

# Equality Analysis Form

## 1. Introduction

### 1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

## 2. Proposed change

<b>Directorate</b>	<b>Resources</b>
<b>Title of proposed change</b>	<b>Council Tax Support review</b>
<b>Name of Officer carrying out Equality Analysis</b>	<b>Helen Helliwell</b>

## 2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

Council tax support is a means tested benefit that residents are able to apply for to support them with council tax payments. There are currently 26,666 active claims for council tax support. There are currently 162,465 chargeable dwelling in Croydon, these are properties where there is a council tax liability.

As an authority we have a duty to review our council tax support scheme annually, as a result of this review we are proposing 3 potential changes to the application of the scheme. The changes are:

Remove the minimum income floor for self-employed disabled working claims. This will positively affect households that have been classified as disabled working, and where the claimant or partner are self-employed and their income isn't disregarded already under permitted earnings

Change the rate by which the income bandings are increased from Consumer Price Index (CPI) to the percentage by which council tax is increased.

This change will affect all claimants equally. The proposal is to increase the income bands used within the scheme by the same percentage that we increase Council Tax. This won't be a set percentage but rather the scheme will state that the income bands will increase by how much London Borough of Croydon increases council tax each year.

Introduce non-dependant deductions for disabled non-working claims. One of the principles of the CTS scheme is that everyone in the household should pay towards council tax. Non-dependents are other adults that live in the property, excluding any partners. In all other groups within the scheme a deduction is taken from the level of CTS entitlement based on the non-dependents income. To implement the 'everyone in the household should pay' principle across all residents we are proposing to introduce non-dependent deductions to disabled not working claims.

The aim of these changes are to make some elements of the scheme fairer and to re-align to the principles of the scheme after a major overhaul of the scheme in April 2022. There is also a need to review the cost of the scheme, especially in relation to the rate of the CPI which would have a major impact on the cost of council tax support to the council.

In seeking to reduce the cost of the scheme the result of two of the changes will mean a reduction in the level of support residents will receive.

### 3. Impact of the proposed change

**Important Note:** It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

#### 3.1 Deciding whether the potential impact is positive or negative

**Table 1 – Positive/Negative impact**

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
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Age	Neutral impact as pensioners are protected from all proposed changes.	<b>All working age claimants would be effected by the changes to the rate by which the income bands will be increased.</b>	<p>According to the 2021 census, The population in Croydon has grown to 390,719 from 363,400 in 2011. 67% of all residents are between the ages of 15 and 64 years old, and 14% are aged over 64.</p> <p>The age breakdown for the borough, according to the 2021 census is as follows:</p> <table border="1" data-bbox="1413 419 2013 790"> <thead> <tr> <th>Age</th> <th>2021 Census Estimates in Croydon</th> <th>2021 census age breakdown of total population</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>19.3%</td> <td>17.4%</td> </tr> <tr> <td>15-64</td> <td>67%</td> <td>64.2%</td> </tr> <tr> <td>64+</td> <td>13.6%</td> <td>18.4%</td> </tr> </tbody> </table> <p><b>The current caseload age breakdown is as follows:</b></p> <table border="1" data-bbox="1413 1029 1827 1332"> <thead> <tr> <th>Age</th> <th>CTS caseload breakdown</th> </tr> </thead> <tbody> <tr> <td>0-15</td> <td>0%</td> </tr> <tr> <td>15-64</td> <td>69.9%</td> </tr> <tr> <td>64+</td> <td>30.1%</td> </tr> </tbody> </table>	Age	2021 Census Estimates in Croydon	2021 census age breakdown of total population	0-15	19.3%	17.4%	15-64	67%	64.2%	64+	13.6%	18.4%	Age	CTS caseload breakdown	0-15	0%	15-64	69.9%	64+	30.1%
Age	2021 Census Estimates in Croydon	2021 census age breakdown of total population																					
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Age	CTS caseload breakdown																						
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Disability	Those who are disabled and self-employed will no	<b>Where a claimant or partner are disabled and not working a deduction</b>	Based on our current caseload 31% of all of our claims are identified as claims where either than claimant or partner as disabled.																				

