

Equality Impact Assessment	Please enter responses below in the right hand columns
TEMPLATE UPDATED SEPT 2015 Date	November 2017
Sign-off path for EIA	<ul style="list-style-type: none"> • Head of Equalities (email equalities@lambeth.gov.uk) • Director – David Ashmore • Strategic Director – Jackie Belton • Corporate Equalities Board
Title of Project, business area, policy/strategy	Council Tax Reduction Support Scheme
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Strategic Director Sponsor	Jackie Belton

London Borough of Lambeth Equality Impact Assessment	Please enter responses below in the right hand columns.
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1.0 Introduction

1.1 Business activity aims and intentions

In brief explain the aims of your proposal/project/service, why is it needed? Who is it aimed at? What is the intended outcome? What are the links to the political vision, and outcomes?

What is Council Tax Reduction Support?

From April 2013 the council tax support localised scheme replaced council tax benefit.

Council tax support is available to people who are unable to meet their full council tax liability themselves from their existing income. Support is available for people in work as well as those on benefit and is determined by a means test. This does mean that the recipient group is inherently a vulnerable group with fewer options due to low incomes more likely to have been affected by wider welfare reforms.

The council worked with residents to develop a set of measures which make the best of central government policy. Consultation with residents and other stakeholders between July and October 2012 looked at a series of options in order to ensure that the council tax local scheme introduced was co-designed by the citizen and by the council.

The resulting (current) local council tax support scheme for working age claimants:

- Discontinued Second Adult Rebate
- Introduced a minimum council tax support award of £5 per week
- Increased the taper to 25%
- Increased non-dependent charges by 50%
- Passed on the shortfall in grant to working age CTS recipients (baseline reduction)

The scheme avoided passing on an additional financial burden of approximately £800k to some of the most vulnerable residents of the borough. These groups were determined by the previous consultation and by members as being anyone with specific disability related incomes, those affected by the benefit cap, war widows/widowers and those with carer related income. This enabled the council to avoid increasing the tax burden for those least able to afford it. These decisions were made following the initial consultation.

The changes made to the scheme did not affect pensioners. Pensioners are protected by a statutory scheme still within government control.

The cost to the council in providing these protections is £1.8m and provides protection to 30,000 people each year.

See the link below for our current 2017/18 CTS scheme

<https://lambeth.sharepoint.com/teams/hub01/BCSLaD/Shared%20Documents/CTS%20Schemes/2017-18%20scheme/Lambeth%20CTS%2017-18%20V1.1.pdf>

Wider welfare reform

The change from a national council tax benefit to a local council tax reduction scheme was part of wider welfare benefit reforms. The introduction of the benefit cap, the removal of spare room subsidy and the introduction of Universal Credit being the largest with smaller changes such as removing support for families with more than two children, removal of the work related activity component of Employment Support Allowance and the reduction in backdating for welfare benefits being some of the less publicised changes.

All of these changes and numerous others mean the most vulnerable groups in our borough have less to live on than they did prior to 2013.

What is the issue/problem?

As a result of the introduction of the council tax support scheme, support for council tax payers is no longer a benefit but a discount on their bills. Financial support for the council from government to make these discounts no longer comes as subsidy, but is calculated through an adjustment to the council's Settlement Funding Agreement.

Spend on council tax support is relatively static and although we have seen a drop in council tax support claimants we have seen a rise in council tax meaning the amount of support paid increased in line with the increase in council tax.

The current funding gap between cost of running the scheme and funding available is £5m for 2017/18. Funding available for CTS was reduced by £1.1m for 2017/18 and we expect a reduction of £600k in 2018/19. These further reductions will continue to put pressure on the council's finances unless a revised scheme with reduced costs can be agreed.

This means the council has the stark choice of continuing to meet the increasing cost of CTS offset by corresponding savings elsewhere or making savings on CTS spend by adjusting the scheme.

Our scheme has been running unchanged since 2013 and has not been amended to reflect reducing funding to cover CTS costs year on year.

