

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. EqlAs 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 EqlAs produced after the decision is made but sometimes a “provisional” EqlA 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: EqlAs 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.

Equality Impact Assessment (EqIA)

Section 1: About the proposal, policy or project

Name of proposal, policy, or project:
Adult Services non-residential care charging policy
Name of lead officer and contact details:
Jenni McCarthy
Name of service and directorate for this proposal, policy, or project:
Adults services
Strategic Director responsible for this proposal, policy, or project:
Marc Gadsby
Date the EqIA was started:
11 August 2025
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
Give brief details of:
▪ What the proposed decision or change is. ▪ The reasons for this decision or change. ▪ The outcomes you are hoping to achieve.
Following a 12 week public consultation, the proposal is to proceed with a phased reduction of the discretionary uplift to the Minimum Income Guarantee (MIG), decreasing from 25% to zero over the next two years
From 25% to 10% in 2025/26
From 10% to 0% in 2026/27
The Cabinet report provides the outcomes of the public consultation on the proposed phased reduction of the discretionary support.
Who will be affected by this proposal, policy, or project?
For example: staff, service users, or the wider community
The proposal will impact adults across all age groups particularly older adults and younger adults with a disability who are in receipt of non-residential care arranged by Waltham Forest and are subject to a financial assessment to determine their ability to contribute towards the cost of their care. If implemented, the proposal

will take a greater proportion of an individual's disposable income into account during the financial assessment. For some service users, this could result in an increased contribution towards the cost of their care, or, in some cases, the introduction of a contribution for the first time. The changes will affect individuals from all age groups, including older adults, young adults, and those with disabilities or long-term conditions, with those already facing financial challenges potentially experiencing a greater burden

Section 3: Equality analysis

This section asks you to consider the potential impact (both positive and negative) of the proposed proposal, policy or project on the protected characteristics and the mitigations that will be taken to avoid or counteract any negative impact identified. If no negative impact(s) has been identified for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one or more of the following protected characteristics. Think about what action(s) you can take to address their specific needs. In addition, you may wish to consider the short-, medium- and longer-term implications, intersectionality between the different characteristics, as well as mitigations that may be required.

Age

This can refer to people who have, for example, a specific age, or who are in a specific age range.

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 phased reduction to the discretionary uplift applied to the MIG is likely to have an impact on all people across all age groups due to the varying proportion of residents accessing non-residential care in Waltham Forest.

Older adults despite being the smallest group in the borough's population (11% 2021 GLA) account for 48% of the service users, making them particularly affected by the proposed change. Similarly Young adults who account for a smaller representation of service users 6%, are also likely to experience an impact. This is due to a higher likelihood of having lower incomes, and some within this group may have disabilities or long-term conditions who are heavily dependent on social care.

Additionally, 42% of young adults receiving care are disabled, which increases their vulnerability. The combination of lower incomes and a higher prevalence of disabilities places this group at a differential impact, potentially leading to adverse impacts when contributing toward the cost of their care. These young adults may face greater financial challenges, especially when contributing toward the cost of their care, which could lead to disproportionate financial strain, increased reliance on support, and difficulty accessing essential services.

According to *A Fairer and Healthier Waltham Forest* (2022), older people are more likely to be income deprived, with over 30% of older people living in poverty, a rate higher than the English average. This highlights the financial vulnerabilities that both older adults and young adults with disabilities face, and the need for targeted support to mitigate the effects of the proposed changes.

Mitigating actions to be taken

Mitigation measures such as income maximisation support and targeted financial assistance will enable individuals to identify and claim benefits or financial resources they may not have accessed previously. This approach not only reduces the immediate financial strain but could leave some service users in a better financial position than before the proposed change.

In direct response to the consultation and the anticipated impact on vulnerable groups, the Council will utilise the existing Local Welfare Assistance Scheme to provide financial support to residents experiencing financial hardship as a result of the phased reduction in the Minimum Income Guarantee uplift. While the fund is open to all, targeted measures will be used to identify and support residents most at risk through proactive outreach and benefits maximisation initiatives.

Gradually aligning the discretionary uplift with national standards will ensure that adult social care services are placed on a firm financial footing, in line with the goals of Mission Waltham Forest. This will support the long-term sustainability of key services, ensuring they are able to meet growing demand and support investment in essential services. By doing so, the proposal secures a continuation of vital support for those who need them most, including older adults and young adults with disabilities.

