

# Appendix H

## 2024/25 Council Tax Support Scheme Equality Impact Assessment

### 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 e.g., 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

<b>Title of service activity / policy/ strategy/ budget change/ decision that you are assessing</b>	<b>Council Tax Support Scheme 2024/25</b>
<b>Team/ Department</b>	<b>Financial Assessment, Resources</b>
<b>Executive Director</b>	<b>Fay Hammond, Executive Director of Resources</b>
<b>Cabinet Member</b>	<b>Cllr Leaver, Cabinet Member for Finance and Procurement</b>
<b>Author(s) name(s) and contact details</b>	<b>Sally Sanders, Head of Financial Assessment</b>
<b>Committee name and date of decision</b>	<b>Cabinet 21.2.2024 Council 22.2.2024</b>
<b>Date of EqIA</b>	<b>13 February 2024</b>

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	<b>13 February 2024</b>
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	<b>Sally Sanders, Head of Financial Assessment Bridgette Cowley, Head of Income &amp; Debt</b>
<b>Name of Director who has approved the EqIA</b>	<b>Fay Hammond, Executive Director of Resources</b>

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

<p>Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision</p> <p><b>Please summarise briefly:</b></p> <p>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?</p>
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## **What is the proposed decision or change?**

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 working-age households in paying their Council Tax. Council Tax Support is awarded as a reduction on a council taxpayers' bills, like a discount, so the resident pays less. The scheme has two parts – a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact only on the non-statutory elements of the scheme and do not affect the statutory scheme for pensioners.

Anyone who is liable for council tax (tenants and homeowners) can apply for council tax support. An application for Housing Benefit or Universal Credit can be used as a claim for council tax support or a separate council tax support application can also be completed.

Generally, low income households (including those who work) will be entitled to some level of support towards their council tax. The amount of support/reduction depends on:

- The local council tax support scheme
- Household type: working age (subject to agreed local scheme) or pension age (subject to prescribed government regulations)
- Household circumstances: single, part of a couple, number of children the household receives child benefit for, residency status, etc.
- Household income, this includes savings, pensions, benefits and earnings for claimant and partner

Since 2013, the Council has reviewed the scheme for working-age households every year and is now deciding on the scheme for 2024/25.

### **The 2024/25 CTS scheme proposal**

The Council is proposing to change the discretionary element of the Council Tax Support scheme that covers the working-age population.

The 2024/25 scheme will be based on the following principles:

- Ensuring everyone in the household makes a fair contribution towards funding local services via council tax.
- Those living in higher-banded properties should not receive greater levels of support than those occupying lower-banded properties.
- The scheme provides targeted support for those impacted by the changes through the Council Tax Support hardship fund.

The Council is looking at a proposal that has three elements of change. The three proposed changes are set out in detail below.

#### **Element 1 – Restricting council tax support to a maximum Band C council tax liability**

It is proposed that council tax support be restricted to a maximum Band C council tax liability. This means that households in higher banded properties (Band D and above) will have their support reduced to the council tax liability level as if they occupied a Band C property.

We have set out below the breakdown of council tax support claimant households by council tax band (as of 31<sup>st</sup> December 2023).

<b>Council tax band</b>	<b>Number of council tax support claimant households</b>
A	2,153
B	4,664
C	11,039
D	8,183
E	2,258
F	437
G	83
H	1

As of 31<sup>st</sup> December 2023, just under 11,000 households claiming Council Tax Support live in properties rated band D and above. 600 claims out of the total 31,200 made so far in 2023/24 would potentially lose over £30 per week. Most of these claims relate to properties in Band E and above.

**Element 2 – Introducing a minimum non-dependent deduction for most households with other adults living in the property and increasing the current deductions by 20%**

A non-dependant is a person living as a member of the applicant’s household who is not their partner or a child/young person for whom they are responsible. There are certain exceptions such as joint-occupiers, boarders, and paid carers, who are not treated as non-dependants. Non-dependants aged 18 or over are usually expected to contribute to household expenses such as council tax.

This change will introduce a deduction for non-working adults and pensioners in the financial assessment. Students, boarders, sub-tenants, and adults disregarded for council tax purposes will remain excluded from a deduction. The rationale for maintaining this exclusion is that the person either does not live within the household e.g., a person in detention or is a patient in hospital or care home, receives little or no state benefit, e.g., students, is still classed as a child for child benefit purposes or is a diplomat or similar.

Part of this proposal is to also increase the non-dependant deduction rates by 20% in 2024/25. This will impact on all households with non-dependants. The details of this deduction are set out in paragraph 47 of the proposed Scheme. The weekly deduction will vary depending on whether the non-dependant is in work (£24.60) or not in work (£5.52). Where the non-dependant in work has low gross weekly earnings, the deduction is reduced correspondingly.

An estimated 7,250 households have non dependants and will be impacted by this change. Of these, 3,000 claims will have a deduction introduced where there is not one currently. Previously, households with non-dependents did not incur a deduction if the non-dependent was receiving out of work benefits or because of the claimant and/or partner’s circumstances (they are registered blind or receiving certain disability benefits).

### **Element 3 – Standardising the minimum payment for mostworking age households at 50% (excluding war widows and single people under 25 including care leavers who will remain at 100%)**

This proposal will introduce one standard minimum payment of 50% for all working age households. This will mean an increase from the current minimum payment of 24.5% for working-age households who are either out of work or in low-paid work and receiving Universal Credit or a legacy benefit, e.g., Income Support.

This also 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.

War widows and single people under 25 (including care leavers) will continue to qualify for a maximum 100% reduction in their council tax (depending on income).

There is one war widow household receiving protection for minimal CTS cost. Given the small cohort of households and small cost the Council proposes to continue this protected group.

In December 2023, 400 households were receiving the under 25-year-old protection at a cost of £69,000 per year. The Government assessed personal allowance is also lower for claimants under 25 years old. Given the lower level of benefits, the small cost of CTS for this cohort and the specific challenges faced by care leavers who are included in this cohort, the Council proposes to continue this protected group.

### **What are the reasons for the decision or change?**

The total cost of the Council Tax Support scheme as of 31st December 2023 was £40.7m (36.5k cases) The cost of the non-statutory working age scheme (28.8k cases) was £29m. The cost of the statutory pensioner scheme is £11.7m (7.7k cases). The percentage cost of Council Tax Support scheme (including the Greater London Authority share) as a proportion of the Council's net budget is 14.24%.

The Council is proposing to introduce changes to the 2024/25 Council Tax Support scheme to contribute towards the budget gap facing the Council, alongside other cost savings and income proposals to ensure the can set a balanced budget and remain financially resilient.

The Council faces a challenging budget gap as reported in September 2023. One of the options to close this budget gap includes reviewing the Council Tax Support Scheme. The Council Tax Support Scheme is the Council's largest area of discretionary spend, and

benchmarking demonstrates that the Council's costs were the highest in London, and therefore a consultation was launched in September 2023 to consider proposals to amend the Council Tax Support Scheme. The Council's budget gap has arisen due to inflation costs and the impact of significant cost pressures in statutory services such as homelessness and demographic pressures in Adults and Children's services.

The Council's final budget is being proposed to Cabinet at the meeting on 21 February 2024. The final government settlement has now been received, and there is a wide gap between the Council's cost pressures and available government funding. Enfield Council's budget pressures total £45.864m; in addition to this, a further £10m is required to be held as a specific homelessness risk reserve. The level of government funding is constrained, with £6.6m received to recognise these cost pressures in the final settlement. Following robust review of the Council expenditure and income, the 2024/25 budget includes extensive and cross-Council savings proposals of £16.568m. The budget also increases the Council Tax by the maximum permitted without a referendum. However, the Council Tax Support Scheme proposals are also required to help close this budget gap. The Council's level of reserves are depleted and remaining financially resilient and setting a balanced budget is critical to maintain key services.

### **Specific proposals**

The proposal to introduce the restriction of council tax support to band C will mean that those living in higher banded properties no longer receive a higher level of support than those living in lower banded properties.

The proposed scheme includes introducing a minimum reduction on the amount of support that would otherwise be available for most households with other adults living in the property (known as a non-dependent deduction). This inclusion of other resident adults in the financial assessment will ensure households with a larger number of resident adults make a higher council tax contribution when compared to single households, couples and households with dependent children (i.e., children for whom child benefit is received).

The introduction of a standard minimum payment for all households receiving benefit levels based on the government assessed needs allowance means that all households will make the same level of council tax contribution.

Restricting Council Tax Support by council tax band, a minimum payment and by non-dependant deductions are common methods of reducing the cost of local working age Council Tax Support schemes in England.

The Council considered a range of other options to amend the Council Tax Support Scheme. These included increasing the value of the income band thresholds, increasing the maximum award for non-protected households only, restricting CTS to a higher council tax band, and reviewing the earned income taper, minimum weekly entitlement, and capital limit. However, none of these options achieved the required level of savings.

