



# WALTHAM FOREST COUNCIL

What is an Equality Analysis (EA) for? [Double click here for more information / Hide](#)

# FULL EQUALITY ANALYSIS (EA) TEMPLATE

Decision **Council Tax Support Scheme 2024-25**

Date **October 2023**

The Council must have due regard to its Public Sector Equality Duty (PSED) when making decisions at member and officer level. An EA is the best method by which the Council can provide the evidential analysis to comply with the equality duty, particularly for major decisions. However, the level of analysis required should only be proportionate to the relevance of the duty to the service or decision. Some decisions will require detailed equalities consideration, e.g. a decision on adult

social care provision or reduction of grants to voluntary organisations, whereas the performance of other functions will have less of an equalities impact, e.g. the appointment of committees where only a limited assessment is required. In rare cases, the Courts have said there may be no impact. If you think this may be the case, then you should undertake the EA screening process first to determine if you need to complete this full EA and have a rational basis for this conclusion.

## What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

The public sector equality duty (s.149, Equality Act 2010) requires the Council, when exercising its functions, to have “due regard” to the need to:

- 5. eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited under the Act,
- 6. advance equality of opportunity between those who share a “protected characteristic” and those who do not share that protected characteristic and
- 7. foster good relations between persons who share a relevant protected characteristic and persons who do not share it (this involves having due regard, in particular, to the need to (a) tackle prejudice, and (b) promote understanding).

These are collectively referred to in this EA as the equality aims. Advancing equality (the second equality aim) involves having due regard, in particular, to the

need to:

- Removing or minimising disadvantages suffered by people due to their protected characteristic
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people including steps to take account of disabled people’s disabilities *and*
- Encouraging people from protected groups to participate in public life or in other activities where their participation in disproportionately low

NB Please note that, for disabled persons, the Council must have regard to the possible need for steps that amount to positive discrimination, to “level the playing field” with non-disabled persons, e.g. in accessing services through dedicated car parking spaces.

## Fostering good relations [Double click here for more information / Hide](#)

**IMPORTANT NOTES:**

1. **THIS FRONT SHEET IS AN ESSENTIAL PART OF THE EA – COMPLETE THE TEMPLATE AND SUBMIT IT AS A SINGLE DOCUMENT.**
2. **IN RARE CASES, WHEN COMPLETING THE ASSESSMENT IT MAY BECOME APPARENT THAT THE RECOMMENDATIONS WOULD LEAD TO UNLAWFUL DISCRIMINATION E.G. A PROPOSAL TO PAY MEN MORE THAN WOMEN. IF SO, STOP, RECONSIDER YOUR PROPOSAL AND SEEK ADVICE.**

THE HEAD OF SERVICE OR DIRECTOR WHO IS RESPONSIBLE FOR MEMBER LEVEL REPORTS MUST BE SATISFIED WITH THE FINALISED EQUALITY ANALYSIS AND FOR MAJOR PROPOSALS, IT IS SENSIBLE TO ENSURE YOUR LEAD MEMBER HAS BEEN CONSULTED.



Fostering good relations involves having due regard, in particular, to the need to tackle prejudice and promote understanding.

### Protected Characteristics [Double click here for more information / Hide](#)

Protected Characteristics defined in the Act are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex and sexual orientation. Marriage and civil partnership are also a protected characteristic for the first equality aim to eliminate discrimination.

### Guidance on compliance with the PSED for officers and decision makers [Double click here for more information / Hide](#)

To comply with the duty, the Council must have “due regard” to the three equality aims. This means the PSED must be considered as a relevant factor in a decision alongside other relevant matters such as budgetary, legal, economic and practical implications. What regard is “due” will depend on the circumstances of each proposal and importance of equalities to the decision being taken. Some key principles for compliance during the decision-making process are set out below:

1. The duty is mandatory and important and must be met by the decision-maker and not delegated.
2. EAs must be evidence based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.
3. There must be an assessment of the practical impact of decisions on equalities, measures to avoid or mitigate negative impact and their effectiveness.
4. There must be compliance with the duty when proposals are being formulated by officers and then by members or officers when taking the decision: the Council cannot rely on an EA produced after the decision is made but sometimes a “provisional” EA is appropriate e.g. before consultation on a proposal.

