

Equality Impact Assessment Template (EqIA)

An Equalities Impact Assessment (EqIA) is a tool to understand the effects a decision will or is likely to have on people, specifically those people who have one or more protected characteristics under the Equality Act 2010.

It is an evidence-based approach and aims to ensure that decision-making processes are fair and do not present barriers to participation or create disadvantage for protected groups.

The EqIA should be started early on in a project before any decision is made. It can also be used:

- As a service improvement tool, and
- To assess the implications of strategic and operational decisions.

In this way, we can help ensure we do not discriminate, and promote equality.

What is the Public Sector Equality Duty (PSED)?

The PSED under the [Equality Act 2010](#) requires that in the exercise of its functions, Waltham Forest Council must have due regard whilst seeking and evidencing ways that we:

- eliminate unlawful discrimination – including victimisation or harassment
- advance equality of opportunity between people who share a protected characteristic and those who don't
- foster or encourage good relations between people who share a protected characteristic and those who don't

The PSED helps the council meet its legal duties and to become more accountable, inclusive, credible and community orientated.

Protected characteristics under the Equality Act 2010

It is against the law to discriminate against someone because of a protected characteristic. These are:

- Age
- Sex
- Ethnicity and race
- Religion or belief
- Disability
- Sexual orientation
- Pregnancy and maternity
- Gender reassignment
- Marriage and civil partnership

An EqIA enables officers to assess the impact of proposed decisions on people with these characteristics.

Protected characteristics as determined by Waltham Forest Council

In addition to our statutory obligations under the Equality Act 2010, Waltham Forest Council include Care Leavers as having a protected characteristic and to this extent passed a motion in April 2023 to recognise this action. Therefore, Waltham Forest Council's EqIA process also includes a requirement to explore the impact of a proposal on that group.

Additional groups that face structural inequalities

As a Council, we are committed to tackling structural disadvantages faced by our residents. We encourage staff to think about how a decision, proposal or policy might affect wider groups who are not covered by the Equality Act, but still experience relative material or social disadvantage in accessing opportunity.

The [State of the Borough report](#) identifies a number of additional groups that should be taken into account:

- Those who face socio-economic inequality (e.g. unemployment, low income, low academic qualifications) or live in areas of high deprivation
- Care Leavers
- People with caring responsibilities
- Survivors of domestic violence
- Migrants, including refugees and asylum seekers
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other disadvantaged groups that you know from your service data who might be adversely affected by your proposal or policy. You need to consider these groups as well as the protected characteristics above as part of your EqIA.

Carrying out an EqIA

When doing an assessment, you must answer these questions:

- Is the proposal, policy, or project likely to exclude or have a detrimental (harmful) effect on a specific group or community?
- Does it affect some groups or communities differently and can this be justified?
- How might it affect wider determinants (factors) such as income, housing, education, employment, neighborhoods, and communities that impact on health and well-being?
- Is the proposal, policy, or project likely to be equally accessed by all groups and communities? If not, can this be justified?
- Are there any barriers that might make it hard or stop different groups or communities accessing the proposal or policy to be delivered?
- Could the proposal or policy promote equality and good relations between different groups?

Service areas are responsible for ensuring EqIAs are started early on and should consult widely within their service to ensure they have considered all potential impacts. This should also include considering the impact on people who have identities that overlap e.g., intersectionality of gender, race, and disability for instance.

When completing a EqIA use data to help collate demographic evidence including:

- Census 2021 in Waltham Forest
- Statistics about the borough
- Other service specific data insights and sources, including data requests via Hornbill.

Guidance on compliance with the Public Sector Equality Duty for officers and decision makers

1. The duty is mandatory and must be met by the decision-maker and not delegated. It is for the decision-maker to consider with help from the report and officer analysis.
2. EqIAs 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 compliance with the duty when decisions, proposal or policies are being formulated by officers and then by members or officers when taking the decision. The Council cannot rely on an EqIAs produced after the

decision is made but sometimes a “provisional” EqIA is appropriate eg. before consultation on a decision, proposal, or policy.