	<p>longer have an assumed income figure used. Previously an increased assumed income would have been used, meaning they would be getting a reduced entitlement,</p>	<p><b>will be introduced for any other adult living in the property</b>  <b>For Disabled claims where the claimant or partner are working they will be impacted, along with all other working age claims by the proposal to change the rate by which the income bands are increased</b></p>	<p>In 28% of these claims either the claimant or partner are disabled and neither are in work, and 3% of claims are classified as disabled working claims meaning either the claimant or partner are disabled and either are in work.</p> <p>As part of the consultation we asked respondents if they considered themselves to have a disability. 140 respondents confirmed whether or not they considered themselves having a disability, 41.4% considered themselves having a disability, 44.3% answered no and 14.3% preferred not to say.</p> <p>84 of the above went on to declare the disability that was identified.</p> <ul style="list-style-type: none"> <li>• 8.3% were visually impaired;</li> <li>• 7.1% declared a hearing impairment;</li> <li>• 44% identified having a mobility disability;</li> <li>• 7.1% declared a learning disability;</li> <li>• 2.4% had communication difficulty;</li> <li>• 22.6% had a hidden disability; and</li> <li>• 32.1% preferred not to say</li> </ul> <p>13.1% stated they identified as having another disability</p>
Sex	None identified	<p><b>Of the 16,260 single claims by females, 11,795 are from working age claimants and of the 6,263 male claims 4,187 are working age. These claimants will be effected by the change to the amount the income bands will be increased.</b></p>	<p>16,260 of the claims made by single people are females, and 6,263 are from males, there are 30 cases where the sex of the claimant is unknown. In claims for couples 1,548 have a female as the claimant and 2,554 have a male. However who is the lead claimant is purely down to whose name is input on the claim form first.</p>
Gender Reassignment	None identified	<p><b>We are unable to identify of those who provided their gender identity whether</b></p>	<p>Data on gender reassignment is not routinely captured. A person's innate sense of their own gender, whether</p>

		<b>they are working age or of pension age, but any working age claimants in these groups will be effected by the changes to the percentage by which the income bands are due to be increased.</b>	male, female or something else may or may not correspond to the sex assigned at birth.  We have recently moved to a new application form and will explore the option of adding additional questions that will enable us to gather this information.  As part of the consultation process we asked respondents to describe their gender identity, 26.2% of people who answered that question identified as male, 63.8% female, 0.7% as non-binary, no one identified as transgender and 9.2% preferred not to say.														
Marriage or Civil Partnership	If one member of a couple is disabled, and the other is self-employed then they will no longer have an assumed income figure applied to their claim. Previously an increased assumed income would have been used, meaning they would be getting a reduced entitlement,	<b>Of the 22,559 single claims, 16,003 are from working age claimants, and 2,375 of the 4,107 of claims by couples are working age claims. These claimants will be effected by the changes to the percentage by which the income bands are due to be increased.</b>	4107 (15%) claims of the current case load are those made by couples, the remaining 22,559 (85%) are from single claimants.  Whether or not the couples are married or in a civil partnership, or are unmarried partners does not affect the way the claims are calculated. We do not hold specific details regarding if a couple are married or not as we do not ask that specific question in our application form, rather if they have a partner.														
Religion or belief	None identified	<b>We are unable to identify of those who provided their religion whether they are working age or of pension age, but any working age claimants in these groups will be effected by the changes to the percentage by which the income bands are due to be increased</b>	As part of the consultation we asked people what their religion was: <table border="1"> <tr> <td>Christian</td> <td>47.1%</td> </tr> <tr> <td>Prefer not to say</td> <td>32.9%</td> </tr> <tr> <td>Other</td> <td>8.6%</td> </tr> <tr> <td>Muslim</td> <td>7.9%</td> </tr> <tr> <td>Hindu</td> <td>2.9%</td> </tr> <tr> <td>Buddhist</td> <td>0.7%</td> </tr> <tr> <td></td> <td></td> </tr> </table>	Christian	47.1%	Prefer not to say	32.9%	Other	8.6%	Muslim	7.9%	Hindu	2.9%	Buddhist	0.7%		
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Race	None identified		Where the claimant has provided their race this has been recorded and the current caseload is broken down as follows: <table border="1"> <thead> <tr> <th>Number</th> <th>% of caseload</th> </tr> </thead> <tbody> <tr> <td></td> <td></td> </tr> </tbody> </table>	Number	% of caseload												
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Asian or Asian British: Bangladeshi	129	0.7%
Asian or Asian British: Indian	234	1.3%
Asian or Asian British: Pakistani	412	2.2%
Asian or British : Any other Backgrnd	405	2.2%
Black-Black British:African	1815	9.9%
Black-Black British:Caribbean	2042	11.1%
Black-Black British:Other	400	2.2%
Chinese	35	0.2%
Mixed :Any other mixed background	229	1.2%
Mixed: White and Asian	216	1.2%
Mixed: White and Black Caribbean	442	2.4%
White: British	3491	19.0%
White: Any other White background	1021	5.6%
Not Known	7519	40.9%
Total working age caseload	18390	