5. Officers and members making a decision where there is an equality impact must give conscious and open minded consideration to the impact of the duty on the decision, e.g. be prepared to change or amend a decision although negative equalities impacts does not stop a decision being made (see 7).
6. The duty is **not**, however, to achieve the three equality aims but to take them into account when making the final decision – therefore, **the duty does not stop difficult but justifiable decisions being made.**
7. The decision maker may take into account countervailing (i.e. opposing) factors that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
8. The duty is ongoing: EAs should be reviewed over time and there should be evidence of how impact will be monitored after the decision.
9. The above is a general guide to this changing area of law. You should also refer to the Council’s EA Page <http://forestnet.lbwf.gov.uk/index/residents-first/equalities/equality-analysis.htm> for more detailed guidance, and specific advice from the Council’s Equalities Lead should be sought on complex issues.

### What to do if your proposal is scheduled for Cabinet/Committee? [Double click here for more information / Hide](#)

## The Proposals *Click and hover over the questions to find more details on what is required.*

### 1. What is the Proposal?

The Council's Council Tax Support scheme offers assistance to working aged residents on low income to pay their Council Tax bill. The existing scheme was introduced from 1 April 2023 and replaced the scheme that was introduced on 1 April 2017.

The scheme is means tested; meaning that how much is awarded depends on the household's income and capital / savings.

The current scheme offers a maximum support level of 85% of a household's eligible Council Tax. This means that residents receiving support must pay a minimum of 15% of their Council Tax themselves.

Other restrictions also apply under the scheme such as:

- There is a minimum award level of £1.00 per week so, residents that would otherwise be entitled to ninety-nine pence (£0.99 pence) or less support per week receive no help at all from the scheme.
- A taper is applied to a person's income when their income is higher than the amount we consider they need to live. The taper level is 30 per cent of the extra income.
- Residents with capital / savings of £6,000 or more are not entitled to receive support under the scheme.
- Standard fixed rate non-dependant deductions are made for other adults (people over 18) living in a household.

The scheme ignores certain income when calculating the level of awards such as disability related welfare benefits, war pensions and war widows pensions and child benefit.

It is also complemented by a discretionary hardship fund of up to £750,000 to provide additional assistance to households suffering the greatest financial hardship.

The proposal is to continue the current scheme in 2024/25 with only necessary minor and consequential adjustments made to reflect Government changes to the amount and treatment of welfare benefits, including Tax Credits and Universal Credits

**Please note that these proposals do not affect residents of state pension age whose entitlement are protected by Government under separate regulations.**

### 2. What are the recommendations?

The Council is proposing to continue with the scheme as outlined above for the Council Tax billing year 1 April 2024 to 31 March 2025 with only minor and consequential changes made to the scheme to reflect applicable Government changes to welfare benefits and Universal Credit.

That would mean a continuation of the existing Council Tax Support scheme in which the maximum level of supported payable is 85%. Working aged recipients of the scheme would therefore be required to pay at least 15% of their council tax liability themselves as now. The other elements outlined above would also continue to apply, such as :

- The standard fixed rate non-dependant deductions for other adults (people over 18) living in a household would continue as now and
- The taper applied to a person's income when their income is higher than their needs allowance would continue as now at 30% and
- The capital/savings limit for getting support would continue as now at £6,000
- The minimum award level of £1.00 would continue as now.
- A Discretionary Council Tax Support Hardship Fund of £750,000 would continue to assist those suffering the greatest financial hardship
- The scheme would continue to disregard (ignore) incomes such as Child Benefit, disability related payments such as Personal Independence Payment and war pensions.

The remaining provisions of the council's scheme for 2024-2025 would continue as published in the updated provisions on the Council's website.

**3. Who is affected by the Proposal?** *Identify the main groups most likely to be affected by the recommendations, directly and indirectly.*

The profile of Council Tax payers in Waltham Forest generally reflect the wider community. However, the profile of households in receipt of Council Tax Support differs from the wider community profile. This is a consequence of the nature of the support scheme, which provides help for Council Tax payers whose financial circumstances are not adequate to cover the Council Tax charge. Therefore those households with larger outgoings, such as those receiving disability benefits, families with children, non-working households living on welfare benefits, or in-work households that are in low paid employment may be over represented within the CTS caseload.

