

Equality Impact Assessments Toolkit

EqlA Template



You must consider the [Equality Impact Assessment Guidance](#) when completing this template.

The EDI team can provide help and advice on undertaking an EqIA and also provide overview quality assurance checks on completed EqIA documents.

EDI team contact email: edi_team@sandwell.gov.uk

Quality Control	
Title of proposal	Council Tax Reduction Scheme 2025/26 This Equality Impact Assessment has been developed in view of the proposed changes to the Council Tax Reduction Scheme for working age applicants with effect from 1st April 2025.
Directorate and Service Area	Finance and Transformation, Revenues and Benefits
Officer completing EqIA	Ian Dunn Revenues and Benefits Service Manager
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Other officers involved in completing this EqIA	Carl Jones Revenues and Benefits Senior operations manager.
Date EqIA completed	29th October 2024
Date EqIA signed off or agreed by Director or Executive Director	22 November 2024
Name of Director or Executive Director signing off EqIA	Alex Thompson
Date EqIA considered by Cabinet	04 th December 2024

Where the EqlA is Published	
(please include a link to the EqlA and send a copy of the final EqlA to the EDI team)	

Section 1.

The purpose of the project, proposal or decision required

The decision of full Council is required to approve changes to the Council's Council Tax Reduction Scheme.

The proposed changes are to enable the Council to make financial savings in line with the Council's current financial situation.

The Council Tax Reduction Scheme provides support to low income households within the district. The changes are proposed to the working age scheme only.

The scheme for pensioners is prescribed by Central Government and changes cannot be made by the Council.

The proposed changes are to:

- Introduce a minimum payment for working age applicants within the scheme; and
- Limit the maximum level of support to Council Tax band B.

Each of the changes are detailed below.

Introduce a minimum payment for working age applicants within the scheme

When Council Tax Reduction was introduced, due to the reduction in monies from Central Government, most authorities introduced a minimum payment for working age applicants. Minimum payments range from 5% to 50% with the most common being 20% to 30%.

Sandwell Council decided in 2013 that it was possible to continue with no minimum payments to maximise the level of support (subject to the circumstance of the applicants).

If a standard minimum payment was introduced this will affect all 18,400 working age households who currently claim Council Tax Reduction.

The proposal is to remove the 100% CTR support and introduce a 15% minimum payment except where the applicant is responsible for a dependant child aged 5 or under who resides in the dwelling. In such cases CTR will continue to 100%. This proposed change would save £1.5m approximately on the cost of the CTR scheme.

A typical 15% minimum payment would equate to a weekly payment of £4.54 (£236.58 per annum)

Capping Support to Council Tax Band B levels

An additional option is to cap the Council Tax band used to calculate CTR. Currently it is capped at Band C. This change in effect means that where an applicant resides in a

dwelling which is at Band C or higher, their Council Tax Reduction would be calculated based on the equivalent of a Council Tax band B level.

Should this option be accepted, 76% of properties in Sandwell are in Band A or B. This would affect 1036 residents and would save £260k on the cost of the CTR scheme.

On average a resident would have to pay an extra £3,78 per week or £196.56 per year in Council tax based on the Council Tax charged for 2024-25.

Other options which have been rejected

Two other changes to the scheme were originally proposed and part of the consultation but have been rejected. These were to:

- remove the income disregard for Carer's Allowance; and
- remove the partial disregard for earnings of £25 per week.

These proposals would have directly affected working age applicants who were in receipt of Carer's Allowance and any working age applicant who is engaged in work.

Section 2.

Evidence used and considered. Include analysis of any missing data

Full modelling of the proposed scheme has been undertaken (and will continue to be undertaken) on the existing working age caseload. Modelling will continue throughout the financial year.

The proposals are to change the working age scheme with effect from 1st April 2025. The legislation requires the Council (prior to its implementation) to consult with:

- major preceptors; and
- the public.

The consultation has taken place (see Section 3) and the new scheme will need to be approved by a decision of full Council

Section 3.

Consultation

Council Tax Reduction Consultation

In line with the legislative requirements, the Council has consulted both with Major Preceptors and with the public.

The public consultation took place from the 16 September until the 27 October 2024 (6 weeks).

The consultation took place on Sandwell Consultation Hub, and to encourage responses, the consultation was promoted by:

- Letters promoting the consultation going out with Council tax bills and Council Tax Reduction letters during the consultation period.
- Posters in all of Sandwell's libraries
- SCVO newsletter
- Sandwell Advice Providers Network
- Housing Associations
- Private Sector Housing team promoting on social media to landlords.
- Social Media

53 responses were received to the consultation. The following outlines the responses received for the proposed changes:

Introducing a 15% minimum payment except where there is a dependant child aged 5 or under resident in the property, in which case CTR will continue up to 100%

- 23 responses agreed with this (43%);
- 28 said they didn't agree (53%); and
- 2 didn't know (4%).

The option of calculating CTR based on a maximum of Council Tax Band B.

- 37 responses agreed with the change (70%);
- 12 said they didn't agree (23%); and
- 4 didn't know (7%)

Further consultation in relation to Budget Setting

In addition to the CTR consultation, as part of the Councils budget consultation which closed on the 19 November 2024, there was a question regarding reducing the level of CTR support and the proposal that £1.7m should be saved from the cost of the scheme affecting approximately 18,000 residents. The question was:

"Given the need to save money, do you agree with this proposal"

- 1329 either agreed or strongly agreed (84%),
- 128 disagreed or strongly disagreed (8%); and
- 117 neither agreed nor disagreed (8%).

