

## Enfield Equality Impact Assessment (EqIA)

### 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 and 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.

**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 1 – Equality Analysis Details

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	<b>Revenues and Benefits telephony services plus Processing and Support services for I&amp;D and FA services</b>
<b>Lead officer(s) name(s) and contact details</b>	<b>Sally Sanders sally.sanders@enfield.gov.uk</b>
<b>Team/ Department</b>	<b>Income and Debt and Financial Assessment services – Resources</b>
<b>Executive Director</b>	<b>Fay Hammond</b>
<b>Cabinet Member</b>	<b>Cllr Leaver</b>
<b>Date of EqIA completion</b>	

## SECTION 2 – Summary of Proposal

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

1. Agree to extend the contract with Civica UK Ltd for the 24/25 period, for Revenues and Benefits telephony and processing and support services for Income and Debt (ID) and Financial Assessment (FA) services.
2. The Council is currently undertaking a full assessment of I&D and FA contracted functions. There is an aspiration for all contracted functions to return to in house delivery when the council has capacity to do so, to be decided during the extended period 24/25. A detailed insourcing proposal will be brought forward in a separate report.
3. The proposed contract includes the option of giving 90 days' notice to end the contract before 31<sup>st</sup> March 2025 should the council be in a position and have capacity to no longer need Civica services.

## 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, where possible, 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 Council Tax Support (CTS) households. The Council does not have estimates of householders or council taxpayers broken down by age. A table of Housing Benefit households would not provide a complete picture of claims due to the continued migration to Universal Credit.

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	55	0.2
Aged 20 to 24 years	19100	5.8	666	1.9
Aged 25 to 29 years	21200	6.4	1780	5.0
Aged 30 to 34 years	23100	7.0	3036	8.5
Aged 35 to 39 years	24000	7.3	4115	11.6
Aged 40 to 44 years	24600	7.5	4295	12.1
Aged 45 to 49 years	22700	6.9	4136	11.6
Aged 50 to 54 years	22700	6.9	3628	10.2
Aged 55 to 59 years	21100	6.4	3127	8.8
Aged 60 to 64 years	17100	5.2	2376	6.7
Aged 65 to 69 years	12800	3.9	1938	5.5
Aged 70 to 74 years	11200	3.4	1931	5.4
Aged 75 to 79 years	8200	2.5	1633	4.6
Aged 80 to 84 years	6500	2.0	1379	3.9
Aged 85 and older	6400	1.9	1422	4.0
All persons	330200	100.0	35517	100.0

Below is a table showing the age profile of Council Tax Support (CTS) households.

Age Range*	All Claims by Gender			Claims with Disability	Claims by family Make up			
	All Claimants	Female	Male		Total	Single	Couple	Family with 1 Dep
19 or under	55	40	15	0	37	-	15	3
20-24	666	492	174	12	258	11	282	115
25-29	1,780	1,465	315	132	302	23	670	785
30-34	3,036	2,420	616	234	382	27	829	1,798
35-39	4,115	3,147	968	371	545	28	892	2,650
40-44	4,295	3,027	1268	462	757	61	1,101	2,376
45-49	4,136	2,711	1425	655	1,143	154	1,195	1,644
50-54	3,628	2,238	1390	832	1,541	322	998	767
55-59	3,127	1,832	1295	1,044	1,939	472	446	270
60-64	2,376	1,288	1088	904	1,678	490	137	71
65-69	1,938	1,061	877	257	1,415	459	40	24
70-74	1,931	1,032	899	2	1,446	449	27	9
75-79	1,633	938	695	0	1,223	398	10	2
80-84	1,379	846	533	0	1,063	313	2	1
85 or older	1,422	923	499	0	1,162	253	6	1
<b>Total</b>	<b>35,517</b>	<b>23,460</b>	<b>12,057</b>	<b>4,905</b>	<b>14,891</b>	<b>3,460</b>	<b>6,650</b>	<b>10,516</b>
*Age of main Claimant	35,517				35517			

### Mitigating actions to be taken

Under 18's are not liable for council tax and therefore not eligible for Council Tax Support. The pink shaded figures show where the prevalence of residents in that age bracket is higher than in the population-at-large.