These proposals affect people of working age that are on low incomes as the scheme is means tested. Therefore, all recipients would be considered to be at a socio-economic disadvantage, particularly people with disabilities, lone parents (more likely to be women), part-time workers (more likely to be women), large households (more likely to be from BME backgrounds) and young single people due to the greater impact the Governments welfare reform programme has had on this group.

However, these proposals recommend continuing with the existing CTS scheme which is more generous than the previous scheme and there are no additional adverse impacts identified as a direct result of the proposal.

**Key borough statistics:** Waltham Forest has an estimated total population of 278,400 as at March 2021. It has a higher proportion of young and working-aged people compared to the national average but similar to the London as a whole. The median age of residents is 35 years (same as London’s average), compared to the UK average of 40 years.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Data and Intelligence Team, Insight Team ([insight@walthamsforest.gov.uk](mailto:insight@walthamsforest.gov.uk)).

	Waltham Forest	Waltham Forest (%)	London (%)	England & Wales (%)
<b>Aged 0-4</b>	19000	6.8%	6.0%	5.4%
<b>Aged 5-15</b>	37300	13.4%	13.3%	13.1%
<b>Aged 16-24</b>	27500	9.9%	11.1%	10.6%
<b>Aged 25-49</b>	120600	43.3%	40.8%	32.8%
<b>Aged 50 – 64</b>	45700	16.4%	16.9%	19.5%
<b>Aged 65+</b>	28400	10.2%	11.9%	18.6%

Source: Census 2021 population estimates, Office for National Statistics

[Double click here to show borough wide statistics / hide statistics](#)

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

Age

CTS caseload at data November 2022 (15,375)		
Age	Number	Percentage
18-24	240	1.56
25-49	4,781	31.1
50-64	4,417	28.73
65+	5,937	38.61
	<b>15,375</b>	<b>100%</b>

CTS caseload at data September 2023 (14,841)		
Age	Number	Percentage
18-24	254	1.71
25-49	4,463	30.07
50-64	4,202	28.32
65+	5,922	39.90
	<b>14,841</b>	<b>100%</b>

**What is the proposal’s impact on the equalities aims?** *Look for direct impact but*

**What actions can be taken to avoid or mitigate any negative impact or to better**

also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Analysis of the data shows that residents' age 65+ makes up 10.2% of the population and almost 40% of CTS claims in September 2023, an increase of 1.29% compared to November 2022 . Pensioners however are not impacted by the Council's scheme as they are protected by a separate scheme which is set in legislation. The scheme for people of pension age is more generous than the Council's scheme including, most notably, a maximum reduction equal to 100% of the Council Tax bill.

18-24 year-olds are under-represented as a category in the CTS caseload compared to the population however, this could be because they are more likely to live in shared accommodation or live at home as part of a family and are therefore less likely as a group to be liable to pay Council Tax.

25-49 year olds are also under-represented as a category in the CTS caseload (30.07%) compared to the borough population statistics (43.4%) and 9.05% of them are in work.

50-64 year olds make up 16.4% of the borough population and 28.32% of CTS recipients so as a group are overrepresented which, given their representation in the caseload suggests that they as a group could be disproportionately impacted by any negative changes to the CTS scheme.

Of those working aged CTS recipients that are working (653) 0.61% are 18-24 year olds, 63.40% 25-49 year olds and 35.99% are aged 50 – 64. The low number of CTS recipients who are in work coupled with the 3.5% reduction in the working aged CTS caseload may suggest that more of this cohort are now in higher paid employment and no longer require financial assistance with their Council Tax.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

## **advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against any potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers' pensions as well as various other incomes, for example Child Benefit and disability benefits such as Personal Independence Payments.

The scheme is also complemented by a Discretionary Council Tax Hardship Fund of up to £750,000 to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough as well as in Residents News and other campaigns run by the Council.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the Local Welfare Assistance scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Interested households are actively supported to move into work where possible through referral into the council's Employment, Business and skills Service and the Fair Deals Jobs programme which also supports residents with skills, qualifications, improved language skills and to maximise incomes. The council's Adult Learning Service also provides a range of skills badly needed by residents to ensure they can, over time, work themselves into better paid roles.

