

## Equality Impact Assessment (EIA) Tool:

|  |   |
|--|---|
| <b>Title of proposal</b>   | Council Tax Support Scheme (CTSS) Proposed 2025/ 2026 Scheme<br><br>Post-consultation |
| <b>Name of division/service</b>  | Finance   |
| <b>Name of lead officer completing this assessment</b>   | ██████████ Principal Policy Officer   |
| <b>Date EIA assessment commenced</b>   | 1 May 2024  |
| <b>Date EIA assessment completed (<i>prior to decision being taken as the EIA may still be reviewed following a decision to monitor any changes</i>)</b> | 16 December 2024  |
| <b>Decision maker</b>  | Amy Oliver  |
| <b>Date decision taken</b>   | 16 January 2025   |

| <b>EIA sign off on completion:</b>             | <b>Signature</b> | <b>Date</b>      |
|--|------------------|------------------|
| <b>Lead officer</b>                            | ██████████       | 16 December 2024 |
| <b>Equalities officer (has been consulted)</b> | ██████████       | 18 December 2024 |
| <b>Divisional director</b>                     | Amy Oliver       | 6 January 2025   |

## Please ensure the following:

- a) That the document is **understandable to a reader who has not read any other documents** and explains (on its own) how the Public Sector Equality Duty is met. This does not need to be lengthy but must be complete and based in evidence.
- b) That available support information and data is identified and where it can be found. Also be clear about highlighting gaps in existing data or evidence that you hold, and how you have sought to address these knowledge gaps.
- c) That the equality impacts are capable of aggregation with those of other EIAs to identify the cumulative impact of all service changes made by the council on different groups of people.
- d) That the equality impact assessment is started at an early stage in the decision-making process, so that it can be used to inform the consultation, engagement and the decision. It should not be a tick-box exercise. Equality impact assessment is an iterative process that should be revisited throughout the decision-making process. It can be used to assess several different options.
- e) Decision makers must be aware of their duty to pay 'due regard' to the Public Sector Equality Duty (see below) and 'due regard' must be paid before and at the time a decision is taken. Please see the Brown Principles on the equality intranet pages, for information on how to undertake a lawful decision-making process, from an equalities perspective. Please append the draft EIA and the final EIA to papers for decision makers (including leadership team meetings, lead member briefings, scrutiny meetings and executive meetings) and draw out the key points for their consideration. The Equalities Team provide equalities comments on reports.

## 1. Setting the context

Describe the proposal, the reasons it is being made, and the intended change or outcome. Will the needs of those who are currently using the service continue to be met?

Local Council Tax Support was introduced in April 2013 to replace the national Council Tax Benefit scheme which was fully funded by Central Government.

Council Tax Support basically consists of two schemes, the scheme for Pension Age applicants and the scheme for Working Age applicants. The Pension Age Scheme is prescribed by Government and allows support of up to 100% of an applicant's Council Tax subject to their income and circumstance. The Council does not have powers to make any amendments to that scheme.

In the case of working age applicants, each Council is obliged to establish a scheme.

When Council Tax Support was introduced, funding available from Government was reduced which meant the majority of Councils had to adopt working age schemes that provided less support to taxpayers than the previous Council Tax Benefit.

In the case of the City Council, the scheme was based on the previous Council Tax Benefit approach but required a minimum payment of 20% of Council Tax liability from all working-age households. Since its introduction in 2013, the scheme has remained broadly unchanged.

The current scheme was not designed to deal with the implementation of Universal Credit (which will be fully rolled out across the Council areas by 2025). It is also complex and administratively inefficient leading to significant additional staffing resource.

Additionally, the Council is seeking to make savings in the cost of the scheme due to current financial constraints. The cost of the scheme is borne by the Council and the major precepting authorities (Police & Fire & Rescue) and is estimated to be £26.6m in 2024/25. The working-age scheme currently costs £14.9m and can be amended by full Council only following a public consultation.

