

## 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	Replacement Council Tax Support scheme 2024/25
Lead Officer	James Johnston (Service Manager) & Donna Radley (Head of Welfare)
Contact Details	<a href="mailto:James.johnston@lbbd.gov.uk">James.johnston@lbbd.gov.uk</a> <a href="mailto:Donna.radley@lbbd.gov.uk">Donna.radley@lbbd.gov.uk</a>

### 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 85% of the charge paid through the scheme, resulting in a minimum payment of 15% for all claimants, 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.

Pensioners are protected under the nationally prescribed pension age CTS scheme and must be able to receive up to a 100% reduction under the national scheme rules and this cannot be varied at a local level. Prescribed regulation changes to the pension age scheme must be applied.

This EIA is required for the proposals to implement a replacement CTS scheme for the financial year 2024/25 for working age households.

A new simplified version of the scheme is being proposed changing the scheme from the current means tested default scheme to an income banded discount scheme.

The current scheme has a number of disadvantages which can be summarised as follows:

- Highly complex calculation of entitlement and legislative based assessment processes
- Reactive to minor changes in circumstances generating higher volumes of work, adjustments to awards and multiple Council Tax bill adjustments
- Complex administration for staff & complex for applicants to understand
- Difficult to simplify with little flexibility in the scheme available
- The impact of Universal Credit (UC) on administration and awards
- Difficult to vary and change the levels of support for different types of applicant

The current default CTS scheme is less compatible with UC.

The impact of UC on the administration of the current CTS scheme can be summarised as follows:

## Why is this service or policy development/review needed?

- Lower entitlement (CTS award)
- A higher volume of changes

UC claimants on average have less entitlement to CTS than existing legacy benefit claimants due to the design of UC.

The current CTS scheme is highly reactive to change. Administration costs are higher for UC claimants due to the monthly re-assessment of UC awards requiring processing and the adjustment of CTS. This results in claimants receiving up to 12 revised Council Tax bills and adjustment notices in the financial year. This may impact on Council Tax collection with amended Council Tax bill's being issued with rescheduled instalments. This creates confusion for the Council taxpayer and may contribute to increased Council Tax arrears.

Managed migration of the existing legacy benefit case load (with some exceptions for claimants in receipt of Employment & Support Allowance (ESA) to UC is scheduled to be undertaken in 2024.

This will have a significant impact on the existing case load.

If the current scheme is retained, it may not adequately support residents and this may act as a disincentive/barrier to work.

The existing scheme is too reactive to change and may not be viable in the long term due to the migration to UC.

In view of the issues with the retaining of the current scheme and taking account of the drivers for change it is proposed that an alternative approach be taken for a replacement scheme in 2024/25.

The main objectives of this CTS scheme change can be summarised as follows:

- Is affordable and maintains a cost neutral position from natural increases in the cost of retaining the current scheme into 2024/25
- Simplifying the scheme making it easy for residents to understand and access
- Provide the maximum level of support for all low income households
- Remove the requirement to continually make changes in awards making support more consistent and provide stability on managing household budgets
- Improve how the scheme works with the UC system
- Create a scheme that is fair and equitable to all residents, requiring a fair contribution from those who can pay while protecting the most vulnerable
- Encourages and incentivises employment
- Builds in capacity to better manage an increase in demand for the scheme (increased automation and more efficient administration)

An income banded discount scheme provides support based on bands of income and provides a percentage reduction off the Council Tax bill (the award). The number of discount bands, the level of discount and income thresholds can all be varied. Banded schemes vary in the types of income taken into account, what circumstances are considered and the % of the discount awarded. Income banded schemes can be designed to be as simple or as complex as desired, can be made more or less generous and designed to support protected groups if required. Re-assessment of cases will only be required if income crosses one of the income band thresholds.

Why is this service or policy development/review needed?

This approach will fundamentally redesign the scheme.

Income banding has the following advantages:

- Simplified and easier for applicants to understand
- Removal of complex means testing
- Simplified administration
- Reduced requirement to report changes in circumstances for applicants (workload)
- Significantly reduced number of claim adjustments and therefore Council Tax bill changes
- Reduced print & post costs due to reduced numbers of changes
- Targeted support at the most vulnerable (or other priority groups) (flexible scheme design)
- Easier to automate changes through existing IT platforms
- More compatible with Universal Credit

The [B&D Joint Health and Wellbeing Strategy 2019-23](#) includes an outcome that when residents need help, they can access the right support, at the right time in a way that works for them.

As a simplified Scheme that is easier for applicants to understand with fewer barriers to access should support this outcome, since the proposed scheme is less reactive to minor changes in circumstances than the current Scheme, enabling residents with fluctuations in their household circumstances (e.g. to time off work for ill-health or caring) to financially plan.

This EIA will consider the impact of introducing a banded income discount scheme in 2024/25.

**Note this decision has not been taken.**

**This EIA analysis is based on a proposed draft CTS scheme to be considered by Cabinet.**

**There are a number of mitigations as set out in the report to support those who may be impacted.**

**The Strategy team has reviewed this EIA.**

## **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.

## **Overall borough wide demographics**

- **Local communities in general**

Barking & Dagenham is a diverse borough with significant levels of deprivation as outlined by the following demographic trends below.

- **Population & Households**

Barking & Dagenham currently has a total population of 218,900.

The population size has increased by 17.7% from around 185,900 in 2011. This is higher than the overall increase for England of 6.6% and the 2<sup>nd</sup> highest in greater London and demonstrates the growth in population in the borough. Nearby boroughs such as Havering saw growth of only 10.4%.

In 2021 Barking & Dagenham ranked 80<sup>th</sup> for total population in Local Authority areas moving up 15 places since 2011.

There are currently 73,900 households in the borough.

This is broken down as follows:

- 1 person in household 23.7%
- 2 people in household 22.5%
- 3 people in household 18.9%
- 4 or more people in household 34.9% (London average 24.1%)

Single family households make up 62.9% of the household composition, higher than the London average of 58%.

The average household size is 2.96 the 4<sup>th</sup> highest average in England & Wales.

Barking & Dagenham therefore has a higher proportion of larger households and a higher proportion of single family households than the London average.

The population is expected to grow another 42% to 309,000 by 2041.

- **Age**

Of this population currently 57,150 are aged under 16. This is the highest proportion in England and Wales.

Of this population currently 142,700 are aged 16 – 64, and 19,050 aged over 65.

The largest age group bracket is age 35 – 39 with 8.5% (18,606) of the borough.

The average age in the borough is 33. This is lower than the London average of 35.

Barking & Dagenham has a significantly higher age profile between 0-19 than the London average.

