

Initial Equality Impact Assessment – Council Tax Reduction Review

Department	Finance
Service	Benefits Service
People involved	Suzanne Van Praag, Elizabeth Keevil, Ruth Evans, Peter Forde and Clare O'Connor

1. What are the aims of the service and what changes are being proposed?

Council Tax Reduction (CTR) was introduced in April 2013 as a locally administered scheme to provide support with Council Tax payments.

The Council has a legal requirement to review its scheme each year. The following changes are being proposed to the scheme for the 2016/17 financial year. As pension age claims are protected by legislation, these changes will only affect claims from those of working age:

1. To apply a 30% minimum Council Tax liability contribution for working age claimants;
2. 0% minimum contribution for vulnerable households including those on certain disability benefits and households where there is a child under 3;
3. To remove the minimum award amount of £3 per week;
4. To remove the banding cap currently set to the equivalent of Band E;
5. Reduction of the amount at which benefit is reduced from 25% to 20% where household income exceeds the means test;
6. Retention of a single level non-dependant deduction;
7. Annual uprating of benefit rates in line with other means tested benefits.

2. What is the rationale behind these changes?

In April 2013 Council Tax Benefit (CTB) was abolished and replaced with a localised Council Tax Reduction (CTR) scheme. The scheme is decided locally with prescribed elements that provide protection for pensioner claims, meaning their awards are protected at the same level of award that they would have received under the CTB scheme.

The Council is required to annually review its CTR scheme and where it proposes any changes or amendments it is then required to consult with Council tax payers. The design of the CTR scheme has financial implications for the Council as any awards of benefit over the level of funding have to be met through the Council's own funds. In the provisional Local Government Finance Settlement announced in December 2015 support for the Council will reduce by £20.2 million between 2015/16 and 2017/18, it is therefore considered reasonable that the Council

should keep under review it's spending in all areas. This includes a review of the Council's spending on CTR and designing a scheme that ensures the cost is distributed equitably between Council tax Payers and CTR recipients.

3. Which Organisations will have the opportunity to feedback on the EIA?

Proposals were outlined in Committee report 15-386. This was accompanied by an EIA. This EIA has been updated with the findings of the public consultation undertaken between 19th October 2015 to 12th December 2015.

The consultation was advertised in Brightside, Wandsworth 24/7 and through the Council's twitter feed and website. The responses were compiled through an on-line survey. In addition, the Council sent a paper copy of the consultation documentation and survey to all 11,000 current recipients of CTR who could respond online or by returning the paper questionnaire.

A link to the consultation was also emailed to organisations and groups including Wandsworth Citizen Advice Bureau, Alzheimer's organisation, Springfield law Centre, Wandsworth Carers Organisation & Social Landlords.

4. What information do you have on the service and the potential impact of your service change in relation to the following?

	List information you have.
Race	<p>Across the Borough the Census of 2011 showed the following information:</p> <p>130,493 households</p> <ul style="list-style-type: none"> • White – Total 76.3% • Mixed / Multiple Ethnic Groups – Total 3.2% • Asian / Asian British – Total 8.6% • Black / African / Caribbean / Black British – Total 10% • Other Ethnic Group – Total 1.8% <p>Total BME – 23.6%</p> <p>Council Tax Reduction Scheme Caseload as at 31st May 2015</p> <p>18,575 claims (5,185 Ethnicity records held equating to 27.9% of caseload)</p> <ul style="list-style-type: none"> • White – Total 47% • Mixed / Multiple Ethnic Groups – Total 6.4% • Asian / Asian British – Total 17.7% • Black / African / Caribbean / Black British – Total 26.4%

- Other Ethnic Group – Total 2.5%

Ethnicity is an optional field and the majority of the caseload has chosen not to provide this data. However, of those who have 53% are BME. This is significantly above the Borough average. The data provided also shows that there are significantly more Asian/Asian British and Black/Black British claimants than the Borough average.