The majority of CTS claimants are aged between 30 and 59 with the highest number of claimants aged between 40 to 44. There does not appear to be any over or under representation amongst any particular working age group which would require targeted mitigations.

Measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

- Civica UK Ltd are the current service providers and have maintained Council Tax and Housing Benefit processing services in Enfield since 2016. Service Level Agreements have been in place throughout the period with agreed Key Performance Indicators. These are monitored monthly. Examples of monthly and annual performance report are included within the main report and monitored during this period with no major breaches.
- The Council has an agreed, costed and tested disaster recovery programme with Civica to protect services
- Service improvements have been introduced during this period to improve the customer journey including the introduction of bespoke IVR.

- The service has been maintained during the pandemic and incorporated numerous one-off Government and Council help schemes both then and since
- Civica are an experienced provider of front-line services to the public and private sector with over 100 customers using the OnDemand service
- The Council regularly engages with VCS organisations including ones that are focused on supporting people older residents, e.g. the over 50's forum, age concern UK to ensure early communication of any specific issues regarding service provision is identified and corrected

## 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.

According to the Census 2021 data, 44,900 people in Enfield reported having a disability - 13.6% of the total population. Below is a table showing the age profile of Council Tax Support (CTS) households with a disability. The proportion of claims with a disability is 13.8%. There does not appear to be any over or under representation amongst any particular age group which would require targeted mitigations. The Council does not have estimates of householders or council taxpayers broken down by age.

**Council tax support claims indicating a claimant or partner with a disability**

Age Range*	All Claims by Gender			Claims with Disability	Claims by family Make up			
	All Claimants	Female	Male		Total	Single	Couple	Family with 1 Dep
19 or under	55	40	15	0	37	-	15	3
20-24	666	492	174	12	258	11	282	115
25-29	1,780	1,465	315	132	302	23	670	785
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<b>*Age of main Claimant</b>	<b>35,517</b>				<b>35517</b>			

### Mitigating actions to be taken

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- The Council has an agreed, costed and tested disaster recovery programme with Civica to protect services
- Service improvements have been introduced during this period to improve the customer journey including the introduction of bespoke IVR.
- The service has been maintained during the pandemic and incorporated numerous one-off Government and Council help schemes both then and since
- Civica are an experienced provider of front-line services to the public and private sector with over 100 customers using the OnDemand service
- The Council regularly engages with VCS organisations including those that are focused on disability, e.g., Enfield Carer's Centre, Enfield Disability Action to ensure early communication of any specific issues regarding service provision is identified and corrected.



## 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.

According to the Census 2021 data 2,800 people aged 16 and over declared a gender identity different from the sex they were registered with at birth - representing 1.1% of the total.

### Gender Identity

Gender identity	Enfield		London		England & Wales	
	number	%	number	%	number	%
Gender identity the same as sex registered at birth	232,329	90.3	6,479,664	91.2	45,389,635	93.5
Gender identity different from sex registered at birth but no specific identity given	1,652	0.6	32,753	0.5	117,775	0.2
Trans woman	518	0.2	11,266	0.2	47,572	0.1
Trans man	486	0.2	11,480	0.2	48,435	0.1
Non-binary	74	0.0	5,407	0.1	30,257	0.1
All other gender identities	58	0.0	3,457	0.0	18,074	0.0
Not answered	22,065	8.6	559,960	7.9	2,914,625	6.0
Total residents aged 16+	257,182	100.0	7,103,987	100.0	48,566,373	100.0
Total residents aged 16 + with gender identity different from sex registered at birth:	2,788	1.1	64,363	0.9	262,113	0.5

### Mitigating actions to be taken

There is no data held within council tax or council tax support records which indicates gender reassignment. 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 payable or council tax support they receive. Information regarding a change of name or gender would be processed to the council tax record or 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 agreement to award this contract 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. The council regularly engages with VCS organisations including ones that are focused on supporting people who are trans age e.g., Enfield LGBT centre to ensure any specific issues regarding this community are identified and addressed at the earliest point.

