

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, 2020/21 and 2021/22 it is proposed that the minimum contribution remains at 25% for 2022/23

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 2022/23

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 1/4/22. For the financial year 2022/23 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 (21/22) Council Tax levels.

Table 1 - Financial Impact of Introduction of Local Scheme

	2021/22 Liability	2021/22 Maximum assistance Pensionable Age	2021/22 Maximum assistance under proposed CTS (75%)	2021/22 Minimum weekly amount to pay (25%)
Band A - Full Charge	£1,127.68	£1,127.68	£845.76	£5.41
Band A - with 25% discount	£845.76	£845.76	£634.32	£4.06
Band B - Full Charge	£ 1,315.63	£1,315.63	£986.72	£6.31

Band B - with 25% discount	£986.72	£986.72	£740.04	£4.73
Band C -Full Charge	£ 1,691.52	£1,691.52	£1,127.68	£7.21
Band C - with 25% discount	£1,127.68	£1,127.68	£845.76	£5.41
Band D - Full Charge	£ 1,691.52	£1,691.52	£1,268.64	£8.11
Band D - with 25% discount	£1,268.64	£1,268.64	£951.48	£6.08
Band E - Full Charge	£ 2,067.41	£2,067.41	£1,550.56	£9.91
Band E - with 25% discount	£1,550.56	£1,550.56	£1,162.92	£7.43
Band F- Full Charge	£2,443.31	£2,443.31	£1,832.48	£11.71
Band F - with 25% discount	£1,832.48	£1,832.48	£1,374.36	£8.79
Band G - Full Charge	£2,819.20	£2,819.20	£2114.40	£13.52
Band G - with 25% discount	£2,114.40	£2,114.40	£1,585.80	£10.14
Band H - Full Charge	£3,383.04	£3,383.04	£2,537.28	£16.22
Band H - with 25% discount	£2,537.28	£2,537.28	£1902.96	£12.17

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 07 October 2021. 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	2355	1255	1100	739	388	351	1540
Single with child dependant	1037	1006	31	113	107	6	527
Couple no child dependant	203	82	121	52	20	32	170
Couple with child dependant	234	124	110	44	16	28	181
Working age - Non Passported							
Single no child dependant	2307	12170	1037	232	133	99	514
Single with child dependant	2561	2433	128	56	56	0	410
Couple no child dependant	656	280	376	56	21	35	191
Couple with child dependant	211	86	125	7	3	4	58
Total Working age	9564	6536	3028	1299	744	555	3591
Pensioner- Passported	3418	2270	1148	1055	730	325	673
Pensioner- Non Passported	1944	1097	847	419	246	173	316
Total Pensioner	5362	3367	1995	1474	976	498	989
Overall Total	14926	9903	5023	2773	1720	1053	4580