The age profile has seen a decrease of 1.7% in people aged 65 and over, with an increase of 20.8% of people aged 15-64. The age profile for children under 15 has also increased by 17.3%.

57,100 (26.1%) of residents were aged under 16 on Census day, the highest proportion in England & Wales.

This demonstrates the changing profiles of the age of the population in Barking & Dagenham.

- **Disability**

Currently 13.2% of the population is registered as disabled under the Equality Act.

Barking & Dagenham currently has 4,790 people of working age (16-64) claiming Disability Living Allowance & 9,687 claiming Personal Independence Payment.

29.8% of households have at least one person who identifies as disabled, the highest proportion in London.

The [B&D Joint Strategic Needs Assessment](#) highlight that people with a disability are at particular risk of disadvantage in all its forms, as they are more likely to be living on a low income, be unemployed or in unsuitable housing, putting their health at additional risk of further decline

(DWP Stat-Xplore - 31.05.2022)

(Census 2021)

- **Gender reassignment**

9 in 10 Barking & Dagenham residents' gender identity was the same as sex registered at birth (90.4%)

Of all English & Welsh local authorities, Barking & Dagenham had the:

- highest proportion of trans women (0.25%)
- 3rd highest proportion of trans men (0.24%)
- 5th highest proportion of people whose gender identity was different but no specific identity given (0.64%)
- 17th highest who did not answer the gender identity question (8.4%)

- **Marriage & civil partnership**

Barking & Dagenham currently has 42.8% of the population married or in a civil partnership, up from 42.1% in 2011. The number of people who were married increased and fell across England.

41.8% of the population were never married or registered in a civil partnership.

8.1% are divorced or in a dissolved civil partnership.

12.8% of households were lone parents with dependant children the highest proportion in England & Wales.

(Census 2021)

- **Pregnancy & maternity**

There are currently 64.2 births per 1000 women of childbearing age the highest in London.

Barking & Dagenham saw England's joint second largest % rise in the proportion of households including a couple with dependant children from 20.9% in 2011 to 24.1% in 2021.

There are 9,4000 (12.8%) lone parent households with dependent children, the highest proportion in England & Wales.

Teenage pregnancy rates are 16.1 per 1000 females aged 15-17.

(Census 2021)

(Borough data explorer)

- **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 69.1%, the 10<sup>th</sup> highest in the country.

In 2021 25.9% of residents identified their ethnic group as Asian, Asian British or Asian Welsh, up from 15.9% in 2011. This 9.9% increase was the largest increase among high level ethnic groups in this area.

44.9% of residents identified as white compared with 58.3% in 2011.

21.4% of residents identified as Black, Black British, Black Welsh, Caribbean of African compared to 20% in 2011.

Ethnic diversity has increased between 2011 and 2021 with the percentage of non-white British residents rising by 18.6% over the decade.

The most common language of residents whose main language is not English is Romanian (4.8%) followed by Bengali (3.1%).

2 in 5 residents were born outside of the UK.

Barking & Dagenham has become increasingly ethnically diverse in the last 10 years.

(Census 2021)

- **Religion**

45.4% of the population identify as Christian, down from 56% in 2011.

18.8% identify with no religion.

24.4% of residents identify as Muslim, up from 13.7% in 2011. This rise of 10.7% was the largest increase in religious groups in Barking & Dagenham.

These groups are the predominant religion in the borough with the next highest identifying as Hindu at 3%.

(Census 2021)

- **Sex/Gender**

Currently 51.3% of the borough's residents are female, and 48.7% are male.

This is broken down by population:

- Male – 106,548
- Female – 112,202

(Census 2021)

- **Sexual orientation**

Nearly 9 in 10 Barking & Dagenham residents described their sexual orientation as Straight or Heterosexual (88.6%)

Of all English & Welsh local authorities, Barking & Dagenham had the:

- 4th highest proportion who described their sexual orientation as all other sexual orientations (0.07%)
- 23rd highest proportion who described their sexual orientation as Pansexual (0.38%)

- **Socio-economic disadvantage (deprivation in the borough)**

In April 2023 the updated poverty indicator tracker for Barking & Dagenham held the:

- 34<sup>th</sup> (worst) average rank (combining the 10 indicators of poverty) against all 309 English Local Authorities
- 32<sup>nd</sup> highest unemployment rate

- 5<sup>th</sup> highest rate of Universal Credit claimants in employment (previously 5<sup>th</sup> in the 2021 census)
- 7<sup>th</sup> highest proportion of households claiming Housing Benefits
- 70<sup>th</sup> highest proportion of households living in fuel poverty
- 63<sup>rd</sup> highest proportion of children under 16 living in relative low income families.

This compared to April 2022:

- 18<sup>th</sup> (worst) average rank (combining the 10 indicators of poverty) against all 309 English Local Authorities
- 2<sup>nd</sup> highest unemployment rate
- 2<sup>nd</sup> highest rate of Universal Credit claimants in employment (previously 5<sup>th</sup> in the 2021 census)
- 5<sup>th</sup> highest proportion of households claiming Housing Benefits
- 17<sup>th</sup> highest proportion of households living in fuel poverty
- 34<sup>th</sup> highest proportion of children under 16 living in relative low income families.

This showed a:

- Falling unemployment rate
- Reduction in fuel poverty (data remains pre cost of living crisis)
- Reduction in children living in relative low-income families

Within London the borough has the highest rates of:

- Universal Credit claimants in employment

The 3<sup>rd</sup> highest rate of

- Children aged under 16 living in relative low income families.

The 4<sup>th</sup> highest rate of:

- Households living in fuel poverty
- Income Support claimants

Barking & Dagenham has dropped from the 18<sup>th</sup> lowest (worst) to 34<sup>th</sup> lowest (worst) combining the 10 indicators of poverty. This is the first time Barking & Dagenham has:

- Featured outside of the top 20 (worst) Local Authorities since February 2020
- Not been the most impoverished borough (3<sup>rd</sup>)

Although these poverty indicators have improved Barking & Dagenham remains a very impoverished borough.

The 2021 census also provided data on poverty indicators:

- 46,100 (62.4%) of households have at least one measure of deprivation.
- 46% of children are estimated to live in poverty the 3<sup>rd</sup> highest in England & Wales.

