

Full Equalities Analysis Assessment

1. Proposal Summary Information

EAA Title	Draft Change to the Council Tax reduction scheme April 2023
Please describe your proposal?	The Council is preparing to consult on changing one of the income bands within the current Council Tax reduction scheme from April 2023
Is it HR Related?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Corporate Purpose	Full council decision

1. What is the Scheme looking to achieve? Who will be affected?

Background and Context

Council Tax Benefit was abolished under the welfare Reform Act 2012 and councils were required to develop their own local Council Tax Support schemes to help people on low incomes and benefits to pay their council tax. Pensioners eligible for Council Tax Support are protected from any loss of support under local schemes.

Ealing Council created its own local Council Tax Reduction Scheme (CTR Scheme) which is now in its ninth year. The scheme has been modified on five previous occasions. Once in April 2015, April 2016, April 2018, April 2019 and again in April 2021

The Council proposes to consult on changing one of the income bands of the current Council Tax Reduction scheme (CTR scheme).

What is the Scheme Looking to Achieve?

Proposed change

The council is proposing to change one of the income bands of the current Council Tax reduction scheme (CTR scheme) from 75% to 80%. This represents a 5% increase in council tax reduction for the lowest income households.

The council's CTR scheme for working age residents will continue to keep the 100% discount for applicants who fall into the protected category. For those who fall into the non-protected category and on the lowest income band will receive 80% discount and all other income bands will remain the same.

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Key feature: This is an income banded scheme which will assess the maximum level of Council Tax Reduction based on the net income of the applicant and their partner (if they live with one).

The proposed change to the scheme will keep the maximum 100% reduction for applicants who fall into the protected category.

Applicants who fall in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction towards their council tax and all other applicants will not be affected. This represents a 5% increase in council tax reduction for the lowest income households.

The change is proposed to help applicants who fall in the non-protected category and the lowest income band (band1) with the increase in the cost of living so they will have less to pay towards their council tax.

Pensioners are not affected by the proposed change, and they will receive the same level of support they do now as required by law.

Positive outcomes:

- The proposed change will mean applicants who fall in the non-protected category and the lowest income band (band1) will have to pay less towards their council tax and keep more of their money to help with the rising cost of living.

Negative outcomes

- There are no disadvantages to the proposed change

Who will be affected by the proposal to implement the change?

The change will only affect working age claimants who fall in the non-protected category and their net household income is between 0.00 and £124.33 per week. No other income bands will be affected.

There are a total of 24,063 claimants who currently receive Council Tax Reduction (CTR) in the borough (August 2022 Northgate report).

Currently there are 7938 pensioners claiming CTR (August 2022 Northgate report) – they will not be affected by the proposed change and they will continue to receive the same support as they do now.

There are 16,125 working age claimants in receipt of Council Tax Reduction (CTR) in the borough (August 2022 Northgate report).

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4904 claimants who currently fall in the non-protected category and the lowest income band (band 1) will benefit from this positive change. They will have a maximum of 80% reduction towards their Council Tax bill. An increase of 5%.

There are 7652 claimants who fall within the protected category and the lowest income band (band 1) they will continue to receive 100% reductions towards their council tax.

All other income bands will remain the same and there will be no negative impact by the proposed change.

2. What will the impact of your proposal be?

Introducing a 5% increase in Council Tax Reduction for the lowest income households will help those who fall into this category with the increase in the rising cost of living.

This will have a positive impact on 4904 working age claimants who currently fall in the non-protected category and the lowest income band (band 1). They will have a maximum of 80% reduction towards their Council Tax bill instead of 75%.

It is anticipated that the proposed change will improve collection rates amongst this group of claimants.

All other income bands are not affected and will remain the same.

2. Impact on Groups having a Protected Characteristic

AGE: *A person of a particular age or being within an age group.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact - Positive

Pension age claimants (7938) are protected by law from any amendments under a local scheme and the proposed change would have a neutral impact upon them. For couples both members of the couple must be pensioners.

The minimum age for receiving Council Tax Reduction is linked to the minimum age for being liable for council tax which is 18 so residents younger than this will not be affected.

4904 working age customers (and partners if they have one) are currently in the non-protected category and the lowest income band (band 1). They would see a positive affect by the proposed change of 5%.

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7652 working age applicants currently fall in the protected category and the lowest income (band 1) and therefore receive 100% reduction in their council tax. The proposed change would not affect them.

For the remainder of the working age caseload the change would be a positive change if their income falls within the lowest income band level (band 1).

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

DISABILITY: *A person has a disability if s/he has a physical or mental impairment which has a substantial and long term adverse effect on their ability to carry out normal day to day activities¹.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact -Neutral

The current scheme provides a maximum Council Tax Reduction of up to 100% for claimants who are classified as falling into the protected category and the lowest income band (band 1).

