

Tameside Metropolitan Borough Council Equality Impact Assessment Form



Subject / Title	Council Tax Reduction Scheme (Council Tax Support Scheme)
Project Lead Officer (Name and Job Title)	Amanda Chadderton, Head of Service
Assistant Director / Director	Ashley Hughes
Department	Exchequer Services
Directorate	Resources

EIA Start Date	EIA Completion Date
May 2024	November 2024

This Equality Impact Assessment template contains collapsible advice and instructions. **Whenever you see a triangle pictured here, ► click on it to reveal or collapse advice and instructions.**

PURPOSE OF THE EQUALITY IMPACT ASSESSMENT

An Equality Impact Assessment (EIA) aims to examine whether a proposal will contribute to or alleviate inequalities in Tameside through assessing the potential impacts the proposal may have on people with ‘protected characteristics’. (A ‘proposal’ here includes any strategy, policy, service change, or project).

‘Protected characteristics’ are attributes that people have or experiences that people may go through which can result in marginalisation or disadvantage. Under the Equality Act 2010, there are nine legally mandated protected characteristics to consider:

- Age
- Sex
- Race (including colour, nationality, and ethnicity)
- Religion or belief
- Disability
- Sexual orientation
- Gender identity¹

¹ We have rearticulated ‘gender reassignment’ under the Equality Act 2010 as ‘gender identity’. An explanation for this is given in the definitions of protected characteristics in STEP FIVE.

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- Pregnancy and maternity
- Being married or in a civil partnership

Tameside Council has classified further characteristics as protected, referred to as 'extra protected characteristics'. These are below:

- Carers
- Cared for Children and Care Leavers
- Ill Mental Health
- Neurodivergence
- Socio-Economic Disadvantage

Conducting an Equality Impact Assessment based on these protected characteristics will aid compliance with the Public Sector Equality Duty (Equality Act 2010, section 149), which requires that all public bodies pay 'due regard' to the three general aims of the Public Sector Equality Duty:

- Page 150
- 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

Having 'due regard' involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low

EQUALITY IMPACT ASSESSMENT CORPORATE STANDARDS

Due to the important ethical and legal aims of the Equality Impact Assessment (EIA), there are several corporately agreed criteria which should be fulfilled when completing EIAs:

- An EIA is required for all formal decisions that involve changes to service delivery. For all other proposals, an EIA must be considered.
- The decision as to whether an EIA is undertaken rests with the Project Lead Officer in consultation with the appropriate Assistant Director / Director where necessary. Where an EIA is not completed, the reason(s) for this must be detailed within the appropriate report.

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- EIAs must be timely and completed alongside the development of any proposal. The findings of any potential detrimental or inequitable impact that may occur through the implementation of the proposal on residents, service users, or staff must be brought to the attention of the decision maker in the accompanying report. Appropriate mitigations must be integrated into the development of the proposal.
- EIAs should be carried out by at least two people. Guidance from case law indicates that judgements arrived at in isolation are not consistent with showing 'due regard' to the necessary equality duties.

INITIAL SCREENING

Step 1: Summarise the proposal

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Purpose:	<p>The Council is required to review its scheme for working age each year. There are a number of issues with the current scheme that need addressing if the system is to continue to provide effective support to low-income taxpayers and also if the Council is able to provide the service in an efficient manner. The main issues are as follows:</p> <ul style="list-style-type: none"> • The need to assist low-income households and assist in the collection of Council Tax; • The introduction of Universal Credit for working age applicants; and • The need for a simplification of the scheme <p>In view of the problems being experienced with the current scheme, it is proposed that an alternative approach be taken from 2025/26. The approach has been to fundamentally redesign the scheme to address all of the issues with the current scheme and in particular;</p> <ol style="list-style-type: none"> (a) The level of support available to the poorest households; (b) The problems with the introduction of full-service Universal Credit; and (c) The significant increase in administration costs due to the high level of changes received in respect of Universal Credit. <p>Pension age applicants for CTR will not be affected by this change.</p>
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1a.	Proposal Title:	Council Tax Reduction Scheme. (Council Tax Support Scheme)
1b.	Proposal Aims:	To implement a new simplified Council Tax Reduction Scheme (Council Tax Support Scheme)
1c.	Context:	Requirement to ensure that the Council Tax Reduction Scheme (Council Tax Support Scheme) for working age is fit for purpose and provides the necessary support.
Page 1 of 52	Stakeholders:	<p>Working age taxpayers who are on a low income and who apply for Council Tax Reduction Scheme (Council Tax Support Scheme).</p> <p>Existing applicants who receive Council Tax Reduction (CTS);</p> <p>Council Taxpayers generally; and</p> <p>Major Precepting Authorities.</p>

Step 2: Impact Analysis – identify the impacts

Purpose:	To identify potential impacts the proposal may have on people with protected characteristics.
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SEE INSTRUCTION:

Each potential impact can be classified as ‘direct’ or ‘indirect’.