In order to address both the financial and administrative issues, we are proposing a simplified 'banded' working age scheme. Following public consultation, the proposal was amended to protect households with up to three children, and to introduce an extra band reducing by 20% as opposed by 25%. This meant that non-protected households could continue to receive up to 80% support (as opposed to 75%), and protected households (the severely disabled and those with caring responsibilities) could receive up to 100% support.

On average, CTS households will see an average reduction in support of £86.76 per year, equivalent to £1.67 per week.

The Council recognises that this is a significant change in both approach and the level of support.

Financial modelling has been undertaken (and will continue to be undertaken throughout the project and the figures initially indicate:

- 6,400 households would be better off;
- 6,100 would be worse off, including 1,000 households who would cease to receive Council Tax Support (typically as a result of excess earnings and who currently receiving partial rather than full support);
- Households better off (as a result of the protection) would benefit by an average of £206 per household per annum, or £3.96 per week.
- Households worse off would lose an average of £472 per household per annum, or £9.08 per week.

In order to mitigate the effects on households who will be worse off under the new scheme, the Council maintains a Council Tax Discretionary Relief (CTDR) provision which allows applicants to apply for additional support where they are facing exceptional hardship.

Part of the proposed changes would be to increase the level of CTDR funding available by £250,000 for 2 years.

## 2. Equality implications/obligations

Which aims of the Public Sector Equality Duty (PSED) are likely be relevant to the proposal? In this question, consider both the current service and the proposed changes.

### a. Eliminate unlawful discrimination, harassment and victimisation

- How does the proposal/service aim to remove barriers or disproportionate impacts for anyone with a particular protected characteristics compared with someone who does not share the same protected characteristics?
- Is this a relevant consideration? What issues could arise?

Ensuring that there are no barriers for those with protected characteristics is a key aim for the Council.

Where working age applicants fall within a “protected group”, support will be available up to 100% (subject to their income) – for this purpose, protected groups are defined as those which include households with a disabled child, receiving Carer’s Allowance or the Carers element of Universal Credit, receiving income-related Employment & Support Allowance, contribution-based Employment & Support Allowance with a Support Component, or a Limited Capability for Work or Work Related Activity elements of Universal Credit, and receiving the middle- or higher-rate of Disability Living or the higher rate of Personal Independence Payments

In addition, Housing Benefit, The Housing Element of Universal Credit and Child Benefit will be disregarded as an income.

For households with more than one member receiving disability benefits, we will only take into account the disability-related income of one, and disregard the remainder – either through CTSS itself or through annual use of CTDR.

The new banded scheme makes provisions for household size and in particular, where any household has dependent children / young persons the proposed scheme allows for additional levels of weekly income before calculating the level of support to be granted. Following consultation, an additional mitigation has been introduced to increase income thresholds for households with three or more children, from allowances up to two children under the scheme first proposed. The current CTS scheme is subject to a ‘two child cap’ on income allowances, but only in respect of third or subsequent children born after May 2017.

It should also be noted that the current non dependant charges, which vary depending on the non-dependant's circumstances, are replaced by a standard weekly deduction of £20 for each non-dependant irrespective of their income / earnings levels. The protections relating to those deductions will be maintained such as where the applicant or partner or the non-dependant is disabled, no deduction will be made.

It is clear that some households will be worse off although this will be ameliorated by the availability of CTDR, and we are requesting a 50% uplift in fund value to mitigate impacts.

Adopting a group as "protected" means that the client group would be protected (fully or partially) from the impact of the reduction in the level of the support from the scheme.

It is proposed that there is an increase in the amount of Discretionary Relief (CTDR) available from £500,000 to £750,000 per year.

### **b. Advance equality of opportunity between different groups**

- Does the proposal/service advance equality of opportunity for people?
- Identify inequalities faced by those with specific protected characteristic(s).
- Is this a relevant consideration? What issues could arise?

