

Enfield Equality Impact Assessment (EqIA)- Draft (prior to decision; analysis is based on current caseload)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.

Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Council Tax Support Scheme 2024/25
Team/ Department	Resources
Executive Director	Fay Hammond
Cabinet Member	Cllr Leaver
Author(s) name(s) and contact details	Sally Sanders
Committee name and date of decision	Cabinet 13.09.2023

Date the EqIA was reviewed by the Corporate Strategy Service	
Name of Head of Service responsible for implementing the EqIA actions (if any)	Sally Sanders/Bridgette Cowley
Name of Director who has approved the EqIA	Fay Hammond

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change?
 What are the reasons for the decision or change?
 What outcomes are you hoping to achieve from this change?
 Who will be impacted by the project or change - staff, service users, or the wider community?

Note this decision has not been taken, this EQIA (Equality Impact Assessment) analysis is based on the proposal which is being consulted on. There are a number of mitigations as set out in the report to support those impacted.

The Council is obliged to set a local Council Tax Reduction Scheme every year following the abolition of the national Council Tax Benefit system in 2013. The Council introduced a local Council Tax Support (CTS) Scheme to provide financial assistance for low-income households in paying their Council Tax. Since 2013, the Council has reviewed the scheme every year and is now deciding on the scheme for 2024/25.

2024/25 proposal

The Council is considering changing the discretionary element of the Council Tax Support scheme as the current scheme has become unaffordable in the current economic climate.

The Council is looking at a proposal that has 3 elements of change to it to reduce the cost of the 2024/25 scheme by:

Element 1

Targeting council tax support to households living in smaller, less expensive property so that those living in larger properties do not receive greater levels of support than those occupying smaller properties. This means that council tax support will be restricted to a maximum Band C council tax liability. Appendix 5 in the main report shows the estimated weekly amount of Council Tax Support claims will lose by band and the current council tax by band. 600 claims out of 31,200 made so far this year would potentially lose over £30 per week. Most of these claims refer to Band E and above.

Element 2

Introduce a minimum non-dependant deduction for households with other adults living in the property (to ensure most adults, regardless of their circumstances or the circumstances of the claimant and/or partner, have the expectation of contributing to council tax as they are also users of council services), and increasing the current deductions by 20% (to bring non dependant deduction rates in line with inflation as rates have not always been increased and for many years were frozen). Appendix 6 in the main report shows the current weekly non dependant deductions and the proposed deductions for 2024/25. An estimated 7,500 households have non dependants and will be impacted by this change of which 3,000 claims will have a deduction introduced as currently no deduction as either receiving out of work benefits or disregarded due to the claimant and/or partners circumstances (because of them being registered blind or receiving certain disability benefits). This will affect protected groups as well as non-

protected groups.

Element 3

Standardising the minimum payment applied to working age claimants to ensure everyone contributes to their council tax. This means removing the following existing protected groups who currently qualify for a maximum 100% reduction in their council tax:

- An applicant (or their partner) receiving Carer's Allowance;
- An applicant (or their partner) receiving Disability Living Allowance (either care component at the highest rate or mobility component at the higher rate) or enhanced Personal Independence Payments (daily living or mobility component);
- An applicant (or their partner) receiving the support component of Employment and Support Allowance;
- An applicant (or their partner) receiving Universal Credit who have the following elements included in their awards - limited capability for work, disabled child element or carer element;
- An applicant (or their partner) who are foster carers and who were recruited and trained by Enfield Council.

The estimated amount of weekly Council Tax Support lose for disabled and carer claims is shown under the disability section of this equality impact assessment.

The proposals also include increasing the minimum payment from 24.5% to 50%. Appendix 7 in the main report shows the proposed income bands.

The proposals will be subject to a 12-week public consultation which is expected to run from September to December 2023. Following public consultation, a decision on the Council Tax Support Scheme for 2024/25 will be made in February 2024 by Cabinet and Council.

Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

1. Age
2. Disability
3. Gender reassignment.
4. Marriage and civil partnership.
5. Pregnancy and maternity.
6. Race
7. Religion or belief.
8. Sex
9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

“Differential impact” means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts and provide evidence to explain why this group might be particularly affected. If there is no differential impact 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 of the following protected characteristics.

Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected.

Below is a table showing the age profile of Enfield **residents** (not householders) alongside the age profile of working age CTS households as the Council does not yet have estimates of householders broken down by age.

The shaded figures show where the proportion of residents in that age bracket is higher than in the population-at-large. Most CTS claimants are aged between 30 and 59 with the highest number of claimants aged between 40 to 44.

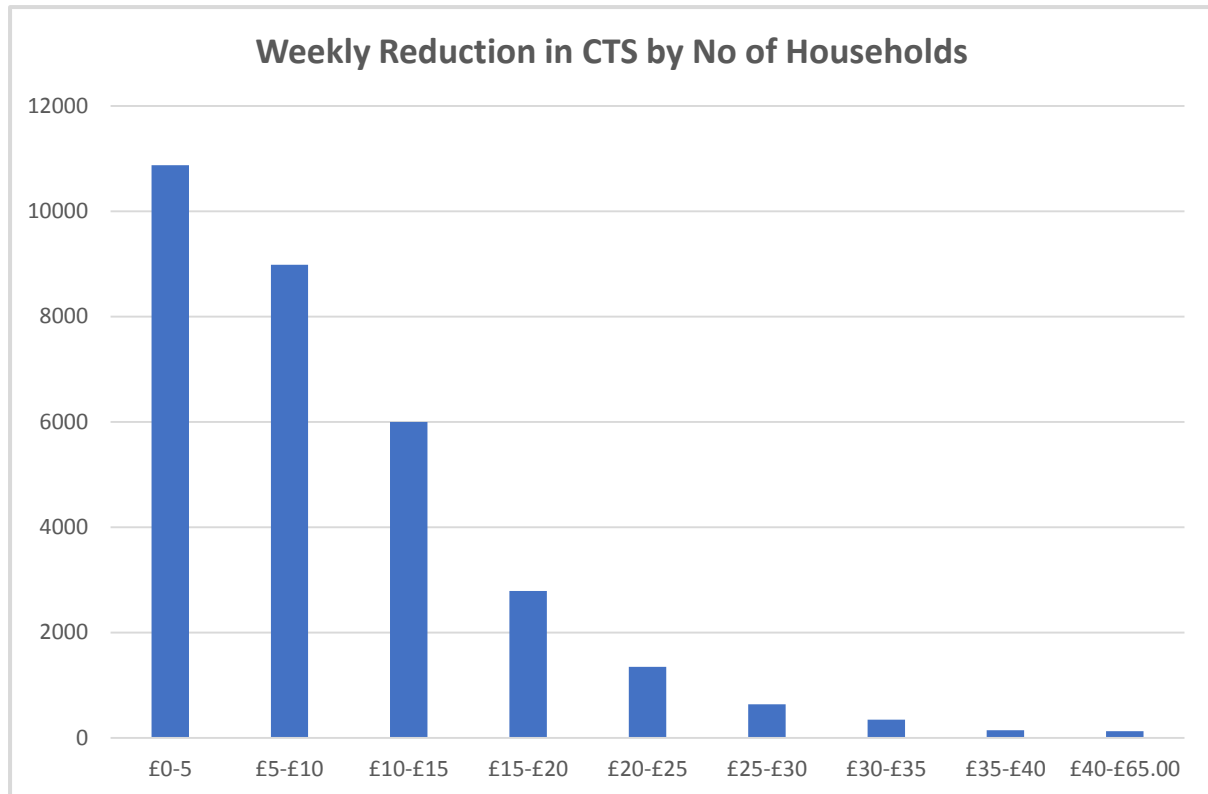
Age band	Enfield population 2021	% of total	CTS Claimants	% of total
Aged 4 years and under	21300	6.5%		
Aged 5 to 9 years	22800	6.9%		
Aged 10 to 14 years	24100	7.3%		
Aged 15 to 19 years	21300	6.5%	26	0.1%
Aged 20 to 24 years	19100	5.8%	647	2.2%
Aged 25 to 29 years	21200	6.4%	1812	6.2%
Aged 30 to 34 years	23100	7.0%	3210	11.0%
Aged 35 to 39 years	24000	7.3%	4388	15.1%
Aged 40 to 44 years	24600	7.5%	4491	15.4%
Aged 45 to 49 years	22700	6.9%	4208	14.5%
Aged 50 to 54 years	22700	6.9%	3757	12.9%
Aged 55 to 59 years	21100	6.4%	3285	11.3%
Aged 60 to 64 years	17100	5.2%	2591	8.9%
Aged 65 to 69 years	12800	3.9%	690	2.4%
Aged 70 to 74 years	11200	3.4%		
Aged 75 to 79 years	8200	2.5%		
Aged 80 to 84 years	6500	2.0%		
Aged 85 and older	6400	1.9%		
All persons	330200	100%	29105	100%