Working age claimants as at 31st May 2015

11,436 claims (4,317 Ethnicity records held equating to 37.7% of affected claimants)

- White – Total 44.1%
- Mixed / Multiple Ethnic Groups – Total 7.2%
- Asian / Asian British – Total 16.8%
- Black / African / Caribbean / Black British – Total 29.5%
- Other Ethnic Group – Total 2.4%

Ethnicity is an optional field and the majority of the caseload has chosen not to provide this data. However, of those who have 55.9% are BME. This is above the Borough average and above the overall caseload average (see above). It should also be noted that the percentage of Black / African / Caribbean / Black British claimants is significantly above the Borough average and also the caseload average.

Working age 'Vulnerable' claimants as at 31st May 2015

3,857 claims (997 Ethnicity records held equating to 25.8% of affected claimants)

- White – Total 51.7%
- Mixed / Multiple Ethnic Groups – Total 6.6%
- Asian / Asian British – Total 12.4%
- Black / African / Caribbean / Black British – Total 26.8%
- Other Ethnic Group – Total 2.5%

Ethnicity is an optional field and the majority of the caseload has chosen not to provide this data. However, of those who have 48.3% are BME. This is above the Borough average but below the overall caseload average (see above). It should also be noted that the percentage of Asian/Asian British claimants is above the Borough average but lower than the overall caseload average.

Claims with an award of less than £3 per week as at 31st May 2015

Statistical information on this client group is unavailable within the current caseload as awards of less than £3 per week result in zero entitlement and therefore would have no active claim for CTR.

Claims in a property higher than Council Tax Band E as at 31st May 2015

331 claims (134 Ethnicity records held equating to 40.1% of affected claimants)

- White – Total 52.2%
- Mixed / Multiple Ethnic Groups – Total 5.2%
- Asian / Asian British – Total 14.3%
- Black / African / Caribbean / Black British – Total 25.3%
- Other Ethnic Group – Total 3%

Ethnicity is an optional field and the majority of the caseload has chosen not to provide this data. However, of those who have 47.8% are BME. This is above the Borough average but below the overall caseload average (see above). The data provided also shows that there are significantly more Black / African / Caribbean / Black British claimants than the Borough average

Working age means tested claimants as at 31st May 2015

3,072 claims (1,448 Ethnicity records held equating to 47.1% of affected claimants)

- White – Total 36.8%
- Mixed / Multiple Ethnic Groups – Total 6.8%
- Asian / Asian British – Total 25.3%
- Black / African / Caribbean / Black British – Total 28%
- Other Ethnic Group – Total 3.1%

Ethnicity is an optional field and the majority of the caseload has chosen not to provide this data. However, of those who have 63.2% are BME. This is significantly above the Borough average and above the overall caseload average (see above). It should also be noted that the percentage of Asian / Asian British and Black / African / Caribbean / Black British claimants is significantly above the Borough average and also the caseload average.

Consultation findings:

From 1,284 responses received between 19th October 2015 and 12th December 2015. Of the 1284 Respondents, 1,160 completed the question with regards to Ethnicity, broken down as follows:

White – Total 49.7%

Mixed / Multiple Ethnic Groups – Total 3.4%

Asian / Asian British – Total 11%

Black / African / Caribbean / Black British – Total 20.3%

Other Ethnic Group – Total 6.6%

Prefer not to say – total 9%

This means that 41.3% of respondents were BME residents. This is above the Borough average according to the 2011 Census which showed the local BME population to be 23.6% and slightly below the caseload profile which showed that 53% of the caseload who provided ethnicity data were BME.

Question 8 of the consultation findings asked whether the respondents think it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer ?

1112 respondents who provided Ethnicity information completed this question:

45.9% answered I am unsure

17.2% answered Not Reasonable

36.9% answered Reasonable

The ethnicity breakdown of answers is as follows:

	White	BME
Unsure	39%	56%
Not reasonable	18%	12%
reasonable	42%	31%

The consultation responses show that the majority (56%) of BME respondents felt “unsure” as to whether it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer with 31% saying that they felt it was reasonable.