As part of the initial modelling undertaken prior to the consultation, consideration was also given to adopting different levels of minimum payment, of 30%, 40% and 50%. However, the preferred option, which was put out to consultation, was to consult on the 50% minimum payment. This was because:

- the cost of Enfield's Council Tax Support Scheme is the highest in London and one of the objectives of this proposal was to reduce the scheme total cost to closer to the London average.
- The budget gap facing the Council is significant. Given the scale of the budget challenge, the Council's preferred option was to consult on the proposal which resulted in the greatest saving for the Council.

Consideration has been given to the introduction of a transitional council tax support scheme for 2024/25 to lessen the impact of the proposals on the protected groups, in particular for those disabled people who previously received the maximum award of 100% and were treated as a protected group. A transitional scheme could, for example, have made the maximum award for protected groups 75% in 2024/25, moving to 50% in 2025/26. It is estimated that this sample transitional arrangement would reduce the level of income that we could otherwise collect in 2024/25 by £2.5m (GLA and Council). However, given the scale of the budget gap the Council faces, no transitional arrangements are proposed. Rather than a "blanket" transitional arrangement to support previously protected groups, it is recommended that financial support be provided through the increased Hardship Fund of £1.5m. The Hardship Scheme will consider individual household circumstances, including household income and outgoings for each claim.

### **What outcomes are you hoping to achieve from this change?**

The total reduction in the proposed Council Tax Support Scheme is £14.3m and the contribution towards the Council's budget gap is £5.8m net. This is, in part because the Council Tax Support Scheme applies to funds collected by the Council on behalf of the Greater London Authority. In addition, the council has prudently estimated that the collection rate for those impacted by the change may be lower. There is also a commitment of an additional £1m to mitigate the impact of these proposals by increasing the existing discretionary hardship scheme. Additional staff resources will be required to collect the additional income, respond to customer queries and provide access to the Welfare Debt Advice Service, this will be funded by setting aside £500k from the additional income generated.

### **Who will be impacted by the project or change?**

The current live working age caseload as of 31<sup>st</sup> December 2023 is, 29,105 but as of 31<sup>st</sup> December 31,238 households are expected to be impacted by this change (this includes households whose circumstances changed in the year meaning they were no longer entitled to council tax support).<sup>1</sup>

The Council has considered the impact of affordability for impacted council tax support households and in particular those previously protected groups where the protection is to be removed under the 2024/25 scheme. The Council does not hold details of household outgoings for the 29,000 impacted households and so it is not possible to assess the affordability of the impact on all 29,000 households.

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<sup>1</sup> The live caseload fluctuates throughout the year as people circumstances change (e.g., people move house or their benefits change). Therefore, figures may differ slightly depending on when the data was calculated.

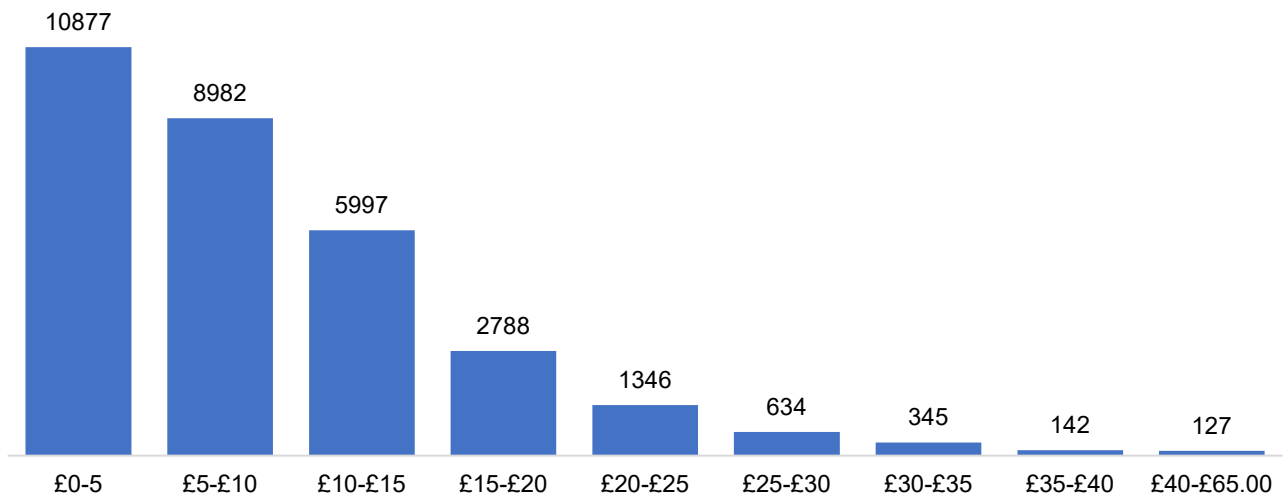
Based on current caseload, it is expected that most working age households will be impacted to some degree by the proposed changes.

The degree of impact will depend on the household situation. The tables and charts below show the number of Council Tax Support claims and potential range of financial loss on the weekly council tax due. This Equality Impact Assessment provides further details on how the different protected groups are expected to be impacted by the proposals.

### Impact – Average weekly household reduction in CTS

On average across all claims residents will be expected to pay £8.84 more a week towards their council tax bill. It is estimated, if these proposals are agreed, 10,877 households (33%), will be required to pay up to an additional £5 a week more council tax than currently.

### Weekly Reduction in CTS by No of Households



Additional data is provided below showing the expected impact of the changes on households by council tax band and household type.

### Impact – Weekly household reduction in CTS by council tax band

Band	Amount of weekly CTS claims will lose by council tax band									Grand Total
	Less than £5	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65.00	
A	1370	775	145	82	12					2384
B	1908	1375	1640	81	39	16				5059
C	4895	3334	2459	942	188	86	40			11944
D	2195	3104	1039	1329	775	285	80	71		8878
E	478	350	644	244	260	194	194	35	57	2456
F	64	35	65	97	58	43	21	33	56	472
G	15	10	5	13	14	10	10	2	14	93
H								1		1



<b>Total</b>	<b>10925</b>	<b>8983</b>	<b>5997</b>	<b>2788</b>	<b>1346</b>	<b>634</b>	<b>345</b>	<b>142</b>	<b>127</b>	<b>31287</b>
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### Impact – Weekly reduction in CTS by household type

Household Type	Weekly reduction in CTS by household type									
	Less than £5	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65	Grand Total
<b>Couple with one child</b>	890	535	268	192	121	42	19	11	12	<b>2090</b>
<b>Couple with two or more children</b>	1445	1559	665	433	192	85	25	11	15	<b>4430</b>
<b>Couple with no children</b>	517	270	360	323	222	133	71	39	33	<b>1968</b>
<b>Lone parent with one child</b>	2571	1833	878	351	171	58	40	6	6	<b>5914</b>
<b>Lone parent with two or more children</b>	2438	2615	1127	580	191	56	32	15	10	<b>7064</b>
<b>Single person</b>	3023	2170	2699	909	449	260	158	60	51	<b>9779</b>
<b>Total</b>	<b>10884</b>	<b>8982</b>	<b>5997</b>	<b>2788</b>	<b>1346</b>	<b>634</b>	<b>345</b>	<b>142</b>	<b>127</b>	<b>31245</b>

The weekly household reduction in CTS by ward is shown at the end of this document.

The proposals were subject to a 16-week public consultation which ran from 22<sup>nd</sup> September 2023 to 21<sup>st</sup> January 2024. The consultation was extended by 4 weeks (from the original end date of 17<sup>th</sup> December 2023) following resident feedback to include further information regarding the Hardship Scheme policy and an easy read version of the FAQs. Further details on the consultation and the consultation findings are available in the appendices to the Council Tax Support Scheme 2023/24 Cabinet and Council reports. Findings relevant to the various protected groups are also provided in this Equality Impact Assessment.

The 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 nine 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 (e.g., 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 the lead claimant of working age Council Tax Support (CTS) households.

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 <sup>2</sup>	Percentage of Enfield population	Number of CTS Claimants	Percentage of total CTS claimants
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%		
<b>All persons</b>	<b>330200</b>	<b>100%</b>	<b>29105</b>	<b>100%</b>

On average residents will be expected to pay £8.84 more a week towards their council tax bill. The table below sets out the average weekly reduction in council tax support by age group.

<sup>2</sup> ONS, Census 2021

Age Group	Average weekly CTS in 2023/24	Average weekly CTS if proposals are agreed	Reduction in weekly CTS	Percentage reduction in CTS	Claims Recalculated
15-19	£15.99	£14.97	£1.02	6.4%	29
20-24	£15.28	£11.76	£3.52	23.0%	724
25-29	£15.56	£9.12	£6.45	41.4%	1940
30-34	£15.89	£9.02	£6.87	43.2%	3374
35-39	£16.11	£8.80	£7.31	45.4%	4627
40-44	£16.18	£8.36	£7.82	48.3%	4785
45-49	£17.06	£8.22	£8.84	51.8%	4467
50-54	£18.42	£8.22	£10.20	55.4%	3975
55-59	£20.52	£8.63	£11.89	58.0%	3415
60+	£21.53	£9.10	£12.43	57.7%	3244
<b>Average</b>	<b>£17.54</b>	<b>£8.70</b>	<b>£8.84</b>	<b>50.4%</b>	<b>30551</b>

### Working age adults

The proposals include an increase in the minimum contribution for all working age residents (except war widows and single people under 25 who are protected from the minimum payment) from 24.5% 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 measures set out in the mitigating actions section offer financial help and advice for affected households.