What we have done

A robust consultation on potential changes to our scheme ran from 12th June 2017 to 3rd September 2017. Consultation was open to anyone who lives or works in the borough. It was also open to advice agencies. A communication strategy was in place to make sure we engaged with stakeholders with particular attention paid to make any current Council Tax Support recipient aware of the consultation. We monitored responses throughout the consultation and took a more proactive approach to consultation following an initially low response rate. We consulted residents and stakeholders on a number of possible options to change to the scheme. Each of these options would be expected to produce a cost saving for the scheme. See section 3 for more details about the consultation.

We are proposing to continue protecting the most vulnerable from the baseline reduction in line with the borough plan.

Please note none of the options listed below would affect pensioners, they remain protected by the national scheme.

There is no intention to remove protection from the baseline reduction for protected groups (those affected by the benefit cap, carers, those with a disability, war widows/widowers)

The options consulted upon were:

- Option 1 – New non-dependant charges
- Option 2 – Liability reduction
- Option 3 – Increasing the amount of council tax to be paid for people not in a protected group
 - Increasing to 20%
 - Increasing to 25%
 - Increasing to 30%
- Option 4 – Reduction in backdating of CTS to four weeks maximum
- Option 5 – Capital cut off reduced to £6,000

The initial EIA included a further three options:

- Removal of amount given to households with 3 or more children (in line with national welfare benefits)
- Removal of the family premium (in line with national Housing Benefit)
- Removal of entitlement for 18-21 year olds (in line with national welfare benefits)

These were all dropped prior to consultation as EIA demonstrated the first two options were likely to affect the same groups, particularly BAME women. Lambeth has a priority to protect families and these options would not be in keeping with that intention.

The third option was dropped as although in line with national welfare benefits was felt to be against the Lambeth priorities as we recognise at times young people have no alternative but to take on a tenancy for themselves and the associated costs of maintaining a tenancy. Wider research also shows Lambeth has a young population when compared to other boroughs and it was felt these changes would disproportionately affect them.

The results from this consultation have been put to the informal cabinet and they have indicated a way forward.

What are we proposing?

Make changes to our scheme to include the options listed below.

- Option 1
- Option 2
- Option 3 at 20%
- Option 4 – Following consultation the proposal is to reduce backdating to 13 weeks not the proposed 4 weeks
- Option 5 – Following consultation the proposal is to reduce the capital cut off to £10,000 not the proposed £6,000

	<p>The following analysis considers whether any particular groups will be affected proportionally more than any other. It should be made clear that no one requiring council tax support will gain from these proposals. We estimate that around 5,000 families will see no change in the amount of support they receive, being in a protected group and with no non-dependants.</p> <p>All options will reduce the potential support to assist with council tax payments. This will leave people with less money in their pockets than they have currently.</p>
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2.0 Analysing your equalities evidence

2.1 Evidence
Any proposed business activity, new policy or strategy, service change, or procurement must be informed by carrying out an assessment of the likely impact that it may have. In this section please include both data and analysis which shows that you understand how this decision is likely to affect residents that fall under the protected characteristics enshrined in law and the local characteristics which we consider to be important in Lambeth (language, health and socio-economic factors).

IF YOUR PROPOSAL ALSO IMPACTS ON LAMBETH COUNCIL STAFF YOU NEED TO COMPLETE A STAFFING EIA.

