

2025-2026 EQUALITY IMPACT ASSESSMENTS

1. 25/26 CHW02: Increase Shared Lives capacity to provide as an alternative to respite in residential care
2. 25/26 CHW04: Implementation of Telecare Service Charges
3. 25/26 CYP01: LAC and Permanency/FPPP: Gordon Brown Centre Reduction in the Contribution for Promoting Independence work to Care Leavers by 50%
4. 25/26 CYP02: Reduction in discretionary spend on the use of taxis and client subsistence payments
5. 25/26 CYP03: Cease the Safe Base Brent offer
6. To increase Council Tax by 4.99% in 2025/26
7. To amend the Council Tax Support Scheme in 2025/26

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Increase Shared Lives capacity to provide as an alternative to respite in residential care
DEPARTMENT:	Adult Social Care
TEAM:	Shared Lives Team
LEAD OFFICER:	Leon Gooding
DATE:	8th January 2025

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

1. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Brent Shared Lives is a Care Quality Commission (CQC) regulated in-house service and can be compared to adult fostering. The service can support customers with a range of support needs such as learning disabilities and mental health. It is a real alternative to someone who does not wish to live in more traditional restrictive models of care such as residential care or supported living. The customer moves into their carer's homes. The customer receives around the clock care according to their assessed eligible care needs. In return, the carers, who are registered as self-employed, will receive a weekly payment for the service they provide as well as annual essential and bespoke training to ensure they maintain the skill set to meet the customer's needs.

Brent Council is proposing to broaden our Shared Lives Offer for clients diagnosed with a Mental Health, Learning Disability and or autism spectrum disorder.

The service currently consists of 12 long term customers, 8 full time-Shared Lives Carers and 4 respite only carers. The shared life option offers a long term, customer focused placement, where the customer, the carer and the customers family can create a life where the customer feels comfortable with, enabling them to thrive, maintain and develop their life and social skills. This option will also impact positively on current financial pressures the authority now faces, by providing quality-based cost-effective placements for our customers as an alternative to the more expensive residential and supported living options. The scheme will also provide incomes for Shared Lives Carers in the local Brent community which will stimulate the local Job Market.

The proposal is to at least double the intake of Shared Lives Carers and provide more placements within the community, positively contributing towards the council's long-term savings plan, whilst continuing to offer quality based, cost-effective long term and respite placements within the community.

Shared Lives offers people who require care and support the opportunity to live independently in the community and can be an alternative to living in a care home, housing with care or housing with support. The Shared Lives scheme matches people who need care and support with an approved carer. The carer shares their family and community life and gives care and support to the person with care needs. Some people live with their Shared Lives carer, while others are regular day-time visitors. Some people combine day-time visits with overnight stays. Carers can support up to three people at one time. Shared Lives schemes have also been known as adult placements.

The success of Shared Lives is largely dependent on achieving a good match between people and their carers. Shared Lives carers are carefully selected and trained by regulated Shared Lives schemes, with the goal of enabling people to benefit from an individual and highly personalised service. Shared Lives carers are trained and paid, and they spend time with the individual they are matched with, working together to achieve meaningful outcomes as part of their identified Care Act needs.

2. Who may be affected by this policy or proposal?

All customers who meet the Care Act 2014 eligibility criteria and need, or currently receive a package of care which includes accommodation can be considered for the Shared Lives options either after their initial assessment or during the review of their current care package.

Carers in the community who are already a Shared Lives Carer or those who meet the criteria for Shared Lives and wish to become a Shared Lives Carer. Shared Lives Carers will have the opportunity to take on more customers on a long-term basis or provide respite care to current and new customers.

There may be a reduction in the usage of current external supported living and respite placements in favour of Shared Lives placement options.

3. Is there relevance to equality and the council's public sector equality duty?

Please explain why. If your answer is no, you must still provide an explanation.

Yes, the affected customer group have disabilities which are protected characteristic under the Equality Act 2010. The current cohort have disabilities that can be described Cognitive, Mental and/or Physical which have a substantial and long – term adverse effect on that person's ability to carry out normal day-to-day activities.

There are Three aims of the general equality duty which includes

- **Eliminate unlawful discrimination**, harassment and victimisation
- **Advance equality of opportunity** between people who share a “protected characteristic” and those who do not
- **Foster good relations** between people who share a protected characteristic and those who do not

The proposal will continue to promote inclusion for our customers with a disability as described above, by supporting and training Shared Lives Carers with bespoke and essential training, ensuring that they are well equipped to support the customer (s) to integrate fully, safely, and appropriately into their local community, whilst offering protection from unlawful discrimination.

The customer will benefit by having on-going holistic package of care and support within a home setting through a consistent Shared Lives Carer whom they can rely on to support them to build on and expand their social and life skills both within the home and community by including them in family and social activities. Customers will be able to safely access the community independently or with support and have safe and varied interactions with the wider community.

4. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	x		
Sex		x	
Race	x		
Disability	x		
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or		x	
Marriage		x	

5. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

**If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.**

SECTION B – IMPACTS ANALYSIS

1. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Financial consideration:

The weekly scale of pay received by Shared Lives Carers is dependent on the assessed level of support required by the customer. There are 3 bands of pay. They are as follows:

Placement costs: Shared lives	Average Placement costs: Learning Disabilities Supporting People Living	Average Placement costs: Mental Health Supporting People Living
Band 1 - £531.02 PW Band 2 – £460.47 PW Band 3 - £389.85 PW (Average cost per week £460.44)	£1401 per week Average saving per client £940 per week	£ 707 per week, Average saving per client £246 per week

There are currently 4,323 people receiving social care services in the London Borough of Brent. Of these people, 2,069 do not make any contribution to their care costs.

As part of the Shared Lives agreement, customers will make a small weekly contribution towards the cost of household utilities and the rental part of the agreement which is covered by Housing Benefit.

2. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

<p>Details of impacts identified</p>	<p>The service provides support to customers from the age of 18 years and upwards. Customers under 18 are not considered for the Shared Lives Scheme and would not be entitled to a placement. Customers under 18 would be placed with the children’s social care teams.</p> <p>Shared Lives can provide respite to unpaid family carers, to help with long-term succession/contingency planning for older family carers. The service provides an interim step-down placement for older people discharged from hospital as they regain their independence in the community as an alternative to more restrictive types of care, such as residential homes. This also reduces the likelihood of readmission to hospital.</p> <p>The service supports older people with dementia to engage in community life in their local, familiar surroundings.</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>Shared lives schemes support adults with learning disabilities, mental health needs and physical disabilities either in a long-term placement, day support or respite. People benefit from consistent support from a carer who knows them well and build meaningful relationships.</p> <p>The service provides a live-in family environment, developing long-lasting relationships with the shared lives carer and a family network. People are supported to engage in their wider community, gain employment and participate in social activities.</p> <p>The service is an alternative to more traditional and restrictive kinds of care, such as care homes.</p> <p>Customers with profound physical and mental disabilities or a forensic history are not currently placed within the scheme due to the level of support and risks involved to both the Shared Lives Carer and any other Customer supported by the Shared Lives Carer.</p>
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RACE

Details of impacts identified	<p>Shared Lives matches customer's needs to a registered carer and their family. The matching process takes into consideration ethnicity and cultural needs as well as any specific support needs.</p> <p>The service provides carers with training to develop skills in person centred care to deliver culturally appropriate care. Cultural needs are identified and included in assessments and detailed in care plans considering ethnic needs in many aspects such as meals, activities and getting feedback from customers and their families to understand their values and what is important to them.</p> <p>The service promotes cultural competence and implements anti-discriminatory practices. Carers are supported to understand and meet the diverse needs of customers using the service.</p>
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SEX

Details of impacts identified	N/A
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SEXUAL ORIENTATION

Details of impacts identified	N/A
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PREGANCY AND MATERNITY

Details of impacts identified	N/A
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RELIGION OR BELIEF

Details of impacts identified	N/A
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GENDER REASSIGNMENT

Details of impacts identified	N/A
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
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3. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No.

4. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

No, the proposal is to expand the current model which will not have a negative impact on current clientele.

5. Please detail any areas identified as requiring further data or detailed analysis.

None.

6. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

N/A

7. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

This is not a policy change therefore there is no perceived impact on the current Customer base supported by Brent Shared Lives or the future expansion of this service.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive

equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Based on the information provided, the expansion of Shared Lives will not have a negative impact on equality for customers.

Positive equality impacts have been identified and they include:

- More cultural, religious, and ethnic placements on offer to better match our customers according to their assessed care and support needs and preferences.
- Average length of placement for a customer living with in a Shared Lives Service is 11 years, this compares favourably to residential care or supported living options in terms of duration and meeting their assessed care and support needs.
- Provision of bespoke and essential training to ensure the Shared Lives Carers have the required knowledge and skills to meet the needs of our customers.
- Reduction in the cost of care for customers, which will positively impact the financial constraints faced by Brent Council as a local authority.
- Provide an income for Shared Lives Carers in the local Brent community which will stimulate the local Job Market.

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	X
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Thomas Atkinson
REVIEWING OFFICER:	Leon Gooding
HEAD OF SERVICE / Operational Director:	Leon Gooding

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Charging for Telecare Services
DEPARTMENT:	Adult Social Care
TEAM:	Commissioning, Contracting and Market Management
LEAD OFFICER:	Andrew Davies
DATE:	23rd December 2024

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

6. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

Brent Council is proposing to charge for telecare services. Before doing this, the changes proposed will be consulted on with ASC service users, telecare service users and the public in Brent. The level of charge is to be determined but will be included in the consultation plan.

Local authorities are able to charge people for the adult social care services they receive. This includes telecare services.

Brent Council contracts with Harrow Council for the provision of a 24/7 specialist telephone helpline and contact centre (Harrow Helpline Services). The service monitors individuals' wellbeing in the home or outside in the community where assisted technologies such as tele-care alarms or GPS tracking systems are in place. The service will also co-ordinate tele-care equipment supply and maintenance.

The telephone helpline and contact centre is part of a wider approach to increase the use of 'at a distance' support that allows vulnerable people to go about their daily activities with minimal intervention, while offering the right amount of support at the critical times it is needed, at any time of the day or night.

The Care Act 2014 places emphasis on prevention and independence as ways of achieving and exceeding the desired outcomes for service users and carers. The 24/7 telephone helpline services and contact centre fulfil these requirements for a group of vulnerable people with unpredictable, unexpected, emergency needs.