Working age adults

The proposals include an increase in the minimum contribution for all working age residents (except war widows and care leavers under 25 years of age who are protected from the minimum payment) to 50%. The proposals would therefore be expected to have a negative impact on most working age adult claimants as they will receive reduced council tax support and be required to contribute more towards their council tax. The mitigations below offer financial help and advice for affected families.

Fewer than 200 pensioner non-dependants would be included within the financial assessment for the first time and an estimated deduction of £5.52 would be made. This may have a negative impact on these households. The mitigations below offer financial

help and advice for affected households.



Over one third of claims are estimated to lose up to £5 per week.

Children and young people

Approximately half of all CTS households have children. For families impacted by the proposals, they will have higher council tax bills to pay and this is expected to have a negative impact. The mitigations below offer financial help and advice for affected families. Once the proposal is agreed information will be publicised within the council tax bills advising residents how to claim and where to obtain advice.

Household Type	Amount of Weekly CTS Claims will lose									
	Less than £5 per Week	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65.00	Grand Total
Couple with 1 child	890	535	268	192	121	42	19	11	12	2090

Couple with 2 or more children	1445	1559	665	433	192	85	25	11	15	4430
Couple with no children	517	270	360	323	222	133	71	39	33	1968
Lone parent with 1 child	2571	1833	878	351	171	58	40	6	6	5914
Lone parent with 2 or more children	2438	2615	1127	580	191	56	32	15	10	7064
Single person	3023	2170	2699	909	449	260	158	60	51	9779
	10884	8982	5997	2788	1346	634	345	142	127	31245

The chart below details the impact by gender, and family make up. The proposal negatively impacts families claiming Council Tax Support

Age Range	All Claimants	All Claims By Gender		Claims By Family Make Up			
		Female	Male	Single	Couple	Family With 1 Dep	Family With 2+ Deps
Aged 15 to 19 years	26	16	10	21	1	3	1
Aged 20 to 24 years	647	489	158	243	10	282	112
Aged 25 to 29 years	1812	1469	343	313	26	720	753
Aged 30 to 34 years	3210	2558	652	388	38	930	1854
Aged 35 to 39 years	4388	3350	1038	563	34	1017	2774
Aged 40 to 44 years	4491	3191	1300	758	62	1191	2480

Aged 45 to 49 years	4208	2827	1381	1158	176	1220	1654
Aged 50 to 54 years	3757	2304	1453	1541	346	1025	845
Aged 55 to 59 years	3285	1923	1362	1989	496	518	282
Aged 60 to 64 years	2591	1427	1164	1842	504	156	89
Aged 65 +	690	279	411	396	256	23	15
Total	29105	19833	9272	9212	1949	7085	10859

Pensioners

Pensioners are defined for prescribed regulation purposes as someone who has attained the qualifying age for state pension credit; and is not, or, has a partner who is not on income support, not on income-based jobseeker's allowance or not on income-related employment and support allowance; or doesn't have an award of universal credit. A pensioner who has a partner who is not of pensionable age (referred to as a mixed aged couple) and is on income support, income-based jobseeker's allowance, income-related employment and support allowance; or has an award of universal credit is treated as working age.

