

Equality 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 1 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, 2021/22, 2022/23. From 2023/24 it increased to 30% and limited to the maximum liability to Band D. It is proposed from 2024/25 the minimum contribution increases to 50% and limited to the maximum liability of a Band D property.

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 2025/26

Views on 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 April 2025. For the financial year 2025/26 it is proposed that the maximum amount of assistance available to working-age claimants under the CTS scheme will be 50%. Calculations have been supplied based on a minimum liability of 50% using the current years (2024/25) Council Tax levels.

Table 1 - Financial Impact of Introduction of Local Scheme

	2024/25 Liability	2024/25 Maximum assistance Pensionable Age	2024/25 Maximum assistance under proposed CTS (50%) + Band D restriction	2024/25 Minimum weekly amount to pay (50%) + Band D restriction
Band A - Full Charge	£1299.81	£1299.81	£649.91	£12.46
Band A - with 25% discount	£974.86	£974.86	£487.43	£9.35
Band B - Full Charge	£ 1516.44	£1516.44	£758.22	£14.54

Band B - with 25% discount	£1137.33	£1137.33	£568.67	£10.91
Band C -Full Charge	£ 1733.07	£1733.07	£866.54	£16.62
Band C - with 25% discount	£1299.80	£1299.80	£649.90	£12.46
Band D - Full Charge	£ 1949.71	£1949.71	£974.86	£18.70
Band D - with 25% discount	£1462.28	£1462.28	£731.14	£14.02
Band E - Full Charge	£ 2382.98	£2382.98	£974.86	£27.01
Band E - with 25% discount	£1787.24	£1787.24	£731.14	£20.25
Band F- Full Charge	£2816.25	£2816.25	£974.86	£35.31
Band F - with 25% discount	£2112.19	£2112.19	£731.14	£26.49
Band G - Full Charge	£3249.52	£3249.52	£974.86	£43.62
Band G - with 25% discount	£2437.14	£2437.14	£731.14	£32.72
Band H - Full Charge	£3899.42	£3899.42	£974.86	£56.09
Band H - with 25% discount	£2947.57	£2947.57	£731.14	£42.07

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 3 September 2024. 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	1774	997	777	731	413	318	1190
Single with child dependant	422	407	15	111	105	6	297
Couple no child dependant	167	N/A	N/A	59	N/A	N/A	144
Couple with child dependant	117	N/A	N/A	32	N/A	N/A	101
Working age - Non Passported							
Single no child dependant	2617	1481	1136	584	366	218	934
Single with child dependant	2346	2243	103	240	224	16	810
Couple no child dependant	502	N/A	N/A	120	N/A	N/A	287
Couple with child dependant	73	N/A	N/A	5	N/A	N/A	23
Total Working age	8018	5522	2496	1882	1205	677	3786
Pensioner- Passported	3187	2107	1080	1155	772	383	668
Pensioner- Non Passported	1856	1105	751	414	245	169	340
Total Pensioner	5043	3212	1831	1569	1017	552	1008
Overall Total	13061	8734	4327	3451	2222	1229	4794

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>8018 (61.39%) of current claimants are under Pension Credit age and will be affected by the Authority's Council Tax Support policy. <i>Data based on September 2024 caseload. Caseload numbers may fluctuate on a daily basis.</i></p> <p>The data demonstrates that 2768 (21.19%) of current working-age claimants are single parent families with child dependents</p>																																																												
Disability	<p style="text-align: center;">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 July 2023 to June 2024. 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> <p style="text-align: center;">Economic inactivity (July2023- June2024)</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th style="text-align: center;">Bromley (level)</th> <th style="text-align: center;">Bromley (%)</th> <th style="text-align: center;">London (%)</th> <th style="text-align: center;">Great Britain (%)</th> </tr> </thead> <tbody> <tr> <td colspan="5" style="text-align: center;">All people</td> </tr> <tr> <td style="text-align: center;">Total</td> <td style="text-align: center;">46,100</td> <td style="text-align: center;">21.6</td> <td style="text-align: center;">20.8</td> <td style="text-align: center;">21.6</td> </tr> <tr> <td style="text-align: center;">Student</td> <td style="text-align: center;">18,000</td> <td style="text-align: center;">39.1</td> <td style="text-align: center;">33.9</td> <td style="text-align: center;">26.8</td> </tr> <tr> <td style="text-align: center;">looking after family/home</td> <td style="text-align: center;">10,400</td> <td style="text-align: center;">22.6</td> <td style="text-align: center;">23.4</td> <td style="text-align: center;">18.9</td> </tr> <tr> <td style="text-align: center;">temporary sick</td> <td style="text-align: center;">!</td> <td style="text-align: center;">!</td> <td style="text-align: center;">1.7</td> <td style="text-align: center;">2.0</td> </tr> <tr> <td style="text-align: center;">long-term sick</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">20.4</td> <td style="text-align: center;">28.1</td> </tr> <tr> <td style="text-align: center;">discouraged</td> <td style="text-align: center;">!</td> <td style="text-align: center;">!</td> <td style="text-align: center;">#</td> <td style="text-align: center;">0.4</td> </tr> <tr> <td style="text-align: center;">retired</td> <td style="text-align: center;">7,300</td> <td style="text-align: center;">15.8</td> <td style="text-align: center;">7.6</td> <td style="text-align: center;">12.9</td> </tr> <tr> <td style="text-align: center;">other</td> <td style="text-align: center;">#</td> <td style="text-align: center;">#</td> <td style="text-align: center;">13.8</td> <td style="text-align: center;">11.0</td> </tr> <tr> <td style="text-align: center;">wants a job</td> <td style="text-align: center;">15,400</td> <td style="text-align: center;">33.3</td> <td style="text-align: center;">18.9</td> <td style="text-align: center;">17.8</td> </tr> <tr> <td style="text-align: center;">does not want a job</td> <td style="text-align: center;">30,800</td> <td style="text-align: center;">66.7</td> <td style="text-align: center;">81.1</td> <td style="text-align: center;">82.2</td> </tr> </tbody> </table> <p>Source: ONS annual population survey # Sample size too small for reliable estimate ! Estimate is not available since sample size is disclosive Notes: numbers are for those aged 16-64. % is a proportion of those economically inactive, except total, which is a proportion of those aged 16 -- 64</p> <p style="text-align: center;">Breakdown of current working age claimants</p> <p>Please see table 2 for detailed breakdown of information on our current claimants</p> <ul style="list-style-type: none"> • 1882 (23.47%) of current claimants below pension credit age have declared a disability • 3786 (47.22%) are receiving DLA/PIP 		Bromley (level)	Bromley (%)	London (%)	Great Britain (%)	All people					Total	46,100	21.6	20.8	21.6	Student	18,000	39.1	33.9	26.8	looking after family/home	10,400	22.6	23.4	18.9	temporary sick	!	!	1.7	2.0	long-term sick	#	#	20.4	28.1	discouraged	!	!	#	0.4	retired	7,300	15.8	7.6	12.9	other	#	#	13.8	11.0	wants a job	15,400	33.3	18.9	17.8	does not want a job	30,800	66.7	81.1	82.2
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Working Age Caseload by Band