4. When an equality implication is identified, officers and members must give conscious and open-minded consideration to the equality duty when making a decision.
5. The duty is not, however, to achieve the three equality aims but to pay due regard when making the final decision – therefore, the duty can encourage officers to amend or change a decision, proposal, or policy where an equality implication is identified, but it does not stop difficult but justifiable decisions being made e.g to no longer continue a service for instance.
6. The decision maker may take into account things that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
7. The duty is ongoing: EqIAs should be reviewed over time and should say how impact will be monitored after the decision.

Positive action

The Equality Act allows ‘positive action’ to tackle disadvantage faced by those sharing a protected characteristic, even if it has the consequence of disadvantaging those sharing a different protected characteristic. Positive action can be justified where it is proportionate. Positive action is different from positive discrimination, which is unlawful.

An example of unlawful positive discrimination would be where an employer recruits a person because they have a relevant protected characteristic rather than because they are the best candidate. For example, it would be unlawful to hire someone simply because their team was under-represented by woman and the candidate is hired because they are a woman.

However, if under-representation is an identified issue, then you could take steps to promote vacancies to this group or provide extra support for them to apply. This is positive action.

The difference between positive action and positive discrimination can be difficult to define and is determined by the particular situation. It is important to reflect upon whether any element of your service necessitates positive action. It is critical that you satisfy your duty under the Equality Act and therefore if you have any concerns, please seek further guidance/or legal advice before continuing.

EdyEquality Impact Assessment Template (EqIA)

Equality Impact Assessment (EqIA)

Section 1: About the proposal, policy or project

Name of proposal, policy, or project:

Council Tax Support Scheme 2025-2026

Name of lead officer and contact details:

Eamonn Hennessy – Eamonn.hennessy@walthamforest.gov.uk – 07507 594 880

Name of service and directorate for this proposal, policy, or project:

Benefits Service - Resources

Strategic Director responsible for this proposal, policy, or project:

Rob Manning – Strategic Director of Resources

Date the EqIA was started:

21.10.2024

What kind of proposal, policy or project is this assessment for?

Tick all that apply.

- Change in service delivery or new service
- Change in policy or new policy
- Grants and commissioning
- Budget change or service cut
- Other - if ticked, please give more detail: Click or tap here to enter text.

Section 2: Proposal, policy, or project summary

Please give a summary of this proposal, policy, or project

Waltham Forest is proposing to change its Council Tax Support scheme from 1 April 2025. Council Tax Support is a reduction in the amount of Council Tax that working-age people on low income need to pay. In the context of the difficult financial challenges the Council is facing, the proposal for next year's Council Tax Support scheme aims to balance introducing a scheme which is affordable for Council, with targeting support toward those that need it most.

The key characteristics of Waltham Forest's existing Council Tax Support scheme and the proposed scheme starting 1 April 2025 can be viewed in the table below.

Our existing Council Tax Support scheme from 1 April 2024 to 31 March 2025	The proposed Council Tax Support scheme from 1 April 2025 to 31 March 2026
A means-tested scheme.	An income-banded scheme.
Working-age residents are entitled to support of up to a maximum of 85% depending on a person's level of income, household composition and level	Working-age residents would continue to be entitled to support of up to a maximum of 85%, depending on a person's level of income, household composition and level of capital. The maximum level of 85% would

of capital.	<p>be limited households who satisfied the means-test and either;</p> <p>a have at least one member with limited capability to work and/or;</p> <p>b are responsible for at least one child aged five and under.</p> <p>For other eligible working-age residents, support would be given up to a maximum of 57%, also depending on the their level of income, household composition and level of capital.</p>
<p>Net earnings can be further reduced when taking into consideration the number of hours worked and household composition.</p> <p>Resident non-dependent adults are tiered within five levels for weekly contributions they're expected to make towards the Council Tax: £0.00, £6.60, £13.15, £16.59 or £20.01.</p>	<p>Resident non-dependent adults are tiered within two levels for weekly contributions they're expected to make towards Council Tax: £8.00 or £20.00.</p>
<p>A person or couple with capital more than £6,000.00 will not be eligible for a reduction.</p>	<p>A person or couple with capital of more than £6,000.00 will not be eligible for a reduction.</p>

The proposed income bands are based on net earnings and can be viewed in the table below.