A **direct impact** occurs when the proposal is targeted at a particular group. For example, if libraries closed down children’s areas, this would directly impact children under ‘Age’.

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An **indirect impact** occurs when the proposal is more general or universal, but it has a knock-on effect on people with particular protected characteristics. For example, if a pelican crossing is removed due to construction or highway changes, this would indirectly impact people with disabilities ('Disability'), the elderly ('Age'), people with children or who are pregnant ('Pregnancy/Maternity').

If a detrimental direct or indirect impact is identified, an appropriate **mitigating action** should be integrated into the development of the proposal. A mitigating action is an adjustment to the proposal that will reduce or minimise the impact. This is covered in STEP SIX of the EIA Process.

The Impact Analysis is separated between two steps: STEP TWO (here) and STEP FIVE (below). In this step:

- State whether any direct or indirect impacts have been identified under each protected characteristic.
- List the impacts identified under each protected characteristic.
- Identify whether a mitigation action is required.

There is **no requirement** at this stage to provide the detailed evidence about each impact or identify specific mitigating actions.

When identifying impacts, think about:

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- Information and intelligence you have access to (e.g. data that is publicly available)
- Experiences and knowledge of residents and service users
- Experiences and knowledge of colleagues, including frontline staff
- Experiences in other local boroughs, particularly Greater Manchester and statistical neighbours
- Research reports from think tanks, academia, government organisations, and charities
- **'Multiple marginalisation'** – how the proposal may impact people with combinations of protected characteristics (e.g. Age and Race/Ethnicity) rather than consider each protected characteristic singularly. A proposal may impact people with one combination of protected characteristics more than another combination of protected characteristics. For example, moving a service from physical to digital provision may detrimentally affect elderly people of Bangladeshi backgrounds more than elderly people of a White British background.

Protected Characteristic	Direct Impact	Indirect Impact	Mitigation Required
<i>Select yes or no from the drop-down list in each box to identify whether any direct or indirect have been identified under each protected characteristic, and also select yes or no to determine whether a mitigating action is required. Subsequently, list these impacts in the grey box under each protected characteristic.</i>			
Age	Yes	Yes	Yes

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	Working age applicants will be affected. Applicants who are of pension age will not be affected as their scheme is prescribed by Central Government.		
Sex	No	Yes	No
	In all schemes , in all LAs, there is a majority of female applicants (to a greater or lesser extent). The change in scheme is not directly targeted on the sex of the applicant.		
Race (including colour, nationality, and ethnicity)	No	No	No
	The proposed change to the scheme will have no differential impact due to race		
Religion or Belief	No	No	No
	The proposed change to the scheme will have no differential impact due to religion or belief		
Disability	No	No	No
	The proposed change to the scheme will have no differential impact due to disability, the proposed scheme is designed to continue to protect the disabled by disregarding disability benefits such as Disability Living Allowance and Personal Independence Payments. The scheme will also further protect disabled applicants as it will provide a further income disregard per week which will reduce the level of income taken into account when calculating any support. The scheme will disregard the Limited Capability for Work / Work Related Elements of Universal Credit.		
Sexual Orientation	No	No	No
	The proposed change to the scheme will have no differential impact due to sexual orientation		
Gender Identity	No	No	No
	The proposed change to the scheme will have no differential impact due to religion or belief		
Pregnancy/Maternity	No	No	No
	The proposed change to the scheme will have no differential impact due to pregnancy or maternity		
Marriage/Civil Partnership	No	No	No
	The proposed change to the scheme will have no differential impact due to marriage / civil partnership		
Carers	Yes	No	No
	The proposed change to the scheme will have a beneficial impact for carers as the new scheme will provide additional disregards to carers allowance or carers element where in receipt of Universal Credit.		
Cared for Children and Care Leavers	No	No	No
	The Council provides assistance to Care Leavers through Council Tax LGFA 1992 S13A1C		
Ill Mental Health	No	No	No
	The proposed change to the scheme will have no differential impact due to ill mental health, the proposed scheme is designed to continue to protect the disabled by disregarding disability benefits such as Disability Living Allowance and Personal Independence Payments.		