Consultation Feedback

During the 12-week public consultation, 25% of respondents identified as working-age adults and 24% as older adults aged 65 and over. This reinforces the relevance of the proposed changes to both age groups and supports the need for targeted mitigations, particularly for those with lower incomes or higher care needs

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

This proposal is not likely to bring any specific positive benefits for people of different age groups.

Sex (gender)

Sex refers to whether you are a man or a woman.

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.

Consultation Feedback

Responses support the service level data, 54% if respondent identifying as female, consistent with the proportion of service users. This reinforces the likelihood of a differential impact on women, particularly older women, who may face greater financial vulnerability. The consultation responses also highlighted 35% identified as male and 11% prefer not to say.

Mitigating actions to be taken

To mitigate the negative impact, measures such as income maximisation support and targeted financial assistance will be implemented to help individuals identify and claim benefits or financial resources they may

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not have accessed previously. This will include utilising the Local Welfare Assistance scheme, aimed at alleviating severe financial hardship or sudden income gaps.

Targeted outreach using the LIFT platform will help identify women most at risk, ensuring they are proactively offered support. Community drop-ins and inclusive communication formats will further ensure that women facing digital exclusion or accessibility barriers can access the help they need.

While the data indicates that women, particularly older women, are more likely to experience an adverse impact, proactive monitoring will be used to track any unintended impacts on men, as well as to assess intersectional impacts (e.g., age, disability, or caregiving roles). The Council will also take a targeted and proactive approach to engagement and support, ensuring those most at risk are identified early and offered appropriate assistance.

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

This proposal is not likely to bring any specific positive benefits for people of a same or different sex (gender).

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Ethnicity and race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

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.

While no disproportionate negative impact is likely for residents from a specific race or ethnic background the Council will continue to monitor the policy's implementation to ensure that this remains the case. Proactive measures, such as clear communication in accessible formats and inclusive public consultation, will be used to ensure transparency and equity for all racial and ethnic groups.

Borough Context

according to the Population data shows that White residents make up 53% of the borough, followed by Asian/Asian British at 20%, and Black/Black British at 15%. This provides a useful baseline for understanding the borough's ethnic composition

Consultation Feedback

Of those who responded to the public consultation, 45% identified as White, 25% as Asian/Asian British and 19% as Black/Black British. This suggests that the consultation reached a good cross section of the borough's ethnic communities.

Mitigating actions to be taken

While no disproportionate negative impact is likely for residents from any one specific race or ethnicity, the Council will continue to monitor the policy's implementation to ensure that this remains the case. Proactive measures, such as clear communication in accessible formats and inclusive engagement and ongoing monitoring will be used to promote transparency and equity for all racial and ethnic groups.

Highlight any positive benefits the proposed change will have on people of a certain race. This proposal is not likely to bring any specific positive benefits for people of different ethnic or racial backgrounds.
Religion or belief
Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism) and includes lack of belief (e.g. Atheism). Belief includes any religious and philosophical belief including lack of belief (e.g. Atheism).
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. Religion and religious beliefs are not likely to be disproportionately negatively impacted, as the Minimum Guarantee will be applied equally across residents receiving care from all religious groups. Mitigating actions to be taken While no disproportionate negative impact is likely for individuals based on their religion and religious beliefs, the Council will continue to monitor the policy's implementation to ensure that this remains the case. Proactive measures, such as clear communication in accessible formats and inclusive engagement and ongoing monitoring will be used to promote transparency and equity for all groups.
Highlight any positive benefits the proposed change will have on people with different religions or beliefs (including a lack of belief). This proposal is not likely to bring any specific positive benefits for people of different religions or beliefs.
Disability
A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities. This could include physical impairment, hearing impairment, visual impairment, learning difficulties, long-term illness or health condition, mental illness, or other impairments.
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. Census 2021 data indicates that 13.2% of residents in Waltham Forest are classed as disabled under the equalities Act. Additionally, 4.4% of the borough's residents reported bad or very bad health in the Census, which is higher than both the London and national averages. This suggests that a significant portion of the population may face increased financial challenges due to the proposed policy changes. Individuals with learning disabilities, who make up 21% of service users, may experience a greater impact. Learning disabilities are often associated with lower income levels and a higher reliance on social care services. As these individuals may find it more difficult to manage financial changes, the reduction in MIG could lead to additional financial pressures.