Adult Social Care has set up a Transformation Programme which includes a Technology Enabled Care (TEC) workstream, with the aim of developing a new offer and model of provision. The services provided within this contract are within the scope of the workstream and will be reviewed as part of the developments during the coming year, with the intention of procuring a new service which can meet the requirements defined through the review process. For this reason, procuring a service which only meets the current specification does not make strategic or financial sense at this time.

In the meantime, the council plans to start charging people for their telecare installation and monitoring services. Council budgets are under increasing pressure and this is an area of service that the council can no longer afford to subsidise. Consequently charging proposals are to be consulted on that will have an impact on current telecare service users and future service users.

There are some important principles that guide the way Brent charges for care services –

- Everybody who receives an adult social care service has a financial assessment, which works out whether they have to pay towards their care. Nearly 50% of people receiving care services pay no charge at all.
- Nobody will be expected to pay more for care than they can afford. Nor will anybody be expected to pay more than the cost of delivering their care package.
- The council supports people to maximise their incomes and also takes into account expenditure that people incur because of their disability or vulnerability, and disregards this expenditure when working out care charges.

The charges that the council implements for its adult social care service are essential to ensure that the service remains sustainable in the years to come. Without the income from service user charges, adult social care services would not be sustainable.

The council is placing greater emphasis on preventative services and supporting people to remain as independent as possible for as long as possible.

7. Who may be affected by this policy or proposal?

There are currently around 3,000 people in Brent who receive telecare services in Brent. However, the information held on these individuals is not particularly detailed. There are number of reasons for this –

- Information on telecare connections are not recorded on Mosaic and so cannot be matched to other social care records
- Telecare is not just prescribed by ASC staff but is also prescribed by NHS workers. As a result, Brent Council does not hold a complete record of the number of people with telecare connections in Brent. This information is held by Harrow Careline that monitors all telecare connections.
- Whilst Harrow Careline shares connection information, not all recipients are known to ASC.

Despite these issues with telecare data, it is fair to assume that the majority of people with telecare connections are older people with vulnerabilities. Many (but not all) will be in receipt of social care support in addition to their telecare services. But, further work will need to be completed to better understand the characteristics of those receiving telecare.

8. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. The changes proposed will have an impact on people with a disability and older people who are receiving telecare services.

9. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age			x
Sex		x	
Race			x
Disability			x
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

10. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

**If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.**

SECTION B – IMPACTS ANALYSIS

8. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

As set out above, further work needs to be done to examine in detail the information held on people who receive telecare services. This will be carried out ahead of consultation starting on the charging proposals.

9. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	<p>The majority of people receiving adult social care services are over the age of 65, although there is a significant minority of people who are of working age. Inevitably these changes will have a greater impact on the disposable incomes of older people because of the nature of the ASC client group and those who receive a telecare service. Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some older adults who can afford to pay more towards their care will be most affected by this change, the benefit of ensuring a sustainable service will also be felt by older people who use social care support.</p>
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DISABILITY

Details of impacts identified	<p>Adult social care services support disabled and vulnerable people with the care that they need to live their life in the best way possible. The potential impact on disabled people is very similar to that on older people, particularly on their income if they have to pay more towards their care. Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some disabled people who can afford to pay more towards their care will be most effected by this change, the benefit of ensuring a sustainable service will also be felt by disabled people who use social care support.</p>
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RACE

Details of impacts identified	<p>Two thirds of Brent’s Adult Social Care service users are from ethnic minority backgrounds, and again the impacts as a result are very similar as for older people and those with disabilities – people from ethnic minority backgrounds will be impacted, but mitigations will be available to support those who need it.</p>
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	Ensuring that adult social care services are sustainable is essential, and charging those who can afford to pay towards their care is an important element of this. So whilst some people from ethnic minority backgrounds who can afford to pay more towards their care will be most effected by this change, the benefit of ensuring a sustainable service will also be felt by all people who use social care support.
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SEX

Details of impacts identified	Fifty six percent of ASC service users are female; 44% are male. Whilst there is a slight variation, and clearly more female service users, the impacts on both female and male service users will be the same and the same mitigations apply to both females and males.
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SEXUAL ORIENTATION

Details of impacts identified	N/A
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PREGANCY AND MATERNITY

Details of impacts identified	N/A
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RELIGION OR BELIEF

Details of impacts identified	N/A
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GENDER REASSIGNMENT

Details of impacts identified	N/A
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
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10. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No. Brent is able to charge for telecare care services. The main issue with the changes proposed is that the council takes steps to minimise the impact on individuals, as outlined in the EIA, and that nobody is asked to pay more than they can afford for care.

11. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes. A full public consultation will take place in early 2025 before any charges are implemented. All ASC service users will be written to offering people a chance to respond to the proposed changes, and there will be a series of public meetings to seek feedback from service users and their carers. A full consultation and communications plan will be developed. For those people who require it, translated copies of the consultation documents will be made available and easy read versions will also be produced.

12. Please detail any areas identified as requiring further data or detailed analysis.

A full analysis of telecare customers will be carried out to see what equalities information can be obtained before the consultation begins.

13. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The negative impact of the changes are that telecare service users will be asked to pay for these services. The importance of charging for adult social care services cannot be overstated. Without income from service users able to pay for care the service isn't sustainable, and the council needs to take steps to ensure that the policy remains fair to service users, but also enables those who can afford it to be charged their contribution for care services.

14. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The impact of the policy will be monitored in a number of ways –

- Monitoring of the number of service users who choose to keep their telecare.
- Monitoring the impact on telecare take up for new service users.
- Monitoring the additional income generated by the proposal to support ASC budgets.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The mitigating actions are set out in this EIA, but include –

- Confirmation that telecare will be considered as part of the financial assessment process.
- Use of disability related expenditure exceptions in financial assessments, where evidence supports this. DRE is disregarded when undertaking a financial assessment.

- Income maximisation activities, including benefit take up, already offered by the council will be promoted to ASC service users.

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Full analysis of telecare service users	An understanding of numbers, how many have care packages, how many people unknown to ASC etc.	Mercy Lett-Charnock	31 st March 2025
Confirm consultation proposals including proposed amount to charge	Consultation and communication plan is fully worked up and signed off.	Mercy Lett-Charnock	31 st March 2025
Carry out public consultation and analyse responses	Outcomes from consultation are recorded and understood and inform final policy for charging	Mercy Lett-Charnock	30 th May 2025
Implement charges	Charges implemented and process for collecting charges put in place.	Mercy Lett-Charnock	30 th June 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Andrew Davies, Head of Commissioning, Contracting and Market Management, Adult Social Care
REVIEWING OFFICER:	
HEAD OF SERVICE / Operational Director:	Rhodri Rowlands, Director Strategic Commissioning and Capacity Building

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Reduction in the contribution for Promoting Independence work to care leavers by 50%, from £160K to £80K annually
DEPARTMENT:	CYP
TEAM:	LAC and Permanency/FPPP
LEAD OFFICER:	Kelli Eboji/Michelle Gwyther
DATE:	2/12/2024

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

11. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The new Independence Pathway approach piloted in 2023-2024 and introduced in full for 2024-25, aims to prepare young people to reach independence sooner at the age of 19.5 years. This is achieved by providing a structured, targeted and consistent support programme, focussing on upskilling by practice. This is achieved through the increased use of the Gordon Brown Centre (GBC) and utilising local community links who offer new independence programmes and courses.

The Gordon Brown Centre programme costs £160K annually for use of one weekend per month at the centre which provides a full weekend of activity focused on independence for 8 young people. They leave the centre having learnt new independent living skills, including basic DIY like putting up a shelf using DIY tools and an understanding of initial approaches of dealing with issues around the home such as water leaks and electrical issues. Young people also leave with items to assist them with independence, including a basic DIY kit.

The proposed savings in relation to this programme would reduce the capacity of the programme by half which will result in one weekend held every two months.

12. Who may be affected by this policy or proposal?

Brent Care Leavers, due to fewer weekend programmes held in the year, which means a reduced provision and availability to choose from.

CYP Personal Advisors, due to less frequent weekend programmes being run by them which could improve work-life balance and wellbeing.

13. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, there is relevance in respect to the Council's responsibility to advance equity of opportunity for people belonging to protected groups. While care experience is not yet a legal protected characteristic, the Council has demonstrated commitment to recognising and treating care experience as a protected characteristic – work is underway to determine how this can be embedded within our processes and approaches. The Council noted that Care Leavers experience a range of disadvantages and vulnerabilities as a group because of their adverse childhood experiences and subsequent trauma, and the nature of growing up in the care system. This GBC programme was designed as one way to ensure these young people were leaving care and moving into independent living with the necessary skills, tools and resources, and achieving this independence in a timely way.

14. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age			x
Sex		x	
Race			x
Disability		x	
Sexual orientation		x	
Gender reassignment		x	
Religion or belief		x	
Pregnancy or maternity		x	
Marriage		x	

15. Please complete **each row** of the checklist with an "X".

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	
Does the policy or proposal relate to an area with known inequalities?	x	

Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

**If you have answered YES to ANY of the above, then proceed to section B.
If you have answered NO to ALL of the above, then proceed straight to section D.**

SECTION B – IMPACTS ANALYSIS

15. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

<p>Information and evidence is based on the demographic of care experienced young people, who are already at a disadvantage because of their early childhood and care experiences.</p> <p>As at 10/12/2024 Brent has: 598 Care Leavers allocated 831 Care Leavers entitled to a service</p> <p>187 16-18 year olds eligible for a Leaving Care service 276 19-21 year olds eligible for a Leaving Care service</p>
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16. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	<p>Negative:</p> <p>There could be delays in young people being able to access a GBC weekend away as the frequency will be reducing by half. This could have an impact on the timeliness of young people being presented to Brent Housing Panel and subsequently bidding and then securing their own property.</p>
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DISABILITY

Details of impacts identified	Not applicable
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RACE

Details of impacts identified	Care leavers are disproportionately from BAME backgrounds, and so the programme reduction could disproportionately affect young people from these groups.
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SEX

Details of impacts identified	Not applicable
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SEXUAL ORIENTATION

Details of impacts identified	Not applicable
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PREGANCY AND MATERNITY

Details of impacts identified	Not applicable
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RELIGION OR BELIEF

Details of impacts identified	Not applicable
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GENDER REASSIGNMENT

Details of impacts identified	Not applicable
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable
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17. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, none of these impacts could be identified as unlawful under the Equality Act.

18. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

This has not been discussed with care experienced young people as the proposal is to reduce the frequency of weekends, not cease the programme completely.