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	The scheme will also further protect disabled applicants as it will provide a further income disregard per week which will reduce the level of income taken into account when calculating any support.		
Neurodivergence	No	No	No
	The proposed change to the scheme will have no differential impact due to disability, the proposed scheme is designed to continue to protect the disabled by disregarding disability benefits such as Disability Living Allowance and Personal Independence Payments. The scheme will also further protect disabled applicants as it will provide a further income disregard per week which will reduce the level of income taken into account when calculating any reduction.		
Socio-Economic Disadvantage	No	No	No
Multiple Marginalisation	No	No	No

Step 3: Initial Screening Sign Off

Purpose:	To determine whether a proposal should proceed from the Initial Screening to the Full Equality Impact Assessment.
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SEE INSTRUCTION:

A full Equality Impact Assessment should be undertaken when:

- There is a formal decision relating to changes in service delivery
- A detrimental impact against a protected group has been identified, irrespective of whether the impact is direct or indirect
- There are substantial, important gaps in knowledge that prevent proper consideration of the proposal’s potential impacts

Sign off is only required if the Initial Screening does not proceed to the Full Equality Impact Assessment.


1e.	Does the proposal require a full EIA?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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1f.	If you are not undertaking a full EIA, please provide justification as to why not.	
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Page 156 This initial screening has been completed by the EIA Lead Officer:	Name:	Amanda Chadderton
	Signature:	
	Department:	Exchequer Services
	Date:	18 November 2024
This Initial Screening has been checked by the Assistant Director / Director:	Name:	Ashley Hughes
	Signature:	
	Department:	Resources
	Date:	18 November 2024

FULL EQUALITY IMPACT ASSESSMENT

Step 4: Issues to Consider

SEE INSTRUCTION:

Data and Intelligence

The following types of data can potentially be accessed:

- Publicly available national data (e.g. from the Local Authority Interactive Tool, ONS, NOMIS, NHS Digital, relevant government departments)
- Local data
- Service user information

It is also worth considering how this data can be used, for example:

- Benchmarking data for Tameside against other local authorities, e.g. local authorities in Greater Manchester, statistical neighbours
- Whether national or regional data can be applied to Tameside
- Whether data at a smaller geographical scale than Tameside is required, e.g. by ward, by MSOA/LSOA

Further intelligence can be gathered from the following:

- Research reports from think tanks, academia, government organisations, and charities
- Policy briefings
- Academic papers (which can be found through search engines, e.g. Google Scholar)

Data and Intelligence

4a.	The services of an external consultant have been engaged in an advisory capacity to ensure that the legal requirements in setting a new scheme are met. The principles in the legal protections for pensioners remains the same, as does guarding against the effects of child poverty, and an incentive for claimants to work in addition to ensuring that the statutory public sector equality duty is considered with any local scheme adopted. Full data modelling has been undertaken from the outset and will continue to be undertaken to ensure minimal impact for claimants and those that are financially vulnerable are protected.
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SEE INSTRUCTION:

Consultation and Engagement

It is expected that you will engage with potential impacted groups on this proposal when undertaking the Equality Impact Assessment to better understand potential impacts on people with protected characteristics.

Engagement can occur through:

- A general consultation/engagement exercise on the proposal (e.g. a survey), where space is provided to discuss impacts on people with protected characteristics
- Regular channels of engagement or feedback e.g. a service user panel that you already operate
- Input from colleagues (particularly frontline staff) and partners (e.g. the VCSE sector)

Alternatively, insights can be retrieved from engagement or consultation exercises that have previously occurred.

