

# Appendix C

## Council Tax Support scheme 2023/24 - Equalities Impact Assessment (EqIA)

### Introduction

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

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

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

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

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

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socio-economic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected 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.

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#### 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 2023/24</b>
<b>Team/ Department</b>	<b>Resources</b>
<b>Executive Director</b>	<b>Fay Hammond</b>
<b>Cabinet Member</b>	<b>Cllr Leaver</b>
<b>Author(s) name(s) and contact details</b>	<b>Sally Sanders</b>
<b>Committee name and date of decision</b>	<b>Consultation - Cabinet 12.10.2022 Decision – Cabinet 8<sup>th</sup> February 2023 Council 23<sup>rd</sup> February 2023</b>

<b>Date the EqIA was reviewed by the Corporate Strategy Service</b>	<b>12<sup>th</sup> December 2022</b>
<b>Name of Head of Service responsible for implementing the EqIA actions (if any)</b>	<b>Sally Sanders/Bridgette Cowley</b>
<b>Name of Director who has approved the EqIA</b>	<b>Fay Hammond</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.

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### Section 2 – Summary of proposal

The Council is obliged to set a local Council Tax Reduction Scheme every year following the abolition of the national Council Tax Benefit system in 2013. The Council introduced a local Council Tax Support (CTS) Scheme to provide financial assistance for low-income households in paying their Council Tax. Since 2013, the Council has reviewed the scheme every year and is now deciding on the scheme for 2023/24.

Following previous Equality Impact Assessments and consultations, the Council introduced a range of groups protected from the minimum payment in the scheme that remain entitled to a maximum award of 100%. These are: pensioners, war widows, foster carers registered with the Council, people in receipt of Carers Allowance and people in receipt of higher rate disability benefits (Higher Rate Disability Living Allowance, Higher Rate Personal Independence Payments, and the support component of Employment Support Allowance).

All other working age households are expected to pay a minimum contribution of 24.5% towards Council Tax. A discretionary Hardship Scheme was introduced to provide support to those households that get into severe financial hardship.

The scheme proposed for 2023/24 aims to eliminate unfairness within the current financial assessment of Council Tax Support. The current scheme:

- reduces the cost of council tax for households receiving the basic needs allowance within the council tax support scheme,
- reduces council tax support in cases of excess income above the basic needs allowance to ensure the scheme costs remain within the budgeted expenditure level.

However, there is an inconsistency for households receiving Universal Credit as households with income above the basic needs allowance do not receive a reduction in council tax support whereas households on legacy benefits, e.g., job seekers allowance, do. This makes the current scheme unfair and unaffordable as the overall costs are inflated by this anomaly. By changing the scheme in 2023/24 the Council would also avoid further additional cost of c£0.8m when the remaining 2,500 working households on legacy benefits migrate to Universal Credit. This change will impact approximately 6,500 working households. The Council will use existing data to analyse the impacted households to identify household composition and their protected characteristics so that all appropriate mitigations can be applied.

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### Section 3 – Equality analysis

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

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

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

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

“Differential impact” means that people of a particular protected characteristic (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.

The Council is aware some of these residents may have low levels of participation in Council consultations. To help maximise participation levels among these groups an email has been sent to all claimants likely affected by the proposals with details of the consultation and how they can share their views.

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#### 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 CTS households as the Council does not have estimates of householders broken down by age.