- The borough also had an economically inactive rate of 35.9%, higher than the London average of 33.8%.
- 7% of the population were providing unpaid care.
- 58.5% of residents are economically active in employment, lower than the London average of 61.4%.
- 16.1% were employed in professional occupations with 15.9% employed in elementary occupations.
- The largest socio-economic classification was lower managerial, administrative and professional occupations at 15.3%, lower than the London average of 20.6%.
- 11.4% of the population were engaged in part time work of 15 hours a week or less, higher than the London average of 10.7%.
- 22.7% of the population hold no formal qualifications, higher than the London average of 16.2%.
- The number of residents renting privately has increased by 412% since 2001.
- 18,100 (24.5%) of households rent from the Council, the 3<sup>rd</sup> highest in England & Wales.
- 17.8% of households are living in a property without enough bedrooms, the 2<sup>nd</sup> highest proportion in England & Wales.

Income (and debt) is the greatest determinant of health, in a positive way enabling people to afford factors that support healthy living (e.g. diet, physical activity, housing, etc.) and in a negative way driving poor health (e.g. mental health, unhealthy behaviours, etc.).

The proposed Council Tax Support Scheme 2024/25 should have an overall positive impact on health and wellbeing and the reduction of health inequalities, including for those with health issues or barriers.

The socio-economic indicators in the borough highlight high levels of deprivation, poverty and issues with housing and present a challenging outlook for the Council.

### **Council Tax Support - Case load and demographics:**

Case load:

There are currently 15,216 live CTS cases:

- 10,717 working age (16-64) (70.43%)
- 4499 pension age (65+) (29.57%)

The CTS working age caseload is currently 7.5% of the working age population of the borough.

The CTS pension age caseload is currently 23.6% of the pension age population of the borough.

### Case load breakdown by demographic types<sup>1</sup>:

The CTS case load can be broken down by age, household size and other characteristics such as disability.

Age range	CTS claimants (main claimant)	Claims with disability (PIP/DLA/LCW)	Carers (receiving carers allowance)	Claims by household type			
				All claimants	Total	Single	Couple
16-24	195	29	12	182	13	96	46
25-34	1,824	570	303	1,571	253	480	1,018
35-44	2,808	1,052	532	2,124	684	570	1,688
45-54	2,691	1,250	540	1,937	754	515	858
55-65	2,857	1,547	428	2,236	621	228	125
66+	4,508	1,496	199	3,653	855	45	21

Age band	Barking & Dagenham population 2021	% of total population by age bracket	Council Tax Support claimants	% of total
0-9	35,536	16.25%	0	0
10-19	33,328	15.24%	10	0.07%
20-29	28,435	13.00%	847	5.58%
30-39	36,691	16.77%	2627	17.29%
40-49	31,986	14.62%	2828	18.62%
50-59	25,140	11.49%	2756	18.14%
60 -69	14,536	6.65%	2525	16.62%
70-79	8,027	3.67%	2170	14.28%
80+	5,071	2.32%	1429	9.41%

### CTS expenditure (cost):

CTS expenditure for the financial year 2023/24 is currently £16,648,683.81

### CTS expenditure by age:

Of this expenditure £11,216,501.52 (67.37%) is against working age claimants and £5,432,182.29 (32.63%) is against pension age claimants.

<sup>1</sup> Policy & Practice localised CTS Final Report

Working age claimants currently make up 65.10% of the population and account for 70% of the CTS caseload and 67.36% of the total CTS expenditure.

Pension age claimants currently make up 8.70% of the population and account for 30% of the CTS caseload and 32.64% of the total CTS expenditure.

**CTS case load by gender:**

The current case load is split as follows:

Male – 33.31%

Female – 68.02%

**CTS case load by ethnicity & race:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

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

**CTS case load by religion:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

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

**CTS case load by sexual orientation:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

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

**CTS case load by Gender reassignment:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

There is currently no monitoring data available within the CTS case load data to distinguish claimants by gender reassignment

**CTS case load by Marriage and civil partnership:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

There is currently no monitoring data available within the CTS case load data to distinguish claimants by marriage and civil partnership.

**CTS case load by Pregnancy and maternity:**

The Council does not collect this information about this characteristic as it is not a mandatory requirement for the processing of CTS.

There is currently no monitoring data available within the CTS case load data to distinguish claimants by pregnancy.

Maternity can only be identified by those claimants in receipt of a Maternity Allowance benefit from the DWP. This will not account for claimants on paid maternity leave, in receipt of other benefits, or neither.

Potential impacts	Positive	Neutral	Negative	What are the positive and negative impacts?	How will benefits be enhanced and negative impacts minimised or eliminated?
<b>Local communities in general</b>					-
<b>Age</b>				<p>Working age claimants will be affected by the proposed replacement scheme. Some claimants may have increased awards and some claimants may see reduced awards.</p> <p>Although the impacts may differ by age group the calculation of CTS is not related to a person's age for the working age scheme.</p> <p>Any differences in entitlement will be as a result of other factors such as differences between the current means test and the new proposed income band thresholds, or the introduction of a flat rate non-dependant charge.</p> <p>No scheme changes are proposed for the pension age scheme which remains centrally prescribed.</p>	<p>It is not feasible to mitigate any potential adverse impacts on the basis of age alone.</p> <p>The following mitigations are in place to support claimants adversely affected by the proposed changes:</p> <ul style="list-style-type: none"> <li>Resident consultation</li> </ul> <p>Consulting residents about the proposed changes and asking for their views on how to mitigate any impact.</p> <p>Public forums will be available to residents at various locations for face to face surgeries.</p> <ul style="list-style-type: none"> <li>Council Tax Discretionary relief (CTDR)</li> </ul>

