



Equality Impact Assessment [version 2.9]

Title: Council Tax Reduction scheme 2023/24	
<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Strategy <input type="checkbox"/> Function <input type="checkbox"/> Service <input type="checkbox"/> Other [please state]	<input type="checkbox"/> New <input type="checkbox"/> Already exists / review <input checked="" type="checkbox"/> Changing
Directorate: Finance	Lead Officer name: Denise Murray
Service Area: Benefits	Lead Officer role: Director - Finance

Step 1: What do we want to do?

The purpose of an Equality Impact Assessment is to assist decision makers in understanding the impact of proposals as part of their duties under the Equality Act 2010. Detailed guidance to support completion can be found here [Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#).

This assessment should be started at the beginning of the process by someone with a good knowledge of the proposal and service area, and sufficient influence over the proposal. It is good practice to take a team approach to completing the equality impact assessment. Please contact the [Equality and Inclusion Team](#) early for advice and feedback.

1.1 What are the aims and objectives/purpose of this proposal?

Briefly explain the purpose of the proposal and why it is needed. Describe who it is aimed at and the intended aims / outcomes. Where known also summarise the key actions you plan to undertake. Please use plain English, avoiding jargon and acronyms. Equality Impact Assessments are viewed by a wide range of people including decision-makers and the wider public.

We are reviewing our Council Tax Reduction (CTR) scheme that currently supports 35,000 households who are on a low income with the cost of their council tax. Just over 24,000 are of working age and the remainder are pension age. The current scheme is a means tested discount and pension age recipients are protected from any reduction in support under a scheme that is set out in national regulations. We have fully funded our working age scheme since CTR was introduced in 2013 and this has resulted in working age recipients getting similar levels of support to pension age recipients (up to 100% of their council tax liability).

We currently spend £43million on the scheme (£30million working age, £13million pension age). The forecast cost of the scheme in 2023/24 is £44million.

The council can make changes to its working age scheme that may reduce the level of discount that is paid (such as introducing a minimum charge for all working age households). This is subject to a consultation process and any changes to the scheme must be agreed by Full Council.

The current proposal is to seek a decision on whether to retain the current levels of support scheme or consult on making changes to the scheme for working age people. If we were to reduce CTR funding this would result in a financial loss for those working age households who are otherwise eligible for support.

1.2 Who will the proposal have the potential to affect?

<input type="checkbox"/> Bristol City Council workforce	<input checked="" type="checkbox"/> Service users	<input type="checkbox"/> The wider community
<input type="checkbox"/> Commissioned services	<input checked="" type="checkbox"/> City partners / Stakeholder organisations	
Additional comments:		

1.3 Will the proposal have an equality impact?

Could the proposal affect access levels of representation or participation in a service, or does it have the potential to change e.g. quality of life: health, education, or standard of living etc.?

If 'No' explain why you are sure there will be no equality impact, then skip steps 2-4 and request review by Equality and Inclusion Team.

If 'Yes' complete the rest of this assessment, or if you plan to complete the assessment at a later stage please state this clearly here and request review by the Equality and Inclusion Team.

<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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Step 2: What information do we have?