Age band	Enfield population 2021	% of total	CTS Claimants	% of total
Aged 4 years and under	21300	6.5		
Aged 5 to 9 years	22800	6.9		
Aged 10 to 14 years	24100	7.3		
Aged 15 to 19 years	21300	6.5	55	0.2
Aged 20 to 24 years	19100	5.8	666	1.9
Aged 25 to 29 years	21200	6.4	1780	5.0
Aged 30 to 34 years	23100	7.0	3036	8.5
Aged 35 to 39 years	24000	7.3	4115	11.6
Aged 40 to 44 years	24600	7.5	4295	12.1
Aged 45 to 49 years	22700	6.9	4136	11.6
Aged 50 to 54 years	22700	6.9	3628	10.2
Aged 55 to 59 years	21100	6.4	3127	8.8
Aged 60 to 64 years	17100	5.2	2376	6.7
Aged 65 to 69 years	12800	3.9	1938	5.5
Aged 70 to 74 years	11200	3.4	1931	5.4
Aged 75 to 79 years	8200	2.5	1633	4.6
Aged 80 to 84 years	6500	2.0	1379	3.9
Aged 85 and older	6400	1.9	1422	4.0
All persons	330200	100.0	35517	100.0

The shaded figures show where the prevalence of residents in that age bracket is

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higher than in the population-at-large.

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

The local scheme maintains a minimum contribution for working age households, who are not in a disabled or carer group which are protected from the minimum payment. Pensionable age claimants are not included in the local scheme and are assessed under the Government prescribed regulations. The proposed scheme for 2023/24 will reduce Council Tax Support for existing working households receiving Universal Credit.

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

Pensioner age claims are not impacted

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

**Mitigating actions to be taken**

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

- Consulting residents about the proposed changes and asking for their views on how to mitigate any impact
- Applying any Government funded hardship and disregarding cost of living payments as set out in the prescribed regulations
- Maintain the protected category for care leavers aged under 25 years old.
- Maintaining a discretionary Council hardship fund (estimated £400k spend for 2022/23). Households may be entitled to hardship equivalent to 50% of the loss of CTS. In some instances, households may be entitled to higher awards depending on their circumstances.
- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.

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

N.B. Pensionable age claimants are not included in the local scheme and are assessed under the Government prescribed regulations.

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#### 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.

The Council protects some 6,000 households from the minimum payment via the existing Council CTS scheme as shown below. All protected households receive 100% Council Tax Support if they do not have excess income above the Government needs allowance.

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

- council tax regulations,
- government council tax support default scheme regulations included within the council scheme, and
- additional protected groups are excluded from the minimum payment requirement. The following groups will remain exempt from the minimum contribution towards Council Tax.
  - A Claimant or partner in receipt of High-Rate Disability Living Allowance (Mobility and Care component) or Enhanced Personal Independence Payments (Daily Living and Mobility Component)
  - A Claimant or partner in receipt of the support component of Employment and Support Allowance.

In addition, households with the following Universal Credit income elements will be included as protected:

- Carer
- Limited Capacity for work and work related activity (LCW/RA),

Less than 10% of existing protected households are working and will be impacted by the introduction of an income banded scheme. However, any reduction in CTS due to excess income will be made from the full council tax as there is no requirement to pay the 24.5% minimum payment.

35 responses to the consultation from disabled residents were received. Of these half receive Council Tax Support.

When looking at the views of disabled respondents, they are generally less



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positive about the proposal, more likely to state that it will have a negative impact on their household and would rather we make no change to the Council Tax Support scheme. However, when the feedback was further analysed, we found that the views of Council Tax Support claimants with a disability and those of Council Tax Support claimants who do not have a disability were identical in relation to the key questions (e.g., around fairness of the proposal and whether the proposal would have a positive or negative impact).

The data does suggest one key difference between the views of the Council Tax Support claimants who have a disability and those who do not: Awareness is lower among those who have a disability

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

The Council funds a range of protected groups at a cost in excess of £2m p.a. in addition to the default scheme provisions for claimants with a disability. These includes foster carers registered with the Council, people in receipt of Carers Allowance and people in receipt of higher rate disability benefits (Higher Rate Disability Living Allowance, Higher Rate Personal Independence Payments, and the support component of Employment Support Allowance). Specific measures to mitigate the impact of the change in scheme include:

- No minimum payment for protected groups
- Consulting residents about the proposed changes and asking for their views on how to mitigate the impact. This included emailing all CTS households direct, contacting the voluntary sector, including those that are focused on disability, e.g., Enfield Carer's Centre, Enfield Disability Action and GLA, and holding local advice surgeries. The consultation was made more accessible to households with a disability by the following measures:
  - The text in the documents, including the questionnaire, can be resized. Thus, enabling some of those with visual impairments to participate
  - An easy read questionnaire was produced, enabling those with learning difficulties to share their views
  - The webpage that hosts the consultation includes an email address for residents to contact us should they require assistance with participating (for example, braille)
  - We are aware residents with a disability can be under-represented in public consultations. It was for this reason that we sent an email to all claimants likely affected by the proposals with details of the consultation
- Applying any Government funded hardship payments and disregarding cost of living payments as set out in the prescribed regulations
- Following consultation, introduce an additional income band between £0 to £55 for low-income households in low paid work for the 2024/25 Council Tax Support scheme.
- Maintaining a discretionary Council hardship fund (estimated £400k spend

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<p>for 2022/23). Households may be entitled to hardship equivalent to 50% of the loss of CTS. In some instances, households may be entitled to higher awards depending on their circumstances. Any financial mitigation may only partially or temporarily assist with the higher council tax bill</p> <ul style="list-style-type: none"> <li>• To contact disability organisations to ask them to promote the Hardship Fund among their clients and investigate further ways to raise awareness of the Fund</li> <li>• Applying the Council’s Fair Debt and Income policy to the collection of council tax. The Fair Debt and Income Strategy specifically includes disability as a circumstance where council tax enforcement processes would be adapted to meet the needs of the council taxpayer.</li> <li>• To support vulnerable groups through improved access to affordable credit, improved money management, our Fair Income and Debt Policy and our council tax and benefit helpline</li> <li>• Enfield’s Welfare Advice &amp; Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident’s situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.</li> </ul>
<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 claimant’s personal details and subject to normal verification processes to ensure consistency with Universal Credit and other social security benefits.</p> <p>The proposed changes to the Council Tax Support Scheme will not have a differential impact on people who are proposing to undergo, is undergoing, or has undergone a process (or part of a process) to reassign their gender.</p>
<p><b>Mitigating actions to be taken</b></p>
<p>As part of the consultation exercise the council has engaged with VCS organisations including ones that are focused on supporting people who are trans age e.g., Enfield LGBT centre.</p>

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#### Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

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

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

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

The proposed changes to the Council Tax Support Scheme will not have a differential impact on people who are married or in a civil partnership.

We are committed to protecting vulnerable residents and delivering a fair Council Tax Support Scheme, including for married and Civil Partnership couples.

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

#### Mitigating actions to be taken

Enfield's local scheme exempts War Widows from the minimum payment. Married or people in civil partnerships can be impacted by the proposal, but this may not be disproportionately more for over another. This is something we will look to continually monitor.

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#### **Pregnancy and maternity**

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

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

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

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

The proposed changes to the Council Tax Support Scheme will not have a differential impact on women who are pregnant or recently had a baby.

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

As part of the consultation exercise the council has engaged with VCS organisations including ones that are focused on supporting pregnant women e.g., Enfield Women's Centre.

#### **Race**

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

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

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

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

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

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purpose. However, other Council held information will be used to monitor and respond to any emerging trends so that our provision is inclusive and fit for purpose.

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

Overall, the proposed changes to the Council Tax Support Scheme will not have a differential impact on people because of their race or ethnicity.