19. Please detail any areas identified as requiring further data or detailed analysis.

N/A

20. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The justification for the proposed reduction is purely in relation to financial constraints and the need to make cost efficiencies within the financial year.

21. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

We will continue to monitor the numbers of young people attending GBC weekends in conjunction with the numbers of young people progressing to Brent Housing Panel. This will be to ensure that the impact of this savings is minimised and we are able to continue to progress and support Brent Care Leavers into their own housing in a timely way.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Based on the analysis above and the proposed mitigations, proceeding with this savings proposal is recommended.

There has been 8 GBC weekends in the 2023/2024 financial year and 7 weekends between April 2024 and November 2024.

Annual capacity for this programme in 2025/26 will be 48 young people with the current proposal of 6 weekends per year with a maximum capacity of 8 young people per weekend. This capacity is greater than the total number of participants across both of the previous years.

If our monitoring activity suggests that the council is at risk of spending more money (than the proposed savings) on high cost support accommodation for Care Leavers because they haven't been able to access the GBC weekend in a timely way, we have the option of purchasing additional places on the GBC weekends to increase the total numbers. This spend will be decided on a case by case basis.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	x
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Booking and attendance data to be tracked and reviewed after 6 months to ensure potential negative impacts are being minimised	A clearer understanding of the take-up of the programme, despite reduced weekends.	Kelli Eboji/ Michelle Gwyther	Sept 2025
Additional spaces on the GBC weekends to be considered on a case by case basis and taken to Children's Placement Panel for a decision to fund additional places	Additional funding agreed if required	Allocated Personal Advisor/ worker	When required
Track the number of young people progressing to Housing Panel and being able to progress to bid for housing to ensure numbers are not affected by the reduction in the number of GBC weekends	Panel-related delays are identified and addressed in a timely manner. Management will have the data to decide whether increasing the cohort numbers on individual GBC weekends by four young people, for an additional cost, would be required as well as feasible.	Kelli Eboji/ Michelle Gwyther	Quarterly

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Kelli Eboji, Head of Looked After Children and Permanency Date: 9/1/2025
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michelle Gwyther, Head of Forward Planning, Performance and Partnerships.
HEAD OF SERVICE / Operational Director:	Kelli Eboji, Head of Looked After Children and Permanency Date: 9/1/2025

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Reduction in discretionary spend on the use of taxis and client subsistence payments
DEPARTMENT:	Children and Young People
TEAM:	Forward Planning Performance and Partnerships Looked After Children and Permanency
LEAD OFFICER:	Michelle Gwyther
DATE:	5 December 2024

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

16. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

A reduction in discretionary spend on taxi fares and a reduction in discretionary spend on client payments for care leavers from April 2025.

Discretionary taxi spend

The proposal is a reduction in the use of taxis as a means of transport for children and young people and families, with other alternative means of travel assistance being provided such as bus passes and / or Oyster cards. This will be achieved through tighter decision-making on the use of taxis to support families, and reducing costs spent on transporting children who are subject to care proceedings and looked after children (LAC) and young people to school by taxi, when their school is at a distance from their placement.

Discretionary client subsistence payments.

Care leavers are entitled to up 6 weeks of subsistence payments under the existing Leaving Care Financial Support policy to support the transition to welfare benefits. However, some young people receive payments for more than the 6 weeks due to a number of factors often linked to their individual circumstances. Initial analysis suggests that 2 in 10 young people receive payments for longer than 6 weeks (not including Unaccompanied Asylum Seeker Children (UASC)).

17. Who may be affected by this policy or proposal?

Taxi fare proposal (detailed data is not currently available)

Children and young people, including LAC.

Families

Front line social work staff and managers

Foster carers

Subsistence proposal

Care Leavers

18. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes – the public sector equality duty has been considered, particularly the first two aims, which are most relevant for this proposal: eliminate unlawful discrimination, harassment and victimisation, and advance equality of opportunity.

19. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age	x		x
Sex			x
Race			x
Disability			x
Sexual orientation			x
Gender reassignment			x
Religion or belief		x	
Pregnancy or maternity			x
Marriage		x	

20. Please complete **each row** of the checklist with an "X".

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	x	

Does the policy or proposal relate to an area with known inequalities?	x	
Would the policy or proposal change or remove services used by vulnerable groups of people?	x	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	x	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

22. Outline what information and evidence have you gathered and considered for this analysis.

If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Taxi fare proposal

Children (who are able to be transported to school on their own), and young people would be affected by the removal of taxis being used to transporting them to and from school. Their attendance and therefore their studies at school or an alternative provision could be affected which would impact on their educational outcomes. This would also affect Brent Council's attendance and attainment performance, both of which are published.

Families would be affected as they are supported with taxis to take their children to and from school who cannot travel on their own, to enable them to attend significant appointments related to their child's plan including contact, and to travel to and from court when there are court proceedings.

Social workers would be affected by reduced taxi availability. Currently taxis are used to support looked after children and young people especially in times of crisis when a placement has broken down and they need to be transported to a new placement. Taxis are also used by social workers for out of hours and weekend use.

Foster carers would also be affected as on occasions and when necessary, foster carers are supported through the provision of taxis to transport looked after children and young people to and from school.

This equates to around 1100 bookings per year, but these are not 1100 unique bookings and comprises a large number of repeat bookings. The spend by CYP is circa £120,000 per year and this is delivered by approved providers who have been quality assured by the Council.

Subsistence proposal:

- Care leavers are entitled to up 6 weeks of subsistence payments under the existing Leaving Care Financial Support policy to support the transition to welfare benefits. Some young people receive payments for more than 6 weeks as a result of factors linked to their individual circumstances, for example delays in them receiving their first Universal Credit payment.

44 care leavers were paid subsistence between April 2024 and October 2024 for more than 6 weeks. Of these 31 young people were UASC who were overpaid by an average of 20 weeks. 13 non UASC young people received support for an average of 22 weeks.

Resources and evidence that have been looked at to complete this analysis include:

- Equality Act 2010
- Brent Equity, Diversity and Inclusion strategy 2024-28
- Public Sector Equality Duty
- Joseph Rowntree Foundation research and reports.
- Data provided by the Performance and data Team within CYP

23. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

<p>Details of impacts identified</p>	<p>Taxi fare proposal</p> <p>Positive: By reducing the provision of taxi fares, a greater level of independence and autonomy is promoted through encouragement of travelling using public transport. It can foster a sense of better freedom whilst building trust between a young person and their families or guardians when the young person is regularly able to demonstrate safe travelling and navigating skills.</p> <p>Negative: Young people may suffer from poor school attendance and as a result of this, poor educational outcomes. With the provision of alternative means to travel to school e.g. a bus pass or oyster card, there may be little incentive for some young people to travel independently to school.</p> <p>Families may not be able to meet requirements in their child’s plan to attend significant appointments which subsequently impacts on the child. If taxis are provided to give an incentive to comply with their child’s plan, the removal of this could result an increase in statutory intervention, for example, children subject to a Child Protection plan coming into care.</p> <p>Social workers use taxis to reach children and young people quickly in terms of crisis, and also to take children and young people to new placements when they move. Delays in reaching a child or young person could add further to trauma they have already experienced.</p> <p>Subsistence proposal:</p> <p>Negative: Some young people could be left without financial support if there are genuine reasons why they are not accessing benefits. This may lead to ad-hoc financial support requests, for example funding for specific purposes (utilities bills) which continues to add financial cost.</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>Taxi Fare Proposal</p> <p>Negative: The proposal to remove taxi assistance could impact on those who experience difficulties, whether physical or learning disabilities, in traveling independently. Those with mobility impairments are more reliant on taxis and local public transport services can often be delayed and have limited capacity to accommodate multiple passengers with mobility needs. Hence private transportation is a quicker and more reliable solution for this cohort. Those with learning disabilities, depending on the severity of them, can find independent travel using public transport to be overwhelming and may require higher levels of guidance to navigate. Families and carers of children and young people will be provided with information regarding other means of support available to them. This may include Brent’s Travel Assistance Policy.</p> <p>Brent council policies and strategies such as Equity, Diversity & Inclusion strategy 2024-2028, Equality Policy, Flexible Working policy and Health and Safety Policy will be followed to ensure appropriate and reasonable adjustments will be put in place for all staff with disabilities who are required to travel as part of their role.</p> <p>Subsistence proposal</p> <p>The proposal will impact equally upon all those identified to be impacted regardless of disability. In most cases, care leavers are in receipt of Universal Credit after the 6 weeks but delays do occur. Care Leavers will be encouraged and supported by their Personal Advisor to use tools such as an online Benefits calculator to ensure they are accessing any other welfare support or grants they may be eligible for, for their individual circumstances.</p>
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RACE

<p>Details of impacts identified</p>	<p>The proposal may impact largely negatively on young people, especially from ethnic minority backgrounds. Monthly data on the disproportionalities amongst the Brent CYP population has been looked at, with attention to those on a Child Protection Plan, those who Looked After Children (LAC) and those who are care leavers.</p> <p>The top 3 ethnicity groups identified for each are as follows:</p> <ul style="list-style-type: none"> - Child Protection Plan: Any Other Ethnic Group (23.7%), Any Other Black Background (18.4%) and Any Other Asian Background (12.6%). - LAC: Any Other Ethnic Group (14.3%), Any Other Mixed Background (14.3%), Any Other Black Background (14%). - Care Leavers: Any Other Ethnic Group (29.5%), Any Other Black Background (12.4%), Black African (12%).
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	<p>Comparing this to 2021 Census population data for the 0-25 age group, for reference:</p> <ul style="list-style-type: none"> - 4.6% identified themselves as being from Any Other Ethnic Groups. - 2.98% identified themselves as being from Any Other Black Background. - 3.2% identified themselves as being from Any Other Mixed Background. - 7.95% identified themselves as being from Any Other Asian Background. - 12.3% identified themselves as being from Black African background. <p>Brent CYP has defined Ways of Working which are represented by a multi-fruit tree, where the 'earth' symbolises that we are an anti-racist organisation. This significantly informs how services are delivered, including the changes mentioned through this proposal. It has been considered that the ethnic minority groups mentioned above face greater challenges including school exclusion, crime, gang activity and delinquency and housing and homelessness. Individuals from ethnic minority backgrounds often feel insecure about using public transport due to these issues, which exacerbates disparities with accessing education as well as other community services. Colleagues from Community Safety including the Safety and Travel Planning team will be consulted for their experience in improving and ensuring neighbourhood safety to support schools and social care teams to encourage travel using public transport.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of race. Leaving Care teams will be supporting all young people, regardless of any protected characteristics, to make timely applications for benefits to prevent need for subsistence payments.</p>
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SEX