Question 9 asked whether the respondent agreed with the Council adopting a working age CTR scheme requiring most households to contribute a minimum of 30% towards the cost of their Council Tax Liability

1119 respondents who provided Ethnicity information completed this question:

	<p>29.9% Agreed 43.3% Disagreed 26.8% Stated they did not know.</p> <p>The ethnicity breakdown of answers is as follows:</p> <table><tr><td></td><td>White</td><td>BME</td></tr><tr><td>Agree</td><td>34%</td><td>26%</td></tr><tr><td>Disagree</td><td>44%</td><td>40%</td></tr><tr><td>d/k</td><td>22%</td><td>34%</td></tr></table> <p>The consultation responses show that a 40% of BME respondents disagreed with the Council adopting a working age CTR scheme requiring most households to contribute a minimum of 30% towards the cost of their Council Tax Liability and 34% did not know. The percentage of BME residents disagreeing with the proposal was in line with the percentage of white respondents who disagreed.</p>		White	BME	Agree	34%	26%	Disagree	44%	40%	d/k	22%	34%
	White	BME											
Agree	34%	26%											
Disagree	44%	40%											
d/k	22%	34%											
Gender	<p>Across the Borough the Census of 2011 showed the following information: 243,533 people aged 16-74 Male – Total 48.4% Female – Total 51.6%</p> <p>Council Tax Reduction Scheme caseload as at 31st May 2015 18,575 claims Male – Total 41% Female – Total 59% Gender is a mandatory field. The majority of the CTR caseload is female. This is above the Borough figure.</p> <p>Working age claimants as at 31st May 2015 11,436 claims Male – Total 38%</p>												

Female – Total 62%

The majority of claimants are female. This percentage is above both the Borough and caseload average.

Working age ‘Vulnerable’ claimants as at 31st May 2015

3,857 claims

Male – Total 38.6%

Female – Total 61.4%

The majority of claimants are female. This percentage is above both the Borough and caseload average.

Claims with an award of less than £3 per week as at 31st May 2015

Statistical information on this client group is unavailable within the current caseload as awards of less than £3 per week result in zero entitlement and therefore would have no active claim for CTR.

Claims in a property higher than Council Tax Band E as at 31st May 2015

331 claims

Male – Total 30.5%

Female – Total 69.5%

The majority of claimants are female. This percentage is significantly above both the Borough and caseload average.

Working age means tested claimants as at 31st May 2015

3,072 claims

Male – Total 42.2%

Female – Total 57.8%

Whilst the majority is still female the percentage of means tested claimants is closer to the Borough average than the overall caseload average.

Consultation findings:

From the 1,284 responses received between 19th October 2015 and 12th December 2015.

Of the 1,284 Respondents, 1,161 completed the question with regards to Gender, broken down as follows:

Male- 42.5%

Female- 52.2 %
Prefer not to say 5.3%

This means that 52.2% of respondents were female residents. This is slightly above the Borough average according to the 2011 Census which showed the local female population to be 51.6 %.

Question 8 of the consultation findings asked whether the respondents think it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer?

1,113 respondents who provided Gender information completed this question:

42.8% Male
52.2% Female
5% Prefer not to Say

The breakdown of answers is as follows:

	Male	Female	All (incl prefer not to say)
Unsure	41%	50%	45%
Not reasonable	18%	15%	17%
reasonable	42%	35%	39%

The consultation responses show that a high proportion (50%) of Female respondents felt “unsure” as to whether it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer. 35% of female respondents felt it was reasonable.