42 who responded to the ethnicity question are white British, 71 are not white British. This is unusual with Enfield's consultations as typically white British respondents form the majority of respondents

The number of respondents is not large enough to enable a comparison of views between more detailed categories (for example, white European and Asian/Asian British). Thus, for analysis purposes, we have compared the views of white British with those who are not white British to provide us with an indicative understanding of perceptions

There are no differences in opinion between white British and not white British on the issue of whether the proposal is fair

Those who are not white British feel the proposal will have a more negative impact on their household than those who are white British. However, when we further analysed the feedback, it appears the views of Council Tax Support claimants who are not white British and those who are white British are identical in relation to this issue

When looking at the preferred approach, the data indicates that not white British favour implementing the proposal than making no change (28% and 19% respectively). This is notable when considering that a higher proportion of not white British than white British feel the proposal will have a negative impact on their household

The data indicates that awareness of the Hardship Fund is the same among white British and not white British (38% and 40% respectively). This suggests awareness is low across all, regardless of broad ethnic category

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

As part of the consultation exercise the council has engaged with VCS organisations including ones that are focused on supporting ethnic minority communities e.g., EREC. The consultation was made more accessible to households with a disability by the following measures:

- The webpage that hosts the consultation can be translated and includes an email address for residents to contact us should they require assistance with participating
- We are aware ethnic minority residents are sometimes seldom heard when it comes to public consultations. For this reason, we sent an email to all claimants likely affected by the proposals with details of the consultation and how they can share their views

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- We understand may be some claimants who do not speak and/or read English and/or may have issues. Due to this issue, we offered claimants face-to-face meetings with benefits advisers to discuss the proposal and how it may affect their household if implemented

Further mitigations include to contact ethnicity organisations to ask them to promote the Hardship Fund among their clients and investigate further ways to raise awareness of the Fund

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

#### **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.

A claimant's religion and belief are not recorded within Council Tax Support records and have no impact on the financial assessment of CTS. The Council is committed to protecting vulnerable residents and delivering a fair Council Tax Support Scheme, including for those with different religions and beliefs. For this reason, we signposted this consultation to the Enfield Faith Forum. An organisation with a large number of representatives from religious organisations across the borough. We support vulnerable groups through improved access to affordable credit, improved money management, our Fair Income and Debt Policy and our council tax and benefit helpline. The proposed changes to the Council Tax Support Scheme will not have a differential impact because of a person's religion or belief.

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

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

As awareness of the Hardship Fund is low across all respondents, we will look to engage with the Faith Forum to address this issue

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<b>Sex</b>
Sex refers to whether you are a female or male.
<p>Will this change to service/policy/budget have a <b>differential impact [positive or negative]</b> on females or males?</p> <p>Please provide evidence to explain why this group may be particularly affected.</p>
<p>This information is recorded within a claimant's personal details but does not impact on the CTS financial assessment.</p> <p>There are approximately twice the number of female council tax support scheme claimants (23,406) than male (12,057).</p> <p>Childcare could be a potential barrier to single parent increasing their hours or obtaining better paid employment, which may mean that they are dependent on benefits to support their income. To promote childcare funding via early years or the DWP, the welfare team may be able to run a campaign, which can help to support some parents of young children into employment. The Fair Debt and Income Strategy specifically identifies single parent households as a circumstance where council tax enforcement processes would be adapted to meet the needs of the council taxpayer.</p> <p>Furthermore, DWP offer specific job coach advice to help single parents with childcare responsibilities to enable them to increase work hours or obtain better paid employment as part of the service provided for Universal Credit claimants.</p> <p>The consultation results do not suggest there are any particular different views for male/female claimants. The mitigations below are appropriate for both female and male claimants.</p>
<b>Mitigating actions to be taken</b>
<ul style="list-style-type: none"> <li>• Measures which are in place to mitigate the impact of the minimum payment include:</li> <li>• Consulting residents about the proposed changes and asking for their views on how to mitigate any impact, ensuring the consultation is inclusive, as well inviting all residents to feedback the council will engage with VCS organisations including ones that support women e.g., Enfield Women's Centre</li> <li>• Applying any Government funded hardship and disregarding cost of living payments as set out in the prescribed regulations</li> <li>• Maintaining a discretionary Council hardship fund (estimated £400k spend for 2022/23). Households may be entitled to hardship equivalent to 50% of the loss of CTS. In some instances, households may be entitled to higher awards depending on their circumstances.</li> </ul> <p>Applying the Council's Fair Debt and Income policy to the collection of</p>

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council tax

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

#### **Sexual Orientation**

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

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

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

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

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

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

Respondents were asked in the questionnaire if they have a gender other than male or female. However, all respondents stated they were male or female.