Consultation and Engagement			
4b. 69/158	Has any consultation or engagement been conducted that is relevant to this Equality Impact Assessment?	<input checked="" type="checkbox"/> YES	<input checked="" type="checkbox"/> NO
		If YES, answer 4c-4e.	If NO, answer 4f.
4c.	Engagement Undertaken:	A full consultation has taken place with claimants, stakeholders, precepting bodies and any interested party in accordance with procedural requirements and as agreed by the Executive Cabinet report of July 2024.	
4d.	Who has been engaged with?	The Councils Big Conversation was used for the consultation with claimants being directly contacted by text, email or letter, and contact made with stakeholders and interested parties by email, letter, and social media. Meetings were held with Tameside Council Welfare Rights Service to gather their views on the proposed scheme. The Greater Manchester Combined Authority (GMCA) was also contacted, however they declined to comment on the proposed scheme.	

Page 159	4e. Outcomes of Engagement:	The outcomes of the consultation are as follows: <ul style="list-style-type: none"> No objections have been made by either of the major preceptors (Police and Crime Commissioner or Fire & Rescue Service); A consultation exercise was undertaken with the public and 1178 responses were received. A summary of the responses for each of the questions relating to the key changes are shown below: 																																												
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="text-align: left;">Question</th> <th style="text-align: center;">Agree (%)</th> <th style="text-align: center;">Disagree (%)</th> <th style="text-align: center;">Don't Know (%)</th> </tr> </thead> <tbody> <tr> <td>Do you agree with introducing an income-based banded discount scheme as shown above?</td> <td style="text-align: center;">52.34</td> <td style="text-align: center;">13.40</td> <td style="text-align: center;">34.26</td> </tr> <tr> <td>Removing Non Dependant Deduction</td> <td style="text-align: center;">54.37</td> <td style="text-align: center;">12.77</td> <td style="text-align: center;">32.86</td> </tr> <tr> <td>Disregarding certain elements of Universal Credit</td> <td style="text-align: center;">66.25</td> <td style="text-align: center;">10.58</td> <td style="text-align: center;">23.17</td> </tr> <tr> <td>Replacing the current earnings disregards with a standard £25 per week disregard (irrespective of the number of hours worked)</td> <td style="text-align: center;">57.60</td> <td style="text-align: center;">9.87</td> <td style="text-align: center;">32.53</td> </tr> <tr> <td>Continuing to protect families by disregarding Child Benefit and Child Maintenance</td> <td style="text-align: center;">68.03</td> <td style="text-align: center;">7.65</td> <td style="text-align: center;">24.32</td> </tr> <tr> <td>Continuing to disregard disability benefits (Personal Independence Payments, Armed Forces Independence Payments, Disability Living Allowance) and providing additional disregards of £50 where the applicant, partner or dependant is disabled</td> <td style="text-align: center;">76.69</td> <td style="text-align: center;">5.90</td> <td style="text-align: center;">17.41</td> </tr> <tr> <td>Introducing a new disregard for the support component of Employment and Support Allowance and partial Carer's Allowance</td> <td style="text-align: center;">67.34</td> <td style="text-align: center;">7.74</td> <td style="text-align: center;">24.92</td> </tr> <tr> <td>Protecting War Pensioners by continuing to disregard War Pensions or War Disablement pensions in full</td> <td style="text-align: center;">74.93</td> <td style="text-align: center;">5.25</td> <td style="text-align: center;">19.82</td> </tr> <tr> <td>Reducing the capital limit to £6,000</td> <td style="text-align: center;">47.94</td> <td style="text-align: center;">22.65</td> <td style="text-align: center;">29.41</td> </tr> <tr> <td>Removing the Extended Payment provision</td> <td style="text-align: center;">51.49</td> <td style="text-align: center;">13.99</td> <td style="text-align: center;">34.52</td> </tr> </tbody> </table>		Question	Agree (%)	Disagree (%)	Don't Know (%)	Do you agree with introducing an income-based banded discount scheme as shown above?	52.34	13.40	34.26	Removing Non Dependant Deduction	54.37	12.77	32.86	Disregarding certain elements of Universal Credit	66.25	10.58	23.17	Replacing the current earnings disregards with a standard £25 per week disregard (irrespective of the number of hours worked)	57.60	9.87	32.53	Continuing to protect families by disregarding Child Benefit and Child Maintenance	68.03	7.65	24.32	Continuing to disregard disability benefits (Personal Independence Payments, Armed Forces Independence Payments, Disability Living Allowance) and providing additional disregards of £50 where the applicant, partner or dependant is disabled	76.69	5.90	17.41	Introducing a new disregard for the support component of Employment and Support Allowance and partial Carer's Allowance	67.34	7.74	24.92	Protecting War Pensioners by continuing to disregard War Pensions or War Disablement pensions in full	74.93	5.25	19.82	Reducing the capital limit to £6,000	47.94	22.65	29.41	Removing the Extended Payment provision	51.49	13.99	34.52
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<p>It should be noted that the majority of all responses received from the public agreed with ALL of the proposed changes.</p>																																														

