

APPENDIX 12

Equality Impact Assessment Template (EqIA)

An Equalities Impact Assessment (EqIA) is a tool to understand the effects a decision will or is likely to have on people, specifically those people who have one or more protected characteristics under the Equality Act 2010.

It is an evidence-based approach and aims to ensure that decision-making processes are fair and do not present barriers to participation or create disadvantage for protected groups.

The EqIA should be started early on in a project before any decision is made. It can also be used:

- As a service improvement tool, and
- To assess the implications of strategic and operational decisions.

In this way, we can help ensure we do not discriminate and promote equality.

What is the Public Sector Equality Duty (PSED)?

The PSED under the [Equality Act 2010](#) requires that in the exercise of its functions, Waltham Forest Council must have due regard whilst seeking and evidencing ways that we:

- eliminate unlawful discrimination – including victimisation or harassment.
- advance equality of opportunity between people who share a protected characteristic and those who don't.
- foster or encourage good relations between people who share a protected characteristic and those who don't.

The PSED helps the council meet its legal duties and to become more accountable, inclusive, credible and community orientated.

Protected characteristics under the Equality Act 2010

It is against the law to discriminate against someone because of a protected characteristic. These are:

- Age
- Sex
- Ethnicity and race
- Religion or belief
- Disability
- Sexual orientation
- Pregnancy and maternity
- Gender reassignment
- Marriage and civil partnership

An EqIA enables officers to assess the impact of proposed decisions on people with these characteristics.

Protected characteristics as determined by Waltham Forest Council

In addition to our statutory obligations under the Equality Act 2010, Waltham Forest Council includes Care Leavers as having a protected characteristic and to this extent passed a motion in April 2023 to recognise this action. Therefore, Waltham Forest Council's EqIA process also includes a requirement to explore the impact of a proposal on that group.

Additional groups that face structural inequalities

As a Council, we are committed to tackling structural disadvantages faced by our residents. We encourage staff to think about how a decision, proposal or policy might affect wider groups who are not covered by the Equality Act but still experience relative material or social disadvantage in accessing opportunity.

The [State of the Borough report](#) identifies a number of additional groups that should be taken into account:

- Those who face socio-economic inequality (e.g. unemployment, low income, low academic qualifications) or live in areas of high deprivation.
- Care Leavers
- People with caring responsibilities
- Survivors of domestic violence
- Migrants, including refugees and asylum seekers.
- Homeless people and people at risk of homelessness
- People who are experiencing long-term unemployment

There might be other disadvantaged groups that you know from your service data who might be adversely affected by your proposal or policy. You need to consider these groups as well as the protected characteristics above as part of your EqIA.

Carrying out an EqIA

When doing an assessment, you must answer these questions:

- Is the proposal, policy, or project likely to exclude or have a detrimental (harmful) effect on a specific group or community?
- Does it affect some groups or communities differently and can this be justified?
- How might it affect wider determinants (factors) such as income, housing, education, employment, neighborhoods, and communities that impact on health and well-being?
- Is the proposal, policy, or project likely to be equally accessed by all groups and communities? If not, can this be justified?
- Are there any barriers that might make it hard or stop different groups or communities accessing the proposal or policy to be delivered?
- Could the proposal or policy promote equality and good relations between different groups?

Service areas are responsible for ensuring EqIAs are started early on and should consult widely within their service to ensure they have considered all potential impacts. This should also include considering the impact on people who have identities that overlap e.g., intersectionality of gender, race, and disability for instance.

When completing a EqIA use data to help collate demographic evidence including:

- Census 2021 in Waltham Forest
- Statistics about the borough
- Other service specific data insights and sources, including data requests via Hornbill.

Guidance on compliance with the Public Sector Equality Duty for officers and decision makers

1. The duty is mandatory and must be met by the decision-maker and not delegated. It is for the decision-maker to consider with help from the report and officer analysis.
2. EqIAs must be evidence-based and accurate – negative impacts must be fully and frankly identified so the decision-maker can fully consider their impact.