<p>Details of impacts identified</p>	<p>Negative: Reduction of provision of taxi fares can impact female young people from a safety perspective, especially during winter months when there are fewer daylight hours and there is less incentive to travel independently. Colleagues from Community Safety including the Safety and Travel Planning team will be consulted for their experience in improving and ensuring neighbourhood safety to support schools and social care teams to encourage travel using public transport.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of sex. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
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SEXUAL ORIENTATION

Details of impacts identified	<p>Negative: Reduction of provision of taxi fares can impact those who identify themselves from the LGBTQ+ community, particularly if they have previously experienced bullying and harassment, or discrimination either in the public realm or within their families. This can make independent travel using public transport a traumatic and unsafe experience.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of sexual orientation. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
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PREGANCY AND MATERNITY

Details of impacts identified	<p>The proposal to remove taxi assistance could impact on those who are pregnant and / or recovering after pregnancy if they are experiencing difficulties during this time with traveling independently.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of pregnancy and maternity. Leaving Care teams will be supporting all young people, regardless of any protected characteristics to make timely applications for benefits to prevent need for subsistence payments.</p>
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RELIGION OR BELIEF

Details of impacts identified	<p>The proposal will impact equally upon all those identified to be impacted regardless of religion or belief.</p>
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GENDER REASSIGNMENT

Details of impacts identified	<p>Negative: Reduction of provision of taxi fares can impact those who identify themselves from the LGBTQ+ community, particularly if they have previously experienced bullying and harassment, or discrimination either in the public realm or within their families. This can make independent travel using public transport a traumatic and unsafe experience.</p> <p>Subsistence proposal The proposal will impact equally upon all those identified to be impacted regardless of gender reassignment. Leaving Care teams will be supporting all young people to make timely applications for benefits to prevent need for subsistence payments.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified

The proposal will impact equally upon all those identified to be impacted regardless of marriage and civil partnership.

24. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

25. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

No engagement initiatives with people affected by this proposal have been undertaken as the proposal was not a public one. Heads of Service who lead teams directly affected by the proposals have been informed about the proposal and have provided some early feedback which has been taken into consideration in how the proposals will be implemented. It is recognised detailed communication and engagement will be required with frontline staff working with families and young people who will be affected.

26. Please detail any areas identified as requiring further data or detailed analysis.

A data analysis was completed to identify numbers for the initial proposal to inform the levels of savings to be proposed. This analysis is being further analysed to break it down into different groups of users and volume of spend to enable effective tracking systems of impact and outcomes.

27. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The primary reason for any negative impacts that may remain are a result of financial constraints faced by the Department hence savings are to be considered wherever possible within this financial year.

Mitigating factor:

Across all of the protected characteristics set out above, there could be a one off or an individual circumstance where due to safeguarding reasons and/or safety, travel assistance in the form of a taxi will need to be provided. It is not possible to set out every single possible scenario where this could happen, but for example if an individual is experiencing domestic abuse or risk of physical harm and needs to remove themselves from the situation, assistance in the form of a taxi will be supplied. This case-by-case will be a principle in the implementation of this savings proposal.

28. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

The detailed analysis will set a benchmark for the number of current users and provide an increased understanding of which specific groups are in greater need. Equality impacts will

be tracked through direct feedback received from service users, where the proposal has negatively impact on them, feedback from frontline professionals and schools and colleges. Each individual impact will be logged so negative impacts can be tracked and any amendments made to implemented actions.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

Taxi fare proposal

There is no statutory duty to provide travel assistance in the form of a taxi to families or children and young people. However, the provision of travel assistance supports families in addressing individual needs and could enable children and young people to step down from statutory children's services in a timelier way.

Subsistence proposal:

As their corporate parent, Brent Council has a duty to financially support young people if they have no other income from either employment or claiming benefits. The entitlements for young people are set out in the Brent 'Leaving Care Financial Procedures' which is being refreshed this financial year.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Complete detailed analysis of user data and spend	Clear picture of activity and volume of spend to provide a clear baseline for monitoring impact and provide an increased understanding of which specific groups are in greater need.	Marie Molisho	20 December 2024
Review and update the discretionary spend policy and share with relevant stakeholders for their agreement	<p>Updated discretionary spend policy with clear thresholds for travel assistance which is agreed and owned by all relevant stakeholders, taking into consideration the needs of specific groups.</p> <p>Updated discretionary spend policy that includes a clear exceptions policy and process for when any payments need to be for longer than 6 weeks, taking into consideration the needs of specific groups.</p>	Marie Molisho and Michelle Gwyther	17 January 2025
Negotiation with taxi companies on block arrangements including the calculation of no shows	Prevented disruption and distress for vulnerable CYP.		28 February 2025
New policy implemented	Clearer understanding amongst staff of the process to be followed when processing applications, especially for exceptional cases.	Marie Molisho and Michelle Gwyther	April 2025 –

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Marie Molisho, Business Support and Income Generation Manager
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REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michelle Gwyther, Head of Forward Planning, Performance and Partnerships
HEAD OF SERVICE / Operational Director:	Shirley Parks, Director, Education, Partnerships and Strategy

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	Safe Base
DEPARTMENT:	Children & Young People
TEAM:	Education Psychology, Care leavers, Virtual School
LEAD OFFICER:	Michaela Richards
DATE:	December 2024

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

21. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The proposal/change is to cease the Safe Base Brent offer, which is a Mental Health and Wellbeing support service for care leavers attending higher education. This would make a budget saving in the Brent Virtual School and Educational Psychology Service.

The Safe Base service is a mental health and wellbeing support service for Brent Care Leavers up to the age of 25 in higher education/apprenticeships. The highest percentage of service users are those attending university. The service is relatively longstanding (6 years) and around 25 young people access support each year.

Young Minds, Kooth and Free Your Mind offer similar free support programmes and university, or college students would also have access to in-house mental health and wellbeing programmes within their places of study.

22. Who may be affected by this policy or proposal?

Young people who currently access the service, this is approximately 25 users of the service.

23. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes, the proposed change is relevant to the Public Sector Equality Duty, and the requirement that the Council has due regard to the need to eliminate discrimination, harassment, and victimisation, and advance equality of opportunity between people who share a relevant protected characteristic and those who don't. Furthermore, the Council is in the process of formally adding care experience as a protected characteristic.

24. Please indicate with an “X” the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age			X
Sex		x	
Race			X
Disability			X
Sexual orientation		x	
Gender reassignment		X	
Religion or belief		x	
Pregnancy or maternity		X	
Marriage		X	

25. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

29. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

Safe base is a valued resource that has a small clientele base. A report published in January 2022 stated that from the services inception (April 2018) to date (January 2022) there had been 82 potential candidates with 51 full referrals being made. Whilst all 51 were offered an initial phone consultation, it is not clear how many took up this offer and how many continued

on to receive ongoing support. Whilst the impact is positive for those young people who engage it is also clear that the reach of the service is small. More recent data indicates that an average of 25 young people access the service each year.

Research into other services with the same profile was conducted and the following services were identified as they are national services:

- <https://www.youngminds.org.uk/>
- <https://www.kooth.com/>

Both services offer online and telephone sessions in the same way as Safe base, in addition to these services there are also region-specific services that can be accessed based on the care leavers location such as <https://www.freeyourmindcic.com/> and <https://www.justtalkherts.org/just-talk-herts.aspx>. Most users of Safe Base are young people at university. A number of students attend Brunel University so a check was completed to ascertain what mental health support they offered and the following was identified: <https://students.brunel.ac.uk/support/mental-wellbeing-services>. A cursory check was made of five other universities and all had a similar offer to Brunel.

Given the above it was felt that the mental health support offered by Safe Base was also offered by other services at national, regional and local (university) level.

30. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	This is an age specific service for young people in higher education. The age group of service users may face unique challenges in higher education, and removing this targeted support could exacerbate inequalities.
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DISABILITY

Details of impacts identified	The service provides mental health support and removing it could disproportionately impact care leavers who need support in this regard.
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RACE

Details of impacts identified	Care leavers are disproportionately from BAME backgrounds, and so service closure could disproportionately affect young people from these groups. However, even though care leavers are disproportionately from these backgrounds it does not mean that young people from these backgrounds are accessing the service more than others.
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SEX

Details of impacts identified	Not applicable
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SEXUAL ORIENTATION

Details of impacts identified	Not applicable
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PREGANCY AND MATERNITY

Details of impacts identified	Not applicable
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RELIGION OR BELIEF

Details of impacts identified	Not applicable
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GENDER REASSIGNMENT

Details of impacts identified	Not applicable
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	Not applicable
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31. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No

32. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

No and further engagement is not required to continue with this proposal.

33. Please detail any areas identified as requiring further data or detailed analysis.

N/A

34. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

There is a risk that the mental health and wellbeing of some young people deteriorates if they did not access other free social emotional and mental health and wellbeing support programmes. To mitigate this, information will be shared with care leavers on the range of free services available nationally and locally that they could access instead of Safe Space, including Young Minds, Kooth and Free Your Mind. Users at university or college would also have access to their educational institutions' own student wellbeing programmes.

35. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

All young people who are current users of the service have an allocated PA who will be in place to recognise any concerns that arise from the closure of the service. These will be reported up through the care leavers service and shared across the relevant Service Managers and Heads of Service.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

There are negative equality impacts based on the above analysis. However these are justified due to the impacts analysis in section B. To mitigate against the risk of negative mental health impacts as a result of service closure, the following mitigation activities are planned:

- Phased reduction to service.
- Signposting for current and potential users.
- Liaising with universities that users attend to ensure that there is a continuity of support.

