

Equality Impact Assessment

SUMMARY RAG RATING

The outcome of this EIA has been assessed to be:	Amber 
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SECTION 1:

Title	Council Tax Support Hardship Policy 2025/26
What are you analysing? - What is the policy/project/activity/strategy looking to achieve? - Who is it intended to benefit? Are any specific groups targeted by this decision? - What results are intended?	Legislation requires the Council to annually review its Council Tax Support scheme to decide whether to make changes. On the 20th of January 2025, Cabinet recommended to Full Council the adoption of a revised Council Tax Support (CTS) scheme for 2025/26 following a period of consultation with residents and stakeholders. Cabinet also recommended that if the scheme was approved by Full Council a CTS Hardship Fund of £0.350m should be created and a CTS Hardship Policy should be developed and brought back to March 2025 Cabinet. Full Council approved the revised scheme on the 23rd of January 2025 with effect from the 1st of April 2025. This EQIA is to support the Cabinet report which recommends the adoption of the CTS Hardship Fund Policy. There are currently 6,504 working age households in receipt of CTS, and the proposal will see all these households CTS reduce in 2025/26. State pension age only households are covered by a prescribed national scheme and are therefore not included as part of this proposal. It will only be working age claim households who are impacted, although these households may have pensioners in them either as non-dependants or as mixed age couples.
Details of the lead person completing the screening/EIA	(i) Full Name: Andy Jeffs (ii) Position: Director of Revenues and Welfare Services (iii) Service Area: Finance and Commercial (iv) Email Contact Details: andy.jeffs@slough.gov.uk (v) Date: 24/02/2025
Date sent to Finance	24/02/2025
Version number and date of update	1

SECTION 2:

2.1

Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal

- If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends, or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.
- Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal

Who is impacted?

The people who are directly impacted by the changes to Council Tax Support are the 6,504 working age households who are currently supported by the scheme, and those who are dependents in their households, including children. The scheme offers different levels of support, depending on income levels. All groups who receive Council Tax Support will receive lower levels of support.

CTS Household by Type	Weekly income	Number of Households	Reduction in CTS
Working Age - Non-Passported – Other	Not working	2,628	£306.06
Working Age - Passported – Other (Passported means there is entitlement to CTS because of other benefits claimed)	Not working	1,019	£308.34
Working Age – Non-Passported – Working income band 1	Less than £115.39	532	£392.25
Working Age – Non-Passported – Working income band 2	£115.39 - 184.61	739	£245.87
Working Age – Non-Passported – Working income band 3	£184.62 - £253.84	720	£208.52
Working Age – Non-Passported – Working income band 4	£253.85 - £323.07	456	£210.93
Working Age – Non-Passported – Working income band 5	£323.08 - £392.30	279	£244.95
Working Age – Non-Passported – Working income band 6	£392.31 - £461.53	131	£159.61
		6,504	

Those on Council Tax Support can also be analysed by those households with children. 3,315 of households receiving support have children:

	Household	Number of cases	Number of children	Lone parent cases	Couple with children cases
	1 child	1,324	1,324	1,016	308
	2 children	1,105	2,210	761	344
	3 children	588	1,764	313	275
	4 children	209	836	94	115
	5 children	56	280	27	29
	6 children	24	144	10	14
	7 children	4	28	1	3
	8 children	2	16	1	1
	9 children	1	9	0	1
	10 children	1	10	1	0
	11 children	1	11	0	1
	Total	3,315	6,632	2,224	1,091
	The impact of the proposed change will not affect pension age people because government have recognised that low-income pensioners cannot be expected to increase their income through paid work and therefore are protected from any reduction in CTS.				
	<u>The equality profile of groups on low incomes or in poverty</u> Detailed equality analysis of those in receipt of Council Tax Support is not available. However, as those impacted are either no working or on a low income, it is possible to use national data to understand the equality groups who are most likely to fall into this group. According to national profiling (1) of those whose income was persistently low or in poverty, those who are on low incomes are more likely to fall in the following groups: • Age and sex: Single parents with children, noting women are more likely than men to be single parents (90%) (2) • Age: Children in families where no one was working. Children in families with 3 or more children (1) Children under 5, especially in larger families • Ethnicity: Asian/ Asian British head of household and Black/ African/ Caribbean/ Black British head of household (1) • Disability: Adults with limiting health conditions or who are disabled. Families living with disabled children (3) Unpaid carers were 50% higher more likely to be in poverty (4) • Gender identity:				