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

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

Local people who are lesbian, gay, bisexual, and transgender can be impacted by the proposal, but this may not be disproportionately so. This is something we will look to continually monitor. As awareness of the Hardship Fund is low across all respondents, we will look to engage with the Enfield Lesbian, Gay, Bisexual and Transgender Network to address this issue. Following the publication of further 2021 Census data by the Office of National Statistics, we hope to develop a better understanding of lesbian, gay, bisexual, and transgender in relation to various issues that may be relevant to future consultations and service changes we



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deliver.

#### **Socio-economic deprivation**

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

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

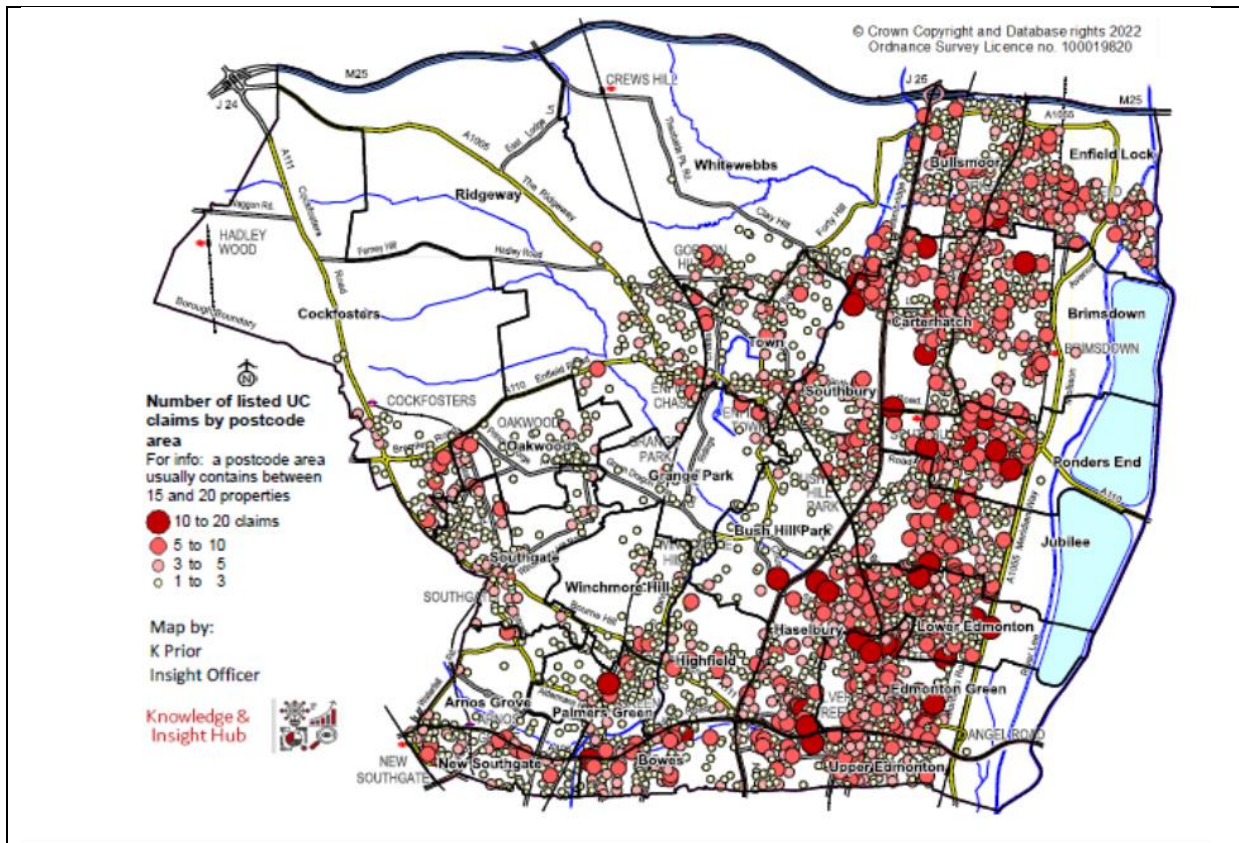
Please provide evidence to explain why this group may be particularly affected.