The services offered are not statutory and there are other similar services that the current users are able to access.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Discussion with team manager with regards to service removal and proposal for phased reduction of service until April 2025.	Key personnel understand the next steps and are able to work with young people to implement the plan and mitigate any negative repercussions.	Michaela Richards Frank Glennon	August 2024
Reduce service from three days to two days. Staff member to identify alternative services and programmes and signpost new users. Ensure that all referees are aware of the reduction and eventual removal of service	Phased reduction that will allow for the service to more naturally end rather than an abrupt end at the end of the financial year.	Frank Glennon	December 2024
Reduce service down to one day and completion of work with current users.	Continuation of the phased reduction of service, able to ensure that those who need are introduced to other services.		February 2025
Service Closure			March 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Michaela Richards
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Michaela Richards
HEAD OF SERVICE / Operational Director:	Shirley Parks

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	To increase Council Tax by 4.99% in 2025/26
DEPARTMENT:	Council wide
TEAM:	N/A
LEAD OFFICER:	N/A
DATE:	29 November 2024

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

26. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The council is required to make significant savings in order to deliver a legally required balanced budget. In order to help overcome this it is proposed to increase council tax by 4.99%, where 2% is ring fenced for Adult Social Care and 2.99% is a general increase. This is the maximum increase allowed by government. The proposal will generate an additional £8.1m of recurring income for the Council and therefore avoid having to make further savings to key council services such as adult social care, children's services, etc.

This will impact all residents within Brent who are eligible to pay council tax. Under the changes that are being made to local government funding, there is more emphasis on generating more funding locally (i.e. becoming more self-determinant). This proposal is linked to one aspect of local government funding where the Council has some discretion to raise additional funds by increases to council tax.

27. Who may be affected by this policy or proposal?

All households in Brent, apart from those who are of state pension age; these households are eligible for 100% council tax discount, however, the discount is only applied following financial assessment of their income.

The increase by band and the number of properties affected are shown below.

Band	Amount payable in 2024/25 (Brent share)	Amount payable in 2025/26 (Brent share)	Increase per annum	Increase per month	Increase per week	Total number of dwellings affected
A	£1,043.10	£1,095.18	£52.08	£4.34	£1.00	6,081
B	£1,216.95	£1,277.71	£60.76	£5.06	£1.17	14,033
C	£1,390.80	£1,460.24	£69.44	£5.79	£1.34	41,661
D	£1,564.65	£1,642.77	£78.12	£6.51	£1.50	39,226
E	£1,912.35	£2,007.83	£95.48	£7.96	£1.84	23,403
F	£2,260.05	£2,372.89	£112.84	£9.40	£2.17	6,563
G	£2,607.75	£2,737.95	£130.20	£10.85	£2.50	3,452
H	£3,129.30	£3,285.54	£156.24	£13.02	£3.00	252

If this proposal is approved, it will affect all households in Brent's 134,671 residential dwellings, that will see their council tax bills increase, unless they are eligible for council tax support. The proposed changes to the council tax support scheme (CTS) for 2025/26 has a separate equalities assessment to determine it's impact. However, a point to be noted is that the 4.99% increase and proposed changes to the CTS scheme could have a cumulative financial impact on some households.

28. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This proposal will have both positive and negative impacts on residents and will potentially affect groups with protected characteristics. However, since the council tax is applicable to all properties, it is not considered that the increase targets any one particular group rather it is an increase that is applied across the board. At the same time because the increase is applied to all properties it is not possible to exempt any particular groups. However, on the latter point there is a council tax support scheme that offers support to vulnerable people and people on low incomes for both pensioners and those of working age. The proposed changes to the CTS scheme will result in significant changes in the eligibility criteria and as a result some households may no longer qualify for council tax support. However, the Brent Resident Support Fund (RSF) and Hardship Fund could provide further assistance to vulnerable residents, including but not limited to help with the cost of their council tax bill.

29. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age		X	
Sex		X	
Race		X	
Disability *		X	
Sexual orientation		X	
Gender reassignment		X	
Religion or belief		X	
Pregnancy or maternity		X	
Marriage		X	

30. Please complete **each row** of the checklist with an “X”.

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council’s public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?		X
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

36. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The Council has analysed the statutory council tax base return which shows the total number of households that are required to pay council tax and the households who are eligible for council tax support.

Other than this, it is not possible to conduct further impact analyses as the proposed council tax increase will affect households in Brent in different ways based on their financial

circumstances. However, low income households will continue to be eligible to apply for council tax support to offset this increase.

The council tax support scheme is also proposed to be amended from 2025/26, subject to a separate consultation process and Equality Analysis.

37. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

Details of impacts identified	N/A
--------------------------------------	-----

DISABILITY

Details of impacts identified	N/A
--------------------------------------	-----

RACE

Details of impacts identified	N/A
--------------------------------------	-----

SEX

Details of impacts identified	N/A
--------------------------------------	-----

SEXUAL ORIENTATION

Details of impacts identified	N/A
--------------------------------------	-----

PREGANCY AND MATERNITY

Details of impacts identified	N/A
--------------------------------------	-----

RELIGION OR BELIEF

Details of impacts identified	N/A
--------------------------------------	-----

GENDER REASSIGNMENT

Details of impacts identified	N/A
--------------------------------------	-----

MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	N/A
--------------------------------------	-----

38. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

No, the impacts identified in this EIA are not unlawful under the Equality Act, as the changes apply universally and are not explicitly targeted at any specific group.

39. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, significant engagement / consultation is planned between December 2024 and February 2025 ahead of the decision being made by full council on 27 February 2025.

40. Please detail any areas identified as requiring further data or detailed analysis.

None required

41. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

If the proposal is rejected, the Adult Social Care budget will not grow by £3.2m, which could pose challenges to the service to meet growing demand of current and future service users. Failure to meet the increasing demand and diverse needs of current and future service users, would have a negative impact on those most at need. It will also likely lead to increased crisis costs and further impact upon budget pressures.

The 2.99% increase in council tax for general use should have a positive impact on some equality groups as it prevents an additional reduction of £4.9m in the Council's budget. Without a specific alternative proposal, the exact benefit to specific groups of residents, staff and external stakeholders is uncertain, but a reduction in budget at short notice will limit the scope of the Council to reduce the impact on services used by vulnerable groups of people.

Whilst the council tax proposal will increase the financial pressure on some households, the council tax support scheme will partially or fully mitigate this impact for those households who are living on low incomes and are eligible for council tax support. The council tax support scheme is also proposed to be amended from 2025/26, subject to a separate consultation process and Equality Analysis. If the revised CTS scheme is approved, this could result in significant changes in the eligibility criteria for claimants and some households may no longer qualify for council tax support.

Some residents who live on their own or no one else in the property counts as an adult, will have the impact mitigated by the 25% discount offered to single households.

42. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

If the council tax proposal is approved, the Council will continue to monitor the impact on equality groups to ensure that any unexpected consequences and/or adverse impact are promptly identified and mitigated. This will take place when the new council tax support scheme is implemented.

The existing powers under Section 13A of the Local Government Act 1992 allow the Council to reduce council tax by up to 100%. The process for applying is detailed on the Council's website. The council plans to increase the funding available for 13A reductions to £1.5m. Applications will be online and managed alongside the Resident Support Fund. A revised policy relating to 13A will be presented to Cabinet in March 2025 for consideration ensuring the funding is targeted at those affected.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

It is proposed to continue with the proposal. The reason for this is that the council tax increase will help to protect front line services, reduce the amount of savings required and provide much needed additional growth for the Adult Social Care budget. The council tax increase proposed is equivalent to approximately £8.1m of additional funding. If this funding was not available, services such as Adult Social Care and Children's Social Care would have to be significantly reduced.

Brent has processes in place for applying a council tax support/reduction/exemption to those eligible, therefore whilst this increase will impact across the board, it is anticipated that the impact will be proportionate dependent on an individual's circumstances and whether they receive a council tax support/reduction/exemption.

Some residents will be additionally impacted by the proposed changes to the Council Tax Support Scheme. The impact of these changes on residents with protected characteristics will be considered in a separate Equality Analysis as part of the decision making process.

SECTION D – RESULT

Please select one of the following options. Mark with an "X".

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Review impact of council tax increase, with a particular focus on understanding the ability to pay of those in arrears by utilising credit reference agencies, monitoring payment patterns and any other information available.	Better understanding of negative impacts so that support and recovery action can be appropriately targeted.	Peter Cosgrove	April – June 2025

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Peter Cosgrove
REVIEWING OFFICER: <i>* the manager with oversight of the project</i>	Ravinder Jassar

**HEAD OF SERVICE
/ Operational
Director:**

Thomas Cattermole

EQUALITY ANALYSIS (EA)

POLICY/PROPOSAL:	New Council Tax Support Scheme
DEPARTMENT:	Household Services
TEAM:	Customer Services & Assessments
LEAD OFFICER:	Sunita Ghudial
DATE:	07 January 2025

NB: Please ensure you have read the accompanying EA guidance and instructions in full.

SECTION A – INITIAL SCREENING

31. Please provide a description of the policy, proposal, change or initiative, and a summary its objectives and the intended results.

The Council is obliged to set a local Council Tax Support Scheme every year following the abolition of the national Council Tax Benefit Scheme in 2013. The Council introduced a local Council Tax Support (CTS) Scheme to provide financial assistance for working-age households in paying their Council Tax. Council Tax Support is awarded as a reduction on a council taxpayers' bills, like a discount, so the household pays less. The scheme has two parts a statutory scheme for pensioners and a non-statutory scheme that covers the working age population. These proposals impact only on the non-statutory elements of the scheme and do not affect the statutory scheme for pensioners.

Anyone who is liable for council tax (tenants and homeowners) can apply for council tax support.

The current local Council Tax Support scheme has been in place since April 2020. It is proposed to introduce a new scheme from 2025/26.

Council Tax Support (CTS) is a local scheme determined by the Council which provides assistance with Council Tax liabilities to households on low incomes. The objectives of the review are: -

- To maintain a scheme which is fair and simple to understand.
- To further align the scheme with Universal Credit and ensure the scheme is fit for future needs.
- To address any elements of the current scheme which are unsustainable or undesirable.
- To streamline administrative processes and reduce complexity for claimants.

Brent faces a significant challenge setting the budget for 2025/26 with a budget gap of c£16m, rising to c£30m by 2027/28. This is to be addressed through identifying further savings, efficiencies, and income generation options.

The changes being proposed will provide an option for Cabinet in addressing this budget gap. If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore propose to use

£5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be used once, £5m will have to be added to the budget gap in the Medium Term Financial Strategy and 2026/27 budget setting process

Other reasons for the proposed changes to the scheme are:

- In the current scheme the income bands have remained static and not changed with CPI growth. The new proposed scheme will increase income bands and non dependant income is in line with the increased CPI ensuring households do not fall out of support
- The new proposed scheme ensures that households liable for Council tax and are on Universal Credit- the notification date from DWP is used to make the CTS award, ensuring households do not lose on entitlement. During 2025/26, additional working age households will be transferred to Universal Credit (UC). There is an opportunity to simplify the administration of the CTS scheme.