## Disability [Double click here to add impact / Hide](#)

**Key borough statistics:** The 2021 Census asked people to rate their health as very good, good, fair, bad or very bad. The data shows that around 17,000 residents of Waltham Forest considered their health to be bad or very bad (6.1% of the population). In addition, the 2021 census asked people if they had a health problem or disability that has lasted or was expected to last for at least 12 months and which limited the person's day-to-day activities, either a little or a lot. As many as 36,760 residents said in the census that their day-to-day activities are limited because of their health. This is made up of seven per cent of population who said their day-to-day activities were limited a lot (15,930 people) and eight per cent whose activities were limited a little (20,830). In total, this is 13 per cent of residents compared to 17.5 per cent nationally.

Health tends to deteriorate further with age with more than half of residents aged 65 and over (57 per cent) having a limiting long-term health problem or disability. Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Data and Intelligence Team, Insight Team ([insight@walthamsforest.gov.uk](mailto:insight@walthamsforest.gov.uk)).

[Double click here to show borough wide statistics / hide statistics](#)

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals.*

In September 2023 there were 14,841 households claiming Council Tax Support of which 5,594 are pensioners and therefore not impacted by the local Council Tax Support scheme. Of the working age cohort (9,247) that would be affected by any changes to the Council's scheme, 3,746 (40.51%) are recorded as having a disability. In addition, 233 children (2.52% of households) are also recorded as having a disability.

We have no data breakdown on whether their disability falls within visual impairment, hearing impact or mobility difficulties. Local caseload data also shows that 1,188 households (12.85% of working age households) had an individual who was caring for someone with a disability in September 2023.

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

In terms of Council Tax Support, disabled households are those where a disability related welfare benefit is in payment. We recognise that people with disabilities are historically disadvantaged and face greater barriers when accessing information about services and therefore consider disabled households to be more vulnerable than other households.

Claimants with disabilities make up 40.51% of the working age Council Tax Support caseload which is almost 1.5% lower than November 2022 but is still significantly higher than the borough statistic.

A possible explanation for their over representation in the caseload is that differently abled people are less likely to be in work.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers' pensions as well as various other incomes, for example Child Benefit and disability benefits such as Personal Independence Payments.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

The scheme is also complemented by a Discretionary Council Tax Hardship Fund of £750,000 to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough as well as in Residents News and other campaigns run by the Council.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the Local Welfare Assistance scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Interested households are actively supported to move into work where possible through referral into the council's Employment, Business and skills Service and the Fair Deals Jobs programme which also supports residents with skills, qualifications, improved language skills and to maximise incomes. The council's Adult Learning Service also provides a range of skills badly needed by residents to ensure they can, over time, work themselves into better paid roles.

## Pregnancy and Maternity [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

**Key borough statistics:** In 2022, a total of 4,040 children were born in Waltham Forest. The General Fertility Rate (number of live births per 1,000 women aged 15-44) in the borough is 60.3) compared to the London average of 50.7.

In 2021, the borough also had the 4<sup>th</sup> highest teenage (under 18) conception rates of London Boroughs (13.8 compared to the London average of 9.5 per 1,000 female population aged 15 to 17). In 2021, there were 63 teenage conceptions with a 54% abortion rate among 15-17 year olds in Waltham Forest (62% across London)

*(Source: Office for National Statistics).*

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).



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## Pregnancy and Maternity Click and hover over the questions to find more details on what is required

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals.*

We have no local data regarding maternity and pregnancy.

We do however know that there are 6,142 working age women in receipt of Council Tax Support which represents 66.42% of the working age caseload. 2,769 of the working age households are lone parent households and 2,656 (95.92%) are women, therefore as a group they will be more adversely impacted than any other group.

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

We hold no data at a caseload level about maternity and pregnancy however as women represents almost 66.64% of the working age caseload this suggests that they as a group could be disproportionately impacted by changes to the Council's scheme.

