, non-Universal Credit claimants and pension age applicants.

Administrative changes that are technical will not be required to be communicated directly to residents.

3. Monitoring and Review

How will you review community and equality impact once the service or policy has been implemented?

*These actions should be developed using the information gathered in **Section 1 and 2** and should be picked up in your departmental/service business plans.*

Action	By when?	By who?
Impact of change monitoring by reviewing Council Tax collection rates and the number of CTS claims, especially with regards to the automatic awarding of Universal Credit CTS claims, to ensure the needs of the most vulnerable are met and a cost analysis can be generated.	Ongoing	James Johnston
Regular monitoring based on performance frameworks	Ongoing	Robert Nellist

4. Next steps

It is important the information gathered is used to inform any Council reports that are presented to Cabinet or appropriate committees. This will allow Members to be furnished with all the facts in relation to the impact their decisions will have on different equality groups and the wider community.

Take some time to summarise your findings below. This can then be added to your report template for sign off by the Strategy Team at the consultation stage of the report cycle.

Implications/ Customer Impact

The proposals for the changes to the CTS scheme for 2021/22 are based on administrative changes, which seek to improve clarity, align with other welfare benefits, primarily Universal Credit, and enhance access for those eligible for entitlement to CTS.

The overall impact of the proposed changes to the 2021/22 CTS scheme for the residents of the borough, and overall customer impact are either neutral or positive.

There are no negative customer impacts that arise from the proposed changes to the CTS scheme from April 2021.

By adopting the acceptance of new electronic Universal Credit new claim applications as a claim for CTS with the Authority, and automatically granting entitlement to CTS, where eligible, access to the CTS scheme for low income residents is improved, helping to continue to provide the best access and support for the most vulnerable residents in the borough.

By also allowing for the reinstatement of CTS claims for Universal Credit claimants, that re-qualify for CTS entitlement, within a 3-month period, without the requirement for a further application form, access to the scheme is further improved, ensuring entitlement where eligible is awarded.

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This new application process will also reduce the print requirement of LBBD and simplifies administration.

Administrative changes to improve the interactions and provide clarity between the scheme and primarily Universal Credit claims are either neutral or positive in their customer impact on residents of the borough.

Administrative changes such as not applying the minimum income floor (MIF) within Universal Credit awards will have a positive impact on eligibility to CTS and will bring Universal Credit claimants in line with existing legacy benefit claimants, who are not currently subject to a MIF.

The improved administration of the scheme through the changes proposed will assist in ensuring the correct levels of support are provided to all low-income socio-economic residents within the borough.

The scheme changes are applicable to working age claimants only, and pension age claimants continue to be protected with 100% CTS awards as per the prescribed regulations.

Working age claimants across all demographic groups, who become new Universal Credit claimants, will see improved access to the scheme by the changes to the application process, that will automatically award entitlement to CTS, where eligible.

Working age claimants who remain on existing legacy benefits will see no change in the administration of the scheme, or application process and therefore changes to the scheme are considered neutral for these claimants.

The proposed changes to the CTS scheme will see neutral or no impact on demographics such as gender re-assignment, marriage and civil partnership, ethnicity, sexual orientation & religion or belief.

The CTS scheme continues to meet government guidelines for the protection of current levels of support for pensioners, the encouragement of people to work while not acting as a disincentive & considers the equality impact on the most vulnerable residents from scheme changes.

5. Sign off

The information contained in this template should be authorised by the relevant project sponsor or Divisional Director who will be responsible for the accuracy of the information now provided and delivery of actions detailed.

Name	Role (e.g. project sponsor, head of service)	Date
Donna Radley	Head of Benefits	22/12/2020