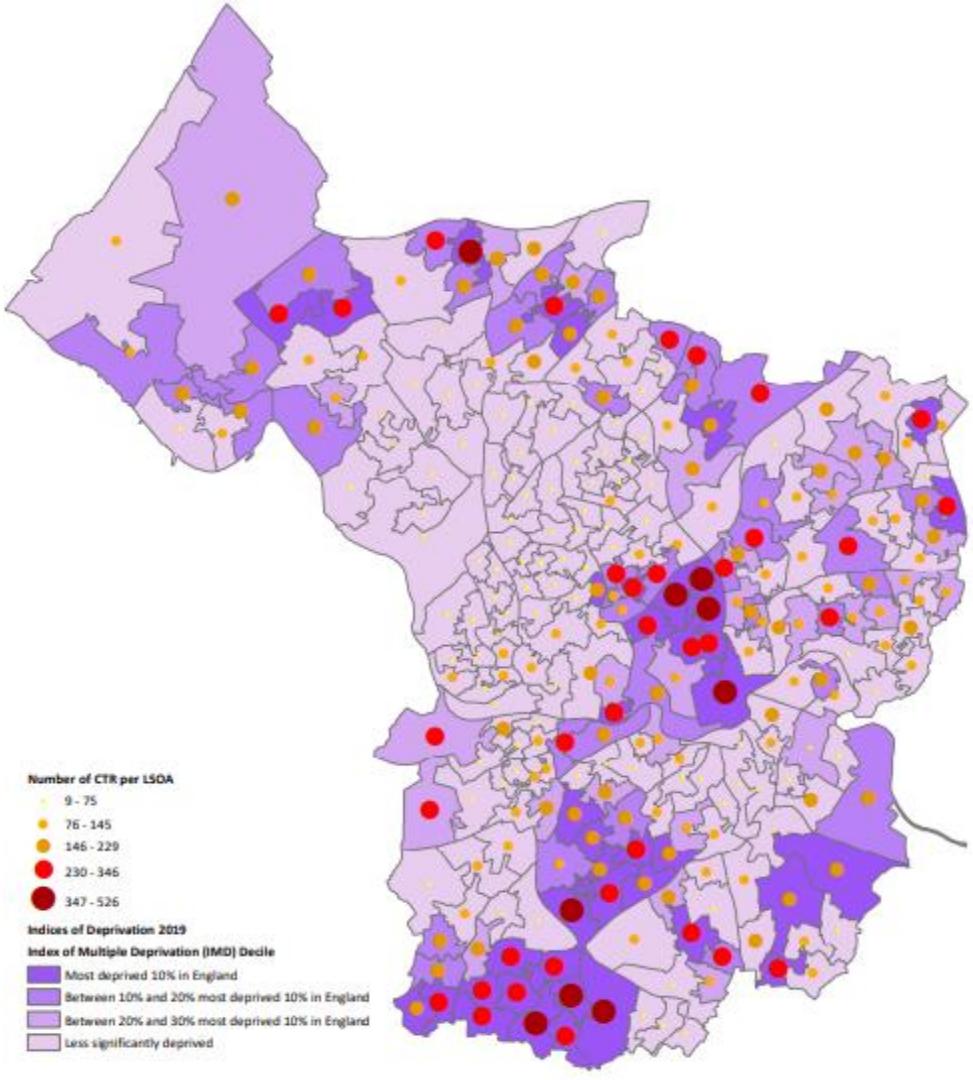
2.1 What data or evidence is there which tells us who is, or could be affected?

Please use this section to demonstrate an understanding of who could be affected by the proposal. Include general population data where appropriate, and information about people who will be affected with particular reference to protected and other relevant characteristics: <https://www.bristol.gov.uk/people-communities/measuring-equalities-success>.

Use one row for each evidence source and say which characteristic(s) it relates to. You can include a mix of qualitative and quantitative data e.g. from national or local research, available data or previous consultations and engagement activities.

Outline whether there is any over or under representation of equality groups within relevant services - don't forget to benchmark to the local population where appropriate. Links to available data and reports are here [Data, statistics and intelligence \(sharepoint.com\)](#). See also: [Bristol Open Data \(Quality of Life, Census etc.\)](#); [Joint Strategic Needs Assessment \(JSNA\)](#); [Ward Statistical Profiles](#).

For workforce / management of change proposals you will need to look at the diversity of the affected teams using available evidence such as [HR Analytics: Power BI Reports \(sharepoint.com\)](#) which shows the diversity profile of council teams and service areas. Identify any over or under-representation compared with Bristol economically active citizens for different characteristics. Additional sources of useful workforce evidence include the [Employee Staff Survey Report](#) and [Stress Risk Assessment Form](#)

Data / Evidence Source	Summary of what this tells us
CTR caseload data and indices of deprivation 2019	<p>All the LSOAs in Bristol that are in the most deprived 10% in England also have above average numbers of households who are receiving CTR. 12,067 awards have been made within these areas. This represents 34% of the entire caseload. By contrast, the least deprived LSOAs (IMD decile 10) have 328 active CTR awards. The map below shows active CTR awards against Indices of Multiple Deprivation.</p>  <p>The map displays the spatial distribution of active CTR awards across Bristol's Local Statistical Geography (LSOA) units. The background color of each LSOA indicates its Index of Multiple Deprivation (IMD) decile, with darker shades representing higher deprivation. Overlaid on this are numerous small yellow dots, which represent individual CTR awards. A legend on the left provides two scales: one for the number of CTR awards per LSOA (ranging from 9-75 to 347-526), and another for the IMD deciles (ranging from Most deprived 10% in England to Less significantly deprived). The highest density of both dots and purple shading is visible in the central and southern parts of the city, indicating a concentration of both deprivation and CTR awards in those areas.</p>