Similarly, individuals with mental health conditions, who represent 11% of service users in Waltham Forest, could also be affected. With only 4% of adults in receipt of secondary mental health services employed in the borough (State of the Borough) , many individuals with mental health conditions face lower income and financial difficulties. The reduction in MIG may make it more challenging for them to meet the costs of their care.

Additionally, young adults represent a large portion of service users with disabilities, and 38% of young adults receiving care are disabled. This group may face compounded challenges as they are more likely to have lower incomes, lower benefits, and lower MIG entitlements. As a result, young adults with disabilities may experience greater financial strain and difficulty in meeting care costs, which could negatively impact their ability to access essential services.

Overall, the changes to the MIG are likely to have a disproportionate impact on individuals with disabilities, learning disabilities, and mental health conditions, who already face significant financial challenges. While the changes may not directly worsen their situation, they could add further strain to their ability to access and afford essential care services.

Consultation Feedback:

- 68% of respondents reported having a long-term condition or illness, with 56% saying it significantly reduces their ability to carry out daily activities.
- Conditions reported include:
 - 67% mobility or physical disability
 - 25% learning disability or difficulty
 - 29% mental health condition
 - 41% chronic illness
 - 21% neurodivergence, with 63% identifying autism, and others reporting ADHD, dyslexia, or other conditions.

This feedback reinforces the concern that individuals with disabilities—particularly those with learning disabilities, mental health conditions, and neurodivergent profiles—may be disproportionately impacted by the reduction in the MIG uplift. These groups are more likely to experience financial strain and difficulty managing care costs.

Mitigating actions to be taken

Mitigating measures such as income maximisation support and targeted financial assistance will be in place to help individuals with disabilities, learning disabilities, and mental health conditions access any benefits or financial resources they may not have previously claimed. These measures aim to reduce immediate financial strain, ensuring that vulnerable groups continue to receive the support they need to manage the changes to the Minimum Income Guarantee (MIG).

This will include utilising the existing Local Welfare Assistance Scheme, which is designed to support residents facing severe financial crisis or sudden income gaps. fund will be targeted at individuals who are unable to manage the increased contributions due to significant financial vulnerability. It will not be applied where individuals are affected but can reasonably meet the payments.

Clear communication, including Easy Read formats and accessible language, will be used to ensure all individuals particularly those with disabilities, learning disabilities, and mental health conditions fully understand the changes and their options for support. Community groups will be engaged to help disseminate information and provide guidance to those who may have difficulty accessing services independently.

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

This proposal is not likely to bring any specific positive benefits for people with disabilities.

Sexual orientation

This refers to whether a person is attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, or asexual.

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 hold no specific service level data regarding Sexual Orientation of individuals in receipt of non-residential care. However, Census 2021 data indicates 86% of Waltham Forest residents identified as straight or heterosexual, while 2.3% identified as gay or lesbian.

Consultation feedback showed that:

- 74% of respondents identified as Straight/Heterosexual
- 3% as Gay or Lesbian
- 22% prefer not to say

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While there is currently no evidence to suggest that the proposed changes to the Minimum Income Guarantee will have a disproportionately negative impact based on sexual orientation, the Council recognises the importance of inclusive policy design and monitoring.

Mitigating actions to be taken

While no disproportionately negative impact is likely for individuals based on sexual orientation, the Council will continue to monitor the implementation of the policy to ensure that this remains the case. Inclusive communication will be used to ensure all residents understand the changes and available support.

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

This proposal is not likely to bring any specific positive benefits for people of different sexual orientations.

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection

against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

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 hold no specific data regarding pregnancy and maternity status of individuals supported by adult social care. Additionally, there is no evidence to suggest that this group will be negatively impacted by the proposed changes to the Minimum Income Guarantee.

Mitigating actions to be taken

While no disproportionately negative impact is likely for individuals based on pregnancy or maternity status, the Council will continue to monitor the policy's implementation to ensure that this remains the case. Proactive measures, including clear communication in accessible formats and inclusive public consultation, will be undertaken to promote transparency and equity for all residents.

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

This proposal is not likely to bring any specific positive benefits for people who are pregnant or on maternity leave

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 hold no specific data regarding Gender reassignment of individuals supported by Adult Social Care. However, during the consultation:

- 88% of respondents stated they identified with the same sex as registered at birth.
- 1% identified differently, and
- 11% preferred not to say.