The Council seeks to ensure that it meets its duty to promote equality and ensure opportunity under the Equality Act 2010.

In addition, Government has ensured that pension age applicants are protected under the prescribed requirements regulations.

The main inequality is faced by working age claimants (who are not deemed to fall within the protected group) who will face the majority of savings made under the scheme.

With regard to enforcement measures in council tax recovery, previous studies have found that women, those with disabilities and people with responsibility for young children may be disproportionately affected. This is due to the fact that the claims population has higher numbers of people within it who face the greatest barriers to work.

Notwithstanding the protections previously stated, some vulnerable groups may face inequalities and these include those with:

- disabilities who could be negatively impacted overall by the reduction measures (5-6%, although 19% of the caseload are positively impacted through receipt of disability benefits);
- dependent children under 5 (13%); and
- other groups including care leavers, foster carers etc. (2%).

The Council's analysis does not suggest that the changes within the Council Tax Support Scheme have or will continue to impact upon any group for whom the Council has a statutory duty under the Equality Act disproportionately, other than the natural distribution of those groups within the existing claims caseload.

### **c. Foster good relations between different groups**

- Does the service contribute to good relations or to broader community cohesion objectives?

- How does it achieve this aim?
- Is this a relevant consideration? What issues could arise?

The Council will look to mobilise significant assistance to all applicants with the introduction of the new scheme including:

- community engagement across faith and community groups;
- local charities;
- schools;
- adult and children's social care (including Early Help);
- the persons from abroad team; and
- local councillors and MPs.

The Council will look to ensure that support is integrated and widespread. It will be essential that assistance is offered to all households (especially the most vulnerable) who apply for Council Tax Support. National data indicates that 1 in 10 eligible working-age households and 2 in 10 eligible pension-age households do not apply for Council Tax Support

### 3. Who is affected?

Outline who could be affected, and how they could be affected by the proposal/service change. Include people who currently use the service and those who could benefit from, but do not currently access the service. Where possible include data to support this.

All existing working age applicants for Council Tax Support could be affected by the change. This could be both positive (if they are within a protected group with support available up to 100%) or negatively due to the reduction in the overall funding available and the reduction in the maximum level of support from 80% to 75%.

Pension age applicants will **not** be affected.

### 4. Information used to inform the equality impact assessment

- What **data, research, or trend analysis** have you used?
- Describe how you have got your information and what it tells you

- Are there any gaps or limitations in the information you currently hold, and how you have sought to address this? E.g. proxy data, national trends, equality monitoring etc.

Specialist software has been utilized to model the existing CTS caseload based on the anticipated changes in order to predict with as high a degree of accuracy as possible the impact on individual groups.

Data has been analysed based on the 24/25 caseload. The data addressed changes for vulnerable groups and those with protected characteristics under the Equality Act such as disability, gender, race etc. The most significant losses were experienced by households with two or more children, both couples and lone parents. The scheme intention is that additional support would instead be offered on a case-by-case basis through the expanded Council Tax Discretionary Relief Scheme.

|                                     | Annual<br>before | Annual<br>after | % loss        |
|-------------------------------------|------------------|-----------------|---------------|
| Single person                       | 920.25           | 875.23          | <b>4.89%</b>  |
| Couple no children                  | 1075.57          | 760.64          | <b>29.28%</b> |
| Lone parent one child               | 846.53           | 688.89          | <b>18.62%</b> |
| Lone parent two or more<br>children | 829.14           | 527.73          | <b>36.35%</b> |
| Couple one child                    | 846.59           | 556.23          | <b>34.30%</b> |
| Couple two or more children         | 627.44           | 278.19          | <b>55.66%</b> |

The main gaps in information relate to ethnic groups affected as we do not know the ethnicity of 54% of CTS claimants. We will seek to improve data collection regarding this over time through online applications and reported changes. However, there is an indirect impact on race, because we know that non-white households are larger on average, and large households are slightly worse off under the proposals relative to smaller households.