Other measures which are in place to mitigate the impact of the direct contract award



to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

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- The Council has an agreed, costed and tested disaster recovery programme with Civica to protect services
- Service improvements have been introduced during this period to improve the customer journey including the introduction of bespoke IVR.
- The service has been maintained during the pandemic and incorporated numerous one-off Government and Council help schemes both then and since
- Civica are an experienced provider of front-line services to the public and private sector with over 100 customers using the OnDemand service
- The Council regularly engages with VCS organisations including ones that are focused on supporting people older residents, e.g. the over 50's forum, age concern UK to ensure early communication of any and corrected

### 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

### Mitigating actions to be taken

Married or people in civil partnerships can be impacted by the proposal, but this may not be disproportionately more for over another. This is something we will look to continually monitor.

Other measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

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### **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 council tax liability or 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 contract proposal will not have a differential impact on women who are pregnant or recently had a baby.

### **Mitigating actions to be taken**

The council engages with VCS organisations including ones that are focused on supporting pregnant women e.g., Enfield Women's Centre to ensure any specific issues are identified and resolved at an early stage.

Other measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

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## 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

According to the Census 2021 data Enfield has the largest numbers of Greek, Greek Cypriot, Kurdish, Turkish and Turkish Cypriot residents of all local authority areas in England and Wales:

- Turkish – 17,807\* – 13.7% of all England and Wales’ Turkish ethnicity population live in Enfield
- Turkish Cypriot – 7,886 (25% of the national total)
- Kurdish – 6,554 (7% of the national total)
- Greek – 3509 (4.5% of the national total)
- Greek Cypriot – 10,101 (21.9% of all Greek Cypriots in England and Wales).

Enfield has now also seen large proportional increases in other ethnic groups:

Enfield is now home to the highest numbers nationally of Albanians and Bulgarians

- 7.3% of Albanians and 5.6% of Bulgarians resident in England and Wales live in the borough.

Enfield has the 5th highest Somali population of the 332 districts of England and Wales.

<b>Ethnicity: 34 categories</b>	<b>Persons (2021)</b>	<b>% of total</b>
White British	103,313	31.3
White Irish	6,184	1.9
Gypsy or Irish Traveller	374	0.1
Greek	3,509	1.1
Greek Cypriot	9,912	3.0
Turkish	17,503	5.3
Turkish Cypriot	7,652	2.3
Kurdish	5,578	1.7
Bulgarian	5,386	1.6
Polish	5,002	1.5
Romanian	4,623	1.4
Albanian	3,324	1.0
Roma / Romany Gypsy	1,146	0.3
White Other	24,720	7.5
Mixed: White / Black Caribbean	5,276	1.6
Mixed: White / Black African	3,084	0.9
Mixed: White / Other Black (incl Black British)	204	0.1
Mixed: White / Asian	4,009	1.2
Mixed: Black / Asian	360	0.1
Mixed: Other	6,543	2.0
Indian	12,015	3.6
Pakistani	3,686	1.1
Bangladeshi	8,142	2.5
Chinese	2,765	0.8
Other Asian	11,641	3.5
Black British	6,015	1.8
Somali	8,089	2.5
Ghanaian	4,836	1.5
Nigerian	4,945	1.5
Other Black African	17,340	5.3
Black Caribbean	16,976	5.1
Other Black	2,784	0.8
Other Ethnic Group: Arab	2,796	0.8
Other Ethnic Group	10,257	3.1

A claimant's race, ethnicity or nationality does not impact on council tax liability or

the council tax support financial assessment. No information is held within the council tax account regarding ethnicity. For Council tax support, 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. However, other Council held information will be used to monitor and respond to any emerging trends so that our provision is inclusive and fit for purpose.

A claimant's entitlement to Council Tax Support is decided in accordance with national criteria e.g., British Citizenship.

#### **Mitigating actions to be taken**

The council engages with VCS organisations including ones that are focused on supporting ethnic minority communities e.g., EREC to ensure any specific issues are identified and addressed as soon as possible.

Other measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

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#### **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.

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?

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

According to the 2021 Census:

Christians still form the largest religious group in Enfield, although their numbers fell by 14,402 (8.6%) from 2011 to 2021

- The number of Muslims rose by 18% to 61,477
- 20% of residents report having 'No religion' - an increase of 34.5%
- The greatest proportionate rise was among people of 'Other Religion' - from 1,950 to 10,351 - a fourfold increase.
- The growth in followers of 'Other Religion' can largely be explained by the numbers of people who can now identify as Alevi
- There are 7,883 Alevi in Enfield - the highest number of any local authority area in the country - over 30% of all England and Wales' Alevi are resident here.
- Enfield residents are more religious than in London or the rest of the country on average, where higher proportions of people have no religious belief. Enfield also contains proportionately more Christians and Muslims than in London or England & Wales.