The proposal however is to continue with the existing and this analysis has not identified any additional adverse impact on this group arising from the proposal.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

The scheme is complemented by a Discretionary Council Tax Hardship fund to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

**Race** [Double click here to add impact / Hide](#)

Check box if NOT applicable

**Key borough statistics:** Just over half of Waltham Forest residents are White ethnic background (53%) and within this 64% are White British. 36% of White residents are categorised as 'White Other', who are predominantly from the Central and Eastern European countries.

The largest minority ethnic group in the borough is Asian (20% of the total population) including people of Pakistani (10%), Indian (3%), Bangladeshi (2%) and Other Asian (5%) backgrounds. 15% of the resident population is Black including Black Caribbean (6%), Black African (7%) and Other Black (2%). 6% of the population have mixed/multiple ethnicities.

*(Source: 2021 Census).*

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

[Double click here to show borough wide statistics / hide statistics](#)

## Race Click and hover over the questions to find more details on what is required

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

**Race** *Click and hover over the questions to find more details on what is required*

Providing ethnicity information as part of the CTS application process is discretionary. In September 2023 ethnicity information was recorded for 53.91% of claimants, broken down as follows:

Council Tax Support caseload (November 2022) where known 8,116 (52.77%)			Council Tax Support caseload (September 2023) where known 8,002 (53.91%)		
Ethnic Group	Number	%	Ethnic Group	Number	%
White: British	2,454	30.24%	White: British	2414	30.17
White: Irish	102	1.26%	White: Irish	116	1.45
White: Any Other	924	11.38%	White: Any Other	1030	11.43
Mixed: White & Black Caribbean	166	2.05%	Mixed: White & Black Caribbean	174	2.17
Mixed: White & Black African	107	1.32%	Mixed: White & Black African	94	1.17
Mixed: White and Asian	57	0.70%	Mixed: White and Asian	53	0.66
Mixed: Any Other	134	1.65%	Mixed: Any Other	507	1.72
Asian/Asian British: Indian	182	2.24%	Asian/Asian British: Indian	169	2.11
Asian/Asian British: Pakistani	827	10.19%	Asian/Asian British: Pakistani	831	10.38
Asian/Asian British: Bangladeshi	199	2.45%	Asian/Asian British: Bangladeshi	195	2.44
Asian/Asian British: Any Other	376	4.63%	Asian/Asian British: Any Other	379	4.74
Black/Black British: Caribbean	769	9.48%	Black/Black British: Caribbean	797	9.96
Black/Black British: African	998	12.30%	Black/Black British: African	931	11.63
Black/Black British: Any Other	291	3.59%	Black/Black British: Any Other	280	3.50
Chinese	39	0.48%	Chinese	32	0.40
Other Ethnic Group	526	6.18%	Other Ethnic Group	484	6.05
	<b>8,511</b>	<b>100%</b>		<b>8,002</b>	<b>100%</b>

**What is the proposal’s impact on the equalities aims?** Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

There is no requirement for people applying for CTS to declare their ethnicity so the information available at a caseload level has been provided on a voluntary basis. Ethnicity information is known for 53.91% of cases only.

The data above when analysed against the caseload suggests that most groups, regardless of ethnicity, have a lower percentage of people receiving CTS than their representation within the borough’s population, where known. The borough level data when compared to the known Council Tax Support ethnicity data suggests that the most significant disparity is attributable to people who defined themselves as white (British, Irish & Other) 53% of the borough population compared to 43% of the Council Tax Support caseload. However, the fact that CTS

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council’s existing scheme includes:

The scheme ignores war widows/widowers’ pensions as well as various other incomes, for example Child Benefit and disability benefits such as Personal Independence Payments.

**Race** *Click and hover over the questions to find more details on what is required*

is paid to households on low income, may suggest that a larger percentage of white residents are in full-time or higher paid employment than some ethnic groups.

Asian as an ethnic group makes up 20% of the borough population and a similar percentage 19.67% of CTS recipients, though Bangladeshi are slightly over-represented. Black Caribbean and in particular black African are over-represented by comparison to the borough data.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

The scheme is also complemented by a Discretionary Council Tax Hardship Fund of £750,000 to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough as well as in Residents News and other campaigns run by the Council.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the Local Welfare Assistance scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Interested households are actively supported to move into work where possible through referral into the council's Employment, Business and Skills Service and the Fair Deals Jobs programme which also supports residents with skills, qualifications, improved language skills and to maximise incomes. The council's Adult Learning Service also provides a range of skills badly needed by residents to ensure they can, over time, work themselves into better paid roles.