Pensioners, as defined for prescribed regulation purposes, are not included in the local scheme and are assessed under the Government prescribed regulations. The proposals to increase the minimum payment would therefore have no impact on these defined pensioners.

Mitigating actions to be taken

Measures which are in place to mitigate the impact of increase in the minimum payment include:

- Maintaining the protected group status of care leavers under 25 years olds. This means they will continue to be qualify for a maximum of 100% reduction in council tax (depending on income).
- Consulting residents about the proposed changes and asking for their views on how to mitigate any impact. This will include advice surgeries in different parts of the borough as well as options to make contact on a one to one basis which can be via email or over the phone.
- Applying any Government funded hardship
- Maintaining a discretionary Council hardship fund
- Maintaining the Cost-of-Living information on the Council website (Campaign launched 3/11/22) to provide residents with information on help with housing costs, debts and bills, Household Support Fund, extra income, saving energy and

help with food

- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS, they can apply for a Council Tax Support Hardship payment. Information can be found on Enfield Councils website under Benefits, Council Tax and Cost of Living Support and promoted on all council tax bills and benefit notification letters.

These measures will support residents who cannot afford to pay their council tax, regardless of their age.

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-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

Under the 23/24 scheme, the following groups qualify for a maximum 100% reduction in their council tax bill:

- An applicant (or their partner) receiving Carer's Allowance;
- An applicant (or their partner) receiving Disability Living Allowance (either care component at the highest rate or mobility component at the higher rate) or enhanced Personal Independence Payments (daily living or mobility component);
- An applicant (or their partner) receiving the support component of Employment and Support Allowance;
- An applicant (or their partner) receiving Universal Credit who have the following elements included in their awards - limited capability for work, disabled child element or carer element;

Under the 23/24 scheme, no non-dependent deductions¹ are applied if the applicant or their partner:

- Is registered blind;
- is receiving Attendance Allowance, the care component of Disability Living Allowance, the

¹

daily living component of Personal Independence Payment, an Armed Forces Independence Payment, or the daily living component of Adult Disability Payment, including where these benefits and payments are temporarily suspended, for example through hospitalisation.

The proposed 24/25 scheme applies a non-dependant deduction in the above circumstances and includes the removal of the above protected groups and increasing the minimum payment for working age residents from 24.5% to 50%, an amount decided on to reduce costs but to also provide an appropriate level of support.

The tables below show how many of those in various age groups with a disability (first table) and those who are carers (second table) will pay more council tax and by how much per week.

Claims with a Disability	Amount of Weekly CTS Claims will lose									
	Less than £5 per Week	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65.00	Grand Total
19 and Under			1							1
20-24	5	9	13	3						30
25-29	14	45	139	32	7	1				238
30-34	22	68	257	77	14	5	1			444
35-39	41	93	349	112	38	15	5	5		658
40-44	40	135	337	154	71	28	17	5	5	792
45-49	49	150	447	220	119	65	30	7	7	1094
50-54	60	146	509	273	152	66	40	13	19	1278
55-59	58	184	589	309	165	96	71	28	25	1525
60+	150	215	689	293	174	113	74	29	25	1762
	439	1045	3330	1473	740	389	238	87	81	7822

Carers	Amount of Weekly CTS Claims will lose									
	Less than £5 per Week	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65.00	Grand Total
19 and Under										0
20-24	8	6	26	9	1	1				51
25-29	20	25	110	52	8	1				216
30-34	33	52	199	110	34	3	1	1		433
35-39	54	74	268	164	57	22	2	4		645
40-44	41	71	217	169	79	30	6	6	4	623
45-49	44	57	172	152	88	37	14	6	4	574
50-54	34	59	157	146	85	41	25	14	14	575

55-59	24	37	115	101	87	49	29	11	14	467
60+	24	29	102	100	72	40	24	12	10	413
	282	410	1366	1003	511	224	101	54	46	3997

The proposed changes to the scheme are expected to have a negative impact on disabled claimants as they will receive reduced council tax support and be expected to contribute more towards their council tax. The mitigations below offer financial help and advice for affected families.