			<p>Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.</p>	<p>Maintaining a discretionary Council hardship fund open for applications from all residents and ensuring this is promoted so residents are aware of the scheme.</p> <p>Section 13A of the Local Government Finance act 1992).</p> <ul style="list-style-type: none"> <li>• Government funded hardship schemes and local welfare assistance</li> </ul> <p>Maintaining an open application process for all residents for the Household Support Fund (HSF) and any other government funded discretionary schemes, including Council funded schemes, to support the wider costs of living for vulnerable residents, helping to assist with financial support and therefore the payment and collection of Council Tax.</p> <ul style="list-style-type: none"> <li>• The Homes &amp; Money HUB &amp; Welfare Service</li> </ul> <p>Services supporting vulnerable residents to maximise their income including welfare benefit take up, advice and support on debts and budgeting</p> <ul style="list-style-type: none"> <li>• Applying the Council's debt management policy</li> </ul> <p>Ensuring the fair and ethical collection of Council Tax and assisting residents who are experiencing financial difficulty.</p>
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<b>Disability</b>	X	X	X	<p>Working age claimants will be affected by the proposed replacement scheme. Some claimants may have increased awards and some claimants may see reduced awards.</p> <p>The scheme proposes an increased level of discount of 5% for claimants in receipt of Personal Independence Payments (PIP) and Disability Living Allowance (DLA) for care and daily living at the middle or higher rates and the limited Capacity for Work (LCW) element of Universal Credit (UC).</p> <p>Carers allowance is not part of the qualifying criteria. Although these claimants may also incur additional costs overall scheme affordability has meant a prioritisation against those claimants in receipt of disability benefits.</p> <p>A 5% increase is applied on each band to ensure consistency of approach.</p> <p>This will affect a total of 5,944 claims and provide higher levels of support for this cohort.</p> <p>The maximum level of award is now 90% of the Council Tax charge which is higher than the 85% for all other claimants.</p> <p>This is a positive impact on disabled claimants from the proposed scheme.</p> <p>Claimants who may have disability but are not in receipt of</p>	<p>The benefits of the increased award (disability uplift) will be recognised by reduced Council Tax bills.</p> <p>It is not feasible to mitigate any potential adverse impacts for claimants with disability not in receipt of qualifying disability benefits on this basis alone.</p> <p>The following mitigations are in place to support claimants adversely affected by the proposed changes:</p> <ul style="list-style-type: none"> <li>• Resident consultation</li> </ul> <p>Consulting residents about the proposed changes and asking for their views on how to mitigate any impact.</p> <p>Public forums will be available to residents at various locations for face to face surgeries.</p> <ul style="list-style-type: none"> <li>• Council Tax Discretionary relief (CTDR)</li> </ul> <p>Maintaining a discretionary Council hardship fund open for applications from all residents and ensuring this is promoted so residents are aware of the scheme.</p> <p>Section 13A of the Local Government Finance act 1992.</p>

		<p>the qualifying benefits will not benefit from this change and in some cases may see reduced awards due to variations in which income band they are in.</p> <p>The proposed scheme proposes to implement flat rate non-dependant deductions. This will continue to disregard these deductions where a claimant or partner are in receipt of DLA or PIP at the middle of higher rates as a qualifying benefit, ensuring the protections that were previously in place will remain.</p> <p>2,715 households have at least 1 non-dependant charge. Of these 684 are exempt from deductions due to receipt of disability benefits and will remain protected.</p> <p>There will therefore be no negative impact from the change to a flat rate non-dependant charge.</p> <p>Claimants who may have disability but are not in receipt of the qualifying benefits may be affected and, in some cases, may see reduced awards due to variations in the amount of non-dependant charge applied.</p> <p>No scheme changes are proposed for the pension age scheme which remains centrally prescribed.</p> <p>Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.</p>	<ul style="list-style-type: none"> <li>• Government funded hardship schemes and local welfare assistance</li> </ul> <p>Maintaining an open application process for all residents for the Household Support Fund (HSF) and any other government funded discretionary schemes, including Council funded schemes, to support the wider costs of living for vulnerable residents, helping to assist with financial support and therefore the payment and collection of Council Tax.</p> <ul style="list-style-type: none"> <li>• The Homes &amp; Money HUB &amp; Welfare Service</li> </ul> <p>Services supporting vulnerable residents to maximise their income including welfare benefit take up, advice and support on debts and budgeting</p> <ul style="list-style-type: none"> <li>• Applying the Council's debt management policy</li> </ul> <p>Ensuring the fair and ethical collection of Council Tax and assisting residents who are experiencing financial difficulty.</p>
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## Disability analysis<sup>2</sup>:

### Percentage change in weekly CTR compared to current scheme retained into 2024/25, by barriers to work



Model 1: change in average CTS award, by barriers to work.

The disability uplift has a positive impact on disabled claimants (DLA) who meet the qualifying criteria with an overall increase in the level of award from the proposed change.

Under the proposed scheme 611 households in total will lose more than £5 in support.

Of this 99 households on PIP/DLA lose more than £5 per week. This is against 3,334 households in receipt of PIP/DLA (3%). 56 of these households are employed/self-employed and lose support due to a variation in their income band against the current means tested scheme.

The proposed scheme proportionately benefits disabled claimants with a small number losing out and can be seen to be a positive change for residents with disability who receive relevant qualifying benefits.

<p><b>Gender reassignment</b></p>		<p>X</p>	<p>There is no CTS data held for this specific category.</p> <p>The scheme will not treat people of different genders any differently.</p> <p>The proposed changes to the CTS scheme will not have a</p>	<p>No impact.</p> <p>No mitigations are required.</p>
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<sup>2</sup> Appendix 1 – Policy & Practice localised CTS Final Report

			differential impact on people who are proposing to undergo, is undergoing, or has undergone a process (or part of a process) to re-assign their gender.	
<b>Marriage and civil partnership</b>				
		X	<p>There is no CTS data held for this specific category.</p> <p>The scheme will not treat people either married or in a civil partnership any differently.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on people who are married or in a civil partnership.</p>	<p>No impact.</p> <p>No mitigations are required.</p>
<b>Pregnancy and maternity</b>				
		X	<p>There is no CTS data held for this specific category.</p> <p>Pregnancy does not affect the claimant's assessment of CTS unless there is a change in financial circumstances.</p> <p>The scheme will only treat people who are on maternity leave differently in so far as considering a change in their circumstances for income &amp; household with regards to the income band discount awarded.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on women who are pregnant or recently had a baby.</p>	<p>No impact.</p> <p>No mitigations are required.</p>
<b>Race (including Gypsies, Roma and Travellers)</b>				
		X	<p>There is no CTS data held for this specific category.</p> <p>There are ethnic inequalities in health, some of which are</p>	<p>No impact.</p> <p>No mitigations are required.</p>

			<p>associated to economic deprivation.</p> <p>The scheme will not treat people of different ethnicity or race any differently.</p> <p>A claimant's entitlement to CTS is decided in accordance with set criteria such as recourse to public funds and immigration status.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on people because of their race or ethnicity.</p>	
<b>Religion or belief</b>		X	<p>There is no CTS data held for this specific category.</p> <p>The scheme will not treat people of different religion any differently.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on people because of their religion or belief.</p>	<p>No impact.</p> <p>No mitigations are required.</p>
<b>Sex</b>	X	X	<p>Working age claimants will be affected by the proposed replacement scheme. Some claimants may have increased awards and some claimants may see reduced awards.</p> <p>Although the impacts may differ by sex the calculation of CTS is not related to a person's gender for the working age scheme.</p> <p>Any differences in entitlement will be as a result of other factors such as differences between the current means test and the new proposed income band thresholds, or the introduction of a flat rate non-dependant charge.</p>	<p>It is not feasible to mitigate any potential adverse impacts on the basis of sex alone.</p> <p>The following mitigations are in place to support claimants adversely affected by the proposed changes:</p> <ul style="list-style-type: none"> <li>• Resident consultation</li> </ul> <p>Consulting residents about the proposed changes and asking for their views on how to mitigate any impact.</p>