Income bands (Net weekly earned income)							
Band	% Support	Single	Couple	Single, 1 Child	Couple, 1 Child	Single, 2+ Children	Couple, 2+ Children
Financially vulnerable groups	85%	£0-£120	£0-£140	£0-£140	£0-£160	£0-160	£0-£180
Band 1	57%	£0-£120	£0-£140	£0-£140	£0-£160	£0-160	£0-£180
Band 2	47%	£120-£170	£140-£190	£140-£190	£160-£210	£160-£210	£180-£230
Band 3	37%	£170-£210	£190-£230	£190-£230	£210-£250	£210-£250	£230-£270
Band 4	27%	£210-£250	£230-£270	£230-£270	£250-£290	£250-£290	£270-£310
Band 5	17%	£250-£290	£270-£310	£270-£310	£290-£330	£290-£330	£310-£350

It is proposed that the scheme be changed because the current scheme is unaffordable, particularly given the more generous scheme introduced as a temporary measure in April 2023 to offset the worst effects of the cost-of-living crisis.

In 2024-25 the predicted spend increases to - an increase of more than £3.5 million compared with 2022/23, before the scheme was changed.

Over the last two years the Council has met the increased cost of the scheme by using income collected from non-Council Tax sources to meet the funding gap. Increased financial pressures mean the Council will find it difficult to continue doing so.

The Council has carefully considered the additional costs associated with increasing the level of support beyond that which could be achieved from using only Council Tax resources, but has decided that this is not practicable.

The proposed scheme is projected to cost £18.29m representing a saving of £2.31m

Who will be affected by this proposal, policy, or project?

For example: staff, service users, or the wider community

The profile of Council Tax payers in Waltham Forest generally reflects that of 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 higher 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 will be over represented within the CTS caseload.

These proposals affect people of working age that are on low incomes within the proposed income bands shown in the table below titled Proposed Income Band Scheme – Weekly Net Earnings Bands.

Proposed Income Banded Scheme - Weekly Net Earnings Bands							
Band	% Support	Single	Couple	Single, 1 Child	Couple, 1 Child	Single, 2+ Children	Couple, 2+ Children
1	85%***	£0-£120	£0-£140	£0-£140	£0-£160	£0-£160	£0-£180
	57%						
2	47%	£120-£170	£140-£190	£140-£190	£160-£210	£160-£210	£180-£230
3	37%	£170-£210	£190-£230	£190-£230	£210-£250	£210-£250	£230-£270
4	27%	£210-£250	£230-£270	£230-£270	£250-£290	£250-£290	£270-£310
5	17%	£250-£290	£270-£310	£270-£310	£290-£330	£290-£330	£310-£350

***Only for available for households with LCW/LCWRA and/or a child aged 5 or under whose weekly net earnings fall within the relevant Band 1 thresholds

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 Government's welfare reform programme has had on this group.

Some households would see their awards change from the current scheme in 2024/25 to the proposed scheme in 2025/26. Some 35 households (0.39% of the total working-age caseload) lose age support completely under the move. Another 4,285 households (47.34% of the working- caseload) see their average award fall by more than £5 a week, while 213 households (2.35% of the working-age caseload) see their average award rise by more than £5 a week.

Households that are worse off by more than £5 a week tend to be classified as non-protected under the scheme, meaning that their maximum award has been reduced from 85% to 57%. They are mostly out of work, and have a non-dependant, so pay an increased non-dependant deduction.

Section 3: Equality analysis.