Mitigating actions to be taken

Provisions to mitigate the financial impact of council tax collection on working age claimants with a disability exist within:

- council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits). These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support
- government council tax support default scheme regulations ensure those with disabilities have their Council Tax Support calculations based on higher applicable amounts and premiums (needs allowance) that will give higher awards of Council Tax Support within the proposed restrictions. Similarly, if in receipt of Universal Credit or legacy passported benefits such as Income Support, Income based Job Seekers Allowance or Income based Employment support allowance, incomes will also be higher based on the same principal
- Consulting residents about the proposed changes and asking for their views on how to mitigate the impact. This will include emailing all CTS households directly, contacting the voluntary sector, including those that are focused on disability, e.g., Enfield Carer's Centre, Enfield Disability Action and GLA (Greater London Authority), and holding local advice surgeries. As part of the emailing all CTS households, this includes the offer of one to one advice on how the change directly impacts the individual either via email or over the phone.
- Applying any Government funded hardship payments
- Maintaining a discretionary Council hardship fund
- Any financial mitigation may only partially or temporarily assist with the higher council tax bill
- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.

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.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

Whether a person is proposing to undergo, is undergoing or has undergone a process (or part of a process) to reassign their gender would not affect the amount of council tax support they receive. Information regarding a change of name or gender would be processed as a change to a claimant's personal details and subject to normal verification processes to ensure consistency with Universal Credit and other social security benefits.

The proposed changes to the Council Tax Support Scheme will not have a differential impact on people who are proposing to undergo, is undergoing or has undergone a process (or part of a process) to reassign their gender.

Mitigating actions to be taken

As part of the consultation exercise the council will engage with VCS organisations including ones that are focused on supporting people who are trans e.g., Enfield LGBT centre

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 U.K 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 this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

The council tax support scheme follows Government regulation regarding the financial assessment of Marriage and Civil Partnerships to ensure consistency with Universal Credit and other social security benefits.

The proposed changes to the Council Tax Support Scheme will not have a differential impact on people who are married or in a civil partnership. War Widows will continue to be exempt from the minimum payment

Mitigating actions to be taken

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 this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

Pregnancy does not affect the claimant's assessment of council tax support unless there is a change of financial circumstances. The Fair Debt and Income Strategy specifically includes pregnancy as a condition where council tax enforcement processes would be adapted to meet the needs of the council taxpayer. Maternity would be treated as a change of circumstance with additional dependant(s) and potential lower income.

The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work.

Mitigating actions to be taken

As part of the consultation exercise the council will engage with VCS organisations including ones that are focused on supporting pregnant women e.g., Enfield Women's Centre. A package of tools to publicise this will be used and supported by the communications team. This will include posters, the use of social media and awareness via VCS newsletters.

- Consulting residents about the proposed changes and asking for their views on how to mitigate the impact. This will include emailing all CTS households directly, contacting the voluntary sector, including those that are focused on disability, e.g., Enfield Carer's Centre, Enfield Disability Action and GLA (Greater London Authority), and holding local advice surgeries. As part of the emailing all CTS households, this includes the offer of one to one advice on how the change directly impacts the individual either via email or over the phone.
- Applying any Government funded hardship payments
- Maintaining a discretionary Council hardship fund
- Any financial mitigation may only partially or temporarily assist with the higher council tax bill
- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts

residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.

Race

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

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

A claimant's race, ethnicity or nationality does not impact on the council tax support financial assessment. Information is requested from each claimant on a voluntary basis to help identify potentially under-represented groups.

Out of the c.35,000 caseload, only 6,000 records regarding ethnicity are held which are largely imported from DWP claims. This is insufficient to use for this purpose.

Poverty rates between ethnic groups vary significantly, with some groups at a much higher risk of poverty than others. Nationally, according to research from the Joseph Rowntree Foundation, poverty rates for the Bangladeshi and Pakistani ethnic groups are higher than other ethnic groups. Between 2018/19 and 2020/21, 51% of people from the Bangladeshi ethnic group were living in poverty while the poverty rate for the Pakistani ethnic group was 44%. More than 2 in 5 people from Black ethnic groups were also in poverty (42%). In comparison, around 1 out of 5 people from white ethnic groups were living in poverty (19%).²

The table below sets out the wards with the highest number of CTS claimants and the proportion of the populations of that ward who are from an ethnic minority background.³ As the table shows, the wards with the highest number of Council Tax Support claims are also the wards with the highest proportions of residents from an ethnic minority group.