While there is currently no evidence to suggest a differential impact on individuals based on gender reassignment, the Council recognises the importance of inclusive policy design and monitoring.

Mitigating actions to be taken

While no disproportionately negative impact is likely for individuals based on their gender reassignment, the Council will continue to monitor the policy's implementation to ensure that this remains the case. Proactive measures, such as clear communication in accessible formats and inclusive engagement, will be used to promote transparency and equity for all residents, including trans and non-binary individuals.

Although only 1% of consultation respondents identified differently from the sex registered at birth and 11% preferred not to say, this highlights the importance of ensuring that all communications and support mechanisms are respectful of diverse gender identities. The Council will continue to work with community organisations to ensure that individuals who may not be visible in service-level data are still reached and supported.

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.

This proposal is not likely to bring any specific positive benefits for people who are proposing to undergo, are undergoing, or have undergone gender reassignment.

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.

Based on the available data, no disproportionate adverse impact is anticipated for individuals based on their marital or civil partnership status. The data indicates that 35% of service users have an unknown marital status, which limits the ability to fully assess the impact of the proposed changes. However, the MIG will continue to be applied equally across all individuals receiving non-residential care regardless of their relationship status.

Mitigating actions to be taken

To ensure no unintended effects, monitoring of the policy's implementation will take place. The public consultation has already provided an opportunity to identify any unforeseen impacts, particularly for those who are married, divorced or widowed.

The Council will continue to review feedback and data to ensure no group is disproportionately affected and that any emerging issues are addressed through appropriate support or adjustments.

Highlight any positive benefits the proposed change will have on people in a marriage or civil partnership. This proposal is not likely to bring any specific positive benefits for people who are married or in civil partnerships.

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.

According to the Department for Education (DfE), there were approximately 43,500 care leavers aged 17–21 in England as of 2023. National data shows that around 39% of care leavers are NEET (Not in Education, Employment, or Training), which is closely linked to financial vulnerability. Research from the Social Care Institute for Excellence (SCIE) highlights that care leavers often lack informal support systems—such as family guidance and community ties—that their non-care-experienced peers rely on. Many care leavers experience multiple, intersecting needs, including financial hardship, mental health challenges, and social isolation. These compounded disadvantages may make it more difficult for care-experienced individuals to manage changes to the Minimum Income Guarantee (MIG), particularly if they are living independently or navigating complex systems without support.

Consultation Feedback:

- 10% of respondents identified as care leavers.
- 83% said they were not, and 7% preferred not to say.

This suggests that care-experienced individuals were represented in the consultation and are likely to be among those most affected by the proposed changes.

Mitigating actions to be taken

Mitigating measures such as income maximisation support and targeted financial assistance will be in place to help care-experienced individuals access any benefits or financial resources they may not have previously claimed. In collaboration with Leaving Care Coaches, tailored support will be offered to address intersecting needs and reduce immediate financial strain.

These measures aim to ensure that care leavers continue to receive the support they need to manage the changes to the MIG. The Council will also continue to monitor the impact of the policy on care-experienced residents and work with relevant services to identify and respond to any emerging issues.

Highlight any positive benefits the proposal will have on people who are Care Leavers.
This proposal is not likely to bring any specific positive benefits for care leavers.

Other structurally disadvantaged groups

The [State of the Borough report](#) identifies a number of groups that might suffer from structural disadvantage in Waltham Forest. These groups should also be taken in account when assessing proposal or policies and include:

- People experiencing socio-economic inequality or geographic deprivation
- 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

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

While the means-tested nature of financial assessments for care contributions ensures that those with the lowest incomes will not be directly affected by the proposed changes to the Minimum Income Guarantee (MIG), individuals with moderate incomes, particularly carers, migrants, and those living in areas of socio-economic deprivation, may experience a differential impact. These groups may feel the financial strain of increased care contributions, especially if they fall just above the threshold.

The State of the Borough Report highlights that Waltham Forest has significant levels of deprivation, with many residents facing challenges related to low income, unemployment, and poor health outcomes. These structural inequalities often intersect with other characteristics such as age, disability, and ethnicity, compounding disadvantage.

Consultation Feedback:

- 21% of respondents were retired and living on the state pension only.
- 16% were unemployed or not working due to long-term sickness.
- 31% were unable to work due to long-term illness or disability.
- 50% reported a very negative impact from the proposed changes.