CTR caseload data and census ethnicity data 2011	There are 79 LSOAs (30% of all areas in Bristol) where there is an above average number of households with people from Black, Asian and minority ethnic																								
CTR caseload data by sex	<p>Sex by lead working age claimant:</p> <ul style="list-style-type: none"> • 15,170 females (61%) • 13,190 single females (53%) 																								
CTR caseload data by age																									
CTR caseload data by receipt of disability benefit																									
CTR caseload data and religion/faith data	<table border="1"> <thead> <tr> <th>Religion</th> <th>Number of Cases</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Hindu</td> <td>2712</td> <td>1%</td> </tr> <tr> <td>Jewish</td> <td>777</td> <td><1%</td> </tr> <tr> <td>Muslim</td> <td>22016</td> <td>5%</td> </tr> <tr> <td>Sikh</td> <td>2133</td> <td><1%</td> </tr> <tr> <td>Other Religion</td> <td>2793</td> <td>1%</td> </tr> <tr> <td>No Religion</td> <td>160218</td> <td>37%</td> </tr> <tr> <td>Religion Not Stated</td> <td>34782</td> <td>8%</td> </tr> </tbody> </table> <p>The three maps below show the distribution within Bristol of these three largest groups within the protected characteristic of 'religion and belief'.</p>	Religion	Number of Cases	Percentage	Hindu	2712	1%	Jewish	777	<1%	Muslim	22016	5%	Sikh	2133	<1%	Other Religion	2793	1%	No Religion	160218	37%	Religion Not Stated	34782	8%
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1. Christian (darker areas have a higher percentage)



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2. No religion (darker areas have a higher percentage)



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3. Muslim (darker areas have a higher percentage)

There is a correlation between areas with high proportion of Muslim residents and high CTR demand (central areas) but also high demand in some areas on the edge of the city where there are high proportions of Christians or those with no religion.

Ethnicity facts and figures – State support¹

The family resources survey estimated that out of all families in the UK, 12% receive CTR and 10% receive HB. However, this varies according to ethnicity and within Black, Asian and minority ethnic groups. Households who are from Bangladeshi and Black backgrounds were most likely to received CTR (19% and 18%) and HB (20% and 17%), as well as income related benefits more generally (26% and 23%). Households with people from an Indian background were least likely to receive either CTR or HB (6% and 4% respectively). Although this is a

¹ State support - GOV.UK Ethnicity facts and figures (ethnicity-facts-figures.service.gov.uk)

	<p>national study, it would suggest that any changes to the scheme will have a disproportionate impact on those from Bangladeshi and Black backgrounds</p>												
Quality of life survey 2021/22 ²	<p>The percentage of those who find it difficult to manage financially differs according to various demographic groups. On average 8.7% of respondents to the quality of life survey found it difficult to manage. The following groups were more likely to be struggling:</p> <table border="1"> <thead> <tr> <th>Group</th><th>% finding it difficult to manage</th></tr> </thead> <tbody> <tr> <td>Black, Asian and minority ethnic</td><td>14.9</td></tr> <tr> <td>Other religion (not Christian or no religion)</td><td>18.2</td></tr> <tr> <td>Parents</td><td>12.0</td></tr> <tr> <td>Single parents</td><td>28.6</td></tr> <tr> <td>Disabled</td><td>21.6</td></tr> </tbody> </table> <p>Those who are struggling financially are more likely to be on a low income and be in receipt of benefits and CTR.</p>	Group	% finding it difficult to manage	Black, Asian and minority ethnic	14.9	Other religion (not Christian or no religion)	18.2	Parents	12.0	Single parents	28.6	Disabled	21.6
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Disabled	21.6												

Additional comments:

2.2 Do you currently monitor relevant activity by the following protected characteristics?

<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Disability	<input type="checkbox"/> Gender Reassignment
<input type="checkbox"/> Marriage and Civil Partnership	<input type="checkbox"/> Pregnancy/Maternity	<input type="checkbox"/> Race
<input type="checkbox"/> Religion or Belief	<input checked="" type="checkbox"/> Sex	<input type="checkbox"/> Sexual Orientation

2.3 Are there any gaps in the evidence base?

Where there are gaps in the evidence, or you don't have enough information about some equality groups, include an equality action to find out in section 4.2 below. This doesn't mean that you can't complete the assessment without the information, but you need to follow up the action and if necessary, review the assessment later. If you are unable to fill in the gaps, then state this clearly with a justification.

For workforce related proposals all relevant characteristics may not be included in HR diversity reporting (e.g. pregnancy/maternity). For smaller teams diversity data may be redacted. A high proportion of not known/not disclosed may require an action to address under-reporting.

