

Appendix 1

Impact Assessment for Council Tax Support **London Borough of Bromley**

Part 1: Description of policy change and its relevance to equality

Category of trigger for Impact Assessment: Re-adoption of existing policy

Background

Council Tax Benefit (CTB) was abolished on the 01 April 2013. The Local Government Act replaced CTB for working age claimants with a scheme to be designed by the local authority – Council Tax Support (CTS). Funding was no longer demand led, but based on an estimate of Borough caseloads, with an initial overall budget 10% lower than that of CTB. Residents meeting the state pension credit age being eligible for a separate national scheme to "leave them no worse off than they are now".

Reason for review

Bromley adopted a 2 year scheme in January 2013 for the financial years 2013/14 and 2014/15. The scheme was based on a minimum liability of 8.5% for 2013/14 and 19% for 2014/15. This scheme was retained for 2015/16 before revision to a 25% minimum contribution for 2016/17. It remained at this level for 2017/18 and it is proposed that the minimum contribution remains at 25% for 2018/19

CTS is a local scheme to assist those who are on a low income to meet their Council Tax liability. Individuals apply for CTS and if their income is below a certain level, which takes account of their circumstances, they are eligible for a reduction on their Council Tax bill.

The "generosity" of the scheme has a direct impact on the Authority's finances. Therefore, the cost of the scheme will influence service provision in other areas, reserves and/or the Council Tax level.

Consultation on the scheme for 2018/19

Views on the retention of the proposed scheme have been sought from the Greater London Authority and a sample of Bromley households. These households included those currently in receipt of CTS as well as those meeting their Council Tax liability from their own means.

Part 2: Collection of Evidence — what do we know?

Description of data used

In order to assess the impact of this policy change, Bromley has used information from a variety of different sources including:

- Data collected from records from the Council Tax and Housing Benefit systems;
- Consultation responses – including equality monitoring data;
- Census 2011 first release data;
- Bromley's Budget Strategy & other financial information about the service
- Office for National Statistics (NOMIS)

Financial Information and Impact

The impact of this proposed scheme will affect all working-age claimants from the 1/4/18. For the financial year 18/19 it is proposed that the maximum amount of assistance available to working-age claimants under the CTS scheme will be unchanged. Calculations have been supplied based on a minimum liability of 25% using the current years (17/18) Council Tax levels.

Table 1 - Financial Impact of Introduction of Local Scheme

	2016/17 Liability	2016/17 Maximum assistance Pensionable Age	2016/17 Maximum assistance under proposed CTS (75%)	2016/17 Minimum weekly amount to pay (25%)
Band A - Full Charge	£929.36	£929.36	£697.02	£4.46
Band A - with 25% discount	£697.02	£697.02	£522.77	£3.34
Band B - Full Charge	£1,084.25	£1,084.25	£813.19	£5.19

Band B - with 25% discount	£813.19	£813.19	£609.89	£3.90
Band C -Full Charge	£1,239.15	£1,239.15	£929.36	£5.94
Band C - with 25% discount	£929.36	£929.36	£697.02	£4.46
Band D - Full Charge	£1,394.04	£1,394.04	£1,045.53	£6.68
Band D - with 25% discount	£1,045.53	£1,045.53	£784.15	£4.84
Band E - Full Charge	£1,703.83	£1,703.83	£1,277.87	£8.17
Band E - with 25% discount	£1,277.87	£1,277.87	£958.40	£6.13
Band F- Full Charge	£1,946.06	£2,013.61	£1,510.21	£9.65
Band F - with 25% discount	£1,459.55	£1,510.21	£1,132.66	£7.24
Band G - Full Charge	£2,245.45	£2,323.40	£1,742.55	£11.14
Band G - with 25% discount	£1,684.09	£1,742.55	£1,306.91	£8.35
Band H - Full Charge	£2,694.54	£2,788.08	£2,091.06	£13.37
Band H - with 25% discount	£2,020.91	£2,091.06	£1,568.29	£10.03

Breakdown of current claimants

In order to understand how the proposed changes will impact on different protected groups Bromley has examined data, where available, based on the current benefit caseload. Data is available on the following: age, gender and disability which are noted in Table 2. There is very limited data available on the ethnic breakdown of current claimants as the appropriate section is seldom completed on the application form.

Table 2 - Breakdown of Current claimants Council Tax Support

Type	Total	Female	Male	Disabled	Disabled female	Disabled male	DLA/PIP Income
Working age - Passported (equalisation definition)							
Single no child dependant	3249	1647	1602	1070	533	537	1522
Single with child dependant	2429	2348	81	206	194	12	636
Couple no child dependant	281	115	166	96	37	59	199
Couple with child dependant	418	226	192	83	29	54	257
Working age - Non Passported							
Single no child dependant	868	463	405	156	75	81	192
Single with child dependant	1209	1166	43	33	32	1	127
Couple no child dependant	91	27	64	32	9	23	49
Couple with child dependant	555	265	290	25	12	13	112
Total Working age	9100	6257	2843	1701	921	780	3094
Pensioner- Passported	4211	2795	1416	1145	834	311	774
Pensioner- Non Passported	2077	1186	891	514	299	215	250
Total Pensioner	6288	3981	2307	1659	1133	526	1024
Overall Total	15388	10238	5150	3360	2054	1306	4118

The table below provides some additional evidence by protected characteristic that has been used to complete this EIA.