	there is less research on people whose gender is different from that assigned at birth, but there is research that people may struggle with housing and (based on London data) live in deprived areas (7) • Pregnancy: earnings are impacted negatively during and after pregnancy. • Religion or belief: People who identified as "Muslim" had the lowest percentage of people aged 16 to 64 years in employment; this resulted from the high percentages of people who were students or looking after home or family in this group. • Sexual orientation: Recent longitudinal research highlights the ways that Lesbian, Gay, and Bisexual people may be more likely to face income inequalities (6) • Other groups: those in social housing (1) Sources: 1 Income Dynamics: Income movements and the persistence of low income, 2010 to 2022 - GOV.UK 2 Families and households - Office for National Statistics 3 Nearly Half of Families With A Disabled Child Living in Poverty Disability Rights UK 4 Poverty and financial hardship of unpaid carers in the UK Carers UK 5 Religion by housing, health, employment, and education, England and Wales - Office for National Statistics 6 Lesbian, gay and bisexual population face housing inequalities, study finds About University of Stirling 7 Trans Learning Partnership To understand how impacts would affect those on Council Tax Support, a consultation exercise was undertaken. 280 people responded, 90% of whom were in receipt of Council Tax Support and equality information was collated. Whilst this sample is too small to use to form a profile of those on Council Tax support, it does provide valuable insight into the views of respondents by equality group. Not all groups responded to all equality questions. The response rates are below: Number of answers & % of 280 respondents (excluding "prefer not to say" responses): Age: 267, 95% Disability: 249, 89% Caring responsibilities: 253, 90% Ethnicity: 233, 83% Pregnancy: 264, 94% Religion: 222, 79% Sex: 257, 92% Gender identity: 258, 92% Sexual orientation: 231, 83% Been in care: 258, 92%
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	Equality Characteristic	Slough population	Over-represented or Under-represented relative to overall size in local population?
	Sex	The population of Slough is 158,500, with 80,005 females (50.5%) and 78,495 males (49.5%)	The consultation results showed that only 35.02% of respondents who provided their Sex as registered at birth were male. This is a lot lower than Slough's male/female population figures. 64.98% of respondents who provided their Sex as registered at birth were female. That is a lot higher than Slough's male/female population figures show.
	Ethnicity	Slough's ethnic groups are 74,093 Asian, 57,134 White, 11,992 black, 7,144 other, 6,311 mixed, and 1,826 Arab	The largest ethnic group of respondents to the consultation at 43.57% were White. The next highest group was Asian or Asian British: Pakistani at 13.93% followed by Asian or Asian British: Indian at 7.86%.
	Disability	The total Disabled population in Slough is 17,975 or 11.3%, of which, 7,880 or 5% have day-to day activities limited a lot, and 10,095 or 6.4% have day-to-day activities limited a little	The consultation had 39.3% not declaring any disability and yet 60.7% have declared themselves as having a Disability. 58.37% have stated they are in receipt of a disability benefit. This differs significantly from our live caseload where we have 10.06% in receipt of disability benefit.
	Sexual orientation	1.9% of Slough's population identified as an LGB+ orientation	77.86% of consultation respondents identified as Straight or Heterosexual. 3.57% identified as Bisexual, Gay, or Lesbian.
	Age	25% of Slough's residents are aged 0-15, 64% are 16-64, and 9.7%	There were no under 18 respondents as you must be over 18 to pay Council Tax. The split was 18-24 2.14%, 25-39 25%, 40-49 25.36%, 50-59 26.79%, 60-69 15.36%70 and over 0.71%.