3. There must be compliance with the duty when decisions, proposal or policies are being formulated by officers and then by members or officers when taking the decision. The Council cannot rely on an EqIAs produced after the decision is made but sometimes a “provisional” EqIA is appropriate e.g. before consultation on a decision, proposal, or policy.
4. When an equality implication is identified, officers and members must give conscious and open-minded consideration to the equality duty when making a decision.
5. The duty is not, however, to achieve the three equality aims but to pay due regard when making the final decision – therefore, the duty can encourage officers to amend or change a decision, proposal, or policy where an equality implication is identified, but it does not stop difficult but justifiable decisions being made e.g. to no longer continue a service for instance.
6. The decision maker may take into account things that may objectively justify taking a decision which has negative impact on equalities, e.g. financial targets, value for money or service needs.
7. The duty is ongoing: EqIAs should be reviewed over time and should say how impact will be monitored after the decision.

Positive action

The Equality Act allows ‘positive action’ to tackle disadvantage faced by those sharing a protected characteristic, even if it has the consequence of disadvantaging those sharing a different protected characteristic. Positive action can be justified where it is proportionate. Positive action is different from positive discrimination, which is unlawful.

An example of unlawful positive discrimination would be where an employer recruits a person because they have a relevant protected characteristic rather than because they are the best candidate. For example, it would be unlawful to hire someone simply because their team was under-represented by woman and the candidate is hired because they are a woman.

However, if under-representation is an identified issue, then you could take steps to promote vacancies to this group or provide extra support for them to apply. This is positive action.

The difference between positive action and positive discrimination can be difficult to define and is determined by the particular situation. It is important to reflect upon whether any element of your service necessitates positive action. It is critical that you satisfy your duty under the Equality Act and therefore if you have any concerns, please seek further guidance/or legal advice before continuing.

Equality Impact Assessment (EqIA)

Section 1: About the proposal, policy or project

Name of proposal, policy, or project:

To increase council tax in 2026/27 by a total 4.80 (including the precept payable to the GLA), this equates to the sum of £2,386.96 for a band D property. The percentage increase in council tax, the Council is being asked to approve is 4.99% (excluding the precept payable to the GLA).

Name of lead officer and contact details:

Ursula Gamble Ursula.gamble@walthamforest.gov.uk

Name of service and directorate for this proposal, policy, or project:

Financial Services - Resources Directorate

Strategic Director responsible for this proposal, policy, or project:

Rob Manning – Strategic Director of Resources

Date the EqIA was started:

30/12/2025

What kind of proposal, policy or project is this assessment for?

Tick all that apply.

- Change in service delivery or new service
- Change in policy or new policy
- Grants and commissioning
- Budget change or service cut
- Other - if ticked, please give more detail: Click or tap here to enter text.

Section 2: Proposal, policy, or project summary

Please give a summary of this proposal, policy, or project

To increase Council Tax in 2026/27 by a total 4.80% (including the precept payable to the GLA), this equates to the sum of £2,386.96 for a band D property. The percentage increase in Council Tax, the Council is being asked to approve is 4.99% (excluding the precept payable to the GLA).

The Council is now proposing to increase the Council Tax in 2026/27 by 4.99%. The proposed increase consists of two elements; 2.99% is an increase on the LBWF precept for core Council Service and 2% relates to the precept for adult social care. The precept payable to the GLA is being increased by 4.10% resulting in an overall increase of 4.80% for all persons liable to pay Council Tax. Whilst it is recognised that any Council Tax increase will have a negative impact on Council Taxpayers, this is justified as the increases in Council Tax are considered necessary to mitigate against increased demand for services (including Adults and Children's Social care; Special Needs provision and Temporary Accommodation), the impact of reductions in central government funding, when adjusted for inflation, to enable the Council to achieve its' overall savings targets and provision of services and set a balanced budget as required. For residents not in receipt of Council Tax Support, they will be liable to pay the full amount of the proposed increase. This EqIA sets out information regarding the impact upon residents with reference to equality groups based on data available to the Council regarding the make-up of its' population.

The Council has a Council Tax Support (CTS) scheme in place as well a discretionary fund of £750,000 to support those in hardship that may not qualify for support through the existing CTS scheme. As well as providing general information on support available through the website and information provided with council tax bills, the Council also undertakes more

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targeted campaigns to support vulnerable residents including some groups with protected characteristics. This EQiA recommends that these targeted campaigns continue and that consideration is given to working with partners to find ways to expand these communications.

Who will be affected by this proposal, policy, or project?

The proposal will impact on all Council Taxpayers in the borough.

Waltham Forest is home to an estimated 276,000 residents as of March 2023 and 102,900 households with at least one usual resident (ONS, Census 2021). The median age of residents is 36.3 years compared to the England average of 40 years. The borough is one of the most diverse areas in the country with an estimated 47% of residents from a minority ethnic background.