	Number	% of caseload
Asian or Asian British: Bangladeshi	162	1%
Asian or Asian British: Indian	387	1%
Asian or Asian British: Pakistani	546	2%
Asian or British : Any other Backgrnd	571	2%
Black-Black British:African	2098	7%
Black-Black British:Caribbean	2426	8%
Black-Black British:Other	2433	8%
Chinese	55	0%
Mixed :Any other mixed background	252	1%
Mixed: White and Asian	235	1%
Mixed: White and Black Caribbean	460	2%
White: British	4755	17%
White: Any other White background	1203	4%
Not Known	13077	46%
Total	28660	



		<b>This is the break down for working age claims – these claimants will be effected by the changes to the percentage by which the income bands are due to be increased.</b>	
The Sexual Orientation	None identified	<b>Of the 29 same sex couples claiming council tax support, 25 are working age claims. These claimants will be effected by the changes to the percentage by which the income bands are due to be increased</b>	Within the current case load there are 4107 claims made by couples, of those 29 are from couples where each partner is of the same sex. We do not ask for details of claimants sexual orientation as part of the application process, so are unable to identify the breakdown for those who have made a single application form.
Pregnancy or Maternity	None identified	<b>Of the 38 claims where the claimant or partner are in receipt of maternity pay all are of working age so will be effected by the changes to the percentage by which the income bands are due to be increased</b>	We currently have 38 active claims where the claimant or partner are in receipt of maternity pay which is recorded on our system. We do not record if someone is pregnant at the time of application.

**Important note:** You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

### 3.2 Additional information needed to determine impact of proposed change

**Table 2 – Additional information needed to determine impact of proposed change**

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

<b>Additional information needed and or Consultation Findings</b>	<b>Information source</b>	<b>Date for completion</b>
<b>We carried out public consultation regarding the changes.</b>  <b>We received 144 responses, 69% of the respondents were in receipt of council tax support. In relation to the proposed changes the responses were:</b>	<b>Full consultation report attached.</b>	

	<b>Strongly or somewhat agree</b>	<b>Neither agree or disagree</b>	<b>Strongly or somewhat disagree</b>
<b>Removal of the minimum income floor for disabled working claims</b>	54%	19%	26%
<b>Changing the percentage the income bands are increased.</b>	42%	21%	40%
<b>Introducing a non-dependant deduction for disabled not working claims</b>	40.90%	19%	40.10%

Out of the 144 respondents, 142 answered the questions regarding to the age of the respondent. 1.4% were between 18-25, 35.9% were between the ages of 26-45, 26.1% were between the ages of 46-55. 23.2% were aged 56-65, and 9.9% were aged 66 or over 3.5% preferred not to declare their age

The largest group of respondents were aged between 26-45, the council tax support caseload indicates that 34% of those who claim are between the ages of 26-45.

141 residents answered the question regarding gender, of which 63.8% confirmed they identified as being female, 26.2% identified as being male, 0.7% confirmed they identified as being non-binary, 9.2% preferred not to say what they identified their gender to be.

140 respondents confirmed whether or not they considered themselves having a disability, 41.4% considered themselves having a disability, 44.3% answered no and 14.3% preferred not to say.

84 of the above went on to declare the disability that was identified.

- 8.3% were visually impaired;
- 7.1% declared a hearing impairment;
- 44% identified having a mobility disability;
- 7.1% declared a learning disability;
- 2.4% had communication difficulty;
- 22.6% had a hidden disability; and
- 32.1% preferred not to say
- 13.1% stated they identified as having another disability

31% of our claims are within a disabled scheme, and 41.4% of respondents to the consultation considered themselves to have a disability.