Religion	2011		2021	
	Number	%	Number	%
Christian	167,417	53.6	153,015	46.4
No religion *	48,522	15.5	65,241	19.8
Muslim	52,141	16.7	61,477	18.6
Not answered	24,195	7.7	23,041	7
Other religion	1,950	0.6	<b>10,351</b>	3.1
Hindu	10,927	3.5	10,231	3.1
Jewish	4,412	1.4	3,713	1.1
Buddhist	1,824	0.6	1,716	0.5
Sikh	1,078	0.3	1,199	0.4

A claimant's religion and belief are not recorded within Council Tax/Council Tax Support records and have no impact on the financial assessment of CTS. The Council is committed to protecting vulnerable residents and delivering a fair Council Tax/Council Tax Support Scheme, including for those with different religions and beliefs. For this reason, we work closely with the Enfield Faith Forum, an organisation with a large number of representatives from religious



organisations across the borough. We support vulnerable groups through improved access to affordable credit, improved money management, our Fair Income and Debt Policy and our council tax and benefit helpline. The proposed contract will not have a differential impact because of a person's religion or belief.

### Mitigating actions to be taken

People of all religions and beliefs can be impacted by the contract services, but this may not be disproportionately more for one religious group or beliefs over another. This is something we will look to continually monitor.

Other measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

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### Sex

Sex refers to whether you are a man or woman.

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

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

This information is recorded within the council tax account and a claimant's personal details but does not impact on council tax liability or the CTS financial assessment.

There are approximately twice the number of female council tax support scheme claimants (23,406) than male (12,057).

### Mitigating actions to be taken

The council engages with VCS organisations including ones that support women e.g., Enfield Women's Centre to ensure any specific issues are identified and addressed at the earliest possible convenience.

Other measures which are in place to mitigate the impact of the direct contract award to Civica UK Ltd for the 22/23 period, for processing and support services for Revenue & Benefits and Financial Assessment include.

- Civica UK Ltd are the current service providers and have maintained Council Tax and Housing Benefit processing services in Enfield since 2016. Service Level Agreements have been in place throughout the period with agreed Key Performance Indicators. These are monitored monthly. Examples of monthly and annual performance report are included within the main report and monitored during this period with no major breaches.
- The Council has an agreed, costed and tested disaster recovery programme with Civica to protect services
- Service improvements have been introduced during this period to improve the customer journey including the introduction of bespoke IVR.
- The service has been maintained during the pandemic and incorporated numerous one-off Government and Council help schemes both then and since
- Civica are an experienced provider of front-line services to the public and private sector with over 100 customers using the OnDemand service

### 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 Council Tax/CTS application and has no impact on the liability for council tax or financial assessment of council tax support.

The Council is committed to protecting vulnerable residents and delivering a fair Council Tax Support Scheme, including for those who are lesbian, gay, bisexual, and transgender. For this reason, we continue to liaise with the Enfield Lesbian, Gay Bisexual and Transgender Network.

We support vulnerable groups through improved access to affordable credit, improved money management, our Fair Income and Debt Policy and our council tax and benefit helpline.

The proposed contract award will not have a differential impact because of a person's sexual orientation.

### **Mitigating actions to be taken**

Local people who are lesbian, gay, bisexual, and transgender may be impacted by the council tax and benefit service delivery, but this may not be disproportionately so. This is something we will look to continually monitor. Following the publication of further 2021 Census data by the Office of National Statistics, we hope to develop a better understanding of lesbian, gay, bisexual, and transgender in relation to various issues that may be relevant to future consultations and service changes we deliver.

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**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.

Appendix 1 provides the map of the borough by deprivation index. 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 will impact on these households. Mitigations are in place as set out below.

CTS provides vital support to low-income households. A map of Enfield showing the index of deprivation is shown at Appendix 1. There is a strong correlation between those receiving CTS and Housing Benefit, levels of council tax debt and the areas of deprivation in the borough

**Mitigating actions to be taken.**

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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?

**SECTION 5 – Action Plan for Mitigating Actions.**

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments



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