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>9564 (64.07%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on October 2021 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 3598 (37.62%) 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 2020 to March 2021. 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 border="1" data-bbox="711 968 1495 1545"> <thead> <tr> <th colspan="5" data-bbox="711 968 1495 1006">Economic inactivity (April 2020- March 2021)</th> </tr> <tr> <th></th> <th data-bbox="870 1012 981 1073">Bromley (level)</th> <th data-bbox="997 1012 1108 1073">Bromley (%)</th> <th data-bbox="1124 1012 1235 1073">London (%)</th> <th data-bbox="1251 1012 1495 1073">Great Britain (%)</th> </tr> </thead> <tbody> <tr> <td data-bbox="901 1080 1029 1109" style="text-align: center;">All people</td><td></td><td></td><td></td><td></td></tr> <tr> <td data-bbox="600 1118 663 1147">Total</td><td data-bbox="838 1118 917 1147">40,900</td><td data-bbox="965 1118 1044 1147">19.4</td><td data-bbox="1092 1118 1171 1147">20.5</td><td data-bbox="1283 1118 1362 1147">21.3</td></tr> <tr> <td data-bbox="584 1156 679 1185">Student</td><td data-bbox="838 1156 917 1185">11,400</td><td data-bbox="965 1156 1044 1185">27.9</td><td data-bbox="1092 1156 1171 1185">32.6</td><td data-bbox="1283 1156 1362 1185">27.3</td></tr> <tr> <td data-bbox="489 1194 774 1224">looking after family/hom</td><td data-bbox="838 1194 917 1224">12,200</td><td data-bbox="965 1194 1044 1224">29.9</td><td data-bbox="1092 1194 1171 1224">23.9</td><td data-bbox="1283 1194 1362 1224">19.7</td></tr> <tr> <td data-bbox="536 1233 727 1262">temporary sick</td><td data-bbox="838 1233 854 1262">!</td><td data-bbox="965 1233 981 1262">!</td><td data-bbox="1092 1233 1140 1262">2.1</td><td data-bbox="1283 1233 1330 1262">1.8</td></tr> <tr> <td data-bbox="536 1271 727 1300">long-term sick</td><td data-bbox="838 1271 854 1300">!</td><td data-bbox="965 1271 981 1300">!</td><td data-bbox="1092 1271 1171 1300">17.8</td><td data-bbox="1283 1271 1362 1300">23.6</td></tr> <tr> <td data-bbox="568 1309 695 1338">discouraged</td><td data-bbox="838 1309 854 1338">!</td><td data-bbox="965 1309 981 1338">!</td><td data-bbox="1092 1309 1140 1338">0.8</td><td data-bbox="1283 1309 1330 1338">0.8</td></tr> <tr> <td data-bbox="600 1347 679 1376">retired</td><td data-bbox="838 1347 917 1376">4,300</td><td data-bbox="965 1347 1044 1376">10.4</td><td data-bbox="1092 1347 1140 1376">7.1</td><td data-bbox="1283 1347 1362 1376">13.6</td></tr> <tr> <td data-bbox="632 1385 679 1414">other</td><td data-bbox="838 1385 917 1414">6,300</td><td data-bbox="965 1385 1044 1414">15.3</td><td data-bbox="1092 1385 1171 1414">15.7</td><td data-bbox="1283 1385 1362 1414">13.1</td></tr> <tr> <td data-bbox="568 1462 695 1491">wants a job</td><td data-bbox="838 1462 917 1491">9,100</td><td data-bbox="965 1462 1044 1491">22.3</td><td data-bbox="1092 1462 1171 1491">24.2</td><td data-bbox="1283 1462 1362 1491">22.4</td></tr> <tr> <td data-bbox="520 1500 743 1529">does not want a job</td><td data-bbox="838 1500 917 1529">31,800</td><td data-bbox="965 1500 1044 1529">77.7</td><td data-bbox="1092 1500 1140 1529">75</td><td data-bbox="1283 1500 1362 1529">77.6</td></tr> </tbody> </table> <p>Source: ONS annual population survey</p> <p>! Estimate is not available since sample size is disclosive</p> <p>Notes: numbers are for those aged 16-64.</p> <p>% 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"> • 1299 (13.58%) of current claimants below pension credit age have declared a disability • 3591 (37.55%) are receiving DLA/PIP 	Economic inactivity (April 2020- March 2021)						Bromley (level)	Bromley (%)	London (%)	Great Britain (%)	All people					Total	40,900	19.4	20.5	21.3	Student	11,400	27.9	32.6	27.3	looking after family/hom	12,200	29.9	23.9	19.7	temporary sick	!	!	2.1	1.8	long-term sick	!	!	17.8	23.6	discouraged	!	!	0.8	0.8	retired	4,300	10.4	7.1	13.6	other	6,300	15.3	15.7	13.1	wants a job	9,100	22.3	24.2	22.4	does not want a job	31,800	77.7	75	77.6
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Sex	<p style="text-align: center;">Bromley population</p> <p>According to nomis official labour market stats Bromley's population (2020) is 51.93% female and 48.13% 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;">68.34% 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 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>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 would have a negative impact on levels of child poverty. It is not possible to evaluate the scale of this impact.</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 & Revenues & Benefits Manager — Monitoring to be ongoing</p>
Disability	<p>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>	<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 than 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	<p>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.</p> <p>There is very limited evidence available to quantify if there will be a differential impact on the different ethnicities.</p>	<p>In order to mitigate any adverse impact it is proposed that a hardship fund is retained for those faced with exceptional circumstances.</p> <p>Responsible Officer(s) Revenues & Benefits Manager — Monitoring to be ongoing.</p>

	<p>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.</p>	
Religion & Belief	No specific impact identified other then all claimants will have to contribute more towards their council tax bill	
Civil Partnerships & Marriage	No specific impact identified other then all claimants will have to contribute more towards their council tax bill	
Sexual Orientation	No specific impact identified other then 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	11/10/21
Officer responsible for monitoring impact	Jayne Carpenter
Date EIA is scheduled to be reviewed	July 2022