Section 4.

Summary assessment of the analysis at section 4a and the likely impact on each of the protected characteristics (if any)

Section 4a - What are the potential/actual impacts of the proposal on the protected characteristics?

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Age	Negative (N)	<p>All working age applicants (except those who is responsible for a dependant child aged 5 or under who resides in the dwelling) will be required to pay at least 15% of their Council Tax. This will in most cases mean an increase in the amounts required to be paid.</p> <p>The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.</p>	<p>Any applicant affected by this change may apply for additional support under the Council's exceptional hardship scheme, which can be accessed via https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received</p>	
Disability	Negative (N)	<p>The new scheme will continue to provide support to households where a member(s) is disabled by:</p> <ul style="list-style-type: none"> continuing to fully disregard disability benefits such as Personal Independence Payments (PIP), Armed Forces Independence Payments (AFIP) and Disability Living Allowance (DLA); <p>The above ensures that the new scheme continues to protect those households</p>	<p>When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund. which can be accessed https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received</p>	

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		<p>although it should be noted that some working age applicants will be affected by the proposed change to the minimum payment.</p> <p>The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.</p>		
Gender Reassignment	Neutral (Ne)	<p>None identified - the Council Tax Reduction Scheme does not discriminate on gender / gender reassignment. It should be noted that some working age applicants (irrespective of gender) will be affected by the proposed change to the minimum payment.</p> <p>The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.</p>	<p>When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed</p> <p>https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received.</p>	
Marriage and civil partnership	Neutral (Ne)	<p>None identified - the Council Tax Reduction Scheme does not discriminate on marriage and civil partnership. It should be noted that some working age applicants (irrespective of their marriage or partnership status) will be affected by the proposed change to the minimum payment.</p>	<p>When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed</p> <p>https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or</p>	

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		The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.	through welfare rights team who will also aim to improve the amount of income received	
Pregnancy and maternity	Neutral (Ne)	Where a working applicant has a dependant 5 years or under who resides with them, the minimum payment change will not apply . However, the capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.	When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received	
Race	Neutral (Ne)	None identified - the Council Tax Reduction Scheme does not discriminate on race. It should be noted that some working age applicants (irrespective of race) will be affected by the proposed change to the minimum payment. The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.	When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received	

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Religion or belief	Neutral (Ne)	None identified - the Council Tax Reduction Scheme does not discriminate because of religion or belief It should be noted that some working age applicants (irrespective of their religion or belief) will be affected by the proposed change to the minimum payment. The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.	When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received	
Sex	Neutral (Ne)	None identified - the Council Tax Reduction Scheme does not discriminate on sex It should be noted that some working age applicants (irrespective of their sex) will be affected by the proposed change to the minimum payment. The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.	When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received	

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
Sexual Orientation	Neutral (Ne)	<p>None identified - the Council Tax Reduction Scheme does not discriminate on sexual orientation</p> <p>It should be noted that some working age applicants (irrespective of their sexual orientation) will be affected by the proposed change to the minimum payment.</p> <p>The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.</p>	<p>When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed</p> <p>https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received</p>	
Could other socio-economic groups be affected?				
Carer Low income groups Veterans/Armed Forces Community Other	Negative (N)	<p>The Council Tax Reduction Scheme supports residents on the lowest income as they currently receive up to 100% support.</p> <p>It should be noted that some working age applicants (irrespective of their socio-economic status) will be affected by the proposed change to the minimum payment.</p>	<p>When additional support is required, applicants may apply to the Council's Exceptional Hardship Fund which can be accessed</p> <p>https://www.sandwell.gov.uk/council-tax/struggling-pay-council-tax-bill or through welfare rights team who will also aim to improve the amount of income received</p> <p>The above helps to “advance equality of opportunity between people who share a</p>	

Reviewed Characteristic	Impact? Positive (P) Negative (N) Neutral (Ne)	Details of impact	Actions to address negative impact or promote positive impact (use section 8 table)	Owner of action/ Timescale
		<p>The capping on the level of support to Council Tax Band B levels may affect applicants who live in a dwelling Band C or above.</p> <p>In the case of carers and veterans/armed forces communities, the scheme continues to disregard Carer's Allowance War Disablement Pensions and War Widows Pensions in full. The latter maintains the Council's Armed Forces Covenant</p>	protected characteristic and those who do not.”	

If there are no adverse impacts or any issues of concern or you can adequately explain or justify them, then please move to Sections 6.

5. What actions can be taken to mitigate any adverse impacts?

As highlighted, if any applicant experiences exceptional hardship, they may apply to the Council's Exceptional Hardship Fund for additional support.

6. Section 6: Decision or actions proposed

The recommendation to Council is to make changes to the Council Tax Reduction scheme for working age applicants as outlined above.

7. Monitoring arrangements

The scheme will be monitored throughout the 2025/26 financial year and where further changes are required; these will be brought before full Council for consideration.

Section 8 Action planning (if required)

Question no. (ref)	Action required	Lead officer/ person responsible	Target date	Progress
7	The scheme will be monitored throughout 2025/26 for its effectiveness	Ian Dunn	2025/26	

If you have any suggestions for improving this process, please contact EDI_Team@Sandwell.gov.uk