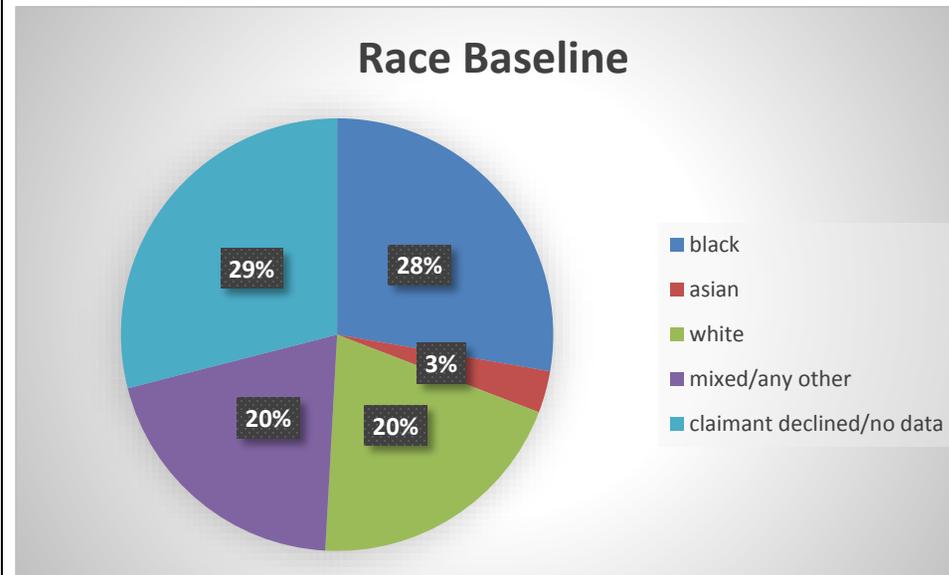
Protected characteristics and local equality characteristics	<p>Impact analysis For each characteristic please indicate the type of impact (i.e. positive, negative, positive and negative, none, or unknown), and: <i>Please explain how you justify your claims around impacts.</i> <i>Please include any data and evidence that you have collected including from surveys, performance data or complaints to support your proposed changes.</i> <i>Please indicate sources of data and the date it relates to/was produced (e.g. ‘Residents Survey, wave 10, April 12’ or ‘Lambeth Business Survey 2012’ etc)</i></p>
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Race

All statistics have been generated from the Academy IT system and are based on claimants benefiting from these existing options in financial year 2015/16. This data has been used to estimate impact for year 2018/19. The exact effect will not be apparent until the end of the financial year in which any change is made.

Council Tax Support recipient data has been analysed across the different equality groups. This has given us the baseline data for each group.

We have then identified which groups will be potentially affected by each option. We can then compare this data to the baseline data to establish significant impacts where the data for those affected by an option varies to a significant level from the baseline data.



Option 1 – New non-dependent charges

None

Percentage of people affected within different racial groups is broadly similar to baseline claim data. Analysis into current claimant groups shows that although women are more affected by this option (see section below), there appears to be no disproportionate impact with respect to

race as the baseline data set and the data set for this option are broadly similar. The female group potentially affected by this option is representative of baseline data.

The female group is representative of baseline data with 27% of the women affected being black compared to a claim baseline of 28% (see chart above) and a female only black claim baseline of 29%.

Option 2 – Liability reduction

None

Percentage of people affected within different racial groups is broadly similar to baseline claim data.

This change is more likely to affect those in low paid work. Wider studies commissioned by Lambeth and produced in 2016 identify that Black African residents and Portuguese are more likely to be in low paid work. There is a difference between wider Lambeth demographics and the demographic for CTS claimants.

Option 3 – Increasing the amount of council tax to be paid for people not in a protected group to 20%

None

Percentage of people affected within different racial groups is broadly similar to baseline claim data.

Option 4 – Reduction in backdating of CTS to 13 weeks maximum

Negative

Percentage of people affected within different racial groups is broadly similar to baseline claim data. White groups are likely to be slightly more affected than other groups when compared to baseline data with a 15% variance.