		<p>This information is recorded within a claimant's personal details.</p> <p>The case load is 33.31% male and 66.69% female for the lead claimant. Any changes that sees reduced awards will disproportionately affect female claimants.</p> <p>Changes in the proposed scheme are not gender specific. The same income threshold and discounts apply to all claimants.</p> <p>Childcare could be a potential barrier for a single parent looking to secure employment or increase their hours and may disproportionately affect woman. By disregarding the childcare element of UC the proposed scheme will support claimants and this may proportionately benefit female claimants.</p> <p>Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on people because of their sex or gender.</p>	<p>Public forums will be available to residents at various locations for face to face surgeries.</p> <ul style="list-style-type: none"> <li>• Council Tax Discretionary relief (CTDR)</li> </ul> <p>Maintaining a discretionary Council hardship fund open for applications from all residents and ensuring this is promoted so residents are aware of the scheme.</p> <p>(Section 13A of the Local Government Finance act 1992).</p> <ul style="list-style-type: none"> <li>• Government funded hardship schemes and local welfare assistance</li> </ul> <p>Maintaining an open application process for all residents for the Household Support Fund (HSF) and any other government funded discretionary schemes, including Council funded schemes, to support the wider costs of living for vulnerable residents, helping to assist with financial support and therefore the payment and collection of Council Tax.</p> <ul style="list-style-type: none"> <li>• The Homes &amp; Money HUB &amp; Welfare Service</li> </ul> <p>Services supporting vulnerable residents to maximise their income including welfare benefit take up, advice and support on debts and budgeting</p>
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				<ul style="list-style-type: none"> <li>Applying the Council's debt management policy</li> </ul> <p>Ensuring the fair and ethical collection of Council Tax and assisting residents who are experiencing financial difficulty.</p>	
<b>Sexual orientation</b>		X	<p>There is no CTS data held for this specific category.</p> <p>The proposed changes to the CTS scheme will not have a differential impact on people because of their sexual orientation.</p>	<p>No impact.</p> <p>No mitigations are required.</p>	
<b>Socio-economic Disadvantage</b>	X	X	X	<p>Working age claimants will be affected by the proposed replacement scheme. Some claimants may have increased awards and some claimants may see reduced awards.</p> <p>Any differences in entitlement will be as a result of factors such as differences between the current means test and the new proposed income band thresholds, or the introduction of a flat rate non-dependant charge.</p> <p>94.11% of households will see a neutral or positive impact on their award from the scheme change.</p> <p>611 households will lose support (5.89%).</p> <p>The proposed scheme is as an average more beneficial for claimants on UC than existing legacy benefits, recognising the planned migration for all</p>	<p>It is not feasible to mitigate any potential adverse impacts on the basis of socio-economic disadvantage alone.</p> <p>The following mitigations are in place to support claimants adversely affected by the proposed changes:</p> <ul style="list-style-type: none"> <li>Resident consultation</li> </ul> <p>Consulting residents about the proposed changes and asking for their views on how to mitigate any impact.</p> <p>Public forums will be available to residents at various locations for face to face surgeries.</p> <ul style="list-style-type: none"> <li>Council Tax Discretionary relief (CTDR)</li> </ul>

		<p>remaining legacy benefits to UC in 2024.</p> <p>There remains a risk that any delay to managed migration to UC would see some legacy benefit claimants lose support until migrated to UC.</p> <p>There are 2,715 households with a non-dependant deduction.</p> <p>Only 13% of these deductions require a means test to establish income to determine the correct deduction.</p> <p>684 households remain exempt from the charge due to receipt of disability benefits mirroring the protections in the current scheme.</p> <p>1,705 households will have higher deductions from the introduction of a flat rate deduction however the majority of households (1457) will have deductions increased at the lowest deduction amount increasing from £4.60 to £5 per week.</p> <p>Flat rate non-dependant deduction changes will affect all household types and economic status.</p> <p>The overall impact of the scheme change is positive for the majority of claimants but there remains some households who will lose support.</p> <p>No scheme changes are proposed for the pension age scheme which remains centrally prescribed.</p> <p>Pension age claimants are protected and will continue to receive full support, inclusive of outreach services.</p>	<p>Maintaining a discretionary Council hardship fund open for applications from all residents and ensuring this is promoted so residents are aware of the scheme.</p> <p>Section 13A of the Local Government Finance act 1992.</p> <ul style="list-style-type: none"> <li>• Government funded hardship schemes and local welfare assistance</li> </ul> <p>Maintaining an open application process for all residents for the Household Support Fund (HSF) and any other government funded discretionary schemes, including Council funded schemes, to support the wider costs of living for vulnerable residents, helping to assist with financial support and therefore the payment and collection of Council Tax.</p> <ul style="list-style-type: none"> <li>• The Homes &amp; Money HUB &amp; Welfare Service</li> </ul> <p>Services supporting vulnerable residents to maximise their income including welfare benefit take up, advice and support on debts and budgeting</p> <ul style="list-style-type: none"> <li>• Applying the Council's debt management policy</li> </ul> <p>Ensuring the fair and ethical collection of Council Tax and assisting residents who are experiencing financial difficulty.</p>
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Appendix 1 provides analysis of the impact of the proposed replacement CTS scheme.

CTS is in the main targeted at low income households that are financially disadvantaged to support the payment of Council Tax and therefore any change to the scheme will impact these households with some gaining support and some losing support.

Model 1 is a banded income discount scheme which takes into account all household income and household size (restricted to 2 children).

Higher rates of discount are given to households on legacy benefits in receipt of PIP/DLA and households on UC who get the LCW/LCWRA element (disability uplift).

Flat rate non-dependent deductions are introduced at £5 per week with current scheme exemptions protected (receipt of disability benefits).

The scheme proposes the following income thresholds (bands) £.