### Children and young people

Over half (62%) of all households claiming council tax support have children (a person under the age of 16 or aged 16 to 20 in full time education or training). Families with children who are impacted by the proposals will have higher council tax bills to pay, and this is expected to have a negative impact. The measures set out in the mitigating actions section offer financial help and advice for affected families.

The table below shows the expected impact of the proposals by household type. Households with children are more likely to be impacted by the proposals as they are more likely to be claiming council tax support.

Amount of weekly CTS Claims will lose										
Household Type	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
<b>Couple with one child</b>	890	535	268	192	121	42	19	11	12	2090

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

The chart below details the impact by gender, and family make up. The proposals are expected to negatively impact 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 dependent	Family With 2+ dependents
<b>Aged 15 to 19 years</b>	26	16	10	21	1	3	1
<b>Aged 20 to 24 years</b>	647	489	158	243	10	282	112
<b>Aged 25 to 29 years</b>	1812	1469	343	313	26	720	753
<b>Aged 30 to 34 years</b>	3210	2558	652	388	38	930	1854
<b>Aged 35 to 39 years</b>	4388	3350	1038	563	34	1017	2774
<b>Aged 40 to 44 years</b>	4491	3191	1300	758	62	1191	2480
<b>Aged 45 to 49 years</b>	4208	2827	1381	1158	176	1220	1654
<b>Aged 50 to 54 years</b>	3757	2304	1453	1541	346	1025	845
<b>Aged 55 to 59 years</b>	3285	1923	1362	1989	496	518	282
<b>Aged 60 to 64 years</b>	2591	1427	1164	1842	504	156	89
<b>Aged 65 +</b>	690	279	411	396	256	23	15
<b>Total</b>	<b>29105</b>	<b>19833</b>	<b>9272</b>	<b>9212</b>	<b>1949</b>	<b>7085</b>	<b>10859</b>

### Single under-25s

Given the lower levels of benefits awarded to under-25s, the small cost of providing Council Tax Support to this cohort (£69,000 in 2023/24), and the extra challenges faced by care leavers (who are included in this cohort), the Council is proposing to maintain the protected group status of single people under 25 (including care leavers). This means they will continue to qualify for a maximum of 100% reduction in council tax (depending on income).

### Pensioners

Pensioners are defined for prescribed regulation purposes as someone who has attained the qualifying age for state pension credit; and is not or does not have a partner who is on income support, income-based jobseeker's allowance or income-related employment and support allowance; or 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. These proposals would therefore not impact on these defined pensioner claimants.

Fewer than two hundred pensioner non-dependants would be included within the financial assessment for the first time and an estimated deduction of £5.52 per week would be made. This may have a negative impact on these households with pensioner non-dependents. The measures set out in the mitigating actions section offer financial help and advice for affected households.

### **Findings from the consultation**

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

In relation to age, some respondents raised potential challenges for young adults in finding jobs, managing finances, and dealing with increased financial burdens. The proposed 24/25 scheme maintains the protected group status of under-25s which means they will continue to qualify for a maximum of 100% reduction in council tax (depending on income).

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

### **The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working-age people.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

### **The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

**The need to foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

**Mitigating actions to be taken**

Measures which are in place to mitigate the impact of the proposals on working-age households include:

- Maintaining the protected group status of single people under 25 (including care leavers). This means they will continue to qualify for a maximum of 100% reduction in council tax (depending on income).
- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

**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.

**Proposals**

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 deductions are applied if the applicant or their partner:

- Is registered blind.
- is receiving Attendance Allowance, the care component of Disability Living Allowance, the 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 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 introducing a standard minimum payment of 50% for all working age residents.

### **Disability and poverty**

Disabled people are more likely to be living in poverty than non-disabled people. According to data published by the think tank Joseph Rowntree Foundation, the poverty rate for disabled people is 29%, 9 percentage points above those who are not disabled. The difference is even more significant for working-age adults: disabled working-age adults are almost twice as likely to live in poverty than those who are not (35% and 18% respectively).<sup>3</sup>

Analysis by the Joseph Rowntree Foundation also shows that people living in a family with a disabled person are also more likely to be in poverty. The poverty rate for individuals who live in families where someone is disabled is 28%, 9 percentage points higher than those who live in families where no one is disabled. Of all families in poverty, just under half contain someone who is disabled, compared with 3 in 10 families not in poverty.

Research published by disability equality charity Scope in 2019<sup>2</sup> reported on the extra costs faced by disabled adults and families with disabled children. They found that disabled households (with at least one disabled adult or child) need an additional £583975 per month to have the same standard of living as non-disabled households. These figures account for disability benefit payments like Personal Independence Payment (PIP), which are designed to help address these costs. These extra costs are driven by disability-related factors such as the need to purchase specialist equipment and home adaptations; higher energy use; and inaccessibility of public transport resulting in greater use of taxis. The report uses data from 2019/20. If this figure is

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<sup>3</sup> Joseph Rowntree Foundation, [UK Poverty 2023: The essential guide to understanding poverty in the UK](#), 2023



updated to account for inflation over the current period 2022/2023, these extra costs rise to £1,122 per month.

### **Disability and employment**

Disabled people in Enfield face lower levels of employment than non-disabled people. In 2022/23, it was estimated that 52.2% of disabled people in Enfield were in employment, lower than London (55.4%) and national (54.9%) averages.<sup>4</sup> People affected by disability in Enfield had an employment rate that was 23.8 percentage points lower than that of people who are not affected by disability. Charity Disability Rights UK highlights that disabled people face disproportionate barriers to employment. They attribute a number of reasons for this, including lack of supported employment and internship programmes and lack of confidence and awareness among employers about workplace adjustments. This means that disabled people may not have the same ability to supplement their income through employment as non-disabled people.

### **Carers and poverty**

Analysis from the Joseph Rowntree Foundation also finds that informal carers are more likely to live in poverty than those without caring responsibilities: 29% compared with 20%.<sup>5</sup> Working-age informal carers are less likely to be employed. Around two-thirds of male carers (67%) and 6 in 10 female carers (62%) are employed. By contrast, 7 in 10 women (70%) and almost 8 in 10 men who are not carers (78%) are employed.

### **Expected impact of the proposals**

The proposed changes to the scheme are expected to have a negative impact on disabled claimants and carers as the proposed 24/25 scheme includes the introduction of a standard minimum payment of 50% for all working age residents and the removal of the following protected groups:

- 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.

The changes are expected to impact disabled and carer claimants disproportionately as many disabled claimants and carers will receive reduced council tax support and be expected to contribute towards their council tax for the first time whereas other working age claimants have been making a minimum payment since the start of the scheme in 2013. The mitigations listed below offer financial help and advice for affected households.

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<sup>4</sup> Department for Work and Pensions, [Employment of disabled people 2023](#)

<sup>5</sup> Joseph Rowntree Foundation, [UK Poverty 2023: The essential guide to understanding poverty in the UK, 2023](#)

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										
	Age Group	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	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
Total number of claims	<b>439</b>	<b>1045</b>	<b>3330</b>	<b>1473</b>	<b>740</b>	<b>389</b>	<b>238</b>	<b>87</b>	<b>81</b>		<b>7822</b>

Carers	Amount of Weekly CTS Claims will lose										
	Age Group	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.	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
Total number of claims	<b>282</b>	<b>410</b>	<b>1366</b>	<b>1003</b>	<b>511</b>	<b>224</b>	<b>101</b>	<b>54</b>	<b>46</b>		<b>3997</b>

