

Appendix D - Equality Impact Assessment (EQIA) Baseline

Stage 1: The proposed change that is being assessed and responsibility for the EQIA

Name of the proposed change	Review of Council Tax Support Scheme (CTS) 2027-28
Purpose of proposed change	To consult on potential changes to the current CTS scheme.
Is this a change to a policy, practice or service?	Potential change to the CTS policy.
Who has senior level responsibility for the proposed change?	Conrad Hall, Corporate Director of Resources and Section 151 Officer
Who is completing this assessment?	Catherine Black, Head of Payments, Revenues, Benefits and Debt
Indicate where your EQIA will be submitted to including date where known:	This is a baseline EQIA which will be completed following statutory consultation and then considered as part of any changes to the current CTS scheme (which would be considered by Full Council in February 2027).

Stage 2: Deciding what relevance the proposed change has for equality

Is the proposed change likely to impact on any of the following? <i>If there is no equality relevance for either go to Stage 7 and get sign off</i>	☒ Communities ☐ Employees
Is the impact on equality low, medium or high?	The impact will depend on the scope of any changes implemented.
Summary of EQIA outcome:	

Stage 3: Describe how the proposed change might impact on the council's ability to undertake the [Public Sector Equality Duty](#) (N.B. this can be both positive or negative):

Eliminating discrimination, harassment, victimisation	The details of any change are not yet known.
Advancing equality of opportunity	The details of any change are not yet known.
Fostering good relations	The details of any change are not yet known.

Stage 4: What evidence has been considered and what consultation has been carried out?

Data and evidence	Census data from 2021 has been used to give an indication of the demographics of Croydon to give wider context of the population. Where it is available we have also used data derived from our current CTS caseload to give a breakdown of which cross section of residents have a current claim. Benchmarking has also been completed to review how other London boroughs operate their Council Tax Support schemes.
Consultation	Consultation must occur on any option required to change the scheme prior to introduction, and is set out in Schedule 1A (3) of the Local Government Finance Act 1992: Consult any major precepting authority which has power to issue a precept to it; publish a draft scheme in such a manner as it thinks fit; and consult such other persons as it considers are likely to have an interest in the operation of the scheme. Consultation will be carried out with existing claimants of CTS, as well as residents, third party organisations and charity organisations within the borough. We will set up an online portal that explains the proposed changes and allows people to comment and leave feedback, also have paper versions available at libraries, and provide information on the Council's website.

Stage 5: Identify any adverse or positive impact and mitigation steps that can be or have been taken

Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact
Use the key below to score the level of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.	1 = Low 2 = Medium 3 = High
The score for likelihood and level of impact are then multiplied.	e.g. Unlikely to impact =1, Low impact =1, total score =1

Characteristics		Likelihood of impact	Level of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
Protected Characteristics (Equality Act 2010)	Age				Any changes would affect only working age residents. Pension age residents are not impacted since there is a nationally prescribed scheme for pensioners. According to the 2021 census, the population in Croydon has grown to 390,719 from 363,400 in 2011. 67% of all residents are between the ages of 15 and 64 years old, and 14% are aged over 64. The age breakdown for the borough, according to the 2021 census is as follows:	

Characteristics		Likelihood of impact	Level of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**												
					<table><tr><td>Age</td><td>2021 Census Estimates in Croydon</td><td>2021 census age breakdown of total population</td></tr><tr><td>0-15</td><td>19.3%</td><td>17.4%</td></tr><tr><td>15-64</td><td>67%</td><td>64.2%</td></tr><tr><td>64+</td><td>13.6%</td><td>18.4%</td></tr></table> 70% of all CTS claimants are of working age. The mean age of the current working age claimants is 46 years old, with a large concentration between 36-57 years old.	Age	2021 Census Estimates in Croydon	2021 census age breakdown of total population	0-15	19.3%	17.4%	15-64	67%	64.2%	64+	13.6%	18.4%	
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	Disability				There are options being considered that could reduce support to those residents in receipt of disability benefits. Moving away from 100% CTS award could impact those who potentially have limited capability to increase income, and who might have additional costs as a result of their disability. 49.6% of all CTS claimants are in receipt of a disability benefit.													

Characteristics		Likelihood of impact	Level of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*	If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**																			
	Gender Reassignment				We do not hold data on this for current claimants but there are no options that would specifically affect this group.																				
	Marriage or Civil Partnership				Although we do not hold data specifically indicating marriage/civil partnerships we do hold data on whether claims are made by a couple living together. Of the working age caseload 87% are from households where no partner is recorded.																				
	Pregnancy and Maternity				We currently have 100 active claims where the claimant or partner are in receipt of maternity pay which is recorded on our system. We do not record if someone is pregnant at the time of application.																				
	Race				As part of the application process we ask people for their Ethnicity and 62% of current claimants answered this question. The current position is: <table><tr><td>Asian or Asian British: Bangladeshi</td><td>1%</td></tr><tr><td>Asian or Asian British: Indian</td><td>1%</td></tr><tr><td>Asian or Asian British: Pakistani</td><td>2%</td></tr><tr><td>Asian or British: Any other Background</td><td>2%</td></tr><tr><td>Black-Black British: African</td><td>10%</td></tr><tr><td>Black-Black British: Caribbean</td><td>11%</td></tr><tr><td>Black-Black British: Other</td><td>2%</td></tr><tr><td>Chinese</td><td>0.1%</td></tr><tr><td>Mixed: Any other mixed background</td><td>2%</td></tr><tr><td>Mixed: White and Asian</td><td>1%</td></tr></table>	Asian or Asian British: Bangladeshi	1%	Asian or Asian British: Indian	1%	Asian or Asian British: Pakistani	2%	Asian or British: Any other Background	2%	Black-Black British: African	10%	Black-Black British: Caribbean	11%	Black-Black British: Other	2%	Chinese	0.1%	Mixed: Any other mixed background	2%	Mixed: White and Asian	1%
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Characteristics		Likelihood of impact	Level of impact	Impact score	Summary of impact (positive, negative, no impact or unknown)*		If negative or unknown, what can be or has been done to mitigate this? Please provide clear actions and timelines.**
					Mixed: White and Black Caribbean	3%	
					White: Any other White background	6%	
					White: British	19%	
					Not Known	38%	
	Religion or Belief				We do not hold data on this for claimants.		
	Sex				71% of all working age claimants are women. There are options to reduce the support to single parents and 94% of all single parent claimants are women.		
	Sexual Orientation				We do not hold data specifically on the sexual orientation of claimants, however of the claims with a partner present 0.6% are same sex couples.		

Stage 6: What is the outcome of your assessment? Select one of these four options:

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the proposed change is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, ensure you have completed Section 5 above.	
Continue the proposed change despite potential for adverse impact	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, there are justifiable reasons to continue as planned. If you reach this conclusion, ensure you have completed Section 4 above, clearly setting out your justifications.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Stage 7: EQIA Monitoring and Sign Off

How will the EQIA be reviewed and monitored, including timescales?			
Equalities advice received from:		Date:	
EQIA approved by:		Date:	