Income Thresholds (Bands) £						
Band	Discount	Disability discount (5% uplift)	Single	Couple	1 child addition	2+ children addition
1	85%	90%	0-80	0-160	130	230
2	75%	80%	80-125	160-190	130	230
3	65%	70%	125-165	190-230	130	230
4	55%	60%	165-205	230-265	130	230
5	35%	40%	205-250	265-290	130	230
6	25%	30%	250-300	290-365	130	230

The impact of the proposed model as a comparison with the current scheme if retained into 2024/25

Band	No. households	% households	Average weekly CTS Model 1	Average weekly CTS Current scheme in 2024/25
1	8,481	81.86	£22.40	£22.35
2	272	2.63	£20.23	£19.32
3	493	4.76	£17.87	£14.24
4	552	5.33	£16.22	£12.58
5	157	1.52	£10.44	£14.32
6	256	2.47	£7.96	£12.49
Losing support	149	1.44	£0	£14.52
<b>Total</b>	<b>10,360</b>			

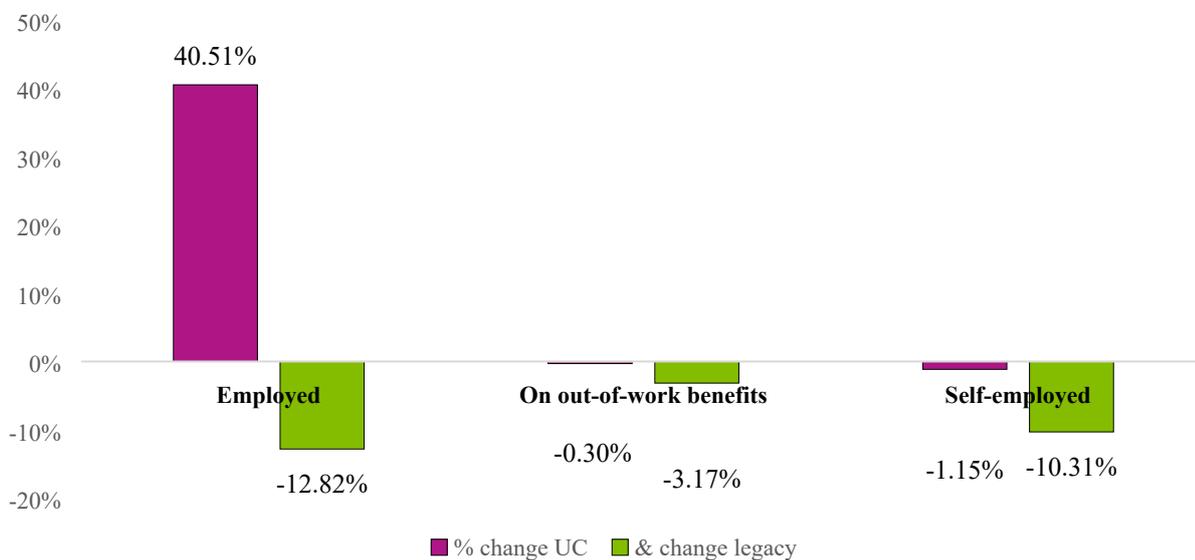
The model increases the average level of support for 9,798 households (94.5%) of the caseload demonstrating its overall positive impact between bands 1-4 for residents with the lowest incomes.

The main reductions in support are for those claimants in higher bands with higher household incomes.

For households that lose out the majority are due to falling into income bands that give an award lower than the earnings taper in the current scheme (employed), as well as due to the introduction of flat rate non-dependant deductions.

This impact can also be modelled against employment status:

### Percentage change in weekly CTR compared to current scheme retained into 2024/25, by economic status



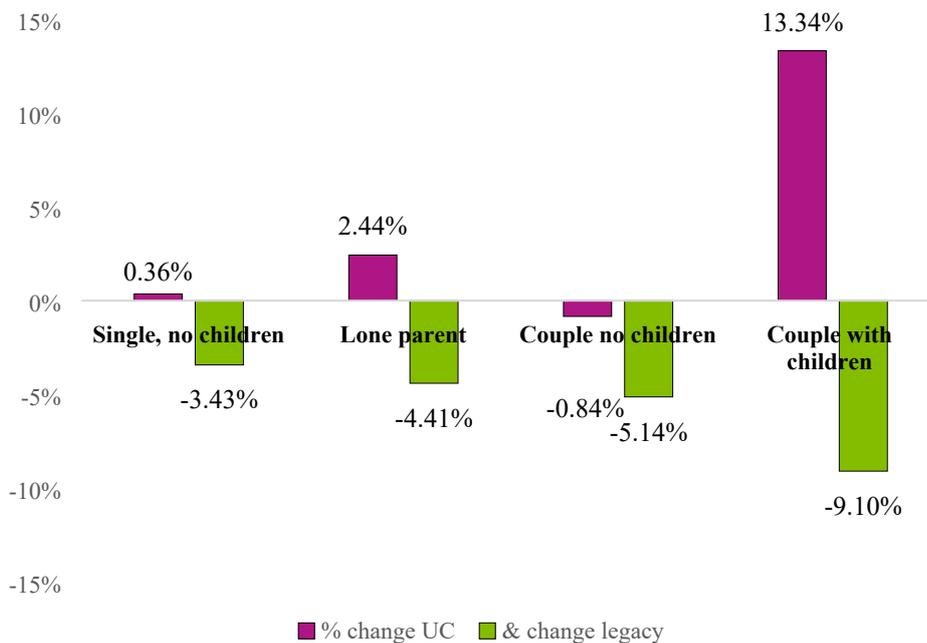
This modelling demonstrates a positive impact of the new scheme on UC claimants in employment against the retention of the current scheme.

Employed households under the old legacy benefits lose out. This is because the average award for employed households on UC in the current scheme in 2024/25 is lower than that for legacy claimants. This means that awards in the current scheme in 2024/25 for employed households who are migrated from legacy to UC may drop. This model accounts for an artificial migration of 30% of the current legacy case load to UC by 2024/25.

These awards are evened out in the model, meaning UC households gain more compared to the current scheme in 2024/25.

The proposed scheme provides better support for employed earners on UC than the current scheme and therefore supports employment and does not disincentivise work.

## Percentage change in weekly CTR compared to current scheme retained into 2024/25, by household type



The modelling demonstrates a positive impact on most household types for claimants in receipt of UC.

Claimants in receipt of legacy benefits are disproportionately affected across all household types. This is in part caused by an artificial migration of this case load to UC (migration) in which these claimants may then receive overall lower awards due to this migration.

A scheme that better supports UC claimants is recommended due to the managed migration of the remaining legacy benefit case load to UC, due to commence in 2024. However should the migration be delayed some legacy benefit claimants may see reduced awards.

The proposed scheme mirrors welfare reform and UC by restricting the allowance for dependant children to two.

The Welfare Reform bill implemented a two child restriction from the 6 April 2017 where families were limited to financial support to their first two children.

The government's reasoning for limiting support to the first two children in a family is that those claiming benefits should face the same financial choices about having children as families who are supporting themselves solely through work.

The current scheme currently treats legacy benefit claimants differently to UC claimants. Restrictions on the child allowance applied within the UC award are also applied within the means test restricting the allowance unless exemptions are granted within the UC award.