The costs of providing CTS under the current working age scheme is forecast to be £19.9m in 2024/25 rising to £21.2m in 2025/26. The proposed scheme options would be expected to reduce this by £8m, which would deliver savings of £5m. The remaining £3m will be utilised for a hardship fund of £1.5m and £1.5m to make a mandatory contribution to the Greater London Authority through the Mayor of London for their precept for 2025/26.

As well as proposals to make changes to the CTS scheme, the Council is also proposing to continue to use its policy under section 13A of the Local Government Finance Act 1992 to further support households with their council tax bills. The Council will use its current mechanism of Households Support fund for households to apply for support with their council tax. Vulnerable groups will be identified using our data sets on Housing Benefits and Council tax support. The Council will work closely with external and internal stakeholders to provide holistic services with income maximisation and debt advice. The council could further refine and promote available support options for residents struggling with council tax bills

Pensioners will be unaffected by this change as their CTS will be calculated as prescribed by legislation. Pensioners will continue to receive full Council tax Support up to 100% of their council tax liability depending on their personal circumstances. Pension age is currently set at is 66 years.

The Council is considering changing the CTS scheme, for 'working age' claimants as the current scheme has become unaffordable in the current economic climate.

2025/26 proposal

The proposed changes to the CTS scheme, for 'working age' claimants is set out in option 2 below.

Option 1

No changes are made to the existing CTS scheme. If this is the preferred option, members will need to identify £5m of savings elsewhere within the Council's budget. This may have a detrimental impact on other services given the significant savings that are already planned.

If the amendments to the Council Tax Support scheme are not approved by Full Council, the budget for 2025/26 will not be a legally balanced budget and will therefore the proposal will be to use £5m of reserves to cover the budget shortfall in 2025/26. As reserves can only be

used once, £5m will have to be added to the budget gap in the Medium Term Financial Strategy and 2026/27 budget setting process.

Option 2

- Introduce a standard 35% minimum payment for working age households and apply a percentage reduction to each of the income bands. This means all CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their CTS will then be calculated based on their income and this will determine which income band they fall into.
- Simplify the non-dependant charges and have just two flat rate non-dependant deductions for most households with other adults living in the property, £8 per week for non-dependants “out of work” and £20 per week for non-dependants “in work”. This would remove the need to verify income for non-dependants for CTS claims and reduce the administration burden.

Proposed Technical Administrative Changes

- Backdating will be restricted to 1 month.
- Accept Universal Credit notification from DWP as start date of claim for CTS.
- To increase/decrease the income bands in line with Consumer Pricing Index (CPI) from September of previous year.
- To increase/decrease the non-dependant charges in line with CPI from September of previous year.
- Review the section 13A policy for hardship fund for Council tax.

Other options that were taken into consideration that were not viable were:

- Minimum CTS award ranging from 20% to 65%.
- Maximum CTS to be capped to Band D
- Change the income bands.
- Apply a cap on a minimum award of CTS of £2/£5 per week.

The above options for various reasons were not viable as it would not give us the necessary savings needed, administratively wouldn't be efficient and households impacted by the proposed changes would be significantly higher.

The proposals were subject to an 8-week public consultation which ran from 21 October to 15 December 2024, details around the findings are captured in section B and separately as part of the consultation findings that report that will accompany the new Council Tax Support Scheme proposal pack. Following public consultation, a decision on the Council Tax Support Scheme for 2025/26 will be made in March 2025 by Cabinet and Council.

32. Who may be affected by this policy or proposal?

Total population of Council Tax Support Scheme claimants

As at 2024/25 there were 135,000 properties within the borough with a Council Tax liability. At that time, Brent had 25,692 households receiving CTS, showing that 19.03% of total taxpayers receive Council Tax Support.

Of the 25,692 households receiving CTS, the breakdown of impacted groups is as follows: 8428 pensioners and 16,833 are working age. This information is provided in greater detail below:

Breakdown of current CTS scheme customer profile			
Type of customer	Number	Yearly (£)	% of Total
Pensioner Scheme			
Pensioner	8428	£12,901,452.70	39.29%
Working-Age Scheme (Employed)			
Single Person No Dependants	2996	£3,018,733.87	9.19%
Lone Parents	2472	£2,241,297.48	6.83%
Couples with no Dependants	488	£582,135.86	1.77%
Couples with Dependants	2039	£1,926,144.02	5.87%
Working-Age Scheme (Not employed)			
Single Person No Dependants	5413	£6,963,607.76	21.21%
Lone Parents	2308	£3,288,646.65	10.02%
Couples with no Dependants	436	£689,629.31	2.10%
Couples with Dependants	681	£1,222,023.06	3.72%
Total	25,692	£32,833,670.71	100%

Breakdown of working age CTS Scheme customer profile by age

Age of Customer	Number	% of Total
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18 to 25	490	2.91%
26 to 35	2531	15.04%
36 to 45	4144	24.62%
46 to 55	4701	27.93%
56+	4967	29.51%
Total	16833	100%

Breakdown of working age CTS scheme customer by gender		
Gender of Customer	Number	% of Total
Female	9416	55.94%
Male	7195	42.74%
Unknown	222	1.32%
Total	16833	100%

<u>Breakdown of working age CTS scheme customer by ethnicity</u>		
<u>Ethnicity</u>	<u>Number</u>	<u>% of Total</u>
White	2272	32.45%
Black or Black British	2067	29.52%
Asian or Asian British	1225	17.50%
Arab	762	10.88%
Mixed Background	430	6.14%
Any Other Ethnicity	205	2.92%
Prefer not to say	41	0.59%

Note: The ethnicity data above is based on 42% of the CTS application having provided their ethnicity data. 58% of the application was unknown.

Breakdown of working age CTS scheme customer by disability	Number	% of Total
Not in receipt of disability benefit	10056	59.74%
In receipt of disability benefit	6777	40.26%
Total	16833	100%

Pensioner Households

Pensioners (of state pensionable age 66 and above) will not be impacted by the proposed changes. Pensioners remain protected as CTS is still controlled nationally for this age group

and can cover up to 100% of their CTS bill depending on the circumstances of the household. Therefore, there will be no impact on pensioners, or their council tax support awards and this group has not been considered as part of this equality impact assessment.

33. Is there relevance to equality and the council's public sector equality duty? Please explain why. If your answer is no, you must still provide an explanation.

Yes. This proposal will have a negative impact on all groups with protected characteristics and a disproportionate impact cannot be ruled out completely. Most CTS claimants are female, indicating a potential disproportionate effect by gender. People between the ages of 46 and 66 make up most claimants, indicating this age group are also more likely to experience a disproportionate impact. Several mitigation actions have been addressed below as part of the consultation feedback.

Although socio-economic status is not a protected characteristic, most claimants in receipt of working-age council tax support under the current scheme fall into the lowest income category and receive the highest level of support. As a result, lower income households are likely to be more negatively impacted by the change, and there may be a disproportionate socioeconomic implication to consider.

34. Please indicate with an "X" the potential impact of the policy or proposal on groups with each protected characteristic. Carefully consider if the proposal will impact on people in different ways as a result of their characteristics.

Characteristic	Impact Positive	Impact Neutral/None	Impact Negative
Age			X
Sex			X
Race			X
Disability			X
Sexual orientation			X
Gender reassignment			X
Religion or belief			X
Pregnancy or maternity			X
Marriage			X

35. Please complete **each row** of the checklist with an "X".

Screening Checklist

	YES	NO
Have you established that the policy or proposal <i>is</i> relevant to the council's public sector equality duty?	X	
Does the policy or proposal relate to an area with known inequalities?	X	
Would the policy or proposal change or remove services used by vulnerable groups of people?	X	
Has the potential for negative or positive equality impacts been identified with this policy or proposal?	X	

If you have answered YES to ANY of the above, then proceed to section B.

If you have answered NO to ALL of the above, then proceed straight to section D.

SECTION B – IMPACTS ANALYSIS

43. Outline what information and evidence have you gathered and considered for this analysis. If there is little, then explain your judgements in detail and your plans to validate them with evidence. If you have monitoring information available, include it here.

The current scheme pays CTS entitlement based on income brackets & non-dependant deductions. Under the current scheme, claimants; in some circumstances, can receive up to a 100% reduction on their Council Tax bill. Detailed equalities analyses have been made for the current scheme and found that the scheme impacts are in general spread evenly across protected and non-protected groups.

Currently, claimants must provide information around their age, gender, and disability status as this is requirement for processing claims. There are also optional fields for claimants to share their ethnicity/race. Hence, we have robust quantitative insights around these characteristics and not others.

To ensure we capture all characteristics, we will be changing our application form to ensure these are included.

Under the scheme's current design, a large number of claimants in receipt of working-age council tax support fall under the lowest income category and receive the highest amounts of support. Consequently, this is the group or income bracket where a significant proportion of the savings are required to be derived from. Therefore, whilst the intention remains that the impacts of this change are not disproportionately felt by any particular group there may be a disproportionate socioeconomic implication to consider due to lower income households being more negatively impacted by the change.

It is worth noting that there are also several statutory requirements that all local CTS schemes must be able to demonstrate (e.g. that they "incentivise work").

Once again, the intention is that impacts are not disproportionately felt by any group. This analysis considers the impacts of the proposed new scheme on groups of claimants with protected characteristics and discusses the policy intentions behind the scheme design

which may have resulted in these impacts, within the main part of the report and in its Conclusion.

There are two key changes as part of the proposed new scheme: -

1. All CTS claimants will be expected to contribute a minimum of 35% towards their Council Tax liability. Their Council Tax Support award will then be calculated based on their income and which band they fall into. All income band award percentages would be reduced as per table below:

Income per week between	Current Scheme	Proposed
£0-£80	100%	65%
£80-£110	80%	50%
£110-£150	50%	30%
£150-£250	30%	20%
£250+	0%	0%

2. A non-dependant deduction is an amount of money taken from Council Tax Support entitlement because there is a non-dependant adult living in the household. A non-dependant is someone aged 18 and over who normally lives within the household such as an adult daughter, son, relative or friend.

Non-dependant charges would be simplified to have either an £8 or £20 non-dependant charge based on whether non-dependant is in work or out of work as per the tables below.

These charges reflect the expectation that non-dependants contribute to the household expenses, including the council tax.

Current Scheme

<i>Non-dependent's income</i>	<i>Deduction per week</i>
Not working	£5
Working (includes Carer's Allowance income) - income up to £150 per week	£10
Working - income between £150 and £200 per week	£15
Working - income over £200 per week	£20

Proposed Scheme

Explanation	Proposed Non-Dependant Charge
Not In Work	£8
In Work	£20

Our current non dependant breakdown shows 2806 non dependants are not working and 1328 non dependants are working.