	<p>Question 9 asked whether the respondent agreed with the Council adopting a working age CTR scheme requiring most households to contribute a minimum of 30% towards the cost of their Council Tax Liability</p> <p>1,120 respondents who provided Gender information completed this question:</p> <p>42.3% Male 52.5 % Female 5.2% Prefer not to say</p> <p>The breakdown of answers is as follows:</p> <table><tr><td></td><td>Male</td><td>Female</td><td>All (incl prefer not to say)</td></tr><tr><td>Agree</td><td>29%</td><td>31%</td><td>31%</td></tr><tr><td>Disagree</td><td>41%</td><td>45%</td><td>42%</td></tr><tr><td>d/k</td><td>29%</td><td>25%</td><td>27%</td></tr></table> <p>The consultation responses show that 45% of female respondents disagreed with the proposal. This is slightly higher than the percentage of male respondents who disagreed.</p>		Male	Female	All (incl prefer not to say)	Agree	29%	31%	31%	Disagree	41%	45%	42%	d/k	29%	25%	27%
	Male	Female	All (incl prefer not to say)														
Agree	29%	31%	31%														
Disagree	41%	45%	42%														
d/k	29%	25%	27%														
Disability	<p>Across the Borough the Census of 2011 showed the following information: 130,493 households Households containing a person with a long term health problem or disability – Total 20.7%</p> <p>Council Tax Reduction caseload as at 31st May 2015 18,575 claims Claims containing a person with a long term health problem or disability – Total 42.6% Disability related information is required. The percentage of claimants overall with a disability is significantly above the Borough average.</p>																

	<p>Working age claimants as at 31st May 2015 11,436 claims Claims containing a person with a long term health problem or disability – Total 49.4% Disability related information is required. The percentage of claimants with a disability within this claiming group is significantly above the Borough figure and also the caseload average.</p> <p>Working age ‘Vulnerable’ claimants as at 31st May 2015 3,857 claims Claims containing a person with a long term health problem or disability – Total 81.2% Disability related information is required. The percentage of claimants within this claiming group is significantly higher than both the Borough and caseload average. This is expected as the definition of ‘vulnerable’ includes the majority of claimants declaring a long term health problem but also includes carers who make up the remainder of vulnerable claimants.</p> <p>Claims with an award of less than £3 per week as at 31st May 2015 Statistical information on this client group is unavailable within the current caseload as awards of less than £3 per week result in zero entitlement and therefore would have no active claim for CTR.</p> <p>Claims in a property higher than Council Tax Band E as at 31st May 2015 331 claims Claims containing a person with a long term health problem or disability – Total 41.4% Disability information is required. The percentage of claimants with a disability within this claiming group is significantly above the Borough figure but below the caseload average.</p> <p>Working age means tested claimants as at 31st May 2015 3,072 claims Claims containing a person with a long term health problem or disability – Total 18.2% Disability information is required. The percentage of claimants with a disability within this claiming group is lower than the Borough average and significantly lower than the caseload average.</p>
--	---

Consultation findings:

From the 1,284 responses received between 19th October 2015 and 12th December 2015.

Of the 1,284 Respondents, 1,094 completed the question with regards to Disability – “Are your day to day activities limited because of a health problem or disability which lasted or is expected to last at least 12 months.”

No	36.1%
Prefer not to say	13.2%
Yes a little	15.8%
Yes a lot	34.9%

This means that 50.7% of respondents said that their day to day activities were limited due to a health problem or disability which lasted or is expected to last at least 12 months . This is above the Borough average according to the 2011 Census which showed 11% and above the borough average for households containing a person with a long term health problem or disability which was 20.7%, but more broadly reflects the caseload profile set out at the start of this section.

Question 8 of the consultation findings asked whether the respondents think it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer.

1,094 respondents who provided Disability information completed this question:

	No disability	Yes, limited a little	Yes, limited a lot
Unsure	39%	44%	53%
Not reasonable	14%	13%	20%
reasonable	47%	43%	28%

The consultation responses show that a high proportion of respondents where their day to day activities are limited due to health problems felt “unsure” as to whether it is reasonable that the Council should seek to balance the needs of CTR recipients and