The following people are classed as protected under the current scheme:

- Entitled to a disability premium, severe disability premium, enhanced disability premium or carer premium when their award is calculated
- Entitled to a disabled earnings disregard, a disabled person's reduction for Council Tax purposes, war disablement pension or war widow's pension
- Classified as a Care Leaver under the age of 25

¹ Due regard to meeting the needs of people with disabilities involves taking steps to take account of their disabilities and may involve making reasonable adjustments and prioritizing certain groups of disabled people on the basis that they are particularly affected by the proposal.

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- Lone parents with a child under five years of age.

7652 applicants currently fall into the protected category and the lowest income (band 1) and therefore receive 100% reduction in their council tax.

Many of the customers who fall into the protected category under the council's Council Tax Reduction scheme will fall into the protected disability characteristic and a lot will not be able to work.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.

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The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

GENDER REASSIGNMENT: *This is the process of transitioning from one sex to another. This includes persons who consider themselves to be trans, transgender and transsexual.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact - Neutral

The impact will be neutral. The proposed change is not specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTR.

The proposed change will not affect people with this protected characteristic positively or negatively.

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Alternatives and mitigating actions which have been considered in order to reduce negative effect:
<p>The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.</p> <p>There is no negative impact to the proposed change.</p>
Describe the Mitigating Action
<p>Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.</p> <p>Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.</p> <p>The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.</p>

RACE: <i>A group of people defined by their colour, nationality (including citizenship), ethnic or national origins or race.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact Neutral
<p>The proposed change is not specifically targeted at this group. Limited data is currently available on the numbers of people with this protected characteristic who are receiving CTR.</p> <p>The proposed change will not affect people with this protected characteristic positively or negatively.</p> <p>A breakdown of approx. 11422 working age recipients of CTR is available (Northgate report August 2022):</p>

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White - English	2547
White - Irish	185
White - gypsy/traveller	8
White - other	0
Any other white background	1217
Mixed - white and black Caribbean	170
Mixed - white and black African	87
Mixed - white and Asian	144
Any other mixed/multiple ethnic background	141
Asian/Asian British - Indian	571
Asian/Asian British - Pakistani	516
Asian/Asian British - Bangladeshi	132
Asian/Asian British - Chinese	0
Any other Asian background	1881
Black/African/Caribbean/Black British - African	1778
Black/African/Caribbean/Black British - Caribbean	623
Any other black/African/Caribbean background	331
Arab	324
Any other ethnic group	767
	11422

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%. Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

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RELIGION & BELIEF: <i>Religion means any religion. Belief includes religious and philosophical beliefs including lack of belief (for example, Atheism). Generally, a belief should affect a person's life choices or the way you live for it to be included.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact: Neutral
<p>The proposed change is not specifically targeted at this group. There is no data relating to how the proposed change will impact those falling under the protected characteristic of race. The change is not targeted at anyone holding a specific belief.</p>
Alternatives and mitigating actions which have been considered in order to reduce negative effect:
<p>The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.</p> <p>There is no negative impact to the proposed change.</p>
Describe the Mitigating Action
<p>Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%. Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.</p> <p>The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.</p>

SEX: <i>Someone being a man or a woman.</i>
State whether the impact is positive, negative, a combination of both, or neutral:
Describe the Impact Neutral
<p>Sex is not a factor that is determinative of the amount of Council Tax Reduction that an applicant is entitled to. The proposed change applies to men and women equally. Gender details extracted from the council's records are as follows (business Objects from Northgate August 2022)</p> <p>The breakdown for the number of working age claimants for whom we have gender details (Northgate report August 2022) is as follows:</p> <p>Female 9491 (58.86%)</p> <p>Male 6634 (41.14%)</p> <p>For working age partners, the figures are as follows:</p>

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Female 2686 (70.65%)

Male 1116 (29.35%)

The positive impact associated with the change will affect more women than men. This reflects the fact that the caseload comprises more women as a proportion of the claimants or partners, than men.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

SEXUAL ORIENTATION: *A person's sexual attraction towards his or her own sex, the opposite sex or to both sexes.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact Neutral

The proposed change is not specifically targeted at this group. There is no data relating to how the proposed change will impact those falling under the protected characteristic of race.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

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The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

PREGNANCY & MATERNITY: *Description: Pregnancy: Being pregnant. Maternity: The period after giving birth - linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, including as a result of breastfeeding.*

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact; positive

The proposed change may impact a woman who falls within this protected characteristic. There is no data relating to how the proposed change will impact those falling under the protected characteristic.

Women during late pregnancy and subsequently whilst on maternity leave may have a reduced income. This could mean that their income may fall to the lowest income band (band 1) and they may be entitled to a maximum 80% reduction or 100% depending on whether they fall into the protected or not-protected category.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is not negative impact to the proposed change.

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Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

MARRIAGE & CIVIL PARTNERSHIP: *Marriage: A union between a man and a woman. or of the same sex, which is legally recognised in the UK as a marriage*
Civil partnership: Civil partners must be treated the same as married couples on a range of legal matters.