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4f.	If engagement has not been undertaken, please explain why.	N/A
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SEE INSTRUCTION:

Legislative Drivers

It is worth considering any legislative drivers that may influence the Equality Impact Assessment:

- Legal duties that services have to abide by, including the Public Sector Equality Duty
- Case law and judicial review, particularly instances where similar services have been provided and challenged, and as a result, have needed to change

Legislative Drivers	
Page 160	<p>Schedule 1A (3) of the Local Government Finance Act 1992, states: Before making a scheme, the authority must:</p> <ul style="list-style-type: none"> • consult any major precepting authority which has power to issue a precept to it and consult such other persons as it considers are likely to have an interest in the operation of the scheme. <p>In addition, in order to set a new scheme, the Council is obliged to make a resolution by 11th March of the year prior to the scheme coming into place.</p>







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SEE INSTRUCTION:

Financial Considerations

It is worth considering any financial considerations that may influence the Equality Impact Assessment, e.g. budgeting, available resources, etc.

This is particularly in relation to mitigating actions that are identified in STEP SIX, which are needed to reduce potential impacts of the proposal at hand.

It may be worth thinking about how mitigating actions can serve as opportunities for innovation.

Financial Considerations	
Page 164	<p>4g. The current cost of the Council Tax Reduction Scheme (CTS) is £16.4 million. To ensure maximum support possible is provided to the most financially vulnerable residents a cost neutral income banded scheme has been modelled providing the same maximum support as the current scheme.</p> <p>Where any applicant is likely to experience exceptional hardship, and as a transitional protection, they will be encouraged to apply for an exceptional hardship payment contained within the provision of the existing Section 13A Policy. This approach will enable individual applicants to be dealt with in a fair and equitable manner.</p> <p>The cost of the CTS scheme is estimated as part of the annual tax base and included within the Council’s budget and Medium-Term Financial Strategy (MTFS).</p> <p>The new income banded Council Tax Support scheme has been modelled on a cost neutral basis and based on the cost of the 2024/25 scheme, notwithstanding the fact that the Council Tax level will rise in April 2025. The latest forecast suggests that the new Council Tax Support scheme will cost around £17.2 million in 2025/26 which is built into the Council’s budget and MTFS. Costs are shared between the Council and the Major Precepting Authorities. The indicative costs exclude any amount granted under the exceptional hardship provision.</p>

Step 5: Impact Analysis – evidence the impacts

Purpose:	To provide evidence of the potential impacts identified under each protected characteristic.
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FOR DEFINITIONS OF PROTECTED CHARACTERISTICS, EXPAND THE INSTRUCTION BELOW.

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SEE INSTRUCTION:

This step constitutes the second part of the Impact Analysis. In this step, under each protected characteristic, each potential impact should be listed and categorised (e.g. Direct or Indirect), and the evidence for each potential impacts should be provided. The potential impacts that have been identified will likely be the same as those that have been identified in STEP TWO. However, these may have changed or new impacts may be identified, due to the gathering of further evidence.

Evidence can be quantitative (numerical) or qualitative (non-numerical), addressing the ‘what’, ‘who’, ‘how’, and ‘why’ of potential impacts. Refer to the guidance on Data/Intelligence and Consultation/Engagement identified in Step 4 to assist with the evidence that can be included in the Impact Analysis.

When listing the impacts, it will help to number each impact. This will help navigate the form when identifying mitigating actions under STEP SIX.

Do not feel constrained by the space provided in the table. To add a new row, right click on the bottom row, then select ‘Insert Item After’ or click the + button. Also, each box will expand downward as the information is entered. However, when entering data tables, copy and paste as pictures; if entered as tables, it will alter the layout of the Impact Analysis form.