Option 5 - Capital cut off reduced to £10,000

None

	<p>Percentage of people affected within different racial groups is broadly similar to baseline claim data.</p>						
<p>Gender</p>	<p>All statistics have been generated from the Academy IT system and are based on claimants benefiting from these existing options in financial year 2015/16. This data has been used to estimate impact for year 2018/19. The exact effect will not be apparent until the end of the financial year in which any change is made.</p> <p>Council Tax Support recipient data has been analysed across the different equality groups. This has given us the baseline data for each group.</p> <p>We have then identified which groups will be potentially affected by each option. We can then compare this data to the baseline data to establish significant impacts where the data for those affected by an option varies to a significant level from the baseline data.</p> <div data-bbox="730 792 1688 1367" data-label="Figure"> <p>A pie chart titled "Gender Baseline" showing the distribution of gender among Council Tax Support recipients. The chart is divided into two segments: a larger blue segment representing 63% for "Female" and a smaller red segment representing 37% for "Male". A legend to the right of the chart identifies the colors: blue for Female and red for Male.</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>63%</td> </tr> <tr> <td>Male</td> <td>37%</td> </tr> </tbody> </table> </div> <p>Option 1 – New non-dependent charges</p>	Gender	Percentage	Female	63%	Male	37%
Gender	Percentage						
Female	63%						
Male	37%						

	<p>Negative</p> <p>Women will be more affected by this option than men, with a 18% variance on baseline claim data. This is due in part to the large number of female single parents supporting young non-dependants or those accessing full time non-statutory education.</p> <p>Analysis into current claimant groups shows that although women are more affected by this option, there appears to be no disproportionate impact with respect to race as the baseline data set and the data set for this option are broadly similar. The female group potentially affected by this option is representative of baseline data with 27% of the women affected being black compared to a claim baseline of 28% (see section above) and a female only black claim baseline of 29%.</p> <p>Option 2 – Liability reduction</p> <p>None</p> <p>Percentage of people affected across genders is broadly similar to baseline claim data.</p> <p>Option 3 – Increasing the amount of council tax to be paid for people not in a protected group to 20%</p> <p>None</p> <p>Percentage of people affected across genders is broadly similar to baseline claim data.</p> <p>Option 4 – Reduction in backdating of CTS to 13 weeks maximum</p> <p>None</p> <p>Percentage of people affected across genders is broadly similar to baseline claim data.</p> <p>Option 5 - Capital cut off reduced to £10,000</p> <p>None</p> <p>Percentage of people affected across genders is broadly similar to baseline claim data.</p>
Gender re-assignment	Unknown

	<p>No data is held for this characteristic. However, we do not anticipate there to be a disproportionate impact given that this group is not to our knowledge particularly dependent on this support or likely to be impacted by the specific nature of the proposed changes to council tax support.</p>						
<p>Disability</p>	<p>All statistics have been generated from the Academy IT system and are based on claimants benefiting from these existing options in financial year 2015/16. This data has been used to estimate impact for year 2018/19. The exact effect will not be apparent until the end of the financial year in which any change is made.</p> <p>Council Tax Support recipient data has been analysed across the different equality groups. This has given us the baseline data for each group.</p> <p>We have then identified which groups will be potentially affected by each option. We can then compare this data to the baseline data to establish significant impacts where the data for those affected by an option varies to a significant level from the baseline data.</p> <div data-bbox="730 834 1688 1409"> <p>The pie chart, titled "Disability Baseline", illustrates the distribution of Council Tax Support recipients. The chart is divided into two segments: a blue segment representing "disabled" claimants at 26%, and a red segment representing "not disabled" claimants at 74%. A legend to the right of the chart identifies the colors: blue for "disabled" and red for "not disabled".</p> <table border="1"> <thead> <tr> <th>Category</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>disabled</td> <td>26%</td> </tr> <tr> <td>not disabled</td> <td>74%</td> </tr> </tbody> </table> </div>	Category	Percentage	disabled	26%	not disabled	74%
Category	Percentage						
disabled	26%						
not disabled	74%						

Option 1 – New non-dependent charges

Negative

Those classified as disabled are far likely to be more affected by this option with a variance of 60% from baseline claim data. Currently many disabled people are protected from non-dependant deductions where as non-disabled people do not benefit from this protection. This option would remove this protection.

Option 2 – Liability reduction

None

Percentage of people affected who are classified as disabled is significantly lower than baseline claim data with a positive variance of 21%. This is due to the protections from the baseline reduction already in place within the scheme.

Option 3 – Increasing the amount of council tax to be paid for people not in a protected group to 20%

None

Percentage of people affected who are classified as disabled is significantly lower than baseline claim data with a positive variance of 21%. This is due to the protections from the baseline reduction already in place within the scheme.