Age

Households in receipt of Council Tax Support as at 29/10/2024					
Age of Claimant	18-24	25-49	50-65	66+	All Ages
Male	109	1088	1704	2325	5226
Female	135	3073	2681	3328	9217
Total Claims	244	4161	4385	5653	14443

Will the proposed change have a differential impact [negative] on people of a specific age or age group (e.g. older or younger people)? If so, explain why this group may be affected and what mitigating actions will be taken.

The proposed changes will impact working age residents in receipt of Council Tax Support. There are currently 8,790 working age households in receipt of Council Tax Support. 35 households (0.39% of the total working-age caseload) lose support completely under the move, whilst another 4,285 households (47.34% of the working-age caseload) see their average award fall by more than £5 a week.

To mitigate against the loss of support there will be £750,000.00 in Discretionary Council Tax Support Payments available to help households most adversely impacted.

Highlight any positive benefits the proposed decision will have on people of a specific age or age group.

213 working aged households (2.35% of the working-age caseload) see their average award rise by more than £5 a week.

No changes have been made to the statutory pension aged Council Tax Support scheme, so those households within the borough will not be impacted.

Households with a child aged 5 or under will be eligible to receive up to 85% Council Tax Support provided they continue to meet other qualifying criteria.

Sex (gender)

Households in receipt of Council Tax Support as at 29/10/2024

	18-24	25-49	50-65	66+	All Ages
Male	109	1088	1704	2325	5226
Female	135	3073	2681	3328	9217
Total Claims	244	4161	4385	5653	14443

Will the proposed change to service/policy have a differential impact [negative] on people of a specific sex (e.g. women, men)? If so, explain why this group may be affected and what mitigating actions will be taken.

The proposed changes have not intended to impact one gender more than another. However, women will be more adversely impacted by the proposed changes to the Council Tax Support scheme for working aged residents because a larger cohort of those in receipt of this support are female.

We currently have 8,790 working age households in receipt of Council Tax Support, 5,889 (67%) of those are female, 2901 (33%) are male.

To mitigate against the loss of support we will be using £750,000.00 in Discretionary Council Tax Support Payments to help households most adversely impacted. We specifically plan to target support towards single parent households of which 2567 (95.5%) of the 2688 working age single parent households are female.

Highlight any positive benefits the proposal decision will have on people of a same or different sex (gender).

213 households (2.35% of the working-age caseload) see their average award rise by more than £5 a week. This is more likely to be a larger proportion of females because they constitute for a larger proportion (67%) of those in receipt of Council Tax Support.

Ethnicity and race

Council Tax Support Caseload as at 29/10/2024

	18-24	25-49	50-65	66+	All Ages
Not Specified	0	48	146	217	411
White: British	51	634	702	966	2353
White: Irish	2	25	32	50	109
White: Any Other	9	403	301	261	974
Mixed: White & Black Caribbean	17	109	43	14	183
Mixed: White & Black African	2	54	29	16	101
Mixed: White & Asian	3	24	21	5	53
Mixed: Any Other	3	77	42	18	140
Asian / Asian British: Indian	1	45	44	75	165
Asian / Asian British: Pakistani	3	308	250	256	817
Asian / Asian British: Bangladeshi	5	100	46	37	188
Asian / Asian British: Any Other	26	140	124	124	414
Black / Black British: Caribbean	25	295	238	229	787
Black / Black British: African	22	456	276	179	933

Black / Black British: Any Other	4	119	111	45	279
Chinese	0	6	10	14	30
Any Other	27	141	128	103	399
Gypsy / Traveller	1	4	2	1	8
Arab	7	71	38	9	125
Claimant Declined	18	348	190	169	725
Not set on claim	18	754	1612	2865	5249
Total Claims	244	4161	4385	5653	14443

Will the proposed change to service/policy have a differential impact [negative] on people of a certain race? If so, explain why this group may be affected and what mitigating actions will be taken.

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 35.65% of working age 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 15.78% of the working age Council Tax Support caseload.

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

Black, Black British, Caribbean or African residents account for 21% of the borough and 17.59% of working age households in receipt of Council Tax Support.