- Marriage and civil partnership
- Pregnancy/Maternity
- Gender reassignment
- Sexual orientation

We will attempt to address these gaps in the evidence base through consultation if any changes to the scheme are proposed.

2.4 How have you involved communities and groups that could be affected?

You will nearly always need to involve and consult with internal and external stakeholders during your assessment. The extent of the engagement will depend on the nature of the proposal or change. This should usually include individuals and groups representing different relevant protected characteristics. Please include details of any completed engagement and consultation and how representative this had been of Bristol's diverse communities. See <https://www.bristol.gov.uk/people-communities/equalities-groups>.

Include the main findings of any engagement and consultation in Section 2.1 above.

If you are managing a workforce change process or restructure please refer to [Managing change or restructure \(sharepoint.com\)](#) for advice on consulting with employees etc. Relevant stakeholders for engagement about workforce changes may include e.g. staff-led groups and trades unions as well as affected staff.

If a decision to consult on potential changes to the scheme is made, a full public consultation is required as per the Local Government Finance Act 1992 (as amended). This will include engaging with affected stakeholders such as CTR recipients, as well as the voluntary and community sector who provide representation, members, MPs, and internal services.

2.5 How will engagement with stakeholders continue?

Explain how you will continue to engage with stakeholders throughout the course of planning and delivery. Please describe where more engagement and consultation is required and set out how you intend to undertake it. Include any targeted work to seek the views of under-represented groups. If you do not intend to undertake it, please set out your justification. You can ask the Equality and Inclusion Team for help in targeting particular groups.

Please see above. This will be dependent upon the decision reached by cabinet on whether to consult on any proposed changes to the CTR scheme.

Step 3: Who might the proposal impact?

Analysis of impacts must be rigorous. Please demonstrate your analysis of any impacts of the proposal in this section, referring to evidence you have gathered above and the characteristics protected by the Equality Act 2010. Also include details of existing issues for particular groups that you are aware of and are seeking to address or

mitigate through this proposal. See detailed guidance documents for advice on identifying potential impacts etc.
[Equality Impact Assessments \(EqIA\) \(sharepoint.com\)](#)

3.1 Does the proposal have any potentially adverse impacts on people based on their protected or other relevant characteristics?

Consider sub-categories (different kinds of disability, ethnic background etc.) and how people with combined characteristics (e.g. young women) might have particular needs or experience particular kinds of disadvantage.

Where mitigations indicate a follow-on action, include this in the 'Action Plan' Section 4.2 below.

GENERAL COMMENTS (highlight any potential issues that might impact all or many groups)	
Any changes that reduce entitlement to people receiving support under the scheme will have a financial impact on those who are, by definition, already on a low income. Evidence of local economic disparity for equalities communities and overrepresentation within the current CTR caseload indicates that any scheme reductions would have a disproportionately negative impact for people on the basis of their protected and other relevant characteristics (see evidence section 2.1 and below). The likely result would be increased indebtedness with the council through non-payment of council tax or households reducing other forms of expenditure to meet this new expense or becoming indebted to other creditors (e.g. landlords, utilities).	
PROTECTED CHARACTERISTICS	
Age: Young People	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Changes to the CTR scheme will only affect working age people and will likely result in a financial impact on households who already have a low income. Almost half of the households potentially affected have at least one child or young person living with them.
Mitigations:	None at present
Age: Older People	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	Older people (over pension age) are protected from any changes to the CTR scheme by national regulations.
Mitigations:	None
Disability	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Disabled people are overrepresented within the CTR caseload and will likely result in a financial loss for those households. The quality of life survey has identified that disabled people are also represented in the group that are finding it difficult to manage financially.
Mitigations:	None at present
Sex	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	Females are more likely to be affected by proposed changes because they are overrepresented within the CTR caseload. They are also more likely to be single parents than males and already likely find it difficult to manage financially.
Mitigations:	None at present
Sexual orientation	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have evidence that changes to the CTR scheme will have a disproportionate of people because of their sexual orientation.
Mitigations:	None
Pregnancy / Maternity	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have sufficient evidence at this stage, but females are disproportionately affected and are more likely to be single parents, both groups are overrepresented in the CTR caseload.
Mitigations:	None at present
Gender reassignment	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have evidence that changes to the CTR scheme will have a disproportionate impact for trans / transgender people.
Mitigations:	None
Race	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>