<p>In addition to the on line public consultation a face to face meeting was held with partners to seek their feedback.</p> <p>The session was attended by representatives from MIND, South West London Law Centre and The Carer's information service.</p> <p>There were concerns raised regarding the introduction of non-dependant deductions for disabled non-working households as there was a concern that the non-dependant could be the carer for the disabled claimant or partner. And taking a deduction for them would be penalising them for having caring responsibilities.</p> <p>The proposed changes to the scheme have been updated as a direct result of this feedback and we are suggesting that in this scenario no non dependant deductions are taken.</p>		
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For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

### 3.3 Impact scores

#### Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact )
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

<b>Severity of Impact</b>	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	<b>Likelihood of Impact</b>			

#### Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

**Table 3 – Impact scores**

<p><b>Column 1</b></p> <p><b>PROTECTED GROUP</b></p>	<p><b>Column 2</b></p> <p><b>LIKELIHOOD OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>likelihood</b> of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 3</b></p> <p><b>SEVERITY OF IMPACT SCORE</b></p> <p>Use the key below to <b>score</b> the <b>severity</b> of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p><b>1 = Unlikely to impact</b>  <b>2 = Likely to impact</b>  <b>3 = Certain to impact</b></p>	<p><b>Column 4</b></p> <p><b>EQUALITY IMPACT SCORE</b></p> <p>Calculate the <b>equality impact score</b> for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p><b>Equality impact score = likelihood of impact score x severity of impact score.</b></p>
Age	3	2	6
Disability	3	2	6
Gender	3	2	6
Gender reassignment	3	2	6
Marriage / Civil Partnership	3	2	6
Race	3	2	6
Religion or belief	3	2	6
Sexual Orientation	3	2	6
Pregnancy or Maternity	3	2	6

## 4. Statutory duties

### 4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

**Important note:** If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

## 5. Action Plan to mitigate negative impacts of proposed change

**Important note:** Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

**Table 4 – Action Plan to mitigate negative impacts**

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	Introduction of non-dependent deductions for disabled not working claims	Excluding any non-dependents who are receiving careers allowance for the claimant or partner A hardship fund is available for those effected by the changes to		Full Cabinet in January 2023

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		support with the reduction in support.		
Race	Changing the percentage by which the income bands are increased which will affect all working age claims	<p>A hardship fund is available for those effected by the changes to support with the reduction in benefit. It will help to provide transitional support to bridge the gap between residents old and new entitlement.</p> <p>The income bands used in the assessment for Council Tax Support will increase by the same rate as council tax increases to ensure that entitlement goes up by the same rate.</p>		
Sex (gender)	Changing the percentage by which the income bands are increased which will affect all working age claims			
Gender reassignment	Changing the percentage by which the income bands are increased which will affect all working age claims			
Sexual orientation	Changing the percentage by which the income bands are increased which will affect all working age claims			
Age	Changing the percentage by which the income bands are increased which will affect all working age claims			
Religion or belief	Changing the percentage by which the income bands are increased which will affect all working age claims			
Pregnancy or maternity	Changing the percentage by which the income bands are			

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	increased which will affect all working age claims			
Marriage/civil partnership	Changing the percentage by which the income bands are increased which will affect all working age claims			

### 6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. <b>If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.</b>	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. <b>If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form</b>  <b>A need to make amendments to the scheme was identified following consultation. Mitigation via a hardship fund has been made available to support those affected the most by the changes.</b>	<b>X</b>
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. <b>If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.</b>	



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	Although some of the changes will directly effect a protected group – namely those with disabilities. Additional allowances have been made to ensure they are not adversely effected. Such as not applying the deduction where the non-dependant is getting carers allowance	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet	Meeting title: Cabinet Date: 26 <sup>th</sup> January 2023	

## 7. Sign-Off

<b>Officers that must approve this decision</b>	
<b>Equalities Lead</b>	<b>Name: Denise McCausland</b> <b>Date:10/1/23</b> <b>Position: Equalities Programme Manager</b>
<b>Director</b>	<b>Name: Jane West</b> <b>Date: 13/01/2023</b> <b>Position: Corporate Director of Resources (Section 151 Officer)</b>