		are 65 or over	As highlighted above those on Council Tax Support can also be analysed by those households with children. 3315 of people seeking support have children:
	Religion or belief	Slough has 50,664 Christian, 46,661 Muslim, 20,726 no religion, 17,985 Sikh, 12,343 Hindu, and 8,544 who did not answer	Of the 280 respondents 95 or 33.93% identified as Christian, 67 or 23.93% identified as Islam, 34 or 12.14% as None, 8 or 2.86% as Hindu and Sikh.
	Gender Identity	0.9% identify as a different gender to their sex registered at birth	91.79% of respondents identify their Gender as being the same sex they were registered with as at birth. 0.36% identified it is different.
	Pregnancy/Maternity	Data not available.	2.5% answered yes to being either pregnant or been pregnant in the last 12 months.
2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.		From the analysis above we can conclude that the following groups will be overrepresented in groups either currently seeking support or potentially seeking support in the future: • Age and sex: Single parents with children, noting women are more likely than men to be single parents (90%) (2) • Age: Children in families where no one was working Children in families with 3 or more children (1) Children under 5, especially in larger families • Ethnicity: Asian/ Asian British head of household and Black/ African/ Caribbean/ Black British head of household (1) • Disability: Adults with limiting health conditions or who are disabled Families living with disabled children (3) • Unpaid carers were 50% higher more likely to be in poverty (4) • Pregnancy:	

	earnings are impacted negatively during and after pregnancy - Religion or belief: People who identified as "Muslim" had the lowest percentage of people aged 16 to 64 years in employment; this resulted from the high percentages of people who were students or looking after home or family in this group. - Sexual orientation: recent longitudinal research highlights the ways that Lesbian, Gay, and Bisexual people may be more likely to face income inequalities (6) - Other groups: those in social housing (1)																							
2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.	From the data there are groups who are less likely to be impacted because they are less likely to be on low incomes.																							
2.4 Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?																								
	<table border="1"> <thead> <tr> <th></th><th>None</th><th>Positive</th><th>Negative</th><th>Not sure</th></tr> </thead> <tbody> <tr> <td>Men or women</td><td>☐</td><td>☐</td><td>Women are more likely than men to be single parents (90%) (2)</td><td>☐</td></tr> <tr> <td>People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)</td><td>☐</td><td>☐</td><td>Ethnicity: Asian/ Asian British head of household and Black/ African/ Caribbean/ Black British head of household (1)</td><td>☐</td></tr> <tr> <td>Disabled¹ people (consider different types of physical, learning, or mental disabilities)</td><td>☐</td><td>☐</td><td>Disability: Adults with limiting health</td><td>☐</td></tr> </tbody> </table>		None	Positive	Negative	Not sure	Men or women	☐	☐	Women are more likely than men to be single parents (90%) (2)	☐	People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)	☐	☐	Ethnicity: Asian/ Asian British head of household and Black/ African/ Caribbean/ Black British head of household (1)	☐	Disabled ¹ people (consider different types of physical, learning, or mental disabilities)	☐	☐	Disability: Adults with limiting health	☐			
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Disabled ¹ people (consider different types of physical, learning, or mental disabilities)	☐	☐	Disability: Adults with limiting health	☐																				

¹ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

				conditions or who are disabled Families living with disabled children (3) Unpaid carers were 50% higher more likely to be in poverty (4)	
	People of particular sexual orientation/s	☐	☐	Sexual orientation: A recent longitudinal research highlights the ways that Lesbian, Gay, and Bisexual people may be more likely to face income inequalities (6)	☐
	People in particular age groups (consider in particular children, under 21s and over 65s)	☐	☐	Age: Children in families where no one was working Children in families with 3 or more children (1) Children under 5, especially in larger families	☐
	People who are intending to undergo, are undergoing, or have undergone a process or part of a process of gender reassignment	☐	☐	People may struggle with housing and (based on London data) live in deprived areas (7)	☐
	Impact due to pregnancy/ maternity	☐	☐	Pregnancy: earnings are impacted negatively during and after pregnancy	☐
	People of particular faiths and beliefs	☐	☐	Religion or belief: People who identified	☐

				as "Muslim" had the lowest percentage of people aged 16 to 64 years in employment; this resulted from the high percentages of people who were students or looking after home or family in this group.	
	People on low incomes*	☐	☐	This change impacts those on a lower income	☐
*People within some equality groups are more likely to be on low incomes (e.g., single parents (mainly women), people with disabilities, some ethnic minority groups etc). This is especially important when you are looking at fees, charges, and access to services.					
2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy, or proposal				
	Yes ☒				
2.6	Provide brief reasons on how you have come to this decision?				
	The modelling has shown that 6,504 non-working age households with low incomes will be impacted by the proposed changes to the scheme.				