Potential impacts:	Based on the information that we hold regarding where CTR recipients live, CTR awards are concentrated in areas with higher numbers of people from Black, Asian and minority ethnic communities. Nationally, people from Bangladeshi and Black/Black British backgrounds are overrepresented within the CTR caseload. These is no reason to suggest that this is not the case in Bristol as well. If the scheme is changed, this group is likely to experience a financial loss. Black, Asian and minority ethnic communities are also overrepresented in the group that are finding it difficult to manage financially.
Mitigations:	None at present
Religion or Belief	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The information that we hold suggests that Muslims living within central and Eastern parts of the city are overrepresented within the CTR caseload and those declaring a Christian or no religion on the outskirts of the city
Mitigations:	None at present
Marriage & civil partnership	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	We do not have evidence that changes to the CTR scheme will have a disproportionate of people on the basis of Marriage and Civil Partnership.
Mitigations:	None
OTHER RELEVANT CHARACTERISTICS	
Socio-Economic (deprivation)	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	The CTR scheme supports households who are on a low income and awards are most highly concentrated in those areas that are in the most deprived.
Mitigations:	None at present
Carers	Does your analysis indicate a disproportionate impact? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Potential impacts:	There are 3,076 households receiving CTR where Carer's Allowance is also in payment, and it is likely that many more carers are not receiving this benefit.
Mitigations:	None at present
Care leavers	Does your analysis indicate a disproportionate impact? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Potential impacts:	None because these households are exempt from paying council tax under a separate scheme.
Mitigations:	None

3.2 Does the proposal create any benefits for people based on their protected or other relevant characteristics?

Outline any potential benefits of the proposal and how they can be maximised. Identify how the proposal will support our Public Sector Equality Duty to:

- ✓ Eliminate unlawful discrimination for a protected group
- ✓ Advance equality of opportunity between people who share a protected characteristic and those who don't
- ✓ Foster good relations between people who share a protected characteristic and those who don't

There are no identified benefits to a reduction in the scheme.

Step 4: Impact

4.1 How has the equality impact assessment informed or changed the proposal?

What are the main conclusions of this assessment? Use this section to provide an overview of your findings. This summary can be included in decision pathway reports etc.

If you have identified any significant negative impacts which cannot be mitigated, provide a justification showing how the proposal is proportionate, necessary, and appropriate despite this.

Summary of significant negative impacts and how they can be mitigated or justified:

Potential financial losses for working age households who are in receipt of CTR if the scheme is changed, which is likely to have a disproportionate impact on protected characteristic groups where there is already evidence of disproportionate hardship. There is potential to mitigate some of the impact through investigation of discretionary fund for affected households or financially protecting some 'vulnerable' groups automatically (e.g. based on receiving a disability benefit).

If any potential saving option would have been taken, it would have not needed to be taken in full, but could be reinvested to support low income vulnerable households either by; supporting some/all existing CTR recipients via transitional protection awards or ongoing ones, or a distinct discretionary fund to further reduce Council Tax for those most in need, or alternatively redirecting funds in to the council's Local Crisis and Prevention Fund (LCPF).

Summary of positive impacts / opportunities to promote the Public Sector Equality Duty:

None identified.

4.2 Action Plan

Use this section to set out any actions you have identified to improve data, mitigate issues, or maximise opportunities etc. If an action is to meet the needs of a particular protected group please specify this.

Improvement / action required	Responsible Officer	Timescale
Consult with equality groups where data is not held	Matthew Kendall	If proposed options to be considered
Investigate use of discretionary fund to support households affected	Matthew Kendall	If proposed options to be considered
Investigate financially protecting some 'vulnerable' groups affected	Matthew Kendall	If proposed options to be considered

4.3 How will the impact of your proposal and actions be measured?

How will you know if you have been successful? Once the activity has been implemented this equality impact assessment should be periodically reviewed to make sure your changes have been effective your approach is still appropriate.

Feedback from stakeholders and service users, monitoring of arrears for council tax.

Step 5: Review

The Equality and Inclusion Team need at least five working days to comment and feedback on your EqIA. EqIAs should only be marked as reviewed when they provide sufficient information for decision-makers on the equalities impact of the proposal. Please seek feedback and review from the [Equality and Inclusion Team](#) before requesting sign off from your Director³.

³ Review by the Equality and Inclusion Team confirms there is sufficient analysis for decision makers to consider the likely equality impacts at this stage. This is not an endorsement or approval of the proposal.

Equality and Inclusion Team Review: <i>Reviewed by Equality and Inclusion Team</i>	Director Sign-Off: Denise Murray
Date: 28/4/2022	Date: 20/5/2022