The definitions of protected characteristics are below:

Age	A person’s specific age or age group. An age group can be numerical (e.g. 18-30) or descriptive (e.g. ‘the elderly’, ‘teenagers’, etc.).
Sex	A person’s biological sex, whether a person is male, female, or those who are differently sexed (e.g. intersex). This does not include sexual orientation and gender identity, which are analysed separately.
Race (including colour, ethnicity, and nationality)	How people identify themselves or are identified in society according to their skin colour, physical features, and national/cultural identity. This can cover: <ul style="list-style-type: none"> • Racial identities (e.g. White, Black, Asian) • Ethnic identities (e.g. Jamaican, Arab, Persian, Jewish, Irish, Gypsy/Roma) • Nationalities • Languages spoken – whether English is the first or additional language • Refugee and asylum status
Religion or Belief	Any religion or belief that a person follows or subscribes to. It includes the commonly recognised religions (such as Christianity, Islam, Hinduism, Judaism, Buddhism, and Sikhism) and the different groups within each religion (e.g. in Christianity, it can cover Catholicism, Protestantism, etc.; in Islam, it can cover Sunni Islam, Shia Islam, Sufism, etc.). It also applies to religions that are not necessarily well known (e.g. Jainism, Baha’i Faith) as well as people who do not have any religious belief (e.g. those ascribing to Humanism and Atheism).
Disability	Physical or mental conditions that have substantial and long-term adverse effects on people’s abilities to carry out day-to-day activities. This covers a wide range of disabilities: <ul style="list-style-type: none"> • Physical and mobility impairments • Sensory impairments (e.g. sight, hearing)

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	<ul style="list-style-type: none"> • Learning disabilities • Progressive conditions (e.g. neurodegenerative disorders, muscular dystrophies, dementia) • Fluctuating and recurring conditions (e.g. rheumatoid arthritis, epilepsy, myalgic encephalitis) • Organ-specific disorders (e.g. respiratory conditions, cardiovascular diseases) • Auto-immune conditions
Sexual Orientation	The orientation that a person has toward another person of any sex or gender. Common orientations are towards people of the opposite sex/gender (e.g. heterosexual/ straight), towards people of the same sex/gender (e.g. a gay man or lesbian), or towards multiple sexes/genders (e.g. bisexual or pansexual). There are other orientations that should be considered (e.g. asexual – a person who does not experience sexual attraction). A person’s orientation can be sexual, romantic, or emotional.
Gender Identity	The gender that a person identifies with. People most commonly identify with the gender that matches their sex assigned at birth – i.e. as a man or woman. People who are trans identify with a gender that is different to their sex assigned at birth. Included amongst people with trans identities are people “proposing to undergo, undergoing, or having undergone a process to reassign sex”. This is the legal definition for ‘gender reassignment’ under the Equality Act 2010. However, this legal definition does not include trans people who do not choose to undertake the medical transitioning process and people with other gender identities (e.g. those who identify as non-binary, gender fluid, etc.).
Page 166	<p>Pregnancy/Maternity</p> <p>‘Pregnancy’ refers to when a person is pregnant and expecting a baby. Any person who can become pregnant should be considered – e.g. women, trans men, and people with different gender identities. This should also cover all aspects of the pregnancy journey, including those who have been affected by miscarriage.</p> <p>‘Maternity’ refers to the period following the birth of the child. In employment, this is related to parental leave. In the non-work context, this is related to unfavourable treatment relating to being a mother or parent. Legally, for the latter, protection is applied for 26 weeks. An important aspect of maternal/parental discrimination is <i>breastfeeding</i>.</p>
	<p>Marriage/Civil Partnership</p> <p>A person’s marital status in law, whether a person is married or in a civil partnership to another person of the opposite sex or same sex.</p>
Carers	Any person who provides unpaid care for a partner, family member, or friend due to illness, disability, frailty, a mental health problem, or an addiction. The person being provided care cannot cope or finds it difficult to cope without that person’s care and support. A carer can have varying caring responsibilities, such as supporting people with everyday tasks (e.g. getting out of bed, bathing, etc.) or providing emotional support. This covers people who may not see themselves as ‘carers’, whom do not separate their caring responsibilities from the relationship that they have with the person for whom they provide care. Importantly, this covers young carers who provide care for their parents or other relatives.
Cared for Children/ Care Leavers	‘Cared for Children’ (sometimes known as ‘looked after children’) are children and young people in the care of the local authority due to their parents being unable to take care of them in a temporary or permanent capacity. ‘Care Leavers’ are any adult who have previously spent time in the care of the local authority.
Ill Mental Health	A person with a condition related to their psychological or emotional wellbeing. This includes a wide variety of conditions:

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	<ul style="list-style-type: none"> • Common mental health problems, such as depression or anxiety disorders • Trauma (e.g. Post Traumatic Stress Disorder) • Severe mental illness (e.g. Psychosis/Schizophrenia or Bipolar Disorder) • Phobias (e.g. Agoraphobia)
Neurodivergence	A person whose mind works differently to neurocognitive styles that society regards as 'normal'. This includes a wide range of conditions and experiences: Autism, ADHD, Dyslexia, Dyscalculia, Dyspraxia, Dysgraphia, Epilepsy, Tourette's, Aphantasia/Synaesthesia, etc.
Socio-Economic Disadvantage	A wide range of experiences accruing from having a disadvantaged socio-economic status: having low or no income; living in absolute or relative poverty; unemployment or underemployment; living in substandard housing; being homeless or threatened with homelessness; food insecurity and poverty; fuel poverty; digital exclusion; etc.
Multiple Marginalisation	A wide variety of combinations of different protected characteristics that uniquely influence a person's experiences. Any combination of protected characteristics can be two or above (e.g. RACE/ETHNICITY and GENDER IDENTITY; CARE LEAVER, CARER, and SOCIO-ECONOMIC DISADVANTAGE).

Impact	Protected Characteristic	Impact	Impact Type (Direct/Indirect)	Evidence
Page 167	<i>Select a protected characteristic from the drop-down list</i>	<i>Identify the potential impact of the proposal</i>	<i>Select 'direct' or 'indirect' from the drop-down list</i>	<i>Provide evidence regarding the proposal's potential impact (e.g. data/intelligence, findings from consultation/engagement, research reports, etc.).</i>
1	Age	The changes will affect all applicants of working age who receive Council Tax Reduction (CTS)	Direct	<p>The population of Tameside is estimated at 231,071 based on the latest Census population statistics from the Office for National Statistics (ONS). Trends show an ageing population. The number of people aged 65 years and over is now 17.53%.</p> <p>Pensioners are not directly impacted. Pensioners, subject to their income, can receive up to 100 per cent support towards their Council Tax. The Council has no power to change the level of support provided to pensioners as the scheme for pension aged customers is prescribed by Central Government and therefore any changes to the level of Council Tax Reduction (CTS) can only be made to the working age scheme.</p> <p>The approach and 'shape' of the scheme is changing, but the overall approach is to maintain support to those households on the very lowest incomes.</p>

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Page 168				<p>Extensive caseload modelling has been undertaken and continues to be conducted to fully understand the impact of the new scheme. The majority of working age claimants (90%) are unaffected.</p> <p>The new scheme has a number of households that benefit (6%) and also a small number of households that will see a reduction in support (4%).</p> <p>Every household expected to see a reduction in support has been looked at to ensure that data held is accurate and that the predicted outcome is correct.</p> <p>Analysis of current caseload and full modelling statistics available alongside full consultation report.</p>	
	Sex	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of sex	Choose an impact type.	From the latest Census population statistics from the Office for National Statistics (ONS) the gender split of Tameside's overall population is 49% male and 51% female. No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.	
	3	Race (including colour, ethnicity, and nationality)	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of race	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
	4	Religion or Belief	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of religion or belief	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
	5	Disability	Disabled persons will continue to be protected under the scheme by the full	Choose an impact type.	No direct/indirect impact on this characteristic. The scheme will continue to protect disabled people by disregarding named disability benefits and elements.

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		disregard of named disability benefits and elements		
6	Sexual Orientation	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of sexual orientation	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
7	Gender Identity	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of gender identity	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
8	Pregnancy/Maternity	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of pregnancy or maternity	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
9	Marriage/Civil Partnership	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of marital or partner status	Choose an impact type.	No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
10	Carers	The scheme will continue to protect carers through the disregard of carers element and partial disregard of carers allowance	Choose an impact type.	No direct/indirect impact on this characteristic. The scheme will continue to protect carers by disregarding the carers element of Universal Credit and partial disregard of carers allowance.
11	Care Leavers	Care Leavers are not affected by the changes and are protected under the Council's Section 13A1C policy		No direct/indirect impact on this characteristic. Care leavers will continue to be protected by reducing Council Tax paid through the Council's Section 13A1C policy.
12	Ill Health / Mental Health	Disabled persons will continue to be protected		No direct/indirect impact on this characteristic. The scheme will continue to protect disabled people by disregarding named disability benefits and elements.

