

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, 2018/19, 2019/20 and 2020/21 it is proposed that the minimum contribution remains at 25% for 2021/22

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 2021/22

Views on the retention of the proposed scheme will be sought from the Greater London Authority and a sample of Bromley households. Those households include current CTS claimants 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;
- Census 2011 data;
- Bromley's Budget Strategy & other financial information about the service
- Office for National Statistics (NOMIS)
- Bromley Joint Strategic Needs Assessment 2017

Financial Information and Impact

The impact of this proposed scheme will affect all working-age claimants from the 1/4/20. For the financial year 2021/22 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 (20/21) Council Tax levels.

Table 1 - Financial Impact of Introduction of Local Scheme

	2020/21 Liability	2020/21 Maximum assistance Pensionable Age	2020/21 Maximum assistance under proposed CTS (75%)	2020/21 Minimum weekly amount to pay (25%)
Band A - Full Charge	£1,064.56	£1,064.56	£798.42	£5.10
Band A - with 25% discount	£798.42	£798.42	£598.81	£3.83
Band B - Full Charge	£ 1,241.99	£ 1,241.99	£931.42	£5.95

Band B - with 25% discount	£931.49	£931.49	£698.62	£4.47
Band C -Full Charge	£ 1,419.41	£ 1,419.41	£1,064.56	£6.80
Band C - with 25% discount	£1064.56	£1064.56	£798.42	£5.10
Band D - Full Charge	£ 1,596.84	£ 1,596.84	£1,197.63	£7.65
Band D - with 25% discount	£1197.63	£1197.63	£898.22	£5.74
Band E - Full Charge	£ 1,951.69	£ 1,951.69	£1,463.76	£9.36
Band E - with 25% discount	£1463.76	£1463.76	£1,097.83	£7.02
Band F- Full Charge	£ 2,306.55	£ 2,306.55	£1,729.91	£11.06
Band F - with 25% discount	£1729.91	£1729.91	£1,297.43	£8.29
Band G - Full Charge	£2,661.40	£2,661.40	£1,996.05	£12.76
Band G - with 25% discount	£1,996.05	£1,996.05	£1,497.04	£9.57
Band H - Full Charge	£3,193.68	£3,193.68	£2,395.26	£15.31
Band H - with 25% discount	£2,395.26	£2,395.26	£1,796.44	£11.48

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 benefit caseload on 20 October 2020. 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	2611	1371	1240	777	409	368	1641
Single with child dependant	1294	1255	39	137	127	10	574
Couple no child dependant	229	90	139	73	27	46	197
Couple with child dependant	234	124	110	44	16	28	181
Working age - Non Passported							
Single no child dependant	1961	1067	894	186	109	77	330
Single with child dependant	2212	2105	107	58	53	5	267
Couple no child dependant	711	295	416	52	19	33	118
Couple with child dependant	277	122	155	10	5	5	56
Total Working age	9529	6429	3100	1337	765	572	3364
Pensioner- Passported	3610	2414	1196	1100	782	318	708
Pensioner- Non Passported	1914	1083	831	416	251	165	274
Total Pensioner	5524	3497	2027	1516	1033	483	982
Overall Total	15053	9926	5127	2853	1798	1055	4346