Option 4 – Reduction in backdating of CTS to 13 weeks maximum

None

Percentage of people affected who are classified as disabled is broadly similar to baseline claim data.

Option 5 - Capital cut off reduced to £10,000

None

Percentage of people affected who are classified as disabled is broadly similar to baseline claim data.

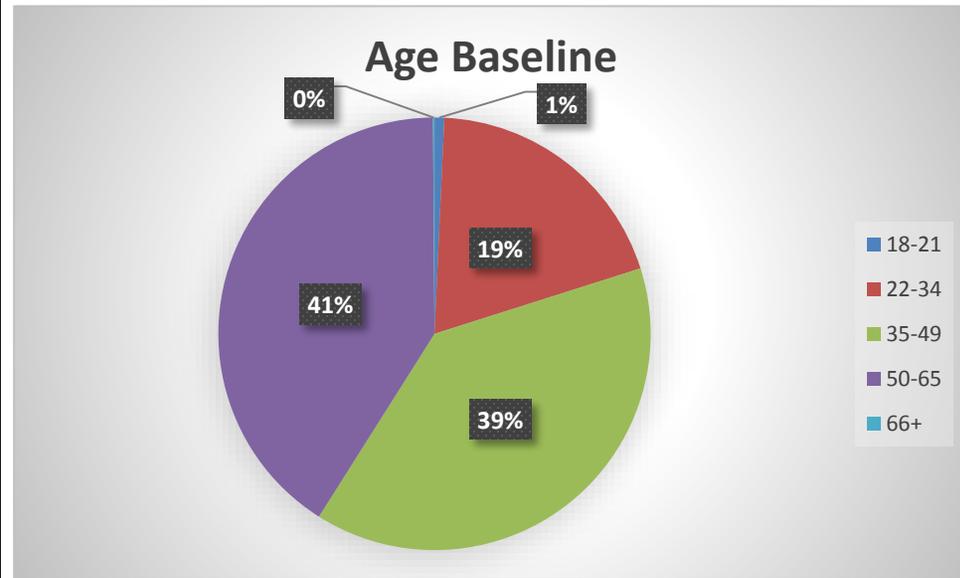
Anyone currently receiving a disability related income is protected from the baseline reduction currently and can receive support up to 100% of their liability. They would retain this protection with any new scheme. They will be protected from options 2 and 3 listed above. In addition the scheme contains additional support for people with disabilities in terms of premiums awarded with the expectation of increased living costs.

Age

All statistics have been generated from the Academy IT system and are based on claimants benefiting from these existing options in financial year 2015/16. This data has been used to estimate impact for year 2018/19. The exact effect will not be apparent until the end of the financial year in which any change is made.

Council Tax Support recipient data has been analysed across the different equality groups. This has given us the baseline data for each group.

We have then identified which groups will be potentially affected by each option. We can then compare this data to the baseline data to establish significant impacts where the data for those affected by an option varies to a significant level from the baseline data.



Option 1 – New non-dependent charges

Negative

This impact of this is more likely to be felt by those over 50 with a variance from baseline claim data of 27%. For those under 35 there is a positive variance of 26%. These differences are likely to be due to the number of people over 50 still supporting young non-dependants or those accessing full time non-statutory education but being classed as disabled.

Option 2 – Liability reduction

None

Percentage breakdown of people affected by age is broadly similar to baseline claim data. Those over 50 are less likely to be affected by this change with a positive variance from the baseline claim data of 12%. This is likely to be due to a larger number of this group being protected from the baseline reduction due to vulnerability.

Option 3 – Increasing the amount of council tax to be paid for people not in a protected group to 20%

None

Percentage breakdown of people affected by age is broadly similar to baseline claim data. Those over 50 are less likely to be affected by this change with a positive variance from the baseline claim data of 12%. This is likely to be due to a larger number of this group being protected from the baseline reduction due to vulnerability.