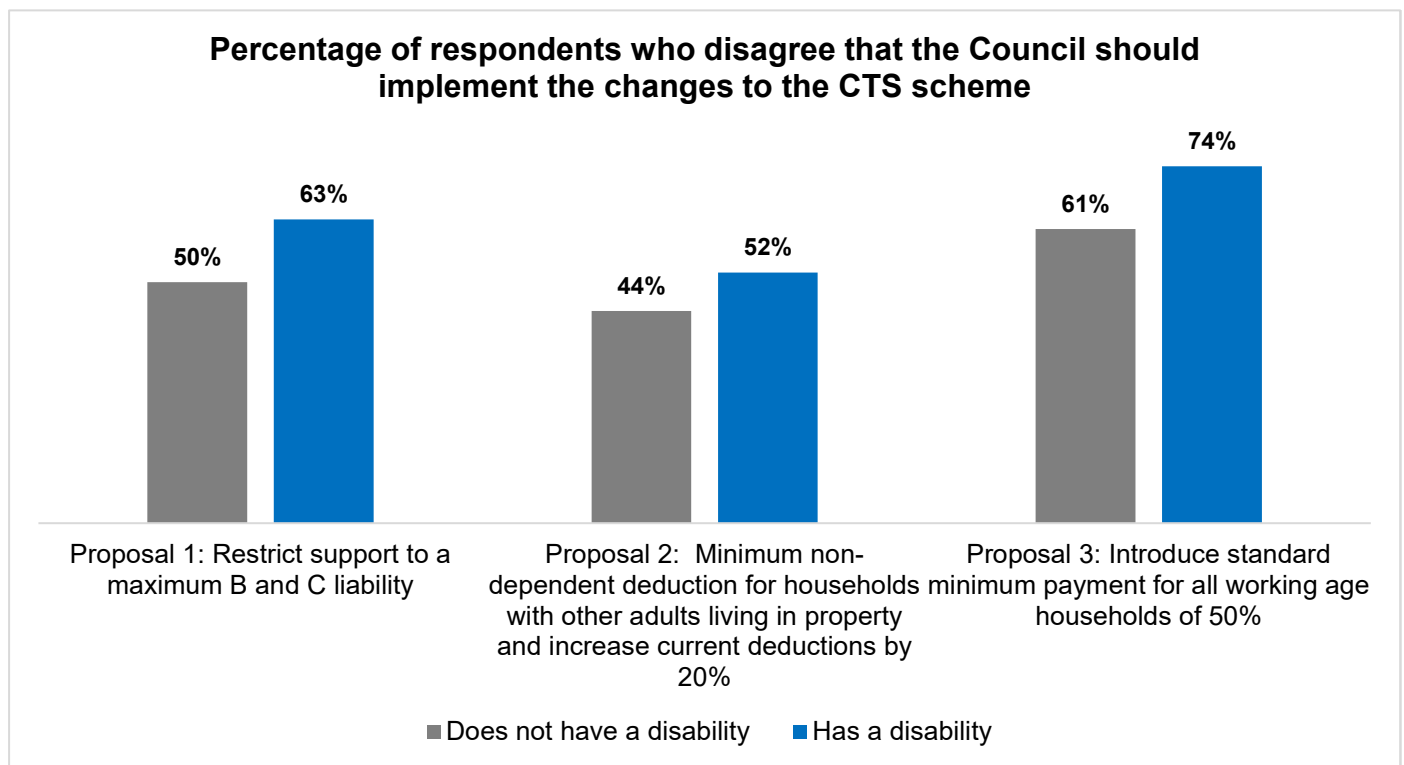
### Findings from the consultation

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our

online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

We directly contacted voluntary and community sector organisations who are focused on supporting disabled residents and carers, including the Enfield Carers' Centre and Carers and Parents in Enfield (CAPE). Following a consultation meeting with the Enfield Learning Disability Partnership Board, an easy read version of the frequently asked questions and additional information on the hardship scheme was added to the consultation website, and the consultation was extended for a further 4 weeks.

Respondents to the consultation were asked to state whether they had a disability or not. 46% of respondents stated they had a disability. Overall, disabled respondents were less likely to agree with the proposals than non-disabled respondents. Disabled respondents were least likely to agree with the proposal to introduce a standard minimum payment for all working age households of 50%.



When asked to explain the negative impact on their household, responses included<sup>6</sup>:

- Respondents with a disability, including those on Personal Independence Payment and Employment and Support Allowance, underscore the significance of council tax support in helping manage their costs and sustaining a decent standard of living.
- Concerns that a reduction in CTS could result in heightened debt, increased poverty, and compromises in meeting essential needs for disabled and vulnerable populations.
- Concerns were also raised about the practicality of finding additional funds to pay for the increase in Council Tax (e.g., through work), and the extra costs associated with disabilities.

<sup>6</sup> Responses to open-ended questions have been coded. This means similar comments have been grouped under common themes.

- VCS groups also raised issues regarding residents with complex needs being housed in higher banded Council Tax properties and emphasised the importance of considering financial need over residence in Council Tax Reduction Schemes.

Respondents were also asked to suggest actions the Council could take to mitigate the impact and alternatives to the proposed changes to the scheme. Suggested actions and alternatives and our responses are listed below.

Suggestion: Maintain protection for those permanently sick or disabled, including 100% Council Tax exemption for claimants of some forms of benefits (especially those in receipt of higher rate disability benefits, such as Higher Rate Disability Living Allowance, Higher Rate Personal Independence Payments, and the support component of Employment Support Allowance).

Our response: Maintaining the existing scheme for those permanently sick or disabled would not deliver the increase in council tax income to support the budget gap. However, there are some mitigations in place as set out below in the design of the proposed scheme.

Although there is an expectation through this proposal that everyone makes a contribution towards Council services that are provided, it is recognised that some residents are not able to increase their income due to the severity of their disability. These residents will receive higher level of government benefits to recognise this, these benefits are disregarded when calculating the level of council tax support.

The examples below show the difference in income between a single person with disability benefits and a single person who doesn't have disability benefits. They will both be asked to pay the same Council Tax under the new scheme proposals:

<b>Single person with disability benefits</b>	<b>Single person with no disability benefits</b>
<p>Income per week in 24/25 will be £280.55/wk, made up of:</p> <ul style="list-style-type: none"> <li>• £108.55 personal independent payments disregarded</li> <li>• £172.00 Universal Credit calculated from (£81.50 Severe disability premium + £90.50 applicable amount as over 25 years old)</li> </ul>	<p>Income per week in 24/25 will be £90.50/wk, made up of £90.50/wk Universal Credit calculated from (£90.50 applicable amount as over 25 years old)</p>

There are around 200 households that may be eligible to apply for a discount based on the fact that they are severely mentally impaired (this is a specific classification) and remain eligible for a full or partial reduction in their Council Tax, this is part of the statutory Council Tax regulations. The council has proactively written to everyone who potentially can make a claim under this provision because historically residents did not need to make this application as the old council tax support scheme provided this 100% reduction.

In addition, an application could be Council Tax Support hardship scheme as a further mitigation.

Suggestion: Maintain full protection for those in receipt of Carers Allowance.

Our response: Maintaining the existing scheme for those in receipt of carers allowance would not deliver the increase in council tax income to support the budget gap. However, there are some mitigations in place as set out below in the design of the proposed scheme.

Although there is an expectation through this proposal that everyone makes a contribution towards Council services that are provided, it is recognised that some residents are not able to increase their income due to carers responsibilities. These residents will receive higher level of government benefits to recognise this. The Council Tax Scheme allows these to residents to retain more of their income when calculating the level of Council Tax Support in recognition of this.

The Council wrote to 500 carers that may be eligible for a 25% discount in their council tax where there are two adults in the property (ie this equates to a single person discount). This is because historically residents did not need to make this application as the old council tax support scheme provided this 100% reduction.

In addition, an application could be Council Tax Support hardship scheme as a further mitigation.

Note that households that receive “carers allowances” may not be in the same household as the person that they are caring for.

Suggestion: Similar properties may be placed into different council tax bands according to area property valuations. This may result in people in exactly the same financial circumstances paying more council tax based on their post code. CTRS schemes should be constructed based on financial need not residence.

Our response: The council tax banding system is a national scheme and the Council Tax Support Scheme has to operate within the legislation which determines bands. However, where the property has been adapted and meets the criteria for disabled relief, householders can apply for a reduction in their council tax bill. Further, where a household has been placed in a particular home (Band D and above) as a result of their care needs, and this causes significant hardship, the individual may apply to the discretionary hardship scheme for support.

Suggestion: Advocacy for transparent communication, awareness campaigns and stream lined application process.

Our response: Support is available for residents at our two community hubs in Enfield Town and Edmonton Green Library and from our Welfare and Debt Advice Team. Information is also available on our website, including a list of frequently asked questions. Additionally, the Council will work closely with the voluntary and community sector to support residents with the council tax support hardship process and applications for any other appropriate exemptions or reliefs. The current hardship fund application form is being reviewed to streamline and simplify wherever possible. However, a level of information/detail is required to ensure a full assessment can be undertaken.

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

**The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on disabled people and carers.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantaged suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

**The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

**The need to foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

**Mitigating actions to be taken**

Measures which are in place to mitigate the negative impact of the proposals on disabled residents include:

- Disability benefits will continue to be disregarded in the Council Tax Support calculation. In addition to this, those in receipt of disability benefits and allowances attract higher premiums and applicable amounts (the amount the Government assesses a household will need to meet necessary weekly costs) which are used in the council tax support calculation. This is particularly relevant to those who are currently protected due to being in receipt of disability benefits and/or carers allowance. This ensures that those currently protected and losing their protection, continue to have a higher income than those not protected, to reflect on their disability related costs. The examples below show the difference in income between a single person with disability benefits and a single person who doesn't have disability benefits. They will both be asked to pay the same Council Tax under the new scheme proposals. Although the person with disability benefits has greater income levels (to support their needs) this income is not taken into account in the council tax support calculation.