According to the 2025 Indices of Deprivation, Waltham Forest is ranked number 187 most deprived out of all 317 authorities in England compared to the position of 79 in the 2019 indices. This compares to 47 for Enfield, 164 for Redbridge, 42 for Haringey and 55 for Havering. The profile of Council Taxpayers in Waltham Forest will generally reflect the wider community. The largest proportion of households in the Borough fall into Band C, with 69% of all dwellings falling within Bands A-C.

The proposed increase in Council Tax of 4.80% including the GLA will result in the following increases in Council Tax bands

	Band A	Band B	Band C	Band D	Band E	Band F	Band G	Band H
Number of households	5,233	32,469	39,219	23,454	8,390	1,850	438	29
2025/26 Council Tax	£1,518.43	£1,771.51	£2,024.58	£ 2,277.65	£2,783.79	£3,289.94	£3,796.08	£4,555.30
Proposed 2026/27 Council Tax	£1,591.31	£1,856.52	£2,121.74	£ 2,386.96	£2,917.40	£3,447.83	£3,978.27	£4,773.92
Council Tax increase	£72.87	£85.02	£97.16	£109.31	£133.60	£157.89	£182.18	£218.62

Section 3: Equality analysis

This section asks you to consider the potential impact (both positive and negative) of the proposed proposal, policy or project on the protected characteristics and the mitigations that will be taken to avoid or counteract any negative impact identified. If no negative impact(s) has been identified for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one or more of the following protected characteristics. Think about what action(s) you can take to address their specific needs. In addition, you may wish to consider the short-, medium- and longer-term implications, intersectionality between the different characteristics, as well as mitigations that may be required.

Age

Waltham Forest has a younger than average population with 24.5 per cent of residents aged 0 to 19 compared to 23.7 per cent in London and 23 per cent nationally. Like London, Waltham Forest also has a higher proportion of working-age adults aged 16 to 64 (69.6 per cent compared to 68.9 per cent in London and 62.9 per cent nationally). There are proportionately fewer people aged over 65 living in Waltham Forest (10.1 per cent) when compared to London (11.9 percent) and the UK average (18.6 per cent). The proposed changes will impact all residents regardless of age, who are liable to pay Council Tax. The age breakdown of the Borough is shown in the table below. The average age of residents is 35.

Grouping	Waltham Forest	WF %	London	London %	England	England %

0-4	19,000	6.80%	529,000	6.00%	3,232,000	5.40%
5-9	17,400	6.30%	531,500	6.00%	3,524,600	5.90%
10-19	31,800	11.40%	1,024,800	11.60%	6,990,700	11.70%
20-64	181,800	65.30%	5,671,100	64.40%	34,786,900	58.40%
65-89	27,200	9.80%	992,600	11.30%	10,533,900	17.70%
90+	1,200	0.40%	50,800	0.60%	529,500	0.90%
Total	278,400		8,799,800		59,597,600	

Will the proposed change have a differential impact [negative] on people of a specific age or age group (e.g. older or younger people)? If so, explain why this group may be affected and what mitigating actions will be taken.

The proposed changes will impact all residents who are liable to pay Council Tax regardless of age. Support is in place for residents, through our council tax support scheme however the profile of households in receipt of Council Tax Support differs from the wider community profile (see table below). This is a consequence of the nature of the support scheme, which provides help for Council Taxpayers whose financial circumstances are not adequate to cover the charge.

Households in receipt of Council Tax Support as at 10/09/2025					
Age of Claimant	18-24	25-49	50-65	66+	All Ages
Male	133	1122	1668	2318	5241
Female	146	3287	2669	3350	9452
Total Claims	279	4409	4337	5668	14693

The Council Tax Support scheme is in place to help both residents of both Working and pension age. In addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted. The Single persons discount (25%) is available to help residents living alone of which pension age residents would form a large percentage.

Highlight any positive benefits the proposed decision will have on people of a specific age or age group.

Sex (gender)

Will the proposed change to service/policy have a differential impact [negative] on people of a specific sex (e.g. women, men)? If so, explain why this group may be affected and what mitigating actions will be taken.

The proposed change does not have an intended impact on one gender more than another. However, it is known that women make up a large cohort of working aged residents in receipt of Council Tax support. Of the 9,025 working age households in receipt of Council Tax Support (CTS), 6,102 (68%) of those are female, 2,923 (32%) are male.