Protected Characteristic	Evidence																																																												
Age	<p>Please see table 2 for detailed breakdown</p> <p>9,100 (59.14%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on Sep 2017 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 3638 (40%) of current working-age claimants are single parent families with child dependents</p>																																																												
Disability	<p style="text-align: center;">Bromley's population</p> <p>The following table shows the number and percentage of working-age residents in receipt of benefits, including those related to sickness and Disability (latest identified data – November 2016).</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Britain</th> <th style="text-align: center;">Bromley</th> <th style="text-align: center;">Bromley</th> <th style="text-align: center;">London</th> <th style="text-align: center;">Great</th> </tr> <tr> <th></th> <th style="text-align: center;">(numbers)</th> <th style="text-align: center;">(%)</th> <th style="text-align: center;">(%)</th> <th style="text-align: center;">(%)</th> </tr> </thead> <tbody> <tr> <td>Total claimants</td> <td style="text-align: center;">16,520</td> <td style="text-align: center;">8.1</td> <td style="text-align: center;">9.3</td> <td style="text-align: center;">11.0</td> </tr> <tr> <td colspan="5" style="text-align: center;">By statistical group</td> </tr> <tr> <td>Job seekers</td> <td style="text-align: center;">1,740</td> <td style="text-align: center;">0.9</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">1.1</td> </tr> <tr> <td>ESA and incapacity benefits</td> <td style="text-align: center;">8,270</td> <td style="text-align: center;">4.1</td> <td style="text-align: center;">4.8</td> <td style="text-align: center;">6.1</td> </tr> <tr> <td>Lone parents</td> <td style="text-align: center;">1,920</td> <td style="text-align: center;">0.9</td> <td style="text-align: center;">1.0</td> <td style="text-align: center;">1.0</td> </tr> <tr> <td>Carers</td> <td style="text-align: center;">2,400</td> <td style="text-align: center;">1.2</td> <td style="text-align: center;">1.3</td> <td style="text-align: center;">1.7</td> </tr> <tr> <td>Others on income related benefits</td> <td style="text-align: center;">240</td> <td style="text-align: center;">0.1</td> <td style="text-align: center;">0.2</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td>Disabled</td> <td style="text-align: center;">1,590</td> <td style="text-align: center;">0.8</td> <td style="text-align: center;">0.7</td> <td style="text-align: center;">0.8</td> </tr> <tr> <td>Bereaved</td> <td style="text-align: center;">350</td> <td style="text-align: center;">0.2</td> <td style="text-align: center;">0.1</td> <td style="text-align: center;">0.2</td> </tr> <tr> <td>Key out-of-work benefits'</td> <td style="text-align: center;">12,180</td> <td style="text-align: center;">6.0</td> <td style="text-align: center;">7.2</td> <td style="text-align: center;">8.4</td> </tr> </tbody> </table> <p>Source: DWP benefit claimants - working age client group</p> <p>Key out-of-work benefits include the groups: job seekers, ESA and incapacity benefits parents and others on income related benefits. See the Definitions and Explanations for details</p> <p>Note: % is a proportion of resident population of area aged 16-64. Figures do not yet include Universal Credit</p> <p style="text-align: center;">Breakdown of current claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <ul style="list-style-type: none"> • 2012 (20.85%) of current claimants below pension credit age have declared a disability 	Britain	Bromley	Bromley	London	Great		(numbers)	(%)	(%)	(%)	Total claimants	16,520	8.1	9.3	11.0	By statistical group					Job seekers	1,740	0.9	1.2	1.1	ESA and incapacity benefits	8,270	4.1	4.8	6.1	Lone parents	1,920	0.9	1.0	1.0	Carers	2,400	1.2	1.3	1.7	Others on income related benefits	240	0.1	0.2	0.2	Disabled	1,590	0.8	0.7	0.8	Bereaved	350	0.2	0.1	0.2	Key out-of-work benefits'	12,180	6.0	7.2	8.4
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Sex	<p style="text-align: center;">Bromley population</p> <p>According to nomis official labour market stats Bromley's population (2015) is 51.95% female and 48.05% male</p> <p style="text-align: center;">Breakdown of current claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <p style="text-align: center;">68.75% of current claimants under pensionable age are female</p> <p style="text-align: center;">Indicates that women are over represented amongst our CTS claimants</p>																																																												
Gender reassignment	<p>The Council does not anticipate this policy will have a particular equality impact on this protected group.</p>																																																												
Pregnancy & Maternity	<p>No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.</p>																																																												