<b>Single person with disability benefits</b>	<b>Single person with no disability benefits</b>
Income per week in 24/25 will be £280.55/wk, made up of:	Income per week in 24/25 will be £90.50/wk, made up of £90.50/wk Universal Credit

<p>£108.55 personal independent payments disregarded          £172.00 Universal Credit calculated from (£81.50 Severe disability premium + £90.50 applicable amount as over 25 years old)</p>	<p>calculated from (£90.50 applicable amount as over 25 years old)</p>
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- Applying 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 (which is based on financial circumstances) are claimed so these options may become more beneficial to mitigate the impact in the reduced support. To support this, the Council has identified those households who may benefit from these council tax regulations and will contact all these households in advance of council tax billing to make them aware.
- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is ‘hardship beyond that which would normally be suffered.’ Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Contacting disability organisations in the borough to ask them to promote the Hardship Fund among their clients and investigate further ways to raise awareness of the Fund.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

<p><b>Gender Reassignment</b></p> <p>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.</p>
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on transgender people?</p>
<p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>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</p>

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 are not expected to 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. However, they are expected to have a negative impact on most working age adult claimants, regardless of gender identity, 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 households.

## **Consultation**

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire, offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household and emailing voluntary and community sector organisations, including those focused on supporting people who are transgender such as the Enfield LGBT Centre. The consultation was open from 22 September 2023 to 21 January 2024.

## **Mitigating actions to be taken**

Measures which are in place to mitigate the impact of the proposals on working-age households include:

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Working with the Enfield LGBT Centre to promote the 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, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

## **Marriage and Civil Partnership**

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, whereas 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 are not expected to have a differential impact on people who are married or in a civil partnership.

There is currently one war widow household receiving protection at a minimal cost. Given the small cohort of households and small cost, the Council is proposing to continue this protected group. This means that war widows will continue to qualify for a maximum of 100% reduction in council tax (depending on income).

**Mitigating actions to be taken**

N/A

**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 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 due to childcare responsibilities. The mitigations below offer financial help and advice for affected households.

**Consultation**

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

As part of the consultation, we directly contacted voluntary and community sector organisations in the borough, including those who may offer support to pregnant women, such as the Enfield Women's Centre.

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

**The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme may have a disproportionate negative impact on people who are pregnant or in the maternity period. This group may have less ability to increase their income, for example by increasing hours at work, because of childcare responsibilities.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

**The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

**The need to foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

**Mitigating actions to be taken**

Measures which are in place to mitigate the impact of the proposals on affected households, including those with members who are pregnant or in the maternity period, include:

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.

- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

## 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. Ethnicity information is requested from each claimant on a voluntary basis.

As of 31 January 2024, 5,262 working age Council Tax Support claimants have provided their ethnic group (out of a total caseload of 28,797). The table below shows the ethnicity breakdown of working-age Council Tax Support claimants.

<b>Ethnic group</b>	<b>Number of Council Tax Support claimants</b>
<b>Asian or Asian British</b>	<b>337</b>
Bangladeshi	100
Chinese	10
Indian	68
Pakistani	45
Any other Asian background	114
<b>Black or Black British</b>	<b>1,777</b>
African	987
Caribbean	600
Any other Black background	190
<b>Mixed or multiple ethnic groups</b>	<b>353</b>
White and Asian	48
White and Black African	52
White and Black Caribbean	141
Any other mixed background	112
<b>White</b>	<b>2,725</b>
British	1,612
Gypsy/Traveller	16
Irish	49
Any other White background	1,048
<b>Other ethnic group</b>	<b>70</b>

Arab	70
<b>Number of claimants with recorded ethnic group</b>	<b>5,262</b>
<b>Number of claimants with no recorded ethnic group</b>	<b>23,535</b>

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%).<sup>7</sup>

The table below sets out the percentage of working-age CTS claims by ward and the percentage of each ward population from an ethnic minority group.<sup>8</sup> As the table shows, for the most part the wards with the highest number of Council Tax Support claims are also the wards with the highest proportion of residents from an ethnic minority group.

Ward	Number of working-age CTS claims <sup>9</sup>	Percentage of all working-age CTS claims <sup>10</sup>	Percentage of ward population from an ethnic minority group
<b>Edmonton Green</b>	2,685	8.6%	83.9%
<b>Enfield Lock</b>	2,465	7.9%	74.1%
<b>Lower Edmonton</b>	2,267	7.2%	83.3%
<b>Brimsdawn</b>	2,129	6.8%	73.6%
<b>Haselbury</b>	2,122	6.8%	82.1%
<b>Upper Edmonton</b>	2,104	6.7%	85%
<b>Jubilee</b>	1,928	6.2%	79.6%
<b>Ponders End</b>	1,795	5.7%	84.1%
<b>Carterhatch</b>	1713	5.5%	72.1%
<b>Southbury</b>	1539	4.9%	63.3%
<b>Bullsmoor</b>	1440	4.6%	66.9%
<b>Bowes</b>	929	3.0%	80.1%
<b>Whitewebbs</b>	1223	3.9%	44.3%
<b>Southgate</b>	914	2.9%	65.1%
<b>New Southgate</b>	823	2.6%	68.3%
<b>Town</b>	820	2.6%	48.2%
<b>Ridgeway</b>	754	2.4%	45.1%
<b>Palmers Green</b>	664	2.1%	64.8%

<sup>7</sup> [Joseph Rowntree Foundation, UK Poverty 2023: The essential guide to understanding poverty in the UK, 2023](#)

<sup>8</sup> Ethnic minority refers to all ethnic groups except the White British group. Ethnic minorities include white minorities, such as Gypsy, Roma, and Irish Traveller groups.

<sup>9</sup> The live caseload as of 31<sup>st</sup> July 2023.

<sup>10</sup> As of 31<sup>st</sup> July 2023, the total live CTS caseload was 31,315.

<b>Highfield</b>	606	1.9%	75.5%
<b>Bush Hill Park</b>	495	1.6%	55.8%
<b>Cockfosters</b>	451	1.4%	58%
<b>Winchmore Hill</b>	425	1.4%	58.3%
<b>Oakwood</b>	418	1.3%	63.4%
<b>Arnos Grove</b>	308	1.0%	64.2%
<b>Grange Park</b>	298	1.0%	49.7%

Although we do not have ethnicity data for all council tax support 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 households.

### Consultation

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

As part of the consultation, we also directly contacted voluntary and community sector organisations in the borough, including those who support residents from ethnic minority backgrounds, such as the Enfield Racial Equality Council.

144 respondents identified their ethnicity. The table below shows the breakdown of respondents by ethnic group.

<b>Ethnic group</b>	<b>Number of respondents</b>
<b>White – English/Welsh/Scottish/Northern Irish/British</b>	<b>76</b>
<b>Other White</b>	<b>40</b>
Greek Cypriot	3
Greek	4
Irish	4
Polish	5
Turkish	8
Any 'Other White' background	16
<b>Black African, Caribbean or Black British</b>	<b>20</b>
African	11
Caribbean	9
<b>Asian or Asian British</b>	<b>4</b>
Any other Asian background	4
<b>Mixed or multiple ethnic groups</b>	<b>4</b>
White and Black Caribbean	4

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

**The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on people from ethnic minority groups.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

**The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

**Foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

**Mitigating actions to be taken**

Measures which are in place to mitigate the impact of the proposals include:

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Contacting voluntary and community sector organisations who support residents from ethnic minority backgrounds to ask them to promote the Hardship Fund among their clients and investigate further ways to raise awareness of the Fund.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

### 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.

The Council does not take a record of a claimant's religion/belief, so this not recorded within the financial assessment system and does not have any impact on the financial assessment of CTS.

The proposed changes to the Council Tax Support Scheme are not expected to have a differential impact because of a person's religion or belief. However, they are expected to have a negative impact on most working age adult claimants, regardless of religion or belief, 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 households.

### Consultation

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

As part of the consultation, we directly contacted voluntary and community sector organisations in the borough, including those who support residents who follow a particular religion or belief. We also engaged with the Enfield Faith Forum which has representatives from different local faith groups.

### Mitigating actions to be taken

Measures which are in place to mitigate the impact of the proposals include:

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Working with the Faith Forum to promote the hardship fund.

- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

## Sex

Sex refers to whether you are a female or male.

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

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

The proposed changes to the scheme are expected to have a negative impact on current and future working age claimants (regardless of sex) as claimants would have to contribute more towards their council tax bill than they previous had to.

Although any change in the scheme would be applied universally, our evidence makes clear that a greater proportion of current Council Tax Support claimants are women and therefore it is expected that women would be disproportionately negatively impacted by the proposals.

The tables below show the expected impact of the proposals on male and female claimants. There are approximately twice the number of female council tax support scheme current claims (20,900) than male (9,651).