Row Labels	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H	Total
Couple no children	4	78	246	225	74	24	7	0	658
Couple with children	15	7	71	80	22	4	2	0	201
Single no children	266	1352	1626	875	213	47	12	0	4391
Single with children	45	282	1328	897	234	53	19	0	2768
Grand Total	330	1719	3181	2077	543	128	40	0	8018

Working Age Disability by Band

DLA/PIP on Claim								
	Band							Total
	A	B	C	D	E	F	G	Total
Couple no children Total	12	51	156	153	48	10	1	431
Couple with children Total	2	4	64	55	14	3	2	124
Single no children Total	98	658	815	433	99	15	6	2124
Single with children Total	20	79	476	404	103	19	6	1107
Total	132	792	1491	1045	264	47	15	3786

Disabled Indicator on claim								
	Band							Total
	A	B	C	D	E	F	G	Total
Couple no children Total	6	26	59	65	17	6	0	179
Couple with children Total	1	2	17	13	3	1	0	37
Single no children Total	63	383	514	273	69	9	4	1315
Single with children Total	4	23	159	115	41	8	1	351
Total	74	434	749	466	130	24	5	1882

Sex	<p style="text-align: center;">Bromley population</p> <p>According to Nomis official labour market stats Bromley's population (2021) is 52.13% female and 47.87% 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="padding-left: 40px;">68.87% of current claimants under pensionable age are female (includes those classed as in a couple)</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 2021 GLA population projection estimates show that 21% 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>

<p>Sex</p>	<p>Females are disproportionately represented amongst current CTS claimants.</p> <p>Any reduction in the level of assistance given would have a negative impact on current and future working age CTS claimants (regardless of gender) as claimants would have to contribute more towards their council tax bill then they have had previously.</p> <p>Although any change in the scheme would be applied universally (i.e. men and women would face the same reduction in CTS) our evidence makes clear that a greater proportion of current CTS claimants are women and therefore as a protected group women would feel the impact of any change in greater numbers.</p>	<p>Monitoring of the impact on women who claim Council Tax Support will continue. In order to mitigate impact it is proposed that the scheme retains the income disregards and allowances that are predominately received by females for example allowances in respect of child care costs. The planned continuation of the hardship scheme will provide a further safeguard for those faced with exceptional circumstances.</p> <p>Responsible Officer(s) Revenues & Benefits Manager — Monitoring to be ongoing</p>
<p>Gender reassignment</p>	<p>No specific impact identified other than all claimants will have to contribute more towards their council tax bill</p>	
<p>Pregnancy & Maternity</p>	<p>No specific impact identified other than all claimants will have to contribute more towards their council tax bill</p>	
<p>Race</p>	<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 then 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 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>

	There is evidence to indicate that BME communities are more likely to be unemployed or in lower paid employment and, therefore, possibly more reliant on CTS. However, there is insufficient evidence on current claimants to demonstrate this is in fact the case in Bromley.	
Religion & Belief	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Civil Partnerships & Marriage	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	
Sexual Orientation	No specific impact identified other than all claimants will have to contribute more towards their council tax bill	

Part 5 — Completion and authorisation

Officer completing assessment	Jayne Carpenter, Revenues & Benefits Manager
EIA completed	25/10/24
Officer responsible for monitoring impact	Jayne Carpenter
Date EIA is scheduled to be reviewed	November 2025