Race	<p style="text-align: center;">Bromley population - Current claimants</p> <p>As advised earlier, there is very limited data available on the ethnic breakdown of the current claimants as only a few complete the non-mandatory section of the form.</p> <p style="text-align: center;">Borough wide information</p> <p>It was estimated in mid-2016 that 15.7% of its population were "non-white". Bromley has a less ethnically diverse population than most other London boroughs, although a distinctive group within the borough is a settled traveller community in the Crays with an estimated 2,000 members.</p>
Religion & Belief	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Civil Partnerships & Marriage	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Sexual Orientation	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.

Part 3 - Analyse of evidence and description of the impact

Characteristic	Actual or likely impacts (negative/positive/no impact) and justification	Actions to be taken to mitigate potential negative impacts (include name of lead and estimated date of completion)
Age	<p>Neutral impact for pension age claimants as the Government has stipulated this group must have their claims assessed as they are now.</p> <p>Given the large number of CTS claimants that are single parent families with dependent children increases in the minimum contribution would have a negative impact on levels of child poverty. There is insufficient evidence to be certain what this impact will be.</p>	<p>It is proposed a hardship fund be retained for those faced with exceptional circumstances. It is further planned to retain all aspects of the current CTS scheme that provides assistance by way of disregards of income and increased allowances.</p> <p>The Council will monitor the impact on this Client group through monitoring of communications, complaints, appeals, request for discretionary awards</p> <p>Responsible Officer(s) Welfare Reform Manager & Head of Revenues & Benefits — Monitoring to be ongoing</p>
Disability	Any increased level of 'contribution' will have a negative impact on current and future disabled CTS claimants as working age claimants will have to pay	The proposed Council Tax Support scheme allows for the complete disregard of certain

	<p>more towards their council tax bill.</p> <p>The proposed change in assistance provided to those in the ESA – Work Related Activity Group, will reduce the assistance available to those recipients. The change is in-line with that contained in HB regulations.</p>	<p>income types such as Disability Living Allowance/PIP and the award of Disability premiums in the benefit calculation. These will be retained to mitigate the impact on those who are disabled. The planned continuation of the hardship scheme for those faced with exceptional circumstances will further alleviate any impact on the disabled.</p> <p>Responsible Officer(s) Welfare Reform Manager & Head of Revenues & Benefits — Monitoring to be ongoing</p>
Sex	<p>Females are disproportionately represented amongst current CTS claimants.</p> <p>Any reduction in the level of assistance given would have a negative impact on current and future working age CTS claimants (regardless of gender) as claimants would have to contribute more towards their council tax bill then they have had previously.</p> <p>Although any change in the scheme would be applied universally (i.e. men and women would face the same reduction in CTS) our evidence makes clear that a greater proportion of current CTS claimants are women and therefore as a protected group women would feel the impact of any change in greater numbers.</p>	<p>Monitoring of the impact on women who claim Council Tax Support will continue. In order to mitigate impact it is proposed that the scheme retains the income disregards and allowances that are predominately received by females for example allowances in respect of child care costs. The planned continuation of the hardship scheme will provide a further safeguard for those faced with exceptional circumstances.</p> <p>Responsible Officer(s) Head of Revenues & Benefits — Monitoring to be ongoing</p>
Gender reassignment	<p>No specific impact identified other than all claimants will have to contribute more towards their council tax bill</p>	
Pregnancy & Maternity	<p>The change in rules so that CRS/R only covers the cost of 2 children will impact on those having larger families. The change brings rules in-line with HB</p>	<p>Certain exemptions apply in HB legislation and scheme. Hardship fund in place to safeguard those with exceptional circumstances.</p>

	There is evidence to indicate that BME communities are more likely to be unemployed and, therefore, possibly more reliant on CTS. However, there is insufficient evidence on current claimants to demonstrate this is in fact the case in Bromley.	
Religion & Belief	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Civil Partnerships & Marriage ²	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Sexual Orientation	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Race	Any reduction in the level of assistance provided would have a negative impact on current and future CTS claimants (regardless of race) as some claimants will have to contribute more towards their council tax bill than they have had previously. There is very limited evidence available to quantify if there will be a differential impact on the different ethnicities.	In order to mitigate any adverse impact is proposed that a hardship fund is retained for those faced with exceptional circumstances. Responsible Officer(s) Head of Revenues & Benefits — Monitoring to be ongoing.

Part 5 — Completion and authorisation

Officer completing assessment	John Nightingale, Head of Revenues and Benefits
EIA completed	30/10/2017
Officer responsible for monitoring impact	John Nightingale
Date EIA is scheduled to be reviewed	November 2018