If the answer in 2.5 above is “No” then sections 3 and 4 are not required to be completed.

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be. Using the evidence gathered in section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

The Council's Council Tax Support scheme (CTS) consists of two parts. The first part makes provision for non-working age claimants which is prescribed on a national basis and cannot be amended by local authorities. The second part of the scheme makes provision for working-age claimants which the Council do have discretion on.

The Council is proposing to amend its current scheme to provide less support the claimants who are not working and on the lowest working incomes.

All working age claimants due to the proposed changes in the scheme will have to pay more in Council Tax. In mitigation the Council proposes:

- A CTS Hardship Fund of £0.350m in 2025/26 and £0.175m in 2026/27 to provide additional financial assistance to households who experience extreme financial difficulty and are unable to pay their full Council Tax charge.
- Provide debt, welfare, and financial advice to assist households in managing their finances e.g., through a benefit check.
- The Council has an enforcement policy which considers the individual needs of a debtor and will consider delaying collection or writing off a debt in appropriate circumstances.
- The government has announced that the Household Support Fund will continue into 2025/26 to support households who may be impacted by the cost of living. Many of these households will be in receipt of CTS and could therefore receive additional support such as towards food or energy costs through vouchers.
- The Discretionary Housing Payment fund will be available in 2025/26 and will continue to support people in receipt of housing costs who are struggling to manage a shortfall in their rent or housing support.

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact	No specific impact	If the impact is negative, how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented.	What, if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
	Women				Women may be more impacted because they live in single		As well as actions summarised above: Work with Children's services and the voluntary sector to ensure that	This will be kept under review via a cumulative impact assessment, as full budget is completed for 2025/26.

					parent households, which are more likely to be on low incomes nationally.		mitigating support reaches single parents.	
	Asian/Asian British				Asian and Asian British people are more likely to live in poverty nationally. 28.21% of consultation respondents were from this group -of which, 53.17% were not working and could be impacted.		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population.	As above

	Black/African/Caribbean/ Black British				Black / African. Caribbean and Black British groups are more likely to live in poverty nationally. This group in the consultation response accounted for 5.36% out of which 26.67% were not working and could be impacted.		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population.	As above
Disability	Physical				Disabled people and disabled children are more likely to live on low incomes. Unpaid carers are 50% higher more likely to be in poverty) The consultation		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population, and also with relevant Council services – Housing, Children’s, and Adults.	None.

					had 39.3% not declaring any disability and 60.7% declared themselves as having a disability. 58.37% stated they were in receipt of a disability benefit. This differs from the data in our benefits system where 10% are in receipt of disability benefit. 56.64% of respondents stated they were not working so could be impacted negatively.			
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Protected Group		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative, how can it be mitigated? (action)	What are the cumulative effects
		Eliminate discrimination	Advance equality	Good relations				
Sexual Orientation	Lesbian, gay men, bisexual				Lesbian, Gay, and Bisexual people may be more likely to face income inequalities nationally. This group made up 3.57% of respondents however, 30% declared themselves as not working. 7% declared a partner and 40% declared children.		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population.	Aa above
Age	Pension age people						The impact of the proposed change will not affect pension age people. The government have recognised that low-income pensioners cannot be expected to increase their income through paid work and therefore are protected from any reduction in CTS.	Pension age people will not be affected.

	Working age people				All working age people in receipt of CTS, currently 6,504 will be negatively impacted by this proposal.		Mitigation actions are highlighted above.	As above
	Younger people (16-25)				In order to receive CTS, you need to be aged 18 as you cannot be liable for Council Tax under this age. Looking at the consultation 2.33% declared they were in the age group 18-24 with 66.7% stating they were working. A group of people in this age group who could be impacted would be care leavers after they turn 25 as up until that age, they are exempt from paying.		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population, and also with relevant Council services – Housing, Children’s, and Adults.	As above
	Children (under 16)				All children under 16 will be impacted if their		Work with the voluntary sector to ensure to ensure that mitigating support	None.