Consultation

The consultation outcome report has been published separately comprised of a more comprehensive set of findings. Key components emerging from the report are captured below.

A wide variety of methods were used as part of the Consultation process with the aim of ensuring the approach was inclusive of all groups including those claimants and non-claimants of CTS.

Overall, there were 397 responses to the consultation of which 176 were currently in receipt of CTS. Although the number of responses was low in comparison with the volume of communications that were issued, this appears to be above the national response level experienced by the majority of Councils who have consulted since the introduction of CTS and is also a higher level than when the last CTS consultation was undertaken in 2019 when only 194 were received.

In relation to high level information around the characteristics of the respondents (see more detail in the full report):

- Age: most respondents were aged 31-40 (24.9%), 41-50 (24.9%), 51-60 (22.6%), 60+ (14.2%).
- Sex: Female (50.4%); Male (38.3%).
- Ethnicity: White British (23.2%), prefer not to say (20.3%), Asian/ / Asian British / Indian (12.3%), White European (9.2%), Black / Black British / African (7.7.%), Black / Black British / Caribbean (7.5%).
- Religion: Christian (25.9%), prefer not to say (25.2%), no religion (23.7%), Muslim (13.1%), Hindu (7.4%).
- Sexual orientation: Heterosexual / straight (67.9%), prefer not to say (24.5%).

The Council followed best practice guidelines by undertaking an 8-week public and stakeholder consultation, between 21 October 2024 and 15 December 2024. Consultation activities included: -

- Questionnaire on Council website promoted via email and letter to all claimants, and all other households.
- Direct engagement by email and letter with Brent Hub partners and CAB with offer to attend dedicated meetings with each organisation.
- Direct engagement by email and letter with partners with offer to attend dedicated meetings with each organisation.
- Direct engagement with the Greater London Authority, Citizens Advice, Disability Forum, and Community event with Adult Social Care
- Drop-in sessions (in all 6 Libraries across the borough)

- Banners in Customer Service Centre, Libraries and at all events.
- Leaflets with consultation link and barcode to respond to consultation.
- Help to complete consultation available at all public buildings e.g. Customer Service Centre, Hubs, Turning point.
- Stakeholder forums to obtain feedback and input from voluntary sector and community organisations.
- Mailbox set up for CTS-related comments and queries.
- Promoting consultation via auto reply message for Council Tax & CTS emails
- Direct engagement by attend Brent Connect meetings.
- Consultation published in the voluntary sector newsletter.
- Face to face engagement in the Customer Service Centre
- Staff engagement

Appendix A captures the impact of the proposed scheme changes by equality characteristics. This has been further broken down into households with and without a non-dependant. This is to demonstrate the varying impact on those households affected by one or both of the proposed scheme changes.

Socio-economic deprivation

As socio-economic deprivation is not captured in section B.2 this provides a brief outline of implications around this characteristic.

The Equality Act 2010 includes a socio-economic duty (section 1) which states that certain public bodies, when making strategic decisions, must consider how their decisions might help to reduce the inequalities associated with socio-economic disadvantage. However, the UK Government has not implemented Section 1 in England and the duty remains non-binding in England.

Council Tax Support in the main is targeted at households that are financially disadvantaged to support the payment of Council Tax and therefore any change to this scheme is expected to have a negative impact on households that are socio-economically disadvantaged.

In relation to the consultation, respondents who claim benefits were significantly less likely to agree with the proposals than respondents who do not claim benefits. Across all six proposals, respondents who claim benefits were more likely to disagree (than agree) that the Council should implement the change.

When asked to identify the potential negative impact on their households, respondents raised concerns that increases in the amount of council tax due would exacerbate existing financial strains, result in heightened debt, increased poverty, and compromises in meeting essential needs, and negatively impact on overall quality of life and mental health. Respondents also raised concerns about the inability to pay council tax without sacrificing other necessities such as food and heating.

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,

b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

44. For each “protected characteristic” provide details of all the potential or known impacts identified, both positive and negative, and explain how you have reached these conclusions based on the information and evidence listed above. Where appropriate state “not applicable”.

AGE

<p>Details of impacts identified</p>	<p>The proposed change will impact negatively on working age CTS claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.</p> <p>This proposal would mean working age claimants would have an estimated additional £9.15 on average per week to pay in Council tax.</p> <p>However, within the scope of the 2025/26 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts. The assessment will be similar to the Resident Support Fund discretionary award looking at households circumstances e.g. flood, fire, terminal illness, financial support through Credit Union, debt advice and income maximisation.</p> <p>Evidence: At present approximately 66.64% of Council Tax Support claimants are working age and 33.36% are pension age.</p> <p>For comparison, the working age population (18 – 66 years) in Brent is approximately 86.83% and the pension age population (67 and over) is 13.17%.</p> <p>The proposed changes mean that all working age CTS claimants for the purposes of the scheme will have to pay at least 35% towards their Council Tax.</p> <p><u>Pensioners</u> (those at state pension age)</p> <p>Pensioners are a protected group (prescribed by central government) for the purposes of the council tax support scheme so will not be financially affected; all changes in CTS entitlement affect only working age claimants.</p> <p><u>Working age</u></p> <p>The data shows that those claimants aged 56 or above (29.51%) are more likely to be affected by the proposals compared to those aged 18 to 25 and 26 to 35 (2.91% and 15.04% respectively).</p>
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	<p>When compared to the total borough working age population aged 56 or above (14.49%), the number is almost double for those in receipt of CTS (29.51%). This proposal is therefore more likely to have an impact on this group.</p>
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DISABILITY

<p>Details of impacts identified</p>	<p>If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.</p> <p>Support is also in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Pension age Council Tax Support claimants are not affected by these proposals.</p> <p>It is worth noting that 774 households who have adaptations made to their property receive disabled relief for their Council tax. This means their Council tax band is reduced by a band e.g. someone is Band D, who receives a disabled relief has their liability reduced to Band C.</p> <p>Evidence: In terms of Council Tax Support, disabled claimants are defined as people who receive Personal Independence Payment, Disability living allowance, Attendance Allowance or Universal Credit- Health allowance.</p> <p>The data shows that 44.96% of CTS scheme working age claimants are in receipt of disability related benefits and will be directly affected by the proposals.</p> <p>The Council recognises the barriers disabled people face and seek to address them by disregarding Disability Living Allowance, Universal Credit Health allowance awards, and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to.</p> <p>Currently, there are premiums for severe disability, enhanced disability, and a disabled child rate. Such premiums are granted when Housing Benefits applicants receive a relevant disability related benefit granted and administered by the Department for Work & Pensions.</p> <p>Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 35% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.</p>
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RACE

<p>Details of impacts identified</p>	<p>Our data shows that BAME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support. There could be a negative impact of the proposals on people from Black, Asian, and Minority Ethnic (BAME) groups.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by ethnicity/race and for Benefits claimants where they have supplied this information.</p> <p>The data indicates that the largest ethnic group of claimants for CTS are White at 25.07% which is below the total White borough working age population of 34.6%. BME people make up 51.75% of claimants which is below the total BME borough working age population of 65.4%.</p> <p>As data is unavailable for 58% of claimants and the race breakdown is not provided, it is not possible to analyse the impact with any statistical significance.</p>
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SEX

<p>Details of impacts identified</p>	<p>Due to the fact that only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.</p> <p>However, equalities monitoring indicates that a higher percentage of claims (55.94%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers, and carers are more likely to be women. According to our working-age Council Tax Support data women make up 94.33% of lone parents in receipt of Council Tax Support.</p> <p>The proposals are therefore considered to have a disproportionate impact on women.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship because of these proposals in order to mitigate any negative impacts.</p> <p>Evidence: The table above (see point 2) shows the figures for the breakdown of Brent by gender where they have supplied this information.</p>
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SEXUAL ORIENTATION

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of sexual orientation.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
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PREGANCY AND MATERNITY

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>The proposed changes to the Council Tax Support Scheme may negatively impact people who are pregnant or who have recently had a baby. In particular, the proposal to increase the minimum payment. This group may have less ability to increase their income, for example by increasing hours at work due to childcare responsibilities.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
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RELIGION OR BELIEF

<p>Details of impacts identified</p>	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of religion.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
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GENDER REASSIGNMENT

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of gender reassignment.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
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MARRIAGE & CIVIL PARTNERSHIP

Details of impacts identified	<p>We do not collect regular information on this characteristic, and it is not required to process, administer and monitor the Local Council Tax Support Scheme. Therefore, there is less information available to detail the impacts on this characteristic when compared to age, disability, race, and sex.</p> <p>That said, the proposed changes to the Council Tax Support scheme are not expected to have a differential impact on the grounds of marriage and civil partnership.</p> <p>As the updated scheme is implemented, we will continue to monitor any implications for specific characteristics and will adapt accordingly.</p>
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45. Could any of the impacts you have identified be unlawful under the Equality Act 2010?

The impacts identified in this EIA are not unlawful under the Equality Act, as the changes to the Council Tax Support scheme apply universally and are not explicitly targeted at any specific group.

The Act requires public bodies to have due regard to the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different groups. Disproportionate impacts on protected groups must be justified to show they are a proportionate means of achieving a legitimate aim. As such, this EIA includes:

1. A justification for the changes, showing that they are necessary and proportionate.
2. An explanation of measures available to minimise or address the disproportionate impacts, including the Council Tax Discretionary policy to enable the Council to consider cases of hardship.

3. A commitment to ongoing monitoring and engagement with affected groups to ensure compliance with equality obligations.

The proposed changes to the council tax support scheme are expected to have a disproportionate negative impact on working age adults, people with a disability, women, people who are pregnant or in the maternity period, people from an ethnic minority group and people who are socio-economically disadvantaged, and any particular disadvantage is justified for the reasons set out above in this report. The Council is pursuing the legitimate aim of balancing the Council's budget in the context of the anticipated required savings, so that the Council can continue to deliver statutory services. With uncertain Government funding, economic conditions, increasing demand for services and a forecast significant reduction in reserves the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are proportionate in light of those budgetary pressures, given the steps taken to limit council tax payments for these groups, and the mitigating measures set out below. This proposal asks all residents to contribute towards Council services that they benefit from. For the same reasons, the Council considers that reasonable adjustments have been made in the revised scheme and mitigating measures to limit any disadvantage suffered by disabled persons. Given the need to make savings and balance the budget, it is not reasonable to go further and reduce still further the council tax that should be paid by this cohort.