Option 4 – Reduction in backdating of CTS to 13 weeks maximum

None

Percentage breakdown of people affected by age is broadly similar to baseline claim data.

Option 5 - Capital cut off reduced to £10,000

Negative

	<p>This impact of this is more likely to be felt by those over 50 with a variance from baseline claim data of 17%. For those under 35 there is a positive variance of 11%. These difference can be explained by the length of time available to build up savings.</p> <p>Setting the capital cut off at £10k rather than the initial £6k does have an indirect impact upon the young who have not had time to build savings. This group potentially have a worse quality of life than those who have savings they can use.</p>
Sexual orientation	<p>Unknown No data is held for this characteristic.</p> <p>However we do not anticipate there to be a disproportionate impact or for anyone to be any more or less affected based on this characteristic.</p>
Religion and belief	<p>Unknown No data is held for this characteristic.</p> <p>However we do not anticipate there to be a disproportionate impact or for anyone to be any more or less affected based on this characteristic.</p>
Pregnancy and maternity	<p>Unknown No data is held for this characteristic.</p> <p>However we do not anticipate there to be a disproportionate impact or for anyone to be any more or less affected based on this characteristic.</p>
Marriage and civil partnership	<p>Unknown No data is held for this characteristic.</p> <p>However we do not anticipate there to be a disproportionate impact or for anyone to be any more or less affected based on this characteristic.</p>
Socio-economic factors	<p>Negative</p> <p>Everyone in receipt of council tax support is on a low income and all options will reduce the potential support to assist with council tax payments. This will leave people with less money in their pockets than they have currently. Discretionary assistance will be in place for those who cannot pay. See the mitigation section for details as to how this assistance will be awarded.</p>

	<p>Wider London studies show that whilst the rate of poverty in London has remained relatively stable since the mid-1990s the patterns of poverty have changed dramatically, with a growth in in-work poverty. A number of the options are more likely to affect those in low paid work.</p>
Language	<p>None No difference from current scheme. We offer translation services at the request of claimants and use interpreters where required.</p>
Health	<p>Negative Everyone in receipt of council tax support is on a low income and all options will reduce the potential support to assist with council tax payments. This will leave people with less money in their pockets than they have currently.</p> <p>The consultation identified concerns among stakeholders about the impact on people with mental health issues and long term conditions. Our current caseload shows 26% of people have a disability related income or have identified themselves as disabled. Anyone with a disability related income is protected from options 2 and 3 already. This follows the initial consultation in 2012 where it was identified the following groups were considered to be particularly vulnerable and would require additional support.</p> <ul style="list-style-type: none"> • Anyone with a disability related income • Those affected by the benefit cap • War widows/widowers • Carers <p>In addition to the protections from options 2 and 3 and current protection from the baseline reduction the scheme includes specific support in terms of additional premiums accepting that costs of living may be higher for people with a disability.</p>
<p>2.2 Gaps in evidence base <i>What gaps in information have you identified from your analysis? In your response please identify areas where more information is required and how you intend to fill in the gaps. If you are unable to fill in the gaps please state this clearly with justification.</i></p>	<p>Equalities data is collected at the point of a claim. Although this forms part of the form it is not part of the claim and people can opt out of providing data. There is no statutory requirement to collect equalities data and we are not permitted to reject claims if this data is not provided.</p> <p>Data for gender and age will always be held. For the race characteristic the current data set contains 29% non-disclosed.</p> <p>Disabilities are recorded based on income codes and indicators. If an individual chooses not to disclose information or to claim a disability income we will be unaware of their disability.</p>