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		under the scheme by the full disregard of named disability benefits and elements		
13	Neurodivergent	Changes to the working age Council Tax Reduction (CTS) will apply to all applicants irrespective of neurodivergence		No direct/indirect impact on this characteristic, this is an income based calculation to establish entitlement.
14	Socio- Economic Disadvantage	The new scheme will look to support the lowest income households and the maximum support available within the scheme remains at the current level		No direct/indirect impact on this characteristic. The new scheme will continue to provide the same level of maximum support as the current scheme.
Page 170	Multiple Marginalisation	The new scheme will look to support the lowest income households and the maximum support available within the scheme remains at the current level		No direct/indirect impact on this characteristic. The new scheme will continue to provide the same level of maximum support as the current scheme.

Step 6: Plan mitigating actions

Purpose:	To identify mitigating actions to minimise potential detrimental impacts of the proposal on people with protected characteristics.
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Impact No.	Impact	Mitigating Action and Rationale	Officer Responsible	Timescale	Completed (Yes/No)	Update
Impact number from	Identify the impact being addressed	Describe the action required to reduce the detrimental impact identified in the Impact Analysis, and explain the rationale underneath and/or intended outcome.	Identify who is responsible for implementing the mitigating action	Provide the timeframe for when the mitigating	Has the mitigating action been implemented?	Provide any progress updates below.

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Impact Analysis			<i>(name and department).</i>	<i>action should be implemented.</i>		
1	Changes to the working age Council Tax Reduction Scheme (CTS)	<p>The current level of maximum support will remain as in the current scheme. Extensive modelling has been undertaken using current caseload and 90% of claimants are unaffected by this change.</p> <p>Where any applicant loses support and is experiencing exceptional hardship then an application for further support can be made to the Council's Exceptional Hardship Fund.</p> <p>Quarterly equality impact monitoring will be undertaken throughout the financial year to monitor the scheme.</p>	A Chadderton, Exchequer Services	Throughout the 2025/2026 financial year	Yes	A Section13A Hardship Policy is in place to mitigate any financial hardship experienced due to the implementation of the new income banded scheme evidence based.
Page 171	Application /administration changes to the working age Council Tax Reduction Scheme (CTS)	<p>Clear communication strategy being adopted with direct contact being made with those receiving reduced or losing support to signpost to other support available.</p> <p>Updated easy to understand information being applied to website. Training being delivered to staff and stakeholders in respect of new scheme and its administration.</p>	A Chadderton, Exchequer Services	Throughout the 2025/2026 financial year and ongoing	Yes	Part of implementation strategy

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Step 7: Sign-off

Purpose:	For the EIA Lead Officer to sign that the EIA is complete, and for the Assistant (Director) to counter-sign that they agree with the content of the EIA and that it is sufficiently robust.
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This Equality Impact Assessment has been completed by the EIA Lead Officer: Page 172	Name:	Amanda Chadderton
	Signature:	
	Department:	Exchequer Services
	Date:	27 November 2024
This Equality Impact Assessment has been checked by the Assistant Director / Director, and signs that it is sufficiently robust and rigorous:	Name:	Ashley Hughes
	Signature:	
	Department:	Resources
	Date:	11 December 2024

POST-IMPLEMENTATION REVIEW

Step 8: Review EIA after implementation

Purpose:	To update the EIA with any new impacts and to provide a progress update on mitigating actions.
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SEE INSTRUCTION:

This step should only be completed if the proposal has passed through the governance process where appropriate and has been implemented. It should be completed at two stages:

- Six months after implementation
- Twelve months after implementation

The evidence in the Impact Analysis should serve as the baseline against which change can be measured.

The Post-Implementation Review can find out whether:

- The proposal has had any positive impacts on people with protected characteristics
- Mitigating actions to minimise detrimental impacts have worked
- There are impacts that were not foreseen in the Impact Analysis that need to be accounted for

Six Months After Implementation	Twelve Months After Implementation
<i>Describe and explain the effects of the proposal on people with protected characteristics, using evidence to compare against the Impact Analysis as a baseline.</i>	

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