Male - Age Group	Average weekly CTS in 2023/24	Average weekly CTS if proposals are agreed	Reduction in weekly CTS	Number of claims
15-19	£15.34	£14.57	£0.77	12
20-24	£15.29	£14.41	£0.88	187
25-29	£14.47	£8.31	£6.16	385
30-34	£16.27	£9.21	£7.06	681
35-39	£16.03	£8.93	£7.09	1099
40-44	£15.86	£8.70	£7.16	1374
45-49	£16.69	£8.74	£7.95	1477
50-54	£18.01	£8.69	£9.32	1538
55-59	£19.12	£8.80	£10.32	1429
60+	£20.44	£9.27	£11.17	1481
<b>Grand Total/average</b>	<b>£17.49</b>	<b>£8.97</b>	<b>£8.52</b>	<b>9651</b>



Female - Age Group	Average weekly CTS in 2023/24	Average weekly CTS if proposals are agreed	Reduction in weekly CTS	Number of claims
15-19	£16.45	£15.25	£1.20	17
20-24	£15.27	£10.85	£4.42	537
25-29	£15.84	£9.32	£6.52	1555
30-34	£15.79	£8.98	£6.82	2693
35-39	£16.14	£8.76	£7.38	3528
40-44	£16.31	£8.22	£8.09	3411
45-49	£17.24	£7.97	£9.27	2990
50-54	£18.68	£7.93	£10.75	2437
55-59	£21.53	£8.51	£13.02	1986
60+	£22.44	£8.95	£13.49	1763
<b>Grand Total/average</b>	<b>£17.57</b>	<b>£8.58</b>	<b>£8.99</b>	<b>20900</b>

### Lone parent households

The table below shows the expected impact of the proposals by household type. Lone parent households are the household type most likely to be claiming Council Tax Support as of July 2023.

Local and national data shows that lone parents are significantly more likely to be women. In 2022, 84% of lone-parent families were lone-mother families.<sup>11</sup> According to the 2021 Census, there are 22,421 lone parent households in Enfield.<sup>12</sup> Of these, 91% had a female household reference person. The household reference person serves a reference point, mainly based on economic activity, to characteristic a whole household and is therefore likely to be the parent in lone-parent households. Therefore, it could be assumed that around 91% of lone parents in Enfield are women. This is one of the reasons why women are significantly more likely to be claiming council tax support than men.

Childcare responsibilities could be a potential barrier to single parents increasing their hours or obtaining better paid employment.

Amount of weekly CTS Claims will lose										
Household Type	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 one child	890	535	268	192	121	42	19	11	12	2090
Couple with two 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 one child	2571	1833	878	351	171	58	40	6	6	5914

<sup>11</sup> ONS, [Families and households in the UK: 2022](#)

<sup>12</sup> ONS, Census 2021

<b>Lone parent with two or more children</b>	2438	2615	1127	580	191	56	32	15	10	7064
<b>Single person</b>	3023	2170	2699	909	449	260	158	60	51	9779
<b>Total number of claims</b>	<b>10884</b>	<b>8982</b>	<b>5997</b>	<b>2788</b>	<b>1346</b>	<b>634</b>	<b>345</b>	<b>142</b>	<b>127</b>	<b>31245</b>

## Disability and care

Women are also more likely to be informal carers than men. According to national (UK) data from 2021/22, 3 million women (9%) and 1.9 million men (6%) were informal carers. Female carers are also more likely to work part-time, with 21% of female carers in part-time employment compared with 8% of men.<sup>13</sup> This is also reflected in the 2021 Census data for Enfield where 9% of female residents are informal carers compared to 6% of men.<sup>14</sup> Female residents also provided, on average, more hours of care per week than men. 31% of female informal carers in Enfield provided 50 or more hours unpaid care a week, compared to 26% of male informal carers.

Women are also more likely to be disabled than men. According to the 2021 Census, 15% of women (25,378) in Enfield are disabled under the Equality Act compared to 12% of men (19,498).<sup>15</sup>

It could therefore be expected that women are more likely to be negatively impacted by the removal of the following protected groups and the increase in the minimum payment for all working age residents from 24.5% to 50%:

- 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.

The mitigations below offer financial support and advice for both female and male claimants.

## Consultation

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024. Of the respondents who described their gender, 68% were female.

As part of the consultation, we directly contacted voluntary and community sector organisations in the borough, including the Enfield Women's Centre.

<sup>13</sup> Department for Work and Pensions, [Family Resources Survey: financial year 2021 to 2022](#)

<sup>14</sup> ONS, Census 2021

<sup>15</sup> ONS, Census 2021

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

### **The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on women as they are significantly more likely to be claiming Council Tax Support.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

### **The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

### **The need to foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

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

Measures which are in place to mitigate the impact of the proposals include:

- Disability benefits will continue to be disregarded in the Council Tax Support calculation. In addition to this, those in receipt of disability benefits and allowances attract higher premiums and applicable amounts (the amount the Government assesses a household will need to meet necessary weekly costs) which are used in the council tax support calculation. This is particularly relevant to those who are currently protected due to being in receipt of disability benefits and/or carers allowance. This ensures that those currently protected and losing their protection, continue to have a higher income than those not protected, to reflect on their disability related costs. The examples below show the difference in income between a single person with disability benefits and a single person who doesn't have disability benefits. They will both be asked to pay the same Council Tax under the new scheme proposals. Although the person with disability benefits has greater income levels (to support their needs) this income is not taken into account in the council tax support calculation.

<b>Single person with disability benefits</b>	<b>Single person with no disability benefits</b>
Income per week in 24/25 will be £280.55/wk, made up of:	Income per week in 24/25 will be £90.50/wk, made up of £90.50/wk Universal Credit

<p>£108.55 personal independent payments disregarded          £172.00 Universal Credit calculated from (£81.50 Severe disability premium + £90.50 applicable amount as over 25 years old)</p>	<p>calculated from (£90.50 applicable amount as over 25 years old)</p>
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- Applying 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 (which is based on financial circumstances) are claimed so these options may become more beneficial to mitigate the impact in the reduced support. To support this, the Council has identified those households who may benefit from these council tax regulations and will contact all these households in advance of council tax billing to make them aware.
- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Contacting voluntary and community sector organisations to ask them to promote the Hardship Fund among their clients and investigate further ways to raise awareness of the Fund.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.
- To promote childcare funding via early years funding 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. This is available for both female and male claimants.

**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 support application and has no impact on the financial assessment of council tax support.

The proposed changes to the Council Tax Support Scheme are not expected to have a differential impact because of a person's sexual orientation. However, they are expected to have a negative impact on most working age adult claimants, regardless of sexual orientation, as they will receive reduced council tax support and be required to contribute more towards their council tax.

### **Consultation**

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire, offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household and emailing voluntary and community sector organisations, including those focused on supporting people who are LGBT+ such as the Enfield LGBT Centre. The consultation was open from 22 September 2023 to 21 January 2024.

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

Measures which are in place to mitigate the impact of the proposals on working-age households include:

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to ensure that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.
- Working with voluntary and community sector groups, including the Enfield LGBT Centre, to promote the hardship fund.
- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

### **Care Experience**

This refers to a person who has spent 13 weeks or more in local authority care.

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

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

A care leaver is someone who has been in the care of the local authority for a period of 13 weeks or more spanning their 16<sup>th</sup> birthday. A young person who is still in care when they reach age 18 stops being a looked after child and becomes a care leaver. Single people under 25 (including care leavers) receive lower rates of Universal Credit than single people aged 25 and over. The table below shows the Universal Credit monthly standard allowance by household type as of January 2024.<sup>16</sup>

Household type	Monthly standard allowance
Single and under 25	£292.11
Single and 25 or over	£368.74

Most single people under 25 also receive a reduced allowance for housing costs.

In December 2023, 400 households receive the protection for under 25-year-olds at a cost of £69,000 per year. Many of these households are care leavers.

The Council Tax Support Scheme proposals for 24/25 are expected to have a positive impact on care leavers. In December 2023 the Council agreed to recognise care experience as a local protected characteristic to ensure the Council considers the impact of its decisions on people with care experience. Given the lower level of benefit received by those under 25, the small cost of providing Council Tax Support for this cohort, and the recognition of extra challenges faced by care leavers, the Council is proposing to maintain the protected group status of single people under 25 (including care leavers). This means they will continue to qualify for a maximum of 100% reduction in council tax (depending on income).

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

No mitigation actions to be taken.

#### **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 households that are socio-economically disadvantaged. However, mitigations are in place as set out below.

The charts below show the numbers weekly CTS claims will lose by ward. Edmonton Green is the highest impacted ward and is the ward with the highest levels of deprivation.