The need to advance equality of opportunity between people who share and people who do not share a relevant protected characteristic.

As highlighted above, most working-age claimants will be required to contribute more towards their council tax. Claimants would therefore be expected to have reduced disposable income which may mean they are less able to participate in public life and community activities, for example leisure activities, groups, clubs, and organisations.

The need to foster good relations between people who share and people who do not share a relevant protected characteristic.

We do not anticipate that the proposals will have any impact on the Council's ability to foster good relations.

46. Were the participants in any engagement initiatives representative of the people who will be affected by your proposal and is further engagement required?

Yes, directly as part of the overall consultation exercise on the council's budget proposals. Secondly as part of an 8-week public consultation which includes contact with all current benefit claimants as well as other households, voluntary groups, and stakeholders.

Stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Council Tax Support Claimants	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Local interest groups have been contacted and drop-in sessions arranged/offered e.g. HUB partners, Brent Connect, Voluntary Organisations, Members of Disability forum etc.	<p>These groups may work with the affected claimants and will need to have the right information to provide support and advice.</p> <p>Drop-in session across all Brent Libraries were publicised on our website and correspondence to claimants.</p>
Brent households	Not implementing the scheme may put increased financial pressures on other Council services which may have an impact on some Brent households.
Heads of Revenues and Benefits	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process.
Corporate Director of Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Chief Executive	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Cabinet Member for Finance	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Council Cabinet	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of the scheme is providing value for money to the council and Brent households.
Leader of the Council	To ensure any changes to the scheme are applied in a fair and transparent manner following a full consultation process and that the administration of

	the scheme is providing value for money to the council and Brent households.
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The feedback and findings from the consultation exercise will be published in a report to Full Council in February 2025.

47. Please detail any areas identified as requiring further data or detailed analysis.

Prior to Full Council determining the final scheme design in February 2025, the EIA will be reviewed and updated if appropriate.

48. If, following your action plan, negative impacts will or may remain, please explain how these can be justified?

The proposed changes to the current CTS scheme will have a disproportionate impact on low income working age households because CTS support is designed for low income working age households.

Any disadvantage is justified for the reasons set out in the consultation paper. The Council is pursuing the aim of reducing the Council’s budget gap of £16m for 2025/26 so that the Council can continue to deliver key statutory services. With uncertain funding from central Government, high inflation over the past 2 years, increasing demand for services and a forecast reduction in reserves, the Council has had to consider a range of options to bridge the funding gap and enable us to set a balanced budget and continue to deliver statutory services. The proposals are considered proportionate considering the budgetary pressures being faced by the Council. Working-age claimants will be required to contribute towards their Council Tax. The increased cost may mean claimants are less able to participate in public life and community activities.

The consultation collective comments and suggestions to the proposal are listed below:

- Lower the Minimum Payment: Reducing the current 35% minimum council tax payment, one of the highest in the UK, would help alleviate financial pressure on residents.
- Recognise Financial Vulnerability: Eligibility for CTS already indicates financial hardship and should be considered before enforcement actions are taken.
- Expand Discretionary Support: Making greater use of the Council Tax Discretionary Reduction Policy could offer critical relief to those most in need.
- Enhance Awareness of Support: The council could further refine and promote available support options for residents struggling with council tax bills.

Maintain Flexible Backdating Rules: Retaining the current backdating policy, which allows claims to be backdated to the start of the financial year for valid reasons, would ensure continued support for vulnerable residents. Having considered all above, in terms of mitigations, if anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The

Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax charge

The Council operates through its Community Hubs, Libraries and Family Well-being Centres a holistic approach to welfare, financial support, and income maximisation for its households. This includes debt and budgeting advice. It will ensure that households who approach our services are advised appropriately and provided the correct financial support to avoid further debt.

The Council through its referral routes with voluntary partners and external organisations will proactively reach out to them providing additional support and signposting appropriately. Our strong relationship with the Health and Wellbeing teams, social prescribers and Adult Social Care teams will allow the Council to provide support for households struggling to pay and need financial aid.

Maintaining the Cost-of-Living information on the Council website to provide residents with information on help with housing costs, debts and bills, extra income, saving energy and help with food.

Working with voluntary and community sector organisations to promote the Hardship Fund. Supporting residents to maximise the application of council tax regulations, where reductions are based on circumstances that are not financial but based on non-financial circumstances e.g., disabled relief (based on adaptations to the property that can reduce the council tax liability to the equivalent to one band lower) and severely mentally impaired exemptions (based on doctor's certification and the award of appropriate disability benefits).

These are sometimes not claimed where Council Tax Support based on financial circumstances are claimed so these options may now become more beneficial to mitigate the impact in the reduced support. The Council will work with relevant voluntary groups and the Learning Disability Partnership Board to improve awareness and take up of these provisions.

Maintaining the principle that the Council Tax Support financial assessment for those with disabilities is based on higher applicable amounts and premiums (the Government assessment of need). This results in a higher award of Council Tax Support when compared with a household with no disability. Similarly, if in receipt of Universal Credit or legacy passported benefits such as Income Support, Income based

There is also a discretionary element to the proposed scheme, whereby the Council Taxpayer's liability may be reduced further if they are experiencing exceptional hardship or are impacted by extraordinary circumstances.

These reductions are made under Section 13A(1)(a) and (2) of the Local Government Finance Act 1992 (the 1992 Act) to:

- a) A person whom the authority considers to be in financial need,
- b) Or persons in classes consisting of persons whom the authority considers to be, in general, in financial need.

The proposed Council Tax Support scheme has been reviewed for its effect on groups with protected characteristics under the Equality Act, and a detailed Equalities Assessment has been prepared and is included in Appendix C

49. Outline how you will monitor the actual, ongoing impact of the policy or proposal?

CTS caseload and expenditure will be monitored monthly during 2025/26.

Impacts on groups with protected characteristics will be monitored, through Council Tax Collection rates, Section 13A Discretionary applications and issues raised by households.

The Council is required to review its CTS scheme each year and to agree its scheme for the following year by 11 March of the preceding financial year. The scheme review for 2025/26 will include a full refresh of the EIA to establish whether there have been any unforeseen impacts which require addressing for 2026/27.

SECTION C - CONCLUSIONS

Based on the analysis above, please detail your overall conclusions. State if any mitigating actions are required to alleviate negative impacts, what these are and what the desired outcomes will be. If positive equality impacts have been identified, consider what actions you can take to enhance them. If you have decided to justify and continue with the policy despite negative equality impacts, provide your justification. If you are to stop the policy, explain why.

The council has taken care to review and update the CTS Scheme and to ensure that it is simple, efficient and has regards to the requirements made under the Government's statement of intent.

The proposal to introduce a minimum award amount has been developed to deliver a simpler, less administratively burdensome CTS scheme while reducing the overall cost of the scheme.

The proposal to have two flat rate non-dependant deduction is to reduce the administrative burden, however this will have an indirect impact on the applicant as it is assumed that the non-dependant will increase their contribution towards the Council Tax bill.

If anyone affected by the changes is struggling to afford the increase in their Council Tax charge, they would be able to approach the council for financial assistance. The Council proposes to set aside £1.5m to further support households under the Section 13A Discretionary Policy, where justified this will mean reducing households' council tax liability to zero.

The proposed changes will not affect pensioners. This is mandatory as legislation prescribes that CTS schemes in respect of pensioners must adhere to one national scheme.

This proposal will deliver £5m of savings to the Council's budget from 2025/26, which will help to protect front line services such as adult social care and children's services from further significant reductions.

The council is proposing to make these changes which will be adopted 1 April 2025 and will be in place for the duration of 2025/26, during which time its impact will be monitored.

SECTION D – RESULT

Please select one of the following options. Mark with an “X”.

A	CONTINUE WITH THE POLICY/PROPOSAL UNCHANGED	
B	JUSTIFY AND CONTINUE THE POLICY/PROPOSAL	X
C	CHANGE / ADJUST THE POLICY/PROPOSAL	
D	STOP OR ABANDON THE POLICY/PROPOSAL	

SECTION E - ACTION PLAN

This will help you monitor the steps you have identified to reduce the negative impacts (or increase the positive); monitor actual or ongoing impacts; plan reviews and any further engagement or analysis required.

Action	Expected outcome	Officer	Completion Date
Public and stakeholder consultation	Better understand potential impacts and incorporate mitigating actions for negative impacts.	Peter Cosgrove/ Asha Vyas/Sunita Ghudial	15 December 2024
Ensuring that changes to the scheme are communicated in an accessible way to claimants with an information or communication need e.g. caused by a disability or language barrier.	That claimants with information or communication needs are assisted where necessary so that they fully understand the change and any potentially potential impacts; and that they are less likely to fall into Council Tax arrears as a result.	Peter Cosgrove/ Asha Vyas/ Sunita Ghudial	January – March 2025
Ensure that the discretionary aspect of the new scheme is utilised	Officers identify and promote the discretionary aspect where appropriate.	Peter Cosgrove / Asha Vyas/	April 2025 – March 2026

<p>where appropriate to prevent hardship. This includes ensuring that staff training equips officers with the awareness to identify where a discretionary payment may be appropriate, and how such requests should be assessed.</p>	<p>Claimants in hardship are given additional assistance where appropriate.</p> <p>Claimants are less likely to fall into Council Tax arrears and have action taken against them through no fault of their own.</p> <p>Claimants do not suffer from unforeseen consequences arising from the change to the new scheme.</p>	Sunita Ghudial	
<p>To investigate opportunities to improve equality monitoring data in the future and to use this to inform decisions about scheme design in future years</p>	<p>To further improve the design of any future scheme based on additional data and impact analysis</p>	Sunita Ghudial / Asha Vyas	April 2025 ongoing
<p>To closely monitor the impacts of the new scheme on claimants; expenditure; Council Tax collection and age debt analysis and complaints and other indicators, particularly during the first year of operation</p>	<p>To further improve the design of the scheme in future years based on additional data and impact analysis.</p>	Sunita Ghudial / Peter Cosgrove/Asha Vyas	April 2025 – March 2026 and ongoing

SECTION F – SIGN OFF

Please ensure this section is signed and dated.

OFFICER:	Sunita Ghudial
REVIEWING OFFICER: <i>* The manager with oversight of the</i>	Tom Pickup/Asha Vyas
Operational Director:	Thomas Cattermole