

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	Comsol: Revenue & Benefits: Council Tax Support scheme 2022/23
Lead Officer	James Johnston (Senior Housing Benefit Officer) & Donna Radley (Head of Benefits)
Contact Details	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 (Working age is anyone under Pension Credit age) liable for Council Tax could get up to 75% of the charge paid through the scheme, dependent upon their circumstances.

The council must consider whether to revise or replace its CTS scheme each financial year, for working age recipients. However, it does not actually have to revise or replace its scheme and can choose to retain the scheme unchanged from the previous financial year.

This EIA is required for the implementation of the 2022/23 CTS scheme.

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 214,107. Of this population currently 63.4 % (135,749) are considered of working age (16 – 64) & 9.2 % (19,807) are considered of pension age (over 65).

There are currently 16,676 live CTS cases, of which 12,032 (72%) are working age and 4644 (28%) are of pension age.

The CTS working age caseload is currently 8.8% of the working age population of the borough.

The CTS pension age caseload is currently 23.4% of the pension age population of the borough.

CTS expenditure for the financial year 2020/21 is currently £14,664,322.

Of this expenditure £9,568,454 (65.24%) is against working age claimants and £5,095,868 (34.76%) is against pension age claimants.

Working age claimants currently make up 63.4% of the population and account for 72% of the CTS caseload and 65.24% of the total CTS expenditure.

Pension age claimants currently make up 9.2% of the population and account for 28% of the CTS caseload and 34.76% of the total CTS expenditure.

(CTS case load data extraction 18/10/2021)

(Census 2020)

➤ Disability

Barking & Dagenham currently has 4,661 people of working age (16-64) claiming Disability Living Allowance & 4,100 claiming Personal Independence Payment.

(DWP Stat-Xplore 2021)

➤ **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 borough population identifying as coming from black and minority ethnic backgrounds has increased from 19.1% to 50.5% between the 2001 and 2011 censuses, and is now at 66%, compared to 34% identifying as White British based on the 2020 census.

This sits above the London average of 61.8%.

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

(Census 2020)

➤ **Religion**

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

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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 16,676 live CTS cases, of which 12,032 (72%) are working age and 4644 (28%) are of pension age.

The CTS working age caseload is currently 8.8% of the working age population of the borough.

The CTS pension age caseload is currently 23.4% of the pension age population of the borough.

(CTS case load data extraction 18/10/2021)

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		No scheme changes are proposed. The overall impact of retaining the current CTS	There are no negative impacts from the retention of the current CTS scheme.

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			<p>scheme changes is either neutral or positive.</p>	
Age	X	X	<p>No scheme changes are proposed. The overall impact of retaining the current CTS scheme changes is either neutral or positive.</p> <p>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 continue to 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 continue to 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 continue to be unaffected.</p> <p>There are no negative impacts from the retention of the current CTS scheme.</p>
Disability	X	X	<p>No scheme changes are proposed. The overall impact of retaining the current CTS scheme changes is either neutral or positive.</p> <p>Pension age claimants are unaffected.</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 continue to 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 continue to be unaffected by the changes.</p>

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			Working age new Universal Credit claimants with disability elements will continue to benefit from automatic awards where eligible.	There are no negative impacts from the retention of the current CTS scheme.
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>No scheme changes are proposed. The overall impact of retaining the current CTS scheme changes is either neutral or positive.</p> <p>Working age new Universal Credit claimants on maternity leave will continue to 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 continue to 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 continue to be unaffected by the changes.</p> <p>There are no negative impacts from the retention of the current CTS scheme.</p>

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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	<p>No scheme changes are proposed. The overall impact of retaining the current CTS scheme changes is either neutral or positive.</p> <p>Pension age claimants are unaffected.</p> <p>Working age new Universal Credit claimants will continue to benefit from automatic awards where eligible.</p>	<p>Pension age claimants are protected and will continue to receive full support.</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 continue to 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>No scheme changes are proposed. The overall impact of retaining the current CTS scheme changes is either neutral or positive.</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 continue to 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>

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			Pension age claimants are unaffected. Working age new Universal Credit claimants will continue to benefit from automatic awards where eligible.	Working age legacy benefit claimants are unaffected. There are no negative impacts from the proposed changes to the CTS scheme.
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 LBBD 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.

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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

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 or administrative changes only, therefore not requiring consultation.

There are no proposed changes to the CTS scheme for 2022/23 which is the retention of the prior year’s scheme.

No consultation is required regarding the retention of the current CTS scheme.

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 made and ongoing expenditure against the CTS scheme.	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.

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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 proposal for the CTS scheme 2022/23 is the retention of the current year's scheme, with prescribed regulation changes for the nationally prescribed Pension Age scheme being implemented.

Pension Age claimants continue to be protected with 100% CTS awards as per the nationally prescribed scheme.

The retention of the current CTS scheme for 2022/23 raises no new EIA issues.

The current minimum payment of 25% required for all working age claimants will continue to disproportionately affect the lowest socio-economic group and it is considered likely that keeping the current scheme will make it difficult to collect Council Tax from those entitled to a reduction under the scheme.

There are no further negative customer impacts that arise from the retention of the current CTS scheme.

Improved access to the scheme through the acceptance of new electronic Universal Credit claims as an application for CTS continue to improve access and inclusion to the scheme for low income and vulnerable residents.

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.

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

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 continues to be improved, ensuring entitlement where eligible is awarded.

Administrative updates applied within changes to the CTS scheme for 2021/22 are continued within the retention of the scheme for 2022/23 and continue to improve the administration, efficiency, and customer experience of the scheme.

The means testing of the support for claimants, based on each individual's ability to pay, is fair and equitable and protects the most vulnerable.

The retention of the current CTS scheme will see neutral 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, meeting the needs and delivering outcomes, both social & economic for residents of the borough.

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	11/11/21