Ward	Number of CTS claims ⁴	Percentage of all CTS claims ⁵	Percentage of ward population from an ethnic minority group
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² [Joseph Rowntree Foundation, UK Poverty 2023: The essential guide to understanding poverty in the UK, 2023](#)

³ Ethnic minority refers to all ethnic groups except the white British group. Ethnic minorities includes white minorities, such as Gypsy, Roma and Irish Traveller groups.

⁴ The live caseload as of 31st July 2023

⁵ As of 31st July 2023, the total live CTS caseload was 31,315.

Brimmsdown	2,129	6.8%	73.6%
Edmonton Green	2,685	8.6%	83.9%
Enfield Lock	2,465	7.9%	74.1%
Haselbury	2,122	6.8%	82.1%
Jubilee	1,928	6.2%	79.6%
Lower Edmonton	2,267	7.2%	83.3%
Ponders End	1,795	5.7%	84.1%
Upper Edmonton	2,104	6.7%	85%

Although we don't have ethnicity data for CTS claimants, if we apply the data above to Council Tax Support, it could be assumed that ethnic minority households would be more likely to be claiming council tax support. Therefore, it could be expected that ethnic minority households will be disproportionately negatively impacted by the proposed changes to the Council Tax Support Scheme. The mitigations below offer financial help and advice for affected families.

Mitigating actions to be taken

As part of the consultation exercise the council will engage with VCS organisations including ones that are focused on supporting ethnic minority communities e.g., EREC. Additional mitigations include:

- Consulting residents about the proposed changes and asking for their views on how to mitigate the impact. This will include emailing all CTS households directly, contacting the voluntary sector, including those that are focused on disability, e.g., Enfield Carer's Centre, Enfield Disability Action and GLA, and holding local advice surgeries.
- Applying any Government funded hardship payments
- Maintaining a discretionary Council hardship fund
- Any financial mitigation may only partially or temporarily assist with the higher council tax bill
- Applying the Council's Fair Debt and Income policy to the collection of council tax

Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

<p>Will this change to service/policy/budget have a differential impact [positive or negative] on people who follow a religion or belief, including lack of belief?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>A claimant's religion and belief is not recorded and have no impact on the financial assessment of CTS.</p> <p>The proposed changes to the Council Tax Support Scheme will not have a differential impact because of a person's religion or belief.</p>
<p>Mitigating actions to be taken</p> <p>As part of the consultation exercise the council will engage with VCS organisations including ones that are focused on supporting ethnic minority communities e.g., The Faith Forum</p>

<p>Sex</p>
<p>Sex refers to whether you are a female or male.</p>
<p>Will this change to service/policy/budget have a differential impact [positive or negative] on females or males?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>This information is recorded within a claimant's personal details but does not impact on the CTS financial assessment.</p> <p>There are approximately twice the number of female council tax support scheme current claims (19,833) than male (9,272).</p> <p>Any reduction in the level of assistance given would be expected to have a negative impact on current and future working age CTS claimants (regardless of gender) as claimants would have to contribute more towards their council tax bill than they previously had to.</p> <p>Although any change in the scheme would be applied universally, our evidence makes clear that a greater proportion of current CTS claimants are women and therefore it is</p>

expected that women would be disproportionately impacted by the proposals.

Childcare could be a potential barrier to single parent increasing their hours or obtaining better paid employment. To promote childcare funding via early years or the DWP, the welfare team will run a campaign, which can help to support parents of young children into employment.

Furthermore, DWP offer specific job coach advice as part of the service provided for Universal Credit claimants.

The mitigations below are appropriate for both female and male claimants.