**Key borough statistics:** The borough also has a diverse range of faith communities. According to the 2021 Census, Christianity is the main religion in Waltham Forest, with 39 per cent of residents identifying as Christian. The second biggest religion is Islam with 22% of residents saying they are Muslims compared to 6.5% nationally. Other religions in the borough are Hindu (2.3% of residents), Buddhist (0.7%), Jewish (0.5%) and Sikh (0.5%). 28% of residents said they are secular/have no religion and 7% chose not to state their religion in the Census.

Waltham Forest has around 150 Christian Churches, 16 Muslim Mosques, 4 Hindu Temples, 3 Jewish Synagogues, 1 Sikh Gurdwara and 1 Tao Temple.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief [Click and hover over the questions to find more details on what is required](#)

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

We do not currently hold any additional data at a caseload level on religion or belief.

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

There is no evidence to suggest that there is an additional adverse impact to this group because of these proposals.

**Key borough statistics:** In total, there is approximately equal number of men and women living in Waltham Forest (2021 Census). However, there is a growing gender imbalance as people get older. 47% of those aged 50 and over are male and 53% are female, compared to equal proportions among the residents aged under 50.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

Age	Male	Female
Aged 0 to 15	51%	49%
Aged 16 to 24	51%	49%
Aged 25 to 49	49%	51%
Aged 50 to 64	48%	52%
Aged 65+	45%	55%
Total	49%	51%

Source: 2021 Census, Office for National Statistics

[Double click here to show borough wide statistics / hide statistics](#)

**Sex** [Click and hover over the questions to find more details on what is required](#)

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

Working age CTS caseload November 2022 – 9,722					Working age CTS caseload September 2023 – 9,247				
	Female	%	Male	%		Female	%	Male	%
CTS recipients by gender	6,402	65.85	3320	34.15	CTS recipients by gender	6,142	66.42	3105	33.58
Lone parent households	2,827	96	117	4	Lone parent households	2,656	95.92	113	4.08
Receiving a disability benefit	1,703	62	1,038	38	Receiving a disability benefit	2,365	63.13	1,381	36.87
In employment	527	61.93	324	38.07	In employment	369	56.94	279	43.06

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected*

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

**Sex** *Click and hover over the questions to find more details on what is required*

*group more than the general population, including **indirect impact***

The data above shows that there are a higher percentage of females claiming Council Tax Support compared to their representation in the LBWF population. This over representation could partly be explained by the fact that around 43.24% live in lone parent households and are therefore more likely to be in part-time work or work fewer hours which may limit their household income; meaning they are more likely to qualify for support. 2,769 of the total working age households are lone parent households and 2,656 (95.92%) are females.

Although there is a lower percentage of females in work and claiming Council Tax Support than men 6% of females compared to 9%, the actual numbers that could potentially be impacted by changes to the CTS scheme is higher for females as the overall percentage of women in receipt of support is larger.

The proposal is to continue with the existing scheme and this analysis has not identified any additional adverse impact on this group arising from the proposal.

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

Measures that have already been put in place to mitigate against the potential impact of the Council's existing scheme includes:

The scheme ignores war widows/widowers' pensions as well as various other incomes, for example Child Benefit and disability benefits such as Personal Independence Payments.

The scheme is also complemented by a Discretionary Council Tax Hardship Fund of £750,000 to support those individuals suffering the most financial hardship. This fund offers short (and where necessary long) term support for the most vulnerable households.

Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage.

The availability of the Discretionary Council Tax Hardship fund is promoted through Council Tax Support notification letters, in Council Tax reminder and final notices, on the Council's website and via partners and advice and voluntary organisations throughout the borough as well as in Residents News and other campaigns run by the Council.

Applications for assistance from other discretionary schemes such as Discretionary Housing Payment and the Local Welfare Assistance scheme are monitored and where appropriate assistance is awarded under the Discretionary Council Tax Hardship fund as well.