					parents are in receipt of CTS and are of working age as all 6,504 households currently in receipt will see a reduction in support. 50% of current households claiming CTS have children.		reaches this population, and also with relevant Council services – Housing, Children’s, and Adults.	
Gender Reassignment					There is research that people may struggle with housing and (based on London data) live in deprived areas (7) Numbers too low to analyse for consultation respondents		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population.	None.
Impact due to pregnancy/maternity Pregnancy: earnings are impacted negatively during and after pregnancy					4.28% answered as part of the consultation to being pregnant or having a baby in the last 12-months. 50% are working. 75% indicated they were lone parents.		Work with the voluntary sector to ensure to ensure that mitigating support reaches this population, and also with relevant Council services – Housing, Children’s, and Adults.	None.

Groups with particular faiths and beliefs				Religion or belief: People who identified as "Muslim" had the lowest percentage of people aged 16 to 64 years in employment; this resulted from the high percentages of people who were students or looking after home or family in this group. The largest group of respondents were Christians at 33.93%, followed by Muslims 23.93%, Hindu 2.86%, Sikh 2.86%, and Buddhist 1.43%. All faith groups will lose under the new scheme.		Work with the voluntary sector and with the faith sector.	None.
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People on low incomes				Based on the proposed changes all those currently in receipt will see their CTS reduce. The largest reduction will be for 532 households who are working and in band 1 where the percentage reduces from 75% to 50%. They will need on average to pay £392.25 more each year. The two non-working band 1 groups will need to contribute on average £307 per annum or £5.91 per week.		Mitigating actions outlined above.	None.
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SECTION 4: ACTION PLAN

4.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. <i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Create a new CTS Hardship Fund of £0.350m in 2025/26 and £0.175m in 2026/27 to support those who will have received less support due to the changes to the scheme	Age, sex, disability, ethnicity	To ensure households on low income are supported.	Additional funding	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	Incorporated into decision on CTS scheme.	Green
	Develop CTS Hardship Fund Policy and take to March 2025 Cabinet for approval	Age, sex, disability, ethnicity	To ensure households on low income are supported.	Policy	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	Incorporated into decision on CTS scheme.	Green
	Provide Debt, Welfare and Financial advice to assist households in managing their finances e.g., through a benefit check	Age, sex, disability, ethnicity	To ensure households on low income are supported.	None	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	31/03/2025	Green
	Liaison with Slough CAB to establish what scope they have to support affected residents who may require advice and	Age, sex, disability, ethnicity	To ensure households have access to support and guidance	None	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	31/03/2025	Green

	budgeting support. This should include targeted support for those who may have communication difficulties, including English not being first language or due to disability.							
	Review the Council Tax recovery process for those in receipt of CTSS	Age, sex, disability, ethnicity.	To ensure recovery action and additional costs are minimised	None	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	31/03/2025	Green	
	Provide training to Revenues, Benefits and Customer Services on changes to include signposting to other help available	Age, sex, disability, ethnicity.	To ensure residents receive the best service and are aware of additional help	None	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	31/03/2025	Green	
	Monitor and review the impact of the changes to the scheme for 2025/26 and diarise a further consultation and review of the CTS scheme for 2026/27	Age, sex, disability, ethnicity.	To ensure the impact of changes to the scheme are identified and fed into the review for 2026/27	None	Andy Jeffs – Finance and Commercial – Revenues and Welfare Services – andy.jeffs@slough.gov.uk	30/06/2025	Green	

Appendix A

Equality Impact Assessment Decision Rating Guide

PLEASE SEE PAGE 1 FOR THE RATING OF THIS PROPOSAL

Decision	Action	Risk
As a result of performing the EIA, there is a risk that a disproportionately negative impact (direct, indirect, unintentional, or otherwise) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. It is not clear if mitigating actions are possible.	Further advice should be taken	Red 
As a result of performing the EIA, there is a risk that a disproportionately negative impact (as described above) exists to one or more of the nine groups of people who share a protected characteristic under the Equality Act 2010. However, this risk may be removed or reduced by implementing mitigating actions.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the EIA, the proposal does not appear to have any disproportionate negative impact on people who share a protected characteristics or anticipated impacts will be either positive or neutral.	Proceed	Green: 