|              | Average<br>award before<br>Change | Average<br>award after<br>Change | % loss        |
|--------------|-----------------------------------|----------------------------------|---------------|
| Ethnicity    |                                   |                                  |               |
| Asian        | 776.28                            | 587.34                           | <b>24.34%</b> |
| Black        | 799.61                            | 621.72                           | <b>22.25%</b> |
| White        | 908.67                            | 761.28                           | <b>16.22%</b> |
| Other        | 812.24                            | 630.27                           | <b>22.40%</b> |
| Not recorded | 852.27                            | 653.9                            | <b>23.28%</b> |

National datasets were used for comparative purposes, for example national datasets by the Ministry of Housing and Local Government. Other councils were used as case studies.

## **5. Consultation**

Have you undertaken consultation about the proposal with people who use the service or people affected, people who may potentially use the service and other stakeholders? What did they say about:

- What is important to them regarding the current service?
- How does (or could) the service meet their needs? How will they be affected by the proposal? What potential impacts did they identify because of their protected characteristic(s)?
- Did they identify any potential barriers they may face in accessing services/other opportunities that meet their needs?

The legislation (Local Government Finance Act 1992 (as amended)) requires the Council to consult with the both the major precepting authorities (the Police & Crime Commissioner for Leicester and the Combined Fire and Rescue Service) and the public. The precepting authorities were contacted to consult on 3 September 2024 (The Fire Service wrote in support), and a six-week public consultation was conducted between 30 September and 10 November 2024. 280 responses were received, of which 268 were potentially affected persons. Demographic data suggests a broad similarity to the characteristics of the general public in the city, with a slight bias towards those aged over 40 years of age, and females were more likely to respond than males. Broad support was expressed for all of the proposals made, 71% overall and 88% in respect of the additional scheme to support vulnerable households.



## 6. Potential Equality Impact

Based on your understanding of the service area, any specific evidence you may have on people who use the service and those who could potentially use the service and the findings of any consultation you have undertaken, use the table below to explain which individuals or community groups are likely to be affected by the proposal because of their protected characteristic(s). Describe what the impact is likely to be, how significant that impact is for individual or group well-being, and what mitigating actions can be taken to reduce or remove negative impacts. This could include indirect impacts, as well as direct impacts.

Looking at potential impacts from a different perspective, this section also asks you to consider whether any other particular groups, especially vulnerable groups, are likely to be affected by the proposal. List the relevant groups that may be affected, along with the likely impact, potential risks and mitigating actions that would reduce or remove any negative impacts. These groups do not have to be defined by their protected characteristic(s).

### Protected characteristics

#### Impact of proposal:

Describe the likely impact of the proposal on people because of their protected characteristic and how they may be affected. Why is this protected characteristic relevant to the proposal? How does the protected characteristic determine/shape the potential impact of the proposal? This may also include **positive impacts** which support the aims of the Public Sector Equality Duty to advance equality of opportunity and foster good relations.

#### Risk of disproportionate negative impact:

How likely is it that people with this protected characteristic will be disproportionately negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

#### Mitigating actions:

For disproportionate negative impacts on protected characteristic/s, what mitigating actions can be taken to reduce or remove the impact? You may also wish to include actions which support the positive aims of the Public Sector Equality Duty to advance equality of opportunity and to foster good relations. All actions identified here should also be included in the action plan at the end of this EIA.

### **a) Age**

Indicate which age group/s is/ are most affected, either specify general age group (children, young people, working aged people or older people) or specific age bands.

#### **What is the impact of the proposal on age?**

The government have legislated that support for pension age applicants is calculated in accordance with the Prescribed Requirement Regulation. They will be protected from the proposed changes.

For information, the number of pensioner age applicants has fallen from 15,000 to 10,500 in the last ten years.