Appendix 1 provides an analysis of the Council Tax Support caseload by gender, disability and family make up. Appendix 2 provides the map of the borough by deprivation index. Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme will impact on these households. Mitigations are in place as set out below.

CTS provides vital support to low-income households recommended scheme maintains existing levels of support for over 80% of existing claimants. Working households in receipt of Universal Credit as at July 2022 is shown by postcode below. A map of Enfield showing the index of deprivation is shown at Appendix 1. There is a strong correlation between those impacted and the areas of worse deprivation but in the interest of fairness it would be inequitable for these households to continue to receive higher CTS awards than those still receiving legacy benefits.

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CTS households likely to receive reduced CTS is shown below by ward. The proposed income banded scheme will reduce CTS for approximately 6,500 working households by an average of £220 per annum or £4.23 a week.

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Impacted UC working households by ward					
Wards	Losing Less than £5 per week	Losing between £5.01 & £10 per week	Losing between £10.01 & £15 per week	Losing between £15.01 & £25 per week	Grand Total
Edmonton Green	370	102	39	9	520
Enfield Lock	327	128	44	14	513
Lower Edmonton	322	132	40	6	500
Haselbury	312	118	39	11	480
Jubilee	307	115	28	7	457
Brimsgate	295	103	29	8	435
Ponders End	276	90	31	4	401
Upper Edmonton	268	90	25	5	388
Carterhatch	221	72	26	12	331
Southbury	196	77	40	13	326
Bullsmoor	163	73	27	7	270
Whitewebbs	161	64	16	4	245
Southgate	95	80	25	15	215
Bowes	115	54	24	9	202
Ridgeway	87	60	23	6	176
Town	115	32	18	6	171
Palmers Green	78	49	23	6	156
New Southgate	99	34	17	3	153
Highfield	50	48	16	6	120
Cockfosters	54	37	7	5	103
Winchmore Hill	46	26	15	6	93
Oakwood	31	33	13	10	87
Bush Hill Park	28	32	9	8	77
Grange Park	22	26	10	8	66
Arnos Grove	36	21	3	2	62
<b>Grand Total</b>	<b>4074</b>	<b>1696</b>	<b>587</b>	<b>190</b>	<b>6547</b>

The majority of households impacted are estimated to lose less than £5 per week and are working households with children.

Impacted households by family make up are:

	Couple	Family 1 Dep	Family 2+ Deps	Single	Total
Losing Less than £5 per week	135	1,373	2,125	441	4,074
Losing between £5.01 and £10/wk	122	532	579	463	1,696
Losing between £10.01 and £15/wk	68	136	71	312	587
Losing between £15.01 and £25/wk	37	34	45	74	190
	362	2,075	2,820	1,290	6,547

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Banded Scheme	Cost	Claims	Yearly Ave	Ave Weekly CTS
Couple	£ 294,982.80	362	£ 814.87	£ 15.65
Family 1 Dep	£ 1,620,043.32	2,075	£ 780.74	£ 14.99
Family 2+ Deps	£ 2,515,637.07	2,820	£ 892.07	£ 17.13
Single	£ 681,463.18	1,290	£ 528.27	£ 10.15
	<b>£ 5,112,126.37</b>	<b>6,547</b>	<b>£ 780.83</b>	<b>£ 15.00</b>