Highlight any positive benefits the proposed change will have on people of a certain race.

To mitigate against the loss of support there will be £750,000.00 in Discretionary Council Tax Support Payments available to help households most adversely impacted.

Religion or belief

The borough 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 Mosques, 4 Hindu Temples, 3 Synagogues, 1 Gurdwara and 1 Tao Temple. Note:

Will the proposed change to service/policy have a differential impact [negative] on people who follow a religion or belief, including lack of belief? If so, explain why this group may be affected and what mitigating action will be taken.

We do not currently hold any additional data at a caseload level on religion or belief, therefore we cannot accurately identify whether a specific religious group would be more likely to be adversely impacted by the proposed changes.

Highlight any positive benefits the proposed change will have on people with different religions or beliefs (including a lack of belief).

We do not currently hold any additional data at a caseload level on religion or belief, therefore we cannot accurately identify whether a specific religious group would be more likely to be favourably impacted by the proposed changes.

Disability

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).

Council Tax Support Caseload as at 29/10/2024					
	18-24	25-49	50-65	66+	All Ages
Disability Income					
Male	24	458	950	1094	2526
Female	26	1006	1573	1574	4179
Total Claims	50	1464	2523	2668	6705

Will the proposed change to service/policy have a differential impact [negative] on people with disabilities? If so, explain why this group may be affected and what mitigating action will be taken.

Our caseload data demonstrates that 4037 or 45.93% of working aged households are in receipt of a disability-related income.

Those in receipt of disability benefits will no longer be exempt from deductions from their support if they have a non-dependant adult living within their household with them. All non-dependant adults within households will be expected to contribute towards the Council Tax Bill within the proposed scheme.

Highlight any positive benefits the proposed change will have on people with a disability.

Working-age residents would be entitled to support of up to a maximum of 85%, depending on a person's level of income, household composition and level of capital and whether they fall within one of the protected groups:

- > households with limited capability to work;
- > households with children aged 5 and under.

For other eligible working-age residents, support would be given up to a maximum of 57%, also depending on the their level of income, household composition and level of capital.

The scheme is specifically designed to support those with disabilities that impact that capability to work. For example, those in receipt of Employment Support Allowance and the limited work capability component of Universal Credit.

In addition, all unearned income is disregarded in the proposed scheme which increases the amount of support residents in receipt of benefits and disability incomes will be eligible for.

Sexual orientation

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 13th highest in London and 31st 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).

Will the proposed change to service/policy have a differential impact [negative] on people with a particular sexual orientation? If so, explain why this group may be affected and what mitigating action will be taken.

We do not currently hold information at a caseload level on sexual orientation for those individuals in receipt of Council Tax Support.

Highlight any positive benefits the proposed change will have on people who identify as heterosexual, bisexual, lesbian or asexual.

We do not currently hold information at a caseload level on sexual orientation for those individuals in receipt of Council Tax Support.

Pregnancy and maternity

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 4th 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).

Will the proposed change to service/policy have a differential impact [negative] on pregnancy and maternity? If so, explain why this group may be affected and what mitigating action will be taken.

We have no local data regarding maternity and pregnancy. We do however know that there are 5,889 working age women in receipt of Council Tax Support which represents 67% of the working age caseload. 2,537 of the working age households are lone parent households and 2,652 (95.5%) are women, therefore as a group they will be more adversely impacted than any other group.

Highlight any positive benefits the proposed change will have on people who are pregnant/expecting a baby.

Households with a child aged 5 and under will be eligible to receive up to 85% support as one of our protected groups, provided they meet the remaining qualifying criteria (household composition, level of income and capital).

Gender reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

According to a [2020 landmark Employment Tribunal ruling](#), people who identify as gender fluid and non-binary or transitioning are protected under this section of the Equality Act and should therefore be considered as part of your assessment.

Will the proposed change to service/policy have a differential impact [negative] on transgender people? If so, explain why this group may be affected and what mitigating action will be taken.

We do not currently hold information at a caseload level on gender reassignment for those individuals in receipt of Council Tax Support.