State whether the impact is positive, negative, a combination of both, or neutral:

Describe the Impact - Positive

The proposed change is not specifically targeted at this group. No data is currently available on the numbers of people with this protected characteristic who are receiving CTR.

Where the income of a couple reduces to the lowest income band (band 1) they may be entitled to a maximum 80% reduction or 100% depending on whether they fall into the protected or non-protected category.

Couples who claim Council Tax Reduction are treated the same irrespective of whether they are:

- A man and woman who are married to each other and are members of the same household
- A man and woman who are not married to each other but are living together as husband and wife
- Two people of the same sex who are civil partners/married to each other and are members of the same household
- Two people of the same sex who are not civil partners/married to each other but are living together as if they were civil partners/married.

The proposed change will not alter the way that couples are treated.

There are 16,125 working age claimants in the Council Tax Support caseload, 3802 of which have partners.

Alternatives and mitigating actions which have been considered in order to reduce negative effect:

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The alternative to the proposed change is to leave the current CTS scheme as is where applicants in the non-protected category and the lowest income band (band 1) continue receiving a maximum of 75% towards their council tax bill.

There is no negative impact to the proposed change.

Describe the Mitigating Action

Implementing the proposed change would mean applicants in the non-protected category and the lowest income band (band 1) will receive a maximum of 80% reduction an increase of 5%.

Discretionary Council Tax Discount will continue to be available irrespective of whether the proposed change is implemented or not.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

3. Human Rights²

4a. Does your proposal impact on Human Rights as defined by the Human Rights Act 1998?

Yes ☐ No ☒

4b. Does your proposal impact on the rights of children as defined by the UN Convention on the Rights of the Child?

Yes ☐ No ☒

4c. Does your proposal impact on the rights of persons with disabilities as defined by the UN Convention on the rights of persons with disabilities?

Yes ☐ No ☒

(If yes, please describe the effect and any mitigating action you have considered.)

² For further guidance please refer to the Human Rights & URNC Guidance on the Council Equalities [web page](#).

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4. Conclusion

The council is proposing to increase the maximum entitlement to council tax reduction for the non-protected category from 75% to 80% for those who fall in the lowest income band.

The proposed change will mean applicants who fall in the non-protected category and the lowest income band (band 1) will have to pay less towards their council tax and keep more of their money to help with the rising cost of living.

All other recipients of Council Tax Reduction will not be affected by the change.

The proposed change represents a 5% increase in Council Tax Reduction for the lowest income households.

The proposed change to the scheme will keep the maximum 100% reduction for applicants who fall into the protected category and the lowest income band (band1).

The proposed change will not affect pensioners. This is a mandatory requirement as legislation prescribes that Local Council Tax Support schemes in respect of pensioners must adhere to one national scheme.

No protected equality groups will be negatively impacted.

Discretionary Council Tax Discount is available for those facing hardship.

The council will continue to provide support through its Local Welfare Assistance Team and in conjunction with colleagues in the Job Centre Plus who work closely with them.

04a. What evidence, data sources and intelligence did you use to assess the potential impact/effect of your proposal? Please note the systems/processes you used to collect the data that has helped inform your proposal. Please list the file paths and/or relevant web links to the information you have described.

(Please list all sources here: i.e. local consultation, residents' survey, census etc.)

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5. Action Planning: *(What are the next steps for the proposal please list i.e. what it comes into effect, when migrating actions³ will take place, how you will measure impact etc.)*

Action	Outcomes	Success Measures	Timescales/ Milestones	Lead Officer (Contact Details)

Additional Comments:

6. Sign off: *(All EAA's must be signed off once completed)*

Completing Officer Sign Off:	Service Director Sign Off:	HR related proposal (Signed off by directorates HR officer)
Signed: <i>Salima Kapadia</i> Name (Block Capitals): SALIMA KAPADIA Policy & Training Officer Date: 23.08.2022	Signed: Name (Block Capitals): Date:	Signed: Name (Block Capitals): Date:
For EA's relating to Cabinet decisions: received by Committee Section for publication by (date):		

Appendix 1: *Legal obligations under Section 149 of the Equality Act 2010:*

³ Linked to the protected characteristics above

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- As a public authority we must have due regard to the need to:
 - a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- The protected characteristics are: AGE, DISABILITY, GENDER REASSIGNMENT, RACE, RELIGION & BELIEF, SEX, SEXUAL ORIENTATION, PREGNANCY & MATERNITY, MARRIAGE & CIVIL PARTNERSHIP
- Having due regard to advancing equality of opportunity between those who share a protected characteristic and those who do not, involves considering the need to:
 - a) Remove or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic
 - b) Take steps to meet the needs of persons who share a relevant characteristic that are different from the needs of the persons who do not share it.
 - c) Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
- Having due regard to fostering good relations between persons who share a relevant protected characteristic and persons who do not, involves showing that you are tackling prejudice and promoting understanding.
- Complying with the duties may involve treating some people more favourably than others; but this should not be taken as permitting conduct that would be otherwise prohibited under the Act.