Interested households are actively supported to move into work where possible through referral into the council's Employment, Business and Skills Service and the Fair Deals Jobs programme which also supports residents with skills, qualifications, improved language skills and to maximise incomes. The council's Adult Learning Service also provides a range of skills badly needed by residents to ensure they can,

Sex *Click and hover over the questions to find more details on what is required*

over time, work themselves into better paid roles.

## Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

Check box if NOT applicable

**Key borough statistics:** In 2021, 4.5% of residents aged 16+ (10,000 people) in Waltham Forest identified their sexual identity as lesbian, gay or bisexual, placing Waltham Forest as 13<sup>th</sup> highest in London and 31<sup>st</sup> in England & Wales. This comprised of:

- 2.3% who identified as gay or lesbian
- 1.6% who identified as bisexual.
- 0.6% with other sexual orientations

1.1% of the population (2,400 people) identified as a gender different from their sex assigned at birth.

The likelihood of an adult identifying as LGBT decreased with age. In 2021, 4.5% of adults aged 16 to 24 identified as LGB+, which decreased to 0.1% of adults aged 65 and over. (Source: Census 2021).

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment *Click and hover over the questions to find more details on what is required*

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals.*

We do not currently hold information at a caseload level on gender reassignment or on sexual orientation for those individuals living in single adult households.

**What is the proposal's impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

This analysis found no evidence of any differential impact arising from these proposals when considered from the perspective of sexual orientation and gender reassignment

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.

**Key borough statistics:**

Marital and civil partnership status	Waltham Forest	%
All usual residents aged 16+	222,181	100
Single	104,046	46.8
Married	87,974	39.6
In a registered same-sex civil partnership	5,332	2.4
Separated	16,422	7.4
Divorced or legally dissolved same-sex civil partnership	8,407	3.8
Widowed or surviving partner from a same-sex civil partnership	222,181	100

Source: 2021 Census

The Civil Partnership Act 2004 came into force on 5 December 2005. The Marriages (Same Sex Couples) Act made provision for the marriage of same sex couples in England and Wales with first marriages taking place on 29 March 2014. From 10 December 2014 civil partners were able to convert their civil partnership into a marriage.

[Double click here to show borough wide statistics / hide statistics](#)

**Marriage and Civil Partnership** [Click and hover over the questions to find more details on what is required](#)

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals.*

We know from our existing caseload that were 13 claims in payment from same sex couples in September 2023. It is however not been possible to determine precisely how many of these couples are married or in a civil partnership.

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Current data held suggests that same sex couples are very much underrepresented in benefit claims compared to heterosexual couples. This analysis found no evidence of any differential impact arising from these proposals when considered from the perspective of marriage or civil partnership.

**Number of marriages/civil partnerships**

	Opposite Sex	Same Sex
Marriages (2020)	403	18
Civil partnerships (2021)	42	8

Source: Office for National Statistics

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

The proposal in this Impact Analysis is a positive one as it makes recommendations for the Council to continue with its existing CTS scheme. Therefore, there are no additional adverse impacts on this protected group resulting from these proposals.



See pages 1 and 2 for full details of these two aims. This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the 8 protected characteristics covered by these aims. Remember, marriage and civil partnership is not covered.

**Key borough statistics:** According to the **Resident Insight Survey** (wave 13 conducted in Feb-Mar 2016), 77% of Waltham Forest residents feel that their local area is a place where people from different backgrounds get on well together.

Women are more likely than men to feel that people from different backgrounds are getting on well locally (81% compared to 74%). Young people aged 16-29 are most likely to feel people are getting on well (84%), while older residents aged 65+ are least likely to think so (66%). BME residents are more likely to think that people from different background are getting on well in their local area than White residents (83% compared to 74%), which is likely related to the different age profile of the BME and White populations.

The Living Together Survey from Dec 2015-Feb 2016 found that 62% of residents agreed that they have the opportunity to mix with people from different backgrounds to themselves. One fifth (20%) feel they do not really mix with people from different backgrounds. People in the north of the borough (Chingford) are least likely to feel they have opportunity to mix with people from different backgrounds to themselves (55% compared to 68% in Leytonstone, 63% in Walthamstow and 61% in Leyton). Younger and BME residents are more likely to mix with people from different background than older residents and those of White background. The survey also found that not enough mixing between people of different backgrounds and lack of understanding of each other are perceived to be the two main reasons which can stop people from getting on together.