Legacy benefit claimants do not currently have any restriction and are granted an allowance for all household dependants.

This has created an inequitable system where claimants are treated differently depending on the type of benefit they receive in the current scheme.

A restriction of the allowance to the first two children will disproportionately affect remaining legacy benefit claimants who are not subject to the restriction however this will align the scheme to how UC claimants are currently treated.

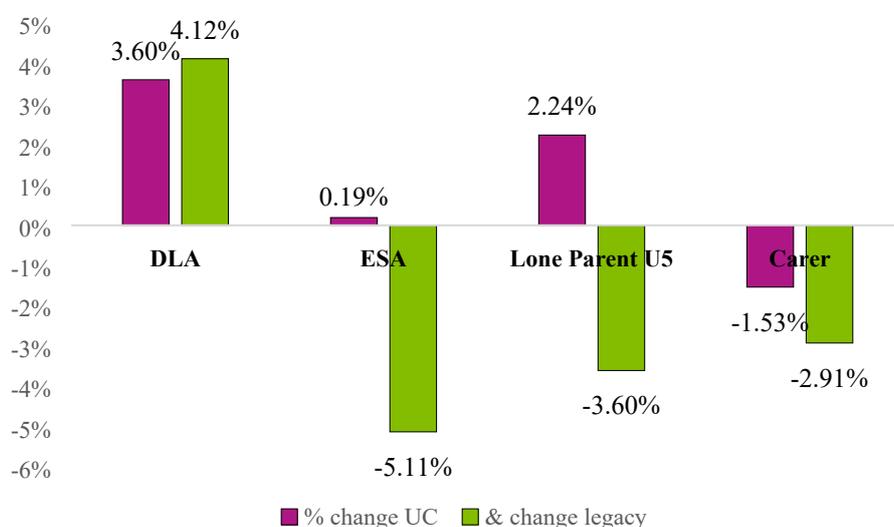
Barking & Dagenham has demographics in which 34.9% of households have four or more people in the household.

However the average household size in Barking & Dagenham is 2.96 residents per household which remains lower than the restriction to a couple and two children (four person).

It is acknowledged that due to a number of larger families in the borough that are not currently subject to a restriction through receipt of legacy benefits there may be an impact through lower awards due to this restriction being applied, and this may also impact larger families on UC as an ongoing concern.

A removal of this restriction would have significant financial implications for the overall affordability of the proposed scheme.

### Percentage change in weekly CTR compared to current scheme retained into 2024/25, by barriers to work

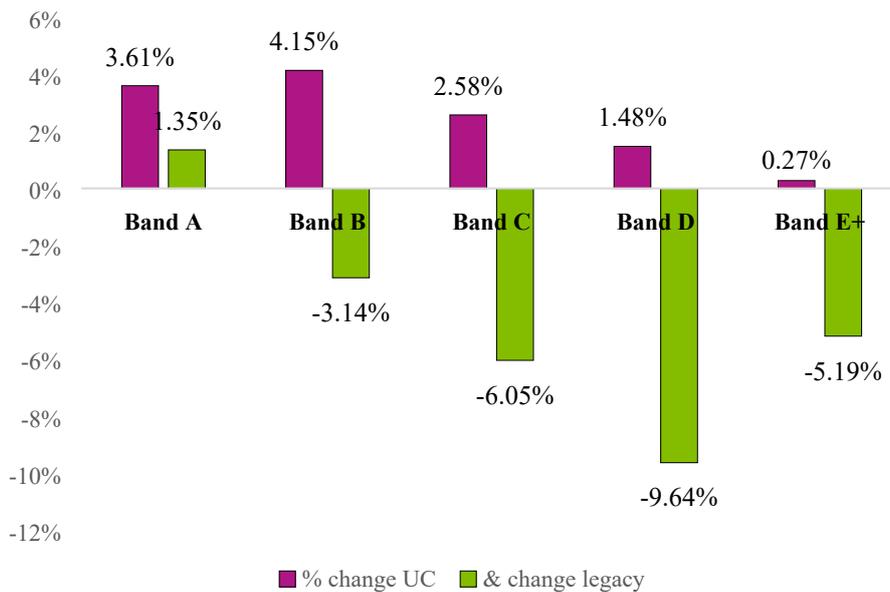


The disability uplift has a positive impact on disabled claimants (DLA) who meet the qualifying criteria with an overall increase in the level of award from the proposed change.

The proposed scheme proportionately benefits disabled claimants with a small number losing out and can be seen to be a positive change for residents with disability who receive relevant qualifying benefits.

Legacy benefit claimants that lose out do so due to changed flat rate non-dependant deductions with deductions now applied that were not previously.

## Percentage change in weekly CTR compared to current scheme retained into 2024/25, by council tax band



Legacy benefit claimants lose out based on their Council Tax band which reflects overall lower levels of support for legacy benefit claimants.

UC claimants see a positive impact.

### Introducing flat rate non-dependant deductions

The current practice of means-testing all non-dependants is inefficient with significant amounts of information required, and ongoing reviews to ensure accuracy and changes in circumstances are applied.

Introducing a flat rate non-dependant charge reduces administration by simplifying the process and requires less information from the resident.

Currently households with non-dependants in receipt of UC (without earnings) have no deduction while non-dependants in receipt of comparable legacy benefits have a deduction creating an inequitable system. A change to the scheme requiring a fair contribution is recommended.

A majority of households that have a non-dependant charge (77%) have no deduction or a minimum deduction of currently £4.60.

This means only 13% of the deductions require a means test to establish the correct deduction rate.

As a consequence, the means testing of non-dependant income is significantly inefficient in its administration of the scheme.

There are 2,715 households in the caseload that have at least one non-dependant. Of these, 684 are exempt from non-dependant deductions as they receive a disability benefit. The scheme will continue to disregard these deductions where a claimant or partner are in receipt of DLA or PIP at

the middle or higher rates as a qualifying benefit, ensuring the protections that were previously in place will remain.

This can also be further broken down to individual

Of the remaining 2,031 households, 1,705 households will have higher deductions, 409 have deductions increase by £5 or more after introducing flat rate deductions of £5 per week and 324 will have lower deductions.

The average increase in deductions is £5.32 per week, whilst the average decrease in deductions is £6.55 per week.

Weekly non-dependant deduction	Number of households
£5	1457
£10	452
£15	103
£20	16
£25	3

Households with an increase in deduction of £5 per week or more:

Household type	Number of households
Couple with children	64
Couple without children	71
Lone parent	88
Single	186

Economic status	Number of households
Employed	47
out of work benefits	341
Self-employed	21

The implementation of flat rate non-dependant charges will see a majority of the case load pay increased charges and will affect all household types and economic status.