Working age households will have to bear the impact of any reduction in support.

#### **What is the risk of disproportionate negative impact on age?**

N/A

#### **What are the mitigating actions?**

All working age applicants who suffer exceptional financial hardship will have access to the Council Tax Discretionary Relief scheme.

### **b) Disability**

A person has a disability if she or he has a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. If specific impairments are affected by the proposal, specify which these are. Our standard categories are on our equality monitoring form – physical impairment, sensory impairment, mental health condition, learning disability, long standing illness, or health condition.

#### **What is the impact of the proposal on disability?**

Those working age applicants with disabilities may be affected by the change, although many disabled households will be better off as a result of the changes:

- where an applicant or their household receives either Disability Living Allowance and Personal Independence, or the Limited Capability for Work or Work Related Activity or Disabled Child Element of Universal Credit, this may lead to 100% support; and
- disability benefits will in most circumstances now be taken account as income, as opposed to disregarded in the current scheme. This will however be partially mitigated by being assessed in a vulnerable group (effectively a 25% award 'uplift' or a £150 income allowance) for those with moderate-to-severe disabilities and additional care and/or mobility needs.
- We will protect disabled households up to a Band C, as opposed to the current Band B, cap.

### **What is the risk of disproportionate negative impact on disability?**

The proposed scheme is designed to assist these households as far as possible. It does this by giving them preferential treatment in the banding system – a disabled person is more likely to qualify for a higher level of support because of this. However, unlike the previous scheme, sources of income are not generally disregarded: the new scheme works on the basis of higher income thresholds than the current system to compensate for this. Thus, a disabled person in receipt of certain benefits such as lower rate disability living allowance and lower rate personal Independence payments may be worse off as a consequence of the new scheme although the great majority will be better off.

In considering the potential for a disproportionate impact on multiply-disabled households, where more than one member of a family receives disability-related income we will offset payments received by the second and subsequent family member (so that only one individuals' disability-related income is taken into account).

### **What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme.

### **c) Gender reassignment**

Indicate whether the proposal has potential impact on trans men or trans women, and if so, which group is affected. a trans person is someone who proposes to, starts, or has completed a process to change his or her gender. A person does not need to be under medical supervision to be protected.

**What is the impact of the proposal on gender reassignment?**

No impact identified.

**What is the risk of disproportionate negative impact on gender reassignment?**

None identified.

**What are the mitigating actions?**

None identified.

### **d) Marriage and civil partnership**

Please note that the under the Public Sector Equality Duty this protected characteristic applies to the first general duty of the Act, eliminating unlawful discrimination, only. The focus within this is eliminating discrimination against people that are married or in a civil partnership with regard specifically to employment.

**What is the impact of the proposal on marriage and civil partnership?**

No impact.

**What is the risk of disproportionate negative impact on marriage and civil partnership?**

None identified.

**What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme

### **e) Pregnancy and maternity**

Does the proposal treat someone unfairly because they're pregnant, breastfeeding or because they've recently given birth.

#### **What is the impact of the proposal on pregnancy and maternity?**

The proposed scheme does not discriminate based on maternity although the scheme adopts the principles of national benefit schemes and the pension age Council Tax Support scheme by limiting the calculation of support (allowing for the costs of supporting no more than two dependent children/ young persons)

#### **What is the risk of disproportionate negative impact on pregnancy and maternity?**

Potentially in relation to larger families

#### **What are the mitigating actions?**

Child Benefit will continue to be disregarded, and childcare costs of up to £300 per week continue to be deducted from income.

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme.

### **f) Race**

Race refers to a group of people defined by their race, colour, and nationality (including citizenship) ethnic or national origins. A racial group can be made up of two or more distinct racial groups, for example Black Britons, British Asians, British Sikhs, British Jews, Romany Gypsies and Irish Travellers.

#### **What is the impact of the proposal on race?**

As demonstrated on p6, on average non-white households on average may be required to pay slightly more following these changes.