	<p>Council Tax payer. High percentages also felt that it was reasonable.</p> <p>Question 9 asked whether the respondent agreed with the Council adopting a working age CTR scheme requiring most households to contribute a minimum of 30% towards the cost of their Council Tax Liability.</p> <p>1,061 respondents who provided Disability information completed this question:</p> <p>No 36.8% Prefer not to Say 13.1% Yes, limited a little 15.7% Yes – limited a lot 34.4%</p> <table><tr><td></td><td>No disability</td><td>Yes, limited a little</td><td>Yes, limited a lot</td></tr><tr><td>Agree</td><td>43%</td><td>32%</td><td>21%</td></tr><tr><td>Disagree</td><td>37%</td><td>38%</td><td>51%</td></tr><tr><td>d/k</td><td>20%</td><td>30%</td><td>28%</td></tr></table> <p>The consultation responses show that a high proportion of respondents where their daily life was limited by their health problems or disability disagreed with the proposal, particularly if their day to day activity was limited a lot.</p>		No disability	Yes, limited a little	Yes, limited a lot	Agree	43%	32%	21%	Disagree	37%	38%	51%	d/k	20%	30%	28%
	No disability	Yes, limited a little	Yes, limited a lot														
Agree	43%	32%	21%														
Disagree	37%	38%	51%														
d/k	20%	30%	28%														
Age	<p>Across the Borough the Census of 2011 showed the following information: 255,989 people aged 16 and over People aged 16 to 59 – Total 85.3% People aged 60+ - Total 14.7%</p> <p>Council Tax Reduction caseload as at 31st May 2015 20,469 claims People working age (18 – 62 (current pension age)) – Total 61.6% People pension age (63+) - Total 38.4% Age information is a mandatory field. The proportion across the CTR caseload of pensioner age claimants is greater than the</p>																

Borough average.

Consultation findings:

From the 1,284 responses received between 19th October 2015 and 12th December 2015.

1,160 respondents answered with regards to their age:

18-34	11.0%
35-44	22.2%
45-54	28.5%
55-64	30.1%
65-74	2.3%
75 or over	0.4%
Prefer not to say	5.5%

Question 8 of the consultation findings asked whether the respondents think it is reasonable that the Council should seek to balance the needs of CTR recipients and Council Tax payer ?

	18-34	35-44	45-54	55-64	65+
Unsure	49%	49%	48%	43%	34%
Not reasonable	12%	14%	19%	18%	16%
Reasonable	39%	37%	33%	39%	50%

	Question 9 asked whether the respondent agreed with the Council adopting a working age CTR scheme requiring most households to contribute a minimum of 30% towards the cost of their Council Tax Liability.					
		18-34	35-44	45-54	55-64	65+
	Agree	37%	33%	25%	29%	41%
	Disagree	38%	39%	48%	45%	34%
	Don't know	25%	29%	27%	27%	25%
Faith	No information held					
Sexual Orientation	No information held					

4. Thinking about each group below please list the impact that the service changes will have:

1. To apply a 30% minimum Council Tax liability contribution for working age claimants;
2. 0% minimum contribution for vulnerable households including those on certain disability benefits and households where there is a child under 3;
3. Annual uprating of benefit rates in line with other means tested benefits
4. To remove the minimum award amount of £3 per week;
5. To remove the banding cap currently set to the equivalent of Band E;
6. Reduction of the amount at which benefit is reduced from 25% to 20% where household income exceeds the means test;
7. Retention of a single level non-dependant deduction;

	<u>Positive impacts</u>	<u>Possible negative impacts</u>
Race	Applying change 3 relating to the annual uprating of benefit rates used within the means test for CTR in line with the Welfare Benefits Freeze and Prescribed Changes will mean the figures used within the calculation will remain	Change 1 has the negative impact of reducing the level of contribution that could be made by way of Council Tax Reduction by 30%. Analysis of the cases potentially impacted shows that this could impact more on BME