#### **Weekly reduction in Council Tax Support by ward**

<sup>16</sup> <https://www.gov.uk/universal-credit/what-youll-get>

Ward	<£5	£5-£9.99	£10-£14.99	£15-£19.99	£20-£24.99	£25-£29.99	£30-£34.99	£35-£39.99	£40-£65.00	Total
Edmonton Green	1058	782	478	218	84	43	14	3	5	2685
Enfield Lock	744	755	452	271	129	50	38	9	17	2465
Lower Edmonton	850	655	418	191	78	41	21	7	6	2267
Brimsdown	749	650	403	186	84	35	14	6	2	2129
Haselbury	757	655	383	160	99	41	12	13	2	2122
Upper Edmonton	798	576	391	191	79	35	25	6	3	2104
Jubilee	630	623	382	158	73	38	14	9	1	1928
Ponders End	658	530	343	150	66	30	12	6		1795
Carterhatch	556	500	351	180	69	38	14	3	2	1713
Southbury	592	425	297	120	57	24	8	8	8	1539
Bullsmoor	420	412	313	148	89	34	11	9	4	1440
Whitewebbs	427	360	238	106	52	21	7	8	4	1223
Bowes	311	265	163	88	45	24	21	7	5	929
Southgate	334	243	166	79	44	19	15	1	13	914
New Southgate	317	205	173	58	27	16	15	5	7	823
Town	287	224	185	63	31	16	8	5	1	820
Ridgeway	243	198	152	80	45	13	7	12	4	754
Palmers Green	312	166	88	44	26	8	11	3	6	664
Highfield	157	126	165	61	41	29	17	4	6	606
Bush Hill Park	146	123	107	47	30	17	16	4	5	495
Cockfosters	123	111	100	53	25	17	12	6	4	451
Winchmore Hill	177	123	60	36	11	7	2	3	6	425
Oakwood	113	117	81	51	24	17	11	1	3	418
Arnos Grove	86	87	55	28	18	13	11	2	8	308
Grange Park	108	72	53	21	20	8	9	2	5	298
<b>Total</b>	<b>10953</b>	<b>8983</b>	<b>5997</b>	<b>2788</b>	<b>1346</b>	<b>634</b>	<b>345</b>	<b>142</b>	<b>127</b>	<b>31315</b>

### Index of Multiple Deprivation

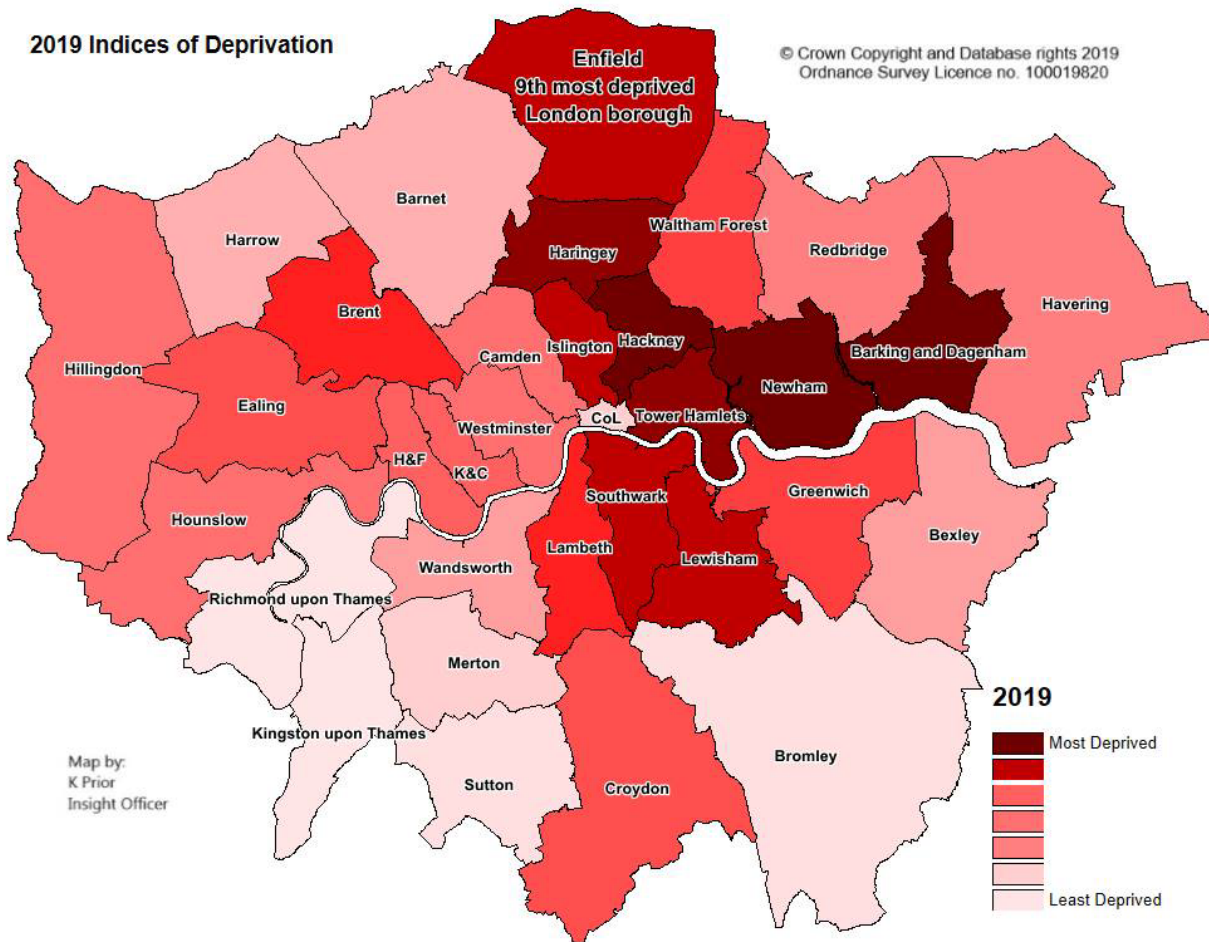
The table and maps below show levels of deprivation in Enfield. The Index of Multiple Deprivation (IMD) is repeated every four years or so, and the most recent one available is the 2019 iteration, with the previous one having been published in 2015.

Enfield's overall deprivation score also fell slightly compared with the rest of England. However, Enfield's relative deprivation within London increased. In 2015, Enfield was the 12<sup>th</sup> most deprived borough in London, and by 2019, this had risen to the 9<sup>th</sup> most deprived.

Of the Outer London boroughs (not including Haringey), Enfield is the second most deprived, after Barking and Dagenham.

When the concentration of super-deprived neighbourhood areas is taken into consideration (i.e., the proportion of LSOA neighbourhoods which are among the 10% most deprived in England), Enfield has the fifth highest proportion of all 33 London boroughs.

67% of all Enfield's LSOA neighbourhoods are within the 50% most deprived neighbourhoods in England.



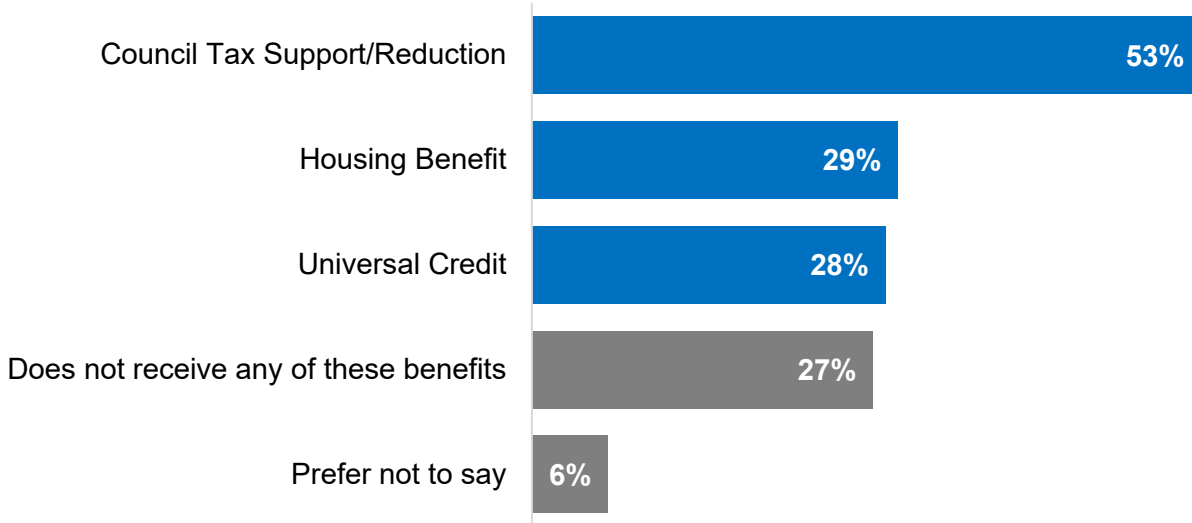
## Consultation

We consulted with residents and representatives of local organisations on the proposed changes to the scheme. This included emailing all Council Tax Support recipients inviting them to complete our online questionnaire and offering one-to-one sessions to Council Tax Support claimants to find out more about how the proposals could impact their household. The consultation was open from 22 September 2023 to 21 January 2024.

Resident respondents to the questionnaire were more likely to be claiming benefits than not. In total, 196 respondents claim benefits. Of these, 153 receive council tax support. Some receive a combination of benefits (this was a multiple-choice question).