This data suggests that a significant proportion of respondents may be experiencing economic vulnerability, which may be exacerbated by the proposed policy change.

While the MIG is means-tested and protects those with the lowest incomes, the consultation responses suggest that a significant proportion of respondents may be living on fixed or limited incomes, such as state pensions or benefits. For individuals who fall just above the threshold, or who face complex financial pressures, the proposed changes may still result in noticeable strain. This highlights the importance of monitoring intersectional impacts, particularly where socio-economic status overlaps with other vulnerabilities such as disability, age, or caring responsibilities.

Mitigating actions to be taken

While the policy is means-tested and protects those with the lowest incomes, mitigating measures will be essential to support individuals who may still experience financial strain—particularly those with moderate incomes, caring responsibilities, or living in socio-economically disadvantaged areas.

The following actions will be taken:

- **Income maximisation support:** Residents will be supported to identify and claim benefits or financial resources they may not currently be accessing. This includes proactive outreach via the LIFT platform and support through Opportunity Max.
- **Targeted financial assistance:** The Council will utilise the Local Welfare Assistance (LWA) scheme to provide discretionary support for residents experiencing exceptional financial difficulty due to the reduction in the Minimum Income Guarantee uplift. An additional £150,000 will be allocated to meet potential increased demand during the two-year transition period.
- **Inclusive communication and engagement:** Accessible formats and tailored messaging, to help reach residents understand the changes and know how to access support. Weekly community drop-in sessions will offer face-to-face help with form filling, navigating online services, and accessing financial advice.

- Community outreach: Engagement with local organisations and community groups to reach structurally disadvantaged residents who may not be visible in service-level data including those affected by digital exclusion or language barriers.
- Ongoing monitoring: The council will monitor the of the policy's implementation to identify and respond to intersectional impacts, particularly where socio-economic status overlaps with other vulnerabilities such as disability, age, or caring roles.

These measures aim to ensure that no group is disproportionately impacted and that support is available for those who may be indirectly affected by the proposed changes

Highlight any positive benefits the proposal will have on groups experiencing structural disadvantage. This proposal is not likely to bring any specific positive benefits for groups experiencing structural disadvantage.

Section 4: Monitoring and reviewing

Use this section to say:

- How you intend to monitor and review the effects of this proposal or policy
- Who will be responsible for assessing its effects

The impact of the proposal will be monitored and reviewed through performance and demographic data, with a focus on assessing its effects across different groups. Financial outcomes will be continuously tracked to ensure the policy remains aligned with the Council's financial sustainability goals while meeting the needs of service users.

Monitoring will include:

- Uptake of mitigation measures such as income maximisation support and hardship fund applications.
- Feedback from service users and frontline staff.
- Analysis of demographic trends and any emerging patterns of disadvantage.

These efforts will be integrated into the service's regular operations

Section 5: Conclusion

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

If there are negative equalities impacts, but you think that the proposal or policies should still proceed in the current or amended form, please provide evidence and an objective explanation as appropriate.

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

This analysis has concluded that the proposed changes to the Minimum Income Guarantee (MIG) are likely to have a direct impact on individuals across the protected characteristics of age, disability and sex.

Older adults, who represent a significant proportion of service users and are more likely to experience income deprivation, may face financial strain.

Individuals with disabilities, including those with learning disabilities or mental health conditions are disproportionately represented among service users and may encounter additional challenges in managing increased care contributions.

Women particularly older women who are overrepresented among service users may also experience a differential impact due to higher likelihood of lower incomes and caregiving responsibilities.

While the policy is means tested and those with the lowest incomes are protected, individuals with moderate incomes or complex financial circumstance including carers, migrants and those living in areas of social economic deprivation may still experience financial pressure.

Mitigation measures including income maximisation support, targeted financial assistance, The Local Welfare Assistance scheme and enhanced communication will be critical to addressing these impacts and ensuring equitable access to care services for all affected groups. Regular monitoring will help identify any unforeseen impacts and appropriate adjustments are made.

The findings of this have been informed by the completed public consultation and the analysis will be revisited as part of the implementation phase to ensure that all feedback has been fully considered and that any necessary revisions to the proposal or additional mitigation measures can be implemented.

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. ☐

Commented [CJ4]: Which outcome will you select? I think it needs to be 3.

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
e.g. Draft	e.g. 1.1	e.g. John Stubbs		

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