#### **What is the risk of disproportionate negative impact on race?**

Due to relative household sizes and demographics.

#### **What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme

### **g) Religion or belief**

Religion refers to any religion, including a lack of religion. Belief refers to any religious or philosophical belief and includes a lack of belief. Generally, a belief should affect your life choices or the way you live for it to be included in the definition. This must be a belief and not just an opinion or viewpoint based on the present state of information available and;

- be about a weighty and substantial aspect of human life and behaviour
- attain a certain level of cogency, seriousness, cohesion, and importance, and
- be worthy of respect in a democratic society, not incompatible with human dignity and not in conflict with fundamental rights of others. For example, Holocaust denial, or the belief in racial superiority are not protected.

Are your services sensitive to different religious requirements e.g., times a customer may want to access a service, religious days and festivals and dietary requirements

#### **What is the impact of the proposal on religion or belief?**

No impact identified.

#### **What is the risk of disproportionate negative impact on religion or belief?**

None identified.

#### **What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme

## **h) Sex**

Indicate whether this has potential impact on either males or females.

### **What is the impact of the proposal on sex?**

Financial impact of rising living costs has been shown in national studies to disproportionate affect females, for example through impacting insecure employment and increasing costs associated with providing for families. A majority of CTS claimants are female, as were respondents in respect of the consultation.

### **What is the risk of disproportionate negative impact on sex?**

Risks around limited engagement for families not receiving support from establish referring organisations/departments, insufficient awards to meet family needs

### **What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme

Women's employment continues to be concentrated in low-wage sectors. In total, 62% of workers paid below the living wage are women. Women are also paid less than men in all age groups, and the impact of parenthood on women remains highly visible in pay gap trends. Approximately 58% of working age households in receipt of support are headed by women. We will monitor the impact of the new scheme and take-up of discretionary support.

## **i) Sexual orientation**

Indicate if there is a potential impact on people based on their sexual orientation. The Act protects heterosexual, gay, lesbian or bisexual people.

**What is the impact of the proposal on sexual orientation?**

No impact identified.

**What is the risk of disproportionate negative impact on sexual orientation?**

None identified.

**What are the mitigating actions?**

None identified.

## **7. Summary of protected characteristics**

**a. Summarise why the protected characteristics you have commented on, are relevant to the proposal?**

As identified above, i.e. those that are reflected in the caseload and have protected characteristics with a material impact on allowances given for income and circumstances.

**b. Summarise why the protected characteristics you have not commented on, are not relevant to the proposal?**

There have been no risk/issues identified specifically with the protected characteristics of gender reassignment or marriage/civil partnership/sexual orientation.



## 8. Armed Forces Covenant Duty

The Covenant Duty is a legal obligation on certain public bodies to 'have due regard' to the principles of the Covenant and requires decisions about the development and delivery of certain services to be made with conscious consideration of the needs of the Armed Forces community.

When Leicester City Council exercises a relevant function, within the fields of healthcare, education, and housing services it must have due regard to the aims set out below:

**a. The unique obligations of, and sacrifices made by, the Armed Forces**

These include danger; geographical mobility; separation; Service law and rights; unfamiliarity with civilian life; hours of work; and stress.

**b. The principle that it is desirable to remove disadvantages arising for Service people from membership, or former membership, of the Armed Forces**

A disadvantage is when the level of access a member of the Armed Forces Community has to goods and services, or the support they receive, is comparatively lower than that of someone in a similar position who is not a member of the Armed Forces Community, and this difference arises from one (or more) of the unique obligations and sacrifices of Service life.

**c. The principle that special provision for Service people may be justified by the effects on such people of membership, or former membership, of the Armed Forces**

Special provision is the taking of actions that go beyond the support provided to reduce or remove disadvantage. Special provision may be justified by the effects of the unique obligations and sacrifices of Service life, especially for those that have sacrificed the most, such as the bereaved and the injured (whether that injury is physical or mental).