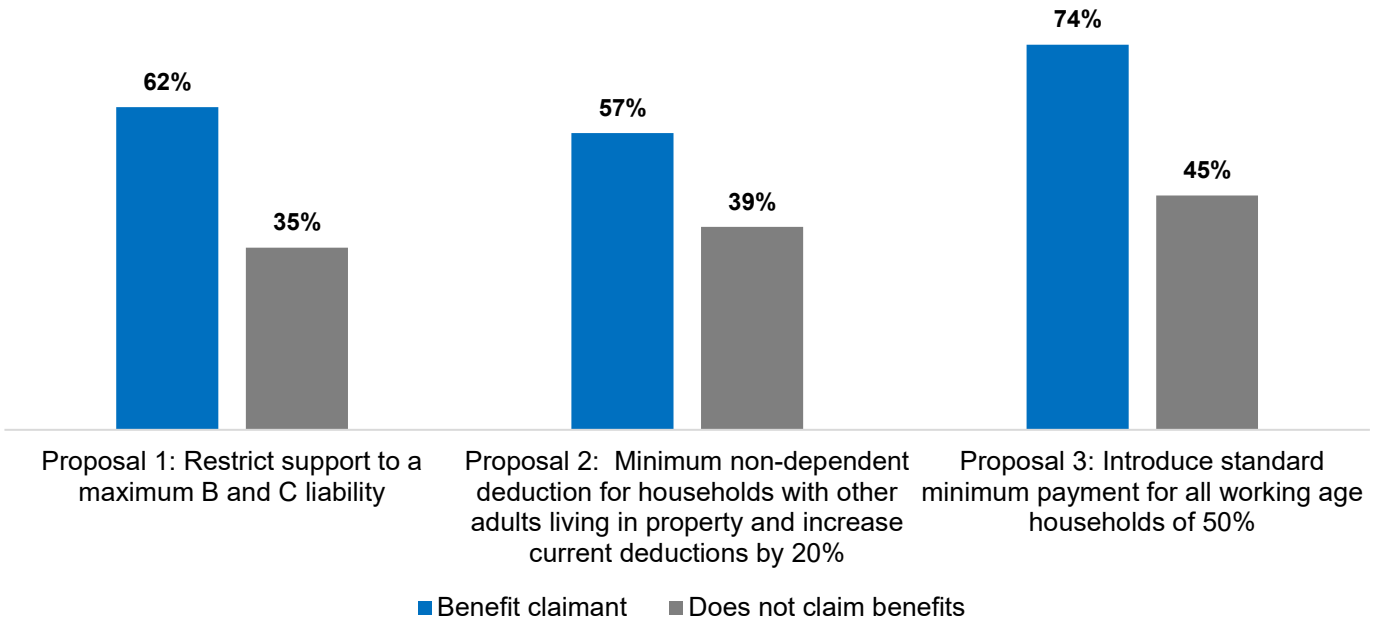


**Respondents: benefit claimants (base: 290)**



Respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits. Across all three proposals, respondents who claim benefits were more likely to disagree (than agree) that the Council should implement the change.

**Percentage of respondents who disagree that the Council should implement the changes to the CTS scheme**



Overall, benefit claimants (60%) would rather the council makes no changes to the Council Tax Support Scheme.

When asked to explain the negative impact on their household, responses included<sup>17</sup>:

- Households currently experiencing financial challenges, facing difficulty affording necessities like food, heating, and bills, especially because of the existing cost of living crisis.
- Concerns over council tax increases exacerbating financial strains, making it challenging to make ends meet.
- Concerns that a reduction in council tax support could result in heightened debt, increased poverty, and compromises in meeting essential needs for vulnerable populations.
- Concerns about the inability to pay council tax without sacrificing other necessities.
- Concerns about the negative impact on overall quality of life, emotional distress, and mental health.

Respondents were also asked to suggest actions the Council could take to mitigate the impact and alternatives to the proposed changes to the scheme. The most common suggestions and our responses are listed below.

Suggestion: Consider each household based on its unique circumstances rather than applying a uniform approach.

- Our response: Council Tax Support is application based and does consider each individual household's income but not expenditure. This includes household circumstances (e.g., single, dependent children) and household income (including savings, pensions, benefits and earnings). A full income and expenditure assessment is conducted should an application for the hardship fund be made.

Suggestion: Requests to not increase Council Tax every year to alleviate the financial burden on residents.

- Our response: A Council Tax increase of 4.99% proposed for 2024/25 of 4.99% is expected to raise £9m income. The Government's core spending power assumptions for councils assume that Council Tax will be raised by the level up to the referendum limit (4.99%). If Council Tax is not increased by 4.99%, the Council will not be able to set a balanced budget.

Suggestion: Make smaller, incremental increase rather than the full proposed changes.

- Our response: The Council considered the introduction of a transitional council tax support scheme for 2024/25 to lessen the impact of the proposals on the protected groups. A transitional scheme could, for example, have made the maximum award for protected groups 75% in 2024/25 and 50% in 2025/26. It is estimated that this transitional arrangement would reduce the level of income that we could otherwise collect in 2024/25 by £2.5m (GLA and Council). Given the financial position of the Council, the low level of reserves and risks of cost pressures in statutory services, no transitional arrangements are proposed. The increased hardship fund will help to mitigate the impact of the proposed changes to the scheme, along with the support and advice from the Welfare and Debt Advice team.

Suggestion: Advocacy for transparent communication, awareness campaigns and steam lined application process.

- Our response: Support is available for residents at our two community hubs in Enfield Town and Edmonton Green Library and from our Welfare and Debt Advice Team. Information is also available on our website, including a list of frequently asked questions. Additionally, the Council

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<sup>17</sup> Responses to open-ended questions have been coded. This means similar comments have been grouped under common themes.

will work closely with the voluntary and community sector to support residents with the council tax support hardship process and applications for any other appropriate exemptions or reliefs. The current hardship fund application form is being reviewed to streamline and simplify wherever possible. However, a level of information/detail is required to ensure a full assessment can be undertaken.

Suggestion: Leave the council tax support scheme as it is.

- Our response: Continuation of the existing discretionary scheme will impact on the Council's ability to set a balanced budget, remain financially resilient, meet its statutory duties and ensure that vital universal and targeted services can continued to be delivered.

Suggestion: Introduce income-based council tax where people on higher incomes pay more.

- Our response: The Council cannot amend the statutory basis for council tax.

The next section of the EqIA summarises how the Council has had due regard to the three equality needs contained in section 149(1) of the Equality Act 2010.

### **The need to eliminate unlawful discrimination, harassment, victimisation and any other unlawful conduct prohibited by the act**

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on people who are socio-economically disadvantaged.

Any particular disadvantage is justified for the reasons set out in the report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate in light of those budgetary pressures.

### **The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic**

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs and organisations.

### **The need to foster good relations between people who share and people who do not share a relevant protected characteristic**

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

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

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

- Increasing the council tax support hardship fund by £1m from 23/24 to a total of £1.5m for 24/25. Hardship fund awards are made in line with the Council Tax Support Hardship Policy which outlines the hardship fund application and award process. The policy has been amended to

ensures that a level of protection and support is available to those applicants most in need (those with extreme financial hardship). Extreme Financial Hardship is 'hardship beyond that which would normally be suffered.' Information on the hardship fund is available on the Council website and will be included in all council tax bills.

- Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.
- Continuing to provide the Welfare Advice & Debt Support to support residents to maximise their income, get their full entitlement to welfare benefits and provide advice and assistance. The team also supports 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.

## 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 Council Tax Support scheme has operated since 2013. The operation of the Council Tax Support scheme and its impact on council tax collection performance are monitored monthly by the Executive Director of Resources. The Council must annually agree the Council Tax Support scheme.

The impact of the Scheme will be monitored through the existing performance information including number of council tax support discretionary hardship payments, number of contacts to the welfare and debt advice team, and 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
Council tax support hardship	Maintaining a discretionary Council hardship fund	Sally Sanders, Head of Financial Assessment	On-going	Costs are contained within the existing Welfare and Financial Assessment teams	It is estimated that the Council will spend up to £475k in council tax support hardship for 2023/24. This will increase to £1.5M in 2024/25 should the proposal(s) be agreed
Welfare Advice & Debt Support	To offer support to residents to maximise income and get full entitlement to welfare benefits	Sally Sanders, Head of Financial Assessment	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. In addition to maximising income, the team will assist residents with council debts such as council tax, rent arrears, housing benefit overpayments and adult social

					care, liaise with voluntary sector groups and promote the hardship fund.
Negative impact of reductions in Council Tax Support on working-age households	Maintain cost of living page		On-going		
Lack of awareness of Council Tax Hardship Scheme	Work with voluntary sector groups to promote Hardship Scheme to affected residents	Sally Sanders, Head of Financial Assessment	On-going		

Appendix 1 - The weekly household reduction in CTS by ward

Ward	<£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	Total
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