	<p>unchanged. Analysis of the cases potentially impacted shows that this could impact more on BME claimants than non-BME claimants, particularly Black / African / Caribbean / Black British claimants.</p> <p>The changes 4 – 6 would have the positive impact of reversing changes that were implemented last year and increasing awards. Analysis of the cases potentially impacted shows that the removal of the banding cap impacts on a greater proportion of non-BME than BME claimants but the reduced taper would impact on a greater proportion of BME claimants, particularly Black / African / Caribbean / Black British claimants.</p>	<p>claimants than non-BME claimants, particularly Black / African / Caribbean / Black British claimants. However, it is important to note that ethnicity data is optional and therefore this analysis has only been based on cases where ethnicity is recorded. The changes to the scheme will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account. Council tenants can access advice on financial management and budgeting via the Financial Inclusion Team and private sector tenants can obtain details of organisations that can provide similar support via the Welfare Reform Team.</p> <p>By applying change 2 the impact of change 1 would be mitigated for groups of claimants that potentially need further support. This positive impact would be to have a 0% minimum contribution for “vulnerable claimants”. Analysis shows that the proposal to have a 0% contribution for “vulnerable claimants” potentially impacts on a larger proportion of non-BME claimants than BME claimants but a large proportion of Black / African / Caribbean / Black British claimants will be supported. It is important to note that currently only 9 of the 24 minimum contribution schemes currently operating across London have a similar mitigating action in place.</p> <p>No specific negative impacts in relation to ethnicity were raised during the consultation.</p>
Gender	<p>Applying change 3 relating to the annual uprating of benefit rates used within the means test for CTR in line with the Welfare Benefits Freeze and Prescribed Changes will mean the figures used within the calculation will remain unchanged. Analysis of the cases potentially impacted</p>	<p>Change 1 has the negative impact of reducing the level of contribution that could be made by way of Council Tax Reduction by 30%. Analysis of the cases potentially impacted shows that this will impacted slightly more on female claimants than male. The changes to the scheme</p>

	<p>shows that this will impacted slightly more on female claimants than male.</p> <p>The changes 4 – 6 would have the positive impact of reversing changes that were implemented last year and increasing awards.</p> <p>Analysis of the cases potentially impacted shows that this will impacted slightly more on female claimants than male.</p>	<p>will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account. Council tenants can access advice on financial management and budgeting via the Financial Inclusion Team and private sector tenants can obtain details of organisations that can provide similar support via the Welfare Reform Team.</p> <p>By applying change 2 the impact of change 1 would be mitigated for groups of claimants that potentially need further support. This positive impact would be to have a 0% minimum contribution for “vulnerable claimants”.</p> <p>Analysis of the cases potentially impacted shows that this will impacted slightly more on female claimants than male. It is important to note that currently only 9 of the 24 minimum contribution schemes currently operating across London have a similar mitigating action in place.</p> <p>Modelling of the 10,841 working age households currently in receipt of CTR as at Nov 2015 including those with a child under 3, indicates that 5,365 (49.5%) would receive protection under this provision.</p>
Disability	<p>Applying change 3 relating the annual uprating of benefit rates used within the means test for CTR in line with the Welfare Benefits Freeze and Prescribed Changes will mean the figures used within the calculation will remain unchanged.</p> <p>The changes 4 – 6 would have the positive impact of reversing changes that were implemented last year and increasing awards.</p> <p>Analysis of the cases potentially impacted shows that the</p>	<p>Change 1 has the negative impact of reducing the level of contribution that could be made by way of Council Tax Reduction by 30%. The potential impact on disabled claimants is mitigated by change 2.</p> <p>By applying change 2 the impact of change 1 would be mitigated for groups of claimants that potentially need further support. This would include:</p> <ul style="list-style-type: none"> • Households receiving disability premiums within their CTR award (including for a child) • Households receiving a carer's premium within their

	<p>removal of the banding cap impacts on a large proportion of disabled claimants but the reduction in taper impacts on a significantly lesser proportion. This could be explained by the majority of claimants who are claiming some form of disability benefit are not subject to the means test due to the primary income they receive. In addition the largest proportion of claimants within this group are low earnings claimants with limited additional financial support.</p>	<p>CTR award (Claimant or Partner)</p> <ul style="list-style-type: none"> • Households receiving the Support Component of Employment and Support Allowance(Claimant or Partner) • Households residing in a property that has been re-banded for disability purposes • Households receiving a War Disablement or War Widows Pension • Households with a child under 3 years old <p>This positive impact would be to have a 0% minimum contribution for “vulnerable claimants”. It is important to note that currently only 9 of the 24 minimum contribution schemes currently operating across London have a similar mitigating action in place</p> <p>Analysis shows that this positive change potentially impacts on a larger proportion of disabled claimants due to the categories classified for support covering the majority of those receiving some form of disability income.</p> <p>Comments from Advice and Support groups in response to the consultation raised concerns in relation to mental health issues for those whose abilities to manage their affairs and finances varies and whose circumstances may fluctuate leading to a cycle of debt. Concerns were also raised that even marginal increases in outgoings can be enough to push households into debt, causing a negative impact on health and mental health. In order to mitigate the impact of these concerns the changes to the</p>
--	--	--