Does the service/issue under consideration fall within the scope of a function covered by the Duty (healthcare, education, housing)? Which aims of the Duty are likely to be relevant to the proposal? In this question, consider both the current service and the proposed changes. Are members of the Armed Forces specifically disadvantaged or further disadvantaged by the proposal/service? Identify any mitigations including where appropriate possible special provision.

Relatively limited impact, however in each of the scheme options payments such as Armed Forces Support Payments, War Disablement and War Widows Pensions are disregarded in full as income.

## **9. Other groups**

### **Other groups**

#### **Impact of proposal:**

Describe the likely impact of the proposal on children in poverty or any other people who we may consider to be vulnerable, for example people who misuse substances, care leavers, people living in poverty, care experienced young people, carers, those who are digitally excluded. List any vulnerable groups likely to be affected. Will their needs continue to be met? What issues will affect their take up of services/other opportunities that meet their needs/address inequalities they face?

#### **Risk of disproportionate negative impact:**

How likely is it that this group of people will be negatively affected? How great will that impact be on their well-being? What will determine who will be negatively affected?

#### **Mitigating actions:**

For negative impacts, what mitigating actions can be taken to reduce or remove this impact for this vulnerable group of people? These should be included in the action plan at the end of this EIA. You may also wish to use this section to identify opportunities for positive impacts.

### **a. Care Experienced People**

This is someone who was looked after by children's services for a period of 13 weeks after the age of 14', but without any limit on age, recognising older people may still be impacted from care experience into later life.

#### **What is the impact of the proposal on Care Experienced People?**

As per other households liable for Council Tax and eligible for CTS, but the acute vulnerabilities of this group are recognised.

#### **What is the risk of negative impact on Care Experienced People?**

Relatively limited (see below)

**What are the mitigating actions?**

Households containing a care leaver under the age of 25 are eligible to receive a local Discretionary Discount of 100% of Council Tax liability. Care leaver status is also recognised as a protected category leading to a presumption in favour of awarding Council Tax Discretionary Relief.

**b. Children in poverty****What is the impact of the proposal on children in poverty?**

Protection is in place for parents with young children such as:

- increasing the level of weekly income allowable for families when calculating the level of support;
- awards for child benefit and child maintenance will continue to be disregarded;
- expenditure on childcare costs will continue to be disregarded from non-qualifying income

However, there is some evidence that welfare reforms such as the proposed changes to this scheme are likely to have greater financial impact upon households with higher numbers of children (three or more). It should be noted that it will be for full Council to decide (after consultation) whether further protection as elements of the new CTSS post-consultation.

**What is the risk of negative impact on children in poverty?**

Moderate risk.

**What are the mitigating actions?**

In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme

**c. Other (describe)****What is the impact of the proposal on any other groups?**

Other groups, including:-

- hostel leavers
- claimants fleeing domestic violence
- supported by Forced Marriage Unit
- war widows

- drug/alcohol dependent
- foster carers
- ex-offenders under MAPPA arrangements

**What is the risk of negative impact on any other groups?**

Low to moderate.

**What are the mitigating actions?**

Aforementioned disregards for income. In any case where households are experiencing exceptional hardship, Council Tax Discretionary Relief (CTDR) can be administered to serve as a 'buffer' to the impact of the Council Tax Support scheme. The Care Leavers Discount administered by the Council on a discretionary basis would not be affected.

## **10. Other sources of potential negative impacts**

Are there any other potential negative impacts external to the service that could further disadvantage service users over the next three years that should be considered? For example, these could include:

- other proposed changes to council services that would affect the same group of service users;
- Government policies or proposed changes to current provision by public agencies (such as new benefit arrangements) that would negatively affect residents;
- external economic impacts such as an economic downturn.

Where the household contains non-dependants, the proposed scheme will make a standard deduction of 20% for each non-dependant. The existing protections (where no non-dependant deductions are made will be maintained).

