

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: Welfare Service Council Tax Support scheme review 2023/24
Lead Officer	James Johnston (Senior Housing Benefit Officer) & Donna Radley (Head of Benefits)
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Why is this service or policy development/review needed?
<p>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.</p> <p>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).</p> <p>The Pension age scheme is nationally prescribed, with a maximum liability of 100% and cannot be changed at a local level.</p> <p>It is proposed that the Council consults on a revision to its CTS scheme for 2023/24 to reduce the minimum payment required by 10% to a minimum payment of 15%.</p> <p>Currently a minimum payment of 25% towards Council Tax liability is required for all working age claimants in Barking & Dagenham irrespective of their financial circumstances and ability to pay.</p> <p>A majority of London Boroughs have minimum payments within their CTS schemes that are less than the 25% currently applied. Only 6 out of 31 Boroughs have comparable or higher minimum contributions giving the Council one of the highest minimum payment rates in Greater London.</p> <p>Current poverty trackers confirm Barking & Dagenham to have the lowest (worst average rank) combining the 10 poverty indicators in the Greater London area.</p> <p>The current CTS scheme does not provide the same level of support to residents of the borough that was provided in 2015/16 and potentially does not provide sufficient core support to residents in light of the socio-economic demographics and poverty indicators within the borough.</p> <p>This is against the current backdrop of a cost of living crisis that is particularly acute within the borough that is significantly affecting residents.</p>

Why is this service or policy development/review needed?

It is proposed that the scheme requires revision to reduce the minimum payment applied within the 2023/24 CTS scheme to provide better core support to low income residents of the borough, including the most financially excluded, with their ongoing Council Tax costs.

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 15,779 live CTS cases, of which 11,203 (71%) are working age and 4575 (29%) are of pension age.

The CTS working age caseload is currently 8.2% of the working age population of the borough.

The CTS pension age caseload is currently 23.09% of the pension age population of the borough.

CTS expenditure for the financial year 2022/23 is currently £14,523,991.

Of this expenditure £9,325,766.87 (64.20%) is against working age claimants and £5,198,225.63 (35.80%) 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 64.20% 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 35.80% of the total CTS expenditure.

(CTS case load data extraction 14/06/2022)

(Census 2020)

➤ **Disability**

Barking & Dagenham currently has 4,631 people of working age (16-64) claiming Disability Living Allowance & 8,669 claiming Personal Independence Payment.

(DWP Stat-Xplore extraction 14/06/2022)

➤ **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.

There are 74.2 births per 1,000 women of childbearing age, which was the highest in London.

(LBBD teenage conception data 2018)

(Office for National Statistics 2020 (Births))

➤ **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 67.1%, compared to 32.9% identifying as White British based on the 2020 census.

This sits above the London average of 62.2%.

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.

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 15,779 live CTS cases, of which 11,203 (71%) are working age and 4575 (29%) are of pension age.

The CTS working age caseload is currently 8.2% of the working age population of the borough.

The CTS pension age caseload is currently 23.09% of the pension age population of the borough.

Current poverty trackers confirm Barking & Dagenham to have the lowest (worst average rank) combining the 10 poverty indicators in the Greater London area.

The current 'minimum payment' of 25% required for all working age claimants will continue to disproportionately affect the lowest socio-economic group and not provide the required level of core support to residents of the borough.

It is considered likely that keeping the current scheme unchanged will continue to make it difficult to collect Council Tax from those entitled to a reduction under the scheme, and this will have a greater impact on the lowest socio-economic group in the borough.

(CTS case load data extraction 14/06/2022)

(Poverty tracker April 2022)

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			A reduction in the minimum payment amount for working age claimants will have a positive impact by providing a greater level of core support against Council Tax liability.	There are no negative impacts from the reduction in the minimum payment amount for working age claimants.
Age	X			Pension age claimants remain protected with	Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.