	<p>Current IT systems do not have the option to save data for gender reassignment, religion or belief or sexual orientation.</p> <p>Although we record partnerships we do not differentiate between living together, marriages or civil partnerships. Benefit regulations do not require us to collect or know this information.</p>
<p>3.0 Consultation, Involvement and Coproduction</p>	
<p>3.1 Coproduction, involvement and consultation</p> <p><i>Who are your key stakeholders and how have you consulted, coproduced or involved them? What difference did this make?</i></p>	<p>Anyone who lives or works in Lambeth is a stakeholder. Advice agencies, landlords are also included in this group.</p> <p>A consultation strategy was developed and an earlier version of the EIA formed part of that strategy. Open consultation is a statutory requirement before changing the scheme. Any decisions on future scheme will be made based on responses to the consultation, resulting in a scheme which is coproduced by the citizen and the council.</p> <p>Consultation material was produced and consultation ran from 12/06/17 to 03/09/17. We received approximately 1600 responses.</p> <p>The Digital by design consultation ran for 12 weeks from Friday Monday 12 June to Sunday 3 September 2017 with a dedicated web page and Snap survey. All 30,000 households receiving CTS were sent a letter inviting them to take part and a letter reminding them about the consultation (to boost the number of responses) containing the web address in a dedicated envelope. Three thousand consultation booklets were printed and made available in our libraries and Customer Service Centre and sent out by the call centre. An on-screen advertisement was placed in our Customer Service Centre. Love Lambeth, facebook, social media and FocusOn newsletters were also used to promote the consultation. In addition we asked local advice agencies to promote the consultation. To boost an initially low response rate, a team of 10 Researchers carried out face-to-face interviews in our Customer Contact Centre and libraries between 8.00am and 5.00pm for two weeks (11-25 August 2017). Telephone interviews were undertaken on four evenings but abandoned due to the low success rate in favour of face-to-face interviews.</p> <p>In general those who responded did not wish to see changes to the scheme feeling any change would put additional financial pressure on those who could least afford it. The table below shows the level of support for each option.</p>

Proposal	Support	Do not support	Neither / No opinion / not answered	Saving
New Non dependent charges	28.5%	49.4%	22.1%	£953k
Backdating reduction	26.9%	50.7%	22.4%	£31k
Liability Reduction	21.6%	47.29%	31.11%	£200k
Capital Cut Off reduction	19.7%	54.3%	26%	£100k
Increase baseline reduction (20%)	18.5%	63.4%	18.1%	£500k
Increase baseline reduction (25%)	8.1%	73.6%	20.3%	£1.03m
Increase baseline reduction (30%)	5.5%	75.4%	19.1%	£1.58m

Following an analysis of the initial consultation responses and in keeping with the fair and sustainable principles, additional modelling was requested to assess the equalities and financial impact of:

- reducing the backdating maximum period to 13 weeks instead of 4 weeks
- reducing capital cut off to £10k instead of £6k
- splitting the non-dep cohort into two groups:
 - those previously protected from a non-dependant deduction due to the disability **status of the householder**
 - those previously protected from a non-dependant deduction due to the **status of the non-dep (usually under 25s and students)**

Following additional modelling it is proposed to:

- reduce backdating to 13 weeks not the proposed 4 weeks
- reduce the capital cut off to £10,000 not the proposed £6,000
- create a discretionary scheme funded by savings which would enable Lambeth to provide additional financial support to those most in need following changes made to the scheme.

For the full consultation report see the link below:

https://lambeth-my.sharepoint.com/personal/psimpson_lambeth_gov_uk/_layouts/15/WopiFrame.aspx?sourcedoc=%7B58ea4377-5274-41a4-8b60-7b4f5abe2843%7D&action=default&slrid=4ac12e9e-d0e2-4000-788e-8c9402da37c9