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>9529 (63.30%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on September 2020 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 3506 (36.79%) of current working-age claimants are single parent families with child dependents</p>																																																																						
Disability	<p>Bromley's population</p> <p>The following table shows the number and percentage of residents aged 16-64 who were deemed economic inactive during the period April 2019 to March 2020. You will note that the percentage of economic inactivity in Bromley is lower; however, a higher proportion is a result of long-term sickness.</p> <table><tr><th></th><th colspan="4">Economic inactivity (Apr 2019 -Mar 2020)</th></tr><tr><th></th><th>Bromley (level)</th><th>Bromley (%)</th><th>London (%)</th><th>Great Britain (%)</th></tr><tr><td colspan="5">All people</td></tr><tr><td>Total</td><td>41,900</td><td>20</td><td>21.1</td><td>20.9</td></tr><tr><td>Student</td><td>13,000</td><td>31.1</td><td>32.4</td><td>26.8</td></tr><tr><td>looking after family/home</td><td>11,300</td><td>26.9</td><td>27.3</td><td>22.5</td></tr><tr><td>temporary sick</td><td>!</td><td>!</td><td>1.7</td><td>1.9</td></tr><tr><td>long-term sick</td><td>5,400</td><td>12.9</td><td>18.5</td><td>23.8</td></tr><tr><td>discouraged</td><td>!</td><td>!</td><td>0.3</td><td>0.4</td></tr><tr><td>retired</td><td>6,800</td><td>16.2</td><td>6.4</td><td>12.9</td></tr><tr><td>other</td><td>5,400</td><td>12.9</td><td>13.5</td><td>11.7</td></tr><tr><td colspan="5"> </td></tr><tr><td>wants a job</td><td>7,400</td><td>17.7</td><td>20.3</td><td>20.8</td></tr><tr><td>does not want a job</td><td>34,500</td><td>82.3</td><td>79.7</td><td>79.2</td></tr></table> <p>Source: ONS annual population survey ! Estimate is not available since sample size is disclosive (see definitions) Notes: numbers are for those aged 16-64. % is a proportion of those economically inactive, except total, which is a proportion of those aged 16-64</p> <p>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">• 1337 (14%) of current claimants below pension credit age have declared a disability• 3364 (35.3%) are receiving DLA/PIP		Economic inactivity (Apr 2019 -Mar 2020)					Bromley (level)	Bromley (%)	London (%)	Great Britain (%)	All people					Total	41,900	20	21.1	20.9	Student	13,000	31.1	32.4	26.8	looking after family/home	11,300	26.9	27.3	22.5	temporary sick	!	!	1.7	1.9	long-term sick	5,400	12.9	18.5	23.8	discouraged	!	!	0.3	0.4	retired	6,800	16.2	6.4	12.9	other	5,400	12.9	13.5	11.7						wants a job	7,400	17.7	20.3	20.8	does not want a job	34,500	82.3	79.7	79.2
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Sex	<p>Bromley population</p> <p>According to nomis official labour market stats Bromley's population (2019) is 51.65% female and 48.35% male</p> <p>Breakdown of current claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <p>68.57% of current claimants under pensionable age are female</p> <p>Indicates that women are over represented amongst our CTS claimants</p>
Gender reassignment	The Council does not anticipate this policy will have a particular equality impact on this protected group.
Pregnancy & Maternity	No specific evidence. We do not anticipate this policy will have a particular equality impact on this protected group.
Race	<p>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>Borough wide information</p> <p>The 2017 GLA population projection estimates show that 19% of its population is made up of black and minority (BME) groups. This percentage does not include Gypsy Travellers, Bromley has a large settled Gypsy Traveller community living in "brick and mortar" concentrated chiefly in the Crays.</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</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>

	would have a negative impact on levels of child poverty. It is not possible to evaluate the scale of this impact.	<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 & Revenues & Benefits Manager — 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 would have to pay more towards their council tax bill.	<p>The proposed Council Tax Support scheme allows for the complete disregard of certain 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 & Revenues & Benefits Manager — 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) Revenues & Benefits Manager — Monitoring to be ongoing</p>

Gender reassignment	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Pregnancy & Maternity	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 then 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) Revenues & Benefits Manager — Monitoring to be ongoing.
	There is evidence to indicate that BME communities are more likely to be unemployed or in lower paid employment 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	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	

Part 5 — Completion and authorisation

Officer completing assessment	Jayne Carpenter, Revenues & Benefits Manager
EIA completed	19/10/20
Officer responsible for monitoring impact	Jayne Carpenter
Date EIA is scheduled to be reviewed	July 2021