#### Mitigating actions to be taken.

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

- Consulting residents about the proposed changes and asking for their views on how to mitigate any impact. One to one sessions will be available to residents in surgeries in the worse affected areas. The Council will engage with CAB and Tamil Relief Centre to identify what they can provide to mitigate the impact.
- Applying any Government funded hardship and disregarding cost of living payments as set out in the prescribed regulations
- Maintaining a discretionary Council hardship fund (estimated £400k spend for 2022/23). Households may be entitled to hardship equivalent to 50% of the loss of CTS. In some instances, households may be entitled to higher awards depending on their circumstances.
- Applying the Council's Fair Debt and Income policy to the collection of council tax
- Enfield's Welfare Advice & Debt Support Team is a service that helps to support vulnerable residents to maximise their income and get their full entitlement to welfare benefits, advice and assist to support residents with council debts such as rent arrears, Adult Social Care debt, Housing benefits overpayments and Council tax arrears/debt. For other debts residents can be offered a fast-track referral process to Citizens Advice. The aim is to holistically case manage the resident's situation. In addition to residents receiving CTS can apply for a Council Tax Hardship payment.
- Following comments received from the voluntary sector in the consultation the Council will introduce an additional income band between £0 to £55 for low-income households in low paid work for the 2024/25 Council Tax Support scheme.

NB Discretionary hardship fund offers transitional partial financial help

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### Section 4 – Monitoring and review

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

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

The local CTS scheme has operated since 2013. The operation of the CTS scheme and its impact on council tax collection performance are monitored monthly by the Executive Director of Resources and the lead member for Resources. The cost of council tax support was expected to fall following the recovery from COVID, but the Ukrainian war is likely to impact this recovery and has caused the Cost-of-Living crisis. If there is a recession it is likely the CTS caseload will rise again. The Council Tax Support scheme must be agreed annually by the Council.

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

### Section 5 – Action plan for mitigating actions

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Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments
Resident consultation	Consulting residents about the proposed changes and asking for their views on how to mitigate any impact. One to one sessions will be available to residents in surgeries in the worse affected areas.	Sally Sanders	October 13 <sup>th</sup> to January 5 <sup>th</sup> 2023	£1,000 approx.	The outcomes of the consultation will be collated and used to inform the final decision in January
Applying any Government funded hardship and disregarding cost of living payments as set out in the prescribed regulations	Local Welfare Assistance, Household support fund, energy rebates are Government funded measures to support financially vulnerable residents	Sally Sanders	On-going during 2022/23	Costs are contained within the existing Welfare and Financial Assessment teams	Work to deliver these schemes is continuing. Any further Government funded relief will be delivered as and when appropriate
Council tax support hardship	Maintaining a discretionary Council hardship fund -	Sally Sanders	On-going	Costs are contained within the existing Welfare and Financial Assessment teams	It is estimated that the Council will spend up to £475k in council tax support hardship for 2022/23. This will increase next year should the proposal(s) be agreed
Council tax enforcement	Applying the Council's Fair Debt and Income Strategy to the collection of council tax	Bridgette Cowley	On-going	Costs are contained within the existing Income and Debt teams	The Council's Fair Debt and Income Strategy was agreed at Cabinet on the 3 <sup>rd</sup> of March 2021. The strategy implements a progressive

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					approach to the management of debt and income and helps deliver fair and equitable treatment for customers.
Welfare Advice & Debt Support	To offer support to residents to maximise income and get full entitlement to welfare benefits	Sally Sanders	On-going	Costs are contained within the existing Welfare and Financial Assessment teams	Enfield's Welfare Advice & Debt Support Team maintains the service to help support vulnerable residents to maximise income and get full entitlement to welfare benefits, advice and assist to support residents with council debts. The aim is to holistically case manage the resident's situation.

**Appendix 1**

**Council Tax Support caseload – Gender, Disability and Family Make up**

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### Council Tax Support scheme 2023/24 - Equalities Impact Assessment (EqIA)

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



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