Further negative impacts could be associated with a further increase in living costs, both in terms of risk to health of individual households and associated economic impacts from economic downturn.

This is to an extent mitigated by the availability of Council Tax Support and Council Tax Discretionary Relief at cost to the Council and the major precepting authorities.

## 11. Human rights implications

Are there any human rights implications which need to be considered and addressed (please see the list at the end of the template), if so, please outline the implications and how they will be addressed below:

Every effort will be made to engage with potentially discriminated groups. Equalities information used for the purpose of anonymised monitoring only.

## 12. Monitoring impact

You will need to ensure that monitoring systems are established to check for impact on the protected characteristics and human rights after the decision has been implemented. Describe the systems which are set up to:

- monitor impact (positive and negative, intended and unintended) for different groups
- monitor barriers for different groups
- enable open feedback and suggestions from different communities
- ensure that the EIA action plan (below) is delivered.

If you want to undertake equality monitoring, please refer to our [equality monitoring guidance and templates](#).

1,900 vulnerable people were given assistance through the CTDR fund last year (2023/24) although others who are struggling to pay their council tax can also apply.

The Council proactively identifies and offers assistance where needed and this is ongoing. This is targeted by identifying those who will be affected most from our records.

It has been noted that some groups may receive greater representation within the claims population because of the barriers to work which are faced.

The Council currently does not have sufficient data within Revenues and Benefits records to reach any conclusions on this however.

The council regularly monitors and captures information on ethnic background but recognises that response rates are low at 46% 'unknown'.

Vulnerable or Protected groups will regularly be monitored (through complaints, statistical monthly, quarterly and annual internal reporting to the Director and Lead Member) to ensure that they are not disproportionately affected and if affected, they receive some form of assistance. Both positive and negative impacts from the scheme will be monitored.

One of the key actions for the impact assessment action plan is to continue to gather and monitor equalities data on applicants (protected characteristics data is now collated from all claims and reported changes), adjusting policy and promotion to enable fair and justified distribution of protection. The EIA will be signed off, amendments may be made and will be reviewed in the future.

### 13. EIA action plan

Please list all the equality objectives, actions and targets that result from this assessment (continue on separate sheets as necessary). These now need to be included in the relevant service plan for mainstreaming and performance management purposes.

| Equality Outcome                                      | Action  | Officer Responsible | Completion date               |
|---|---|---------------------|-------------------------------|
| Equality monitoring requirements                      | To continue to gather and monitor equalities data on applicants, adjusting policy and promotion to enable fair and justified distribution of protection.                        | ██████████          | From October 2024 and ongoing |
| Equality data analysis and scheme improvements        | To continue and increase engagement with relevant stakeholder agencies through a variety of mediums, including literature and relevant corporate events.                        | ██████████          | To January 2025               |
| A scheme that is accessible to all that are eligible. | To continue to review performance and amend as necessary dependent on circumstances. Develop partnership arrangements to understand impact of recovery upon total indebtedness. | ██████████          | From October 2024             |
|   |   |                     |                               |

## **Human rights articles:**

### **Part 1: The convention rights and freedoms**

**Article 2:** Right to Life

**Article 3:** Right not to be tortured or treated in an inhuman or degrading way

**Article 4:** Right not to be subjected to slavery/forced labour

**Article 5:** Right to liberty and security

**Article 6:** Right to a fair trial

**Article 7:** No punishment without law

**Article 8:** Right to respect for private and family life

**Article 9:** Right to freedom of thought, conscience and religion

**Article 10:** Right to freedom of expression

**Article 11:** Right to freedom of assembly and association

**Article 12:** Right to marry

**Article 14:** Right not to be discriminated against

### **Part 2: First protocol**

**Article 1:** Protection of property/peaceful enjoyment

**Article 2:** Right to education

**Article 3:** Right to free elections