Note: These statistics provide general data for this protected characteristic. You need to ensure you have sufficient information about those affected by the proposals.

For more detailed breakdowns or further information please contact the Strategy and Design team ([insight@walthamforest.gov.uk](mailto:insight@walthamforest.gov.uk)).

[Double click here to show borough wide statistics / hide statistics](#)

**Additional Impacts on Advancing Equality & Fostering Good Relations** [Click and hover over the questions to find more details on what is required](#)

**Additional Equalities Data (Service level or Corporate)**

The council's Council Tax Support scheme is means tested and therefore available to low income households. As a result, all recipients would be considered to be at a socio-economic disadvantage, particularly disabled people, lone parents (more likely women), part time workers (more likely to be women) and large households (more likely to be from BME backgrounds).

The proposal in this impact analysis is a positive one as it recommends continuing with the existing scheme. Minor changes would be to the scheme in April 2024 because of annual Government changes to Welfare Benefits and any changes to Universal Credit that are used to calculate awards. Any changes to the level of support residents are entitled to will be communicated to them in writing. Other support is available too for Council Tax payment options, such as 12 monthly and fortnightly instalments via direct debit and standing order are offered at the billing stage as a way of alleviating any financial impact Government changes will have on low income households. The availability of up to £750,000 under the Discretionary Council Tax Hardship fund will be promoted through Council Tax Support notification letters, Council Tax reminder and final letters, Residents News, on the Council's website and via partners and advice and voluntary organisations throughout the borough.

Additionally, we will ensure that the communication options and materials used are accessible, inclusive and effective.

## Additional Impacts on Advancing Equality & Fostering Good Relations *Click and hover over the questions to find more details on what is required*

**Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?**

These proposals do not identify any additional benefits or risks other than those outlined above. Furthermore, the proposal is to continue the Council's existing scheme, meaning the proposal does not carry any additional impacts on any equality groups.

**What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above?** Provide details of how effective the mitigation will be and how it will be monitored.

The proposal makes no changes to the Council's existing Council Tax Support scheme therefore no additional adverse impacts have been identified on any equality groups as a result of this analysis.

### Conclusion

*Consider the Guidance below and set out your conclusions from the equalities analysis of the 8 protected characteristics. If there are negative equalities impacts, but you think that the proposals should still proceed in the current or amended form, explain what the objective justification for this is, providing evidence as*

*appropriate. If it is helpful, refer to other documents e.g. the Cabinet report. You may find it helpful to identify one of the 4 outcomes below as being closest to your current proposals. (Use your conclusions as a basis for the "Equalities Implications" in the Cabinet report.)*

#### **This analysis has concluded that...**

This analysis has not identified any additional equality impact as a result of these proposals. This means that those in receipt of support from April 2024 would continue to be required to pay at least 15% of their eligible Council Tax themselves, which is the same as the current requirement. There will be continued financial monitoring of the costs of the scheme and before any further changes are made to the scheme which could reduce or remove the support payable the Council would have to carry out a statutory consultation which would also identify any equality impacts. The Council will also keep under review this Equality Impact Analysis as part of its compliance with its' Public Sector Equality Duty.

Up to £750,000 will continue to be made available under the continuation of a Discretionary Council Tax Hardship Fund to offer extra support to the most vulnerable residents. This fund is administered alongside other discretionary funds such as Discretionary Housing Payment which provides additional support with rent and other housing costs to help maintain or secure tenancies and the Council's Local Welfare Allowance scheme which provides much needed support for families in crisis to obtain food, essential furniture and white goods as well as meeting fuel costs.

The outcome following analysis of the impact indicates the impact to be outcome 3.

#### **Outcome of Analysis** *Check one that applies*

**Outcome 1**

No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

**Outcome 2**

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

**Outcome 3**

Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

**Outcome 4**

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Head of Service:



Name: Nalda Russell-Stowe

Date: October 2023