Highlight any positive benefits the proposed change will have on people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex.

We do not currently hold information at a caseload level on gender reassignment for those individuals in receipt of Council Tax Support.

Marriage and civil partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the UK both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will the proposed change to service/policy have a differential impact [negative] on people in a marriage or civil partnership? If so, explain why this group may be affected and what mitigating action will be taken.

We know from our existing caseload that were 13 claims in payment from same sex couples in October 2024. It is however not been possible to determine precisely how many of these couples are married or in a civil partnership.

Current data held suggests that same sex couples are very much underrepresented in benefit claims compared to heterosexual couples.

Couples with no children will be adversely impacted by the proposed changes to the scheme with this group of households expected to see a decrease in support of 29.05%.

Highlight any positive benefits the proposed change will have on people in a marriage or civil partnership.

To mitigate against the loss of support there will be £750,000.00 in Discretionary Council Tax Support Payments available to help households most adversely impacted.

Care Leavers

Will the proposed change to service/policy have a differential impact [negative] on people who are Care Leavers? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed changes will have no impact on care leavers. Care Leavers under 25 will continue to be eligible for discretionary council tax hardship support payments to cover their full council tax up until their 25th birthday.

Highlight any positive benefits the proposal will have on people who are Care Leavers.

The proposed changes will have no impact on care leavers. Care Leavers under 25 will continue to be eligible for discretionary council tax hardship support payments to cover their full council tax up until their 25th birthday.

Other structurally disadvantaged groups

Will the proposed change to service/policy have a differential impact [negative] on other structurally disadvantaged groups?

Groups of households which include non-dependant adults will be adversely impacted by the proposed changes. All non-dependant adults residing with a working aged household will be expected to contribute towards Council Tax, so the level of support for those households will decrease.

£8 per week for those out of work and £20 per work for those that are working.

Highlight any positive benefits the proposal will have on groups experiencing structural disadvantage.

The only income taken into consideration when calculating which level of support a household will be entitled to is self-employed earnings and earned income. All other income will be disregarded, so those in receipt of benefits such as universal credit and employment support allowance will see this income disregarded and receive the maximum level of support available to them under the scheme (57% or 85%) as a result.

Section 4: Monitoring and reviewing

The effects of the proposal have been monitored and reviewed by acquiring modelled schemes from Policy in Practice. Reports have been provided detailing the groups that will be most adversely impacted. To reduce the potential impact on affected residents if the proposals are adopted, the findings from the consultation will be used to inform how discretionary hardship funds are used to target those in need, as well as how we help residents through advice and guidance to maximise their income.

The Acting Head of Benefits – Eamonn Hennessy, will be responsible for assessing the effects and mitigating the impact.

Section 5: Conclusion

Set out your conclusions from the analysis of the proposal or policy.

This analysis has identified that couples without children and women, particularly those of lone parent households will be most likely to be adversely impacted by the proposed changes.

This means that those in receipt of support from April 2025 would continue to be required to pay at least 15% of their eligible Council Tax themselves, which is the same as the current requirement. However, only eligible protected groups can potentially receive this level of support. Thereafter, for other eligible working-age residents, support would be given up to a maximum of 57%, also depending on their level of earned or self-employed income, household composition and level of capital.

The Council will also keep this Equality Impact Analysis under review 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 authority will continue to conduct more detailed analysis of households' ability to meet these liabilities based on the administrative data the Council has access to using platforms and methodologies for reliable analysis. We will monitor equality data to identify any disproportionate impact on affected groups.

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

Outcome of Equality Impact Assessment *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 would 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.

Section 6: Signatures

Signed off by Corporate Director for the proposal or policy/project:

Name:

Click here to enter text.

Date:

Click here to enter text.

Section 7: Version control

Status	Version	Author	Date	Changes made
Draft	1.1	Eamonn Hennessy	14-10-2024	
Second Draft	1.2	Eamonn Hennessy	25.11.2024	Template explanation included