		<p>scheme will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account. Council tenants can access advice on financial management and budgeting via the Financial Inclusion Team and private sector tenants can obtain details of organisations that can provide similar support via the Welfare Reform Team.</p>
Age	<p>All changes would have no impact on pensioner age claimants as their CTR is established under prescribed legislation.</p> <p>Applying change 3 relating the annual uprating of benefit rates used within the means test for CTR in line with the Welfare Benefits Freeze and Prescribed Changes will mean the figures used within the calculation will remain unchanged.</p> <p>The changes 4 – 6 would have the positive impact of reversing changes that were implemented last year and increasing awards. This would be regardless of the age of the claimant or family.</p>	<p>Change 1 has the negative impact of reducing the level of contribution that could be made by way of Council Tax Reduction by 30%. The potential impact would be regardless of the age within working age claimants.</p> <p>By applying change 2 the impact of change 1 would be mitigated for groups of claimants that potentially need further support. This positive impact would be to have a 0% minimum contribution for “vulnerable claimants”. In addition the changes to the scheme will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account</p> <p>An Advice and Support group raised concerns about ESA recipients who would not come within the protected groups. To mitigate the impact of changes the scheme will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account.</p> <p>Comments made during the consultation did suggest that the age range where protection is proposed to end could be varied.</p>

Faith / Sexual orientation	<p>Applying change 3 relating the annual uprating of benefit rates used within the means test for CTR in line with the Welfare Benefits Freeze and Prescribed Changes will mean the figures used within the calculation will remain unchanged.</p> <p>This is regardless of faith or sexual orientation.</p> <p>The changes 4 – 6 would have the positive impact of reversing changes that were implemented last year and increasing awards. This positive impact would be regardless of faith and sexual orientation.</p>	<p>Change 1 has the negative impact of reducing the level of contribution that could be made by way of Council Tax Reduction by 30%. This negative impact would be regardless of faith and sexual orientation. To mitigate the impact of changes the scheme will be publicised in order to ensure that claimants who are impacted have sufficient time to take the changes into account. Council tenants can access advice on financial management and budgeting via the Financial Inclusion Team and private sector tenants can obtain details of organisations that can provide similar support via the Welfare Reform Team.</p> <p>By applying change 2 the impact of change 1 would be mitigated for groups of claimants that potentially need further support. This positive impact would be to have a 0% minimum contribution for “vulnerable claimants”. This positive mitigation would be regardless of faith and sexual orientation.</p>
----------------------------	--	---

5. Is a full EIA required? Yes. As such an initial EIA was submitted alongside the original proposal and has been updated to reflect the findings of the public consultation.

- Is the service a frontline service? Yes
- Is it clear what impact the service change will have on all the equality groups? Individual changes would have a known effect but when combined or with multiple changes together the impact is unknown
- Overall will the change have a negative impact on any of the equality groups? Yes the overall effect of applying change 1 would have a negative effect but this will be mitigated through the proposals in relation to “vulnerable clients”, through publicity regarding the changes to the scheme and also potentially through any combination of changes 3 – 6.

6. Through the initial EIA have you identified any actions that needed to be implemented to improve access to the service or monitoring of the service? (please list)

Changes 2 – 6 could mitigate the effects of change. In particular change 2 should mitigate the impact of the change for vulnerable clients and it is important to note that currently only 9 of the 24 minimum contribution schemes currently operating across London have a similar mitigating action in place. In addition advance publicity regarding the changes will ensure that any claimants potentially impacted have an opportunity to take changes into account. In addition Council tenants can access advice on financial management and budgeting via the Financial Inclusion Team and private sector tenants can obtain details of organisations that can provide similar support via the Welfare Reform Team.

Signed C O'Connor
Date; 12 January 2016
Approved by: C O'Connor