			<p>no minimum payment required.</p> <p>Support remains in place from the Visiting & Welfare outreach service to assist pension age claimants with the application process.</p> <p>A reduction in the minimum payment amount for working age claimants will have a positive impact by providing a greater level of core support against Council Tax liability.</p>	There are no negative impacts from the reduction in the minimum payment amount for working age claimants.
Disability	X		A reduction in the minimum payment amount for working age claimants will have a positive impact on any claimant with a disability by providing a greater level of core support against Council Tax liability.	There are no negative impacts from the reduction in the minimum payment amount for working age claimants with a disability.
Gender reassignment		X	No impact.	The scheme will not treat people of different genders any differently.

				There is no CTS data held for this specific category.
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		A reduction in the minimum payment amount for working age claimants will have a positive impact on any claimant who is pregnant or on maternity leave/benefit by providing a greater level of core support against Council Tax liability.	<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>There are no negative impacts from the reduction in the minimum payment amount for working age claimants who are pregnant or on maternity leave/benefit.</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	A reduction in the minimum payment amount for working age claimants will have a positive impact on all claimants regardless of gender by providing a greater level of core support against	<p>The scheme will not treat people of different gender/sex any differently.</p> <p>Pension age claimants are protected and will continue to receive full support.</p> <p>There are no negative impacts from the reduction in the minimum payment amount for working age claimants of all gender/sex as these are treated the same.</p>

				Council Tax liability.	
Sexual orientation		X		No impact	<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			<p>A reduction in the minimum payment amount for working age claimants will have a positive impact on residents of the lowest socio-economic demographic by providing a greater level of core support against Council Tax liability.</p>	<p>Pension age claimants are protected and will continue to receive full support.</p> <p>There are no negative impacts from the reduction in the minimum payment amount for working age claimants with socio-economic disadvantage.</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

Prior to the implementation of any change to the CTS scheme the Council is required to consult with the residents of the borough.

The guiding principles that have been established through case law for fair consultation are as follows:

- The consultation must be carried out at an early stage when the proposals are still at a formative stage
- Sufficient information on the reasons for the decision must be provided to enable the consultees to carry out a reasonable consideration of the issues and to respond
- Adequate time must be given for consideration and responses to be made
- The results of the consultation must be properly taken into account in finalising any decision

The aims of any consultation should be to:

- Inform residents and help them understand the impact of the proposals
- Confirm why the proposals are being made
- Detail any alternative proposals
- Give purposeful consideration to realistic alternative proposals presented
- Obtain feedback on whether residents support the proposals

The consultation is anticipated to be primarily web based with information made available on the website and advertised in the media, with further promotion at the libraries and community hubs, to encourage residents to participate.

To account for digital exclusion paper copies will be made available.

A further public consultation will be held on sites within the borough to enable consultation to take place in person for residents. This will also be promoted to encourage residents to attend and engage.

Consideration will be given to direct contact with current CTS claimants, either by email or with paper copies if email addresses are not held.

Contact and engagement with affected stakeholders such as CAB, DABD and other voluntary groups will also be required to obtain their views on the proposed changes. This may be in person or via online meetings.

The outcome of the consultation will be reported to Cabinet to support in a decision being reached on any change to the scheme.

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

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.

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 2023/24 is a reduction of 10% in the minimum payment amount to 15%.

Pension Age claimants continue to be protected with no minimum payment and 100% CTS awards as per the nationally prescribed scheme.

A revision of the current CTS scheme for 2023/24 to reduce the minimum payment will have a positive impact on all demographic groups within the borough.

There are no further negative customer impacts that arise from the reduction in the minimum payment amount.

A reduced minimum payment to 15% required for all working age claimants will continue to disproportionately affect the lowest socio-economic group and it is considered likely that this will still make it difficult to collect Council Tax from those entitled to a reduction under the scheme.

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

A revision of the current CTS scheme will see neutral impacts on demographics such as gender re-assignment, marriage and civil partnership, ethnicity, sexual orientation & religion or belief, as these characteristics have no specific data held against them and are not addressed within the make up of the scheme i.e., they have no impact on the administration or award.

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