### Households losing out

Working age claimants will be affected by the proposed replacement scheme. Some claimants may have increased awards and some claimants may see reduced awards.

Any differences in entitlement will be as a result of factors such as differences between the current means test and the new proposed income band thresholds, or the introduction of a flat rate non-dependant charge.

611 households in total will lose out. 584 households will lose more than £5 per week and 149 households will lose all support.

There are currently 10,360 households resulting in 5.89% of households losing support.

149 households losing all support:

Economic status	Number of households
Employed	109
Out of work	19
Self-employed	21

Household type	Number of households
Couple with children	73
Couple without children	4
Lone parent	63
Single	9

611 households losing more than £5 per week:

Economic status	Number of households
Employed	225
Out of work	328
Self-employed	58

Household type	Number of households
Couple with children	181
Couple without children	77
Lone parent	195
Single	158

Of the households losing out that are employed, the majority lose out due to falling into income bands that give an award than the earnings taper in the current scheme, as well as due to the introduction of flat rate non-dependant deductions. Of those out of work, the majority is due to the introduction of flat rate non-dependant deductions.

99 out of 3,334 households on PIP/DLA (disabled) lose more than £5 per week, which is 3.0%. 56 of these households are employed or self-employed. 79 out of 1,594 lone parents with a child under 5 lose more than £5 per week, 67 of which are either employed or self-employed.

The scheme therefore has a neutral or positive impact on 94.11% of households compared to the current scheme.

The proposed scheme will benefit those claimants on UC more than existing legacy benefits and this has been designed to reflect the planned migration of the remaining legacy benefits to UC in 2024. There remains a risk that any delay to the proposed migration would disproportionately affect existing legacy benefit claimants across all types of household type and income and should be noted.

<b>Any community issues identified for this location?</b>		X		No issues recognised	No impact
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## 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.

There is also a duty to consult with the major precept authorities who are statutory consultees.

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 Council will be required to consult extensively on the proposals to change the CTS scheme due to the significant change to the scheme proposed.

The consultation will be primarily web based through an online survey form.

The survey will inform residents of the proposals to change the scheme and ask residents and stakeholders their opinions and views on:

- Replacing the current scheme with an income banded discount scheme for 2024/25 (Model 1)
- Other options including (Model 2) and retaining the current scheme unchanged.

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

The survey will be run through the Citizens Alliance website and will require promotion across the Council webpages, social media channels, E-newsletter, press releases & CTS award notification letters.

Current CTS claimants affected by the proposals may be contacted directly to explain possible changes to their award due to the changed scheme for 2024/25, to invite consultation and feedback on the proposed changes.

It is also anticipated that public workshops will be held at various sites throughout the borough, supported by outreach officers, to enable residents and stakeholders to engage with the proposals in person and these sessions will need to be widely promoted to ensure visibility and attendance.

Consideration will be given to the communication strategy for inclusion to ensure all residents have equal access and uptake given the links between exclusion in respect to communication given the link between exclusion and poor health (e.g. digital exclusion, non-English speakers, those engaged with community groups but not statutory authorities, etc.).

Direct engagement with voluntary partners and stakeholders will be required with the support of the relevant internal teams to ensure a broad section of these partners are engaged in the consultation process.

CTS scheme consultations historically have poor response rates from residents and the Council will need to ensure it widely promotes the consultation to ensure engagement in the proposals.

The outcome of the consultation will be reported to Cabinet.

### 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	James Johnston

## 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 current CTS scheme has numerous ongoing issues with its administration that highlights the need for the Council to consider a replacement scheme in order to effectively administer and provide support to residents through the core support of the CTS scheme.

The requirement to consider a replacement CTS scheme means the Council should now consider the implementation of an income banded discount CTS scheme to address some of the issues that arise with the retention of the current CTS scheme.

An income banded discount scheme provides support based on bands of income and provides a percentage discount off the Council Tax bill (the CTS award). The number of discount bands, the level of discount and income thresholds can all be varied. Income banded discount schemes can be designed to be as simple or as complex as desired, can be made more or less generous and designed to support protected groups if required. Re-assessment of cases will only be required if income crosses one of the income band thresholds.

An income banded CTS scheme can be designed to assist households with low incomes and ensure that their Council Tax liability is manageable and fair.

It is difficult to vary the current CTS scheme to adopt or target different levels of support at a range of applicants. An income banded discount scheme gives the Council the opportunity to vary support based on a targeted approach to residents in line with Council objectives and Borough manifestos.

The draft proposed replacement income banded discount CTS scheme for 2024/25 can be summarised to have the following equality impacts on current CTS claimants:

The draft proposed replacement income banded discount CTS scheme for 2024/25 can also be summarised to have the following overall impacts on residents of the borough.

The replacement CTS scheme will help the Council to meet key objectives contained in its corporate plan 2023 to 2026 which can be summarised as follows:

- **Putting residents at the heart of what we do**
  - Delivery on a new CTS scheme
  - Creates a scheme that is fair and equitable to all residents, requiring a fair contribution towards Council Tax from those who can pay while protecting the most vulnerable.
  - Simplifies the scheme making it easy for residents to understand and access when/if required.

- Looking at our risk management while we consider replacing our scheme
  - Making every contact count (reducing avoidable contact & providing better customer service )
  - Innovation to meet the challenges of today and tomorrow
  - Provides the borough with a CTS scheme that has recognised the need for change and provided a scheme that is fit for purpose into the future
  - Building service capacity for the future and Improving the efficiency of support available
  - Making it easier to get support
  - Being evidence lead and data driven on why we are changing our scheme
  - Providing value for money in how we administer our scheme
  - Cost neutral helping to support our medium term financial strategy and wider Council budgets and therefore does not require cuts to additional services to fund its cost.
  - Help to improve Council Tax collection rates
  - Reductions in printing/post costings
- **Support the big issues of poverty, unemployment, debt & inequalities**
    - Provides and protects the maximum level of support for all low income households.
    - Supporting residents through the cost of living crisis
    - Better financial resilience, stability and security
    - Support against unsustainable debt
    - Supporting the most vulnerable residents
    - Supporting, encouraging & incentivising employment and a return to employment
    - Help to live independent lives
- **Equality, diversity and inclusion at heart of decision making.**
    - Fundamental to how we approach a change in our scheme with a responsibility to the Equality Act.
    - Completing an EIA to assess the impact of our decisions on those with protected characteristics and to implement mitigations for adverse impacts where possible. EIA at the heart of decision making.

This EIA demonstrates an overall positive impact of the proposed draft CTS scheme change against equalities, diversity and the protected characteristics from the Equalities Act.