<p>3.2 Gaps in coproduction, consultation and involvement <i>What gaps in consultation and involvement and coproduction have you identified (set out any gaps as they relate to specific equality groups)? Please describe where more consultation, involvement and/or coproduction is required and set out how you intend to undertake it. If you do not intend to undertake it, please set out your justification.</i></p>	<p>To boost an initially low response rate, a team of 10 Researchers carried out face-to-face interviews in our Customer Contact Centre and libraries between 8.00am and 5.00pm for two weeks (11-25 August 2017). Telephone interviews were undertaken on four evenings but abandoned due the low success rate in favour of face-to-face interviews.</p> <p>We have compared the equality characteristics of those who responded to the consultation to Lambeth wide data where possible as every council tax payer will be affected by budget decisions. There are some difference as would be expected but no one group is particularly under represented. The following points should be noted:</p> <ul style="list-style-type: none"> • Fewer white people responded proportionately to borough averages • 57% of responses were from those currently in receipt of council tax support. This is not surprising as they are directly affected by decision made. They also received letters and reminders to respond. Almost 40% of responses came from non-CTS recipients which we feel provides a fair representation.
<p>4.0 Conclusions, justification and action</p>	
<p>4.1 Conclusions and justification <i>What are the main conclusions of this EIA? What, if any, disproportionate negative or positive equality impacts did you identify at 2.1? On what grounds do you justify them and how will they be mitigated?</i></p>	<p>None of the options put forward will have a positive impact however the council faces the hard choice of cutting council tax support funding or cutting funding elsewhere.</p> <p>The EIA shows no one group will be impacted by all options although some groups will be affected by some options more than other groups.</p> <p>Mitigation</p> <ul style="list-style-type: none"> • Section 13a finding available on application (Capita managed) – already available • Proposing a discretionary fund (Discretionary CTS Hardship Fund – DCTSHF) of £400k to be set aside and managed by Lambeth to support those facing most hardship. This will operate in a similar way to Discretionary Housing Payments. The service has an excellent track record of awarding DHPs to those in most need, protecting tenancies and supporting people both in the long and short terms. The team works with partners including Financial Resilience to develop an annual policy, constantly reviewing to ensure priorities of the policy are being met. It is anticipated the DCTSHF will be administered by the same team and in a similar manner in

	<p>accordance with a policy co- designed and approved by members. This scheme will enable us to support people who cannot pay rather than those who won't pay. It also provides the ability to see outside modelling groups and see the real financial situation of the family.</p> <ul style="list-style-type: none"> • Emergency Support Scheme – already available for specific financial need • Existing local scheme protections (protection from the baseline reduction and national protection for pensioners) • Existing scheme requirements – The existing scheme has embedded consideration for circumstances of the claimants. Some of these are listed here. For example it contains a number of additional premiums; for families with dependent children; age related premiums, as it is recognised that the cost of living increases with age; disability related premiums and others. In addition there is an inbuilt taper of 25% and earned income disregards, child care cost disregards aimed to benefit low paid workers and make work pay. • Debt strategy
<p>4.2 Equality Action plan <i>Please list the equality issue/s identified through the evidence and the mitigating action to be taken. Please also detail the date when the action will be taken and the name and job title of the responsible officer.</i></p>	
Equality Issue	Mitigating actions
Potential for unconscious bias from those making decisions regarding the discretionary scheme	Arrange Equalities Training
Knowledge of claiming CTS and discretionary fund	<ul style="list-style-type: none"> • Communication with potential claimants following a claim for UC/HB • Publicise the discretionary fund <ul style="list-style-type: none"> ○ Add to claim forms for HB/CTS along with DHP claim ○ Add to website ○ Communicate with stakeholders and partners ○ Identify potential recipients at time of assessment and suggest they make a claim ○ Identify people who are failing into council tax debt so see if they would benefit from the discretionary fund
Capital cut off being set at £10k means that those too young to have built savings will potentially be subsidising those who have had the opportunity to save up to £10k	Review cut off points on 2019/20 regarding this effect.

Non-dependant deductions may not be affordable – particularly affecting disabled households and those households with younger non-dependants	The discretionary fund will be used to support people who are not able to pay while expecting people who can pay to do so.
5.0 Publishing your results	
The results of your EIA must be published. Once the business activity has been implemented the EIA must be periodically reviewed to ensure your decision/change had the anticipated impact and the actions set out at 4.2 are still appropriate.	
EIA publishing date	
EIA review date	
Assessment sign off (name/job title):	

All completed and signed-off EIAs must be submitted to equalities@lambeth.gov.uk for publication on Lambeth’s website. Where possible, please anonymise your EIAs prior to submission (i.e. please remove any references to an officers’ name, email and phone number).