Mitigating actions to be taken

- Measures which are in place to mitigate the impact of the minimum payment include:
- Consulting residents about the proposed changes and asking for their views on how to mitigate any impact, ensuring the consultation is inclusive, as well inviting all residents to feedback the council will engage with VCS organisations including ones that support women e.g., Enfield Women's Centre and also families
- Applying any Government funded hardship
- Maintaining a discretionary Council hardship fund
- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.

Sexual Orientation

This refers to whether a person is sexually 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, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

Sexual Orientation is not recorded within a CTS application and has no impact on the financial assessment of council tax support.

The proposed changes to the Council Tax Support Scheme will not have a differential impact because of a person's sexual orientation.

Mitigating actions to be taken

As part of the consultation exercise the council will engage with VCS organisations including ones that are focused on sexual orientation e.g. Enfield LGBT centre

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on these households. However, mitigations are in place as set out below.

Appendix 8 in the main report shows the numbers weekly CTS claims will lose by ward and current claims by lower layer super output area and postcode. Edmonton Green is the highest impacted ward has the highest levels of deprivation as shown in appendix 9. Surgeries will be held in Edmonton Green for residents to offer welfare advice and guidance.

Mitigating actions to be taken.

Specific measures to mitigate the impact of the change in scheme include:

- Consulting residents about the proposed changes and asking for their views on how to mitigate any impact. One to one sessions will be available to residents in surgeries in the worse affected areas. During the consultation, we will be engaging with key VCS organisations to discuss our proposals and further develop our impact assessment and mitigating actions as we develop our final decision.
- Applying any Government funded hardship
- Maintaining a discretionary Council hardship fund

- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation.

NB Discretionary hardship fund offers transitional partial financial help

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Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

The local CTS scheme has operated since 2013. The operation of the CTS scheme and its impact on council tax collection performance are monitored monthly by the Executive Director of Resources. The cost of council tax support was expected to fall following the recovery from COVID but the Ukraine war is likely to impact this recovery and has significantly contributed to rising household bills and the cost of living crisis. It is likely the CTS caseload will remain at the current high level of rise again. The Council Tax Support scheme has to be agreed annually by the Council.

The impact of the Scheme will be monitored through the existing performance information including: number of council tax support discretionary payments, number of contacts to the welfare and debt advice team, any changes to the level of non-payment of Council Tax.

Section 5 – Action plan for mitigating actions

Identified Issue	Action Required	Lead officer	Timescale/ By When	Costs	Review Date/Comments
Resident consultation	Consulting residents about the proposed changes and asking for their views on how to mitigate any impact. One to one sessions will be available to residents in surgeries in the worse affected areas.	Sally Sanders	September to December 2023	£1,000 approx .	The outcomes of the consultation will be collated and used to inform the final decision in February
Applying any Government funded hardship	Local Welfare Assistance, Household support fund, energy rebates are Government funded measures to support financially vulnerable residents	Sally Sanders	On-going during 2023/24	Costs are contained within the existing Welfare and Financial Assessment teams	Work to deliver these schemes is continuing. Any further Government funded relief will be delivered as and when appropriate
Council tax support hardship	Maintaining a discretionary Council hardship fund	Sally Sanders	On-going	Costs are contained within the existing Welfare and Financial	It is estimated that the Council will spend up to £475k in council tax support hardship for 2023/24. This will

				ial Asses sment teams	increase next year should the proposal(s) be agreed
Council tax enforcement	Applying the Council's Fair Debt and Income Strategy to the collection of council tax	Bridgette Cowley	On-going	Costs are contained within the existing Income and Debt teams	The Council's Fair Debt and Income Strategy was agreed at Cabinet on the 3 rd March 2021. The strategy implements a progressive approach to the management of debt and income and helps deliver fair and equitable treatment for customers.
Welfare Advice & Debt Support	To offer support to residents to maximise income and get full entitlement to welfare benefits	Sally Sanders	On-going	Costs are contained within the existing Welfare and Financial Assessment teams	Enfield's Welfare Advice & Debt Support Team maintains the service to help support vulnerable residents to maximise income and get full entitlement to welfare benefits, advice and

					assist to support residents with council debts. The aim is to holistically case manage the resident's situation.
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