Households in receipt of Council Tax Support as at 10/09/2025					
Age of Claimant	18-24	25-49	50-65	66+	All Ages
Male	133	1122	1668	2318	5241
Female	146	3287	2669	3350	9452
Total Claims	279	4409	4337	5668	14693

In addition to the Council Tax support scheme, there is a fund of £750,000 for Discretionary Council Tax Support. We specifically plan to target support towards care leavers of which 100 (63.3%) of the 158 are male.

Highlight any positive benefits the proposal decision will have on people of a same or different sex (gender).

We will be using £750,000 in Discretionary Council Tax Support Payments to help households most in need of additional support in payment their Council Tax.

Ethnicity and race**Will the proposed change to service/policy have a differential impact [negative] on people of a certain race? If so, explain why this group may be affected and what mitigating actions will be taken.**

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on people of a certain race. Residents within the borough are likely to reflect the wider population. It is known that Waltham Forest remains in the top 20 most diverse areas in the country. In 2021 an estimated 47% of residents are from a minority ethnic background a slight decrease from 48% in 2011. In 2021 Waltham Forest ranked as the 18th most diverse borough in England and Wales in comparison to 2011 when it ranked as the 10th most diverse.

The Council Tax support (CTS) scheme is in place to support residents; in addition, the Council has a discretionary fund of £750,000 available to help households most adversely impacted.

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Highlight any positive benefits the proposed change will have on people of a certain race.**Religion or belief**

The borough has a diverse range of faith communities. According to the 2021 Census, Christianity is the main religion in Waltham Forest, with 39 per cent of residents identifying as Christian. The second biggest religion is Islam with 22% of residents saying they are Muslims compared to 6.5% nationally. Other religions in the borough are Hindu (2.3% of residents), Buddhist (0.7%), Jewish (0.5%) and Sikh (0.5%). 28% of residents said they are secular/have no religion and 7% chose not to state their religion in the census.

Waltham Forest has around 150 Christian Churches, 16 Mosques, 4 Hindu Temples, 3 Synagogues, 1 Gurdwara and 1 Tao Temple. Note:

Will the proposed change to service/policy have a differential impact [negative] on people who follow a religion or belief, including lack of belief? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on people of a certain religion. We do not currently hold any additional data on religion or belief, therefore we cannot accurately identify whether a specific religious group would be more likely to be adversely impacted by the proposed changes.

Highlight any positive benefits the proposed change will have on people with different religions or beliefs (including a lack of belief).**Disability**

The 2021 Census asked people to rate their health as very good, good, fair, bad or very bad. The data shows that around 17,000 residents of Waltham Forest considered their health to be bad or very bad (6.1% of the population). In addition, the 2021 census asked people if they had a health problem or disability that has lasted or was expected to last for at least 12 months and which limited the person's day-to-day activities, either a little or a lot. As many as 36,760 residents

said in the census that their day-to-day activities are limited because of their health. This is made up of seven per cent of population who said their day-to-day activities were limited a lot (15,930 people) and eight per cent whose activities were limited a little (20,830). In total, this is 13 per cent of residents compared to 17.5 per cent nationally.

Health tends to deteriorate further with age with 42 per cent of population aged 65 and over (10,906) having a limiting long-term health problem or disability.

Will the proposed change to service/policy have a differential impact [negative] on people with disabilities? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on people with disabilities. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted. We will be using £750,000 in Discretionary Council Tax Support Payments to help households most in need of additional support. Additionally, those in receipt of disability incomes will potentially be eligible for up to 85% support. 4414 of the 9025 working age residents in receipt of CTS are in receipt of disability incomes.

<u>Council Tax Support Caseload as at 10/09/2025</u>					
	18-24	25-49	50-65	66+	All Ages
Disability Income					
Male	32	509	969	1145	2655
Female	36	1136	1732	1806	4710
Total Claims	68	1645	2701	2951	7365

Those in receipt of disability benefits are no longer exempt from deductions from their support if they have a non-dependant adult living within their household with them. All non-dependant adults within households will be expected to contribute towards the Council Tax Bill.

Highlight any positive benefits the proposed change will have on people with a disability.

Sexual orientation

In 2021, 4.5% of residents aged 16+ (10,000 people) in Waltham Forest identified their sexual identity as lesbian, gay or bisexual, placing Waltham Forest as 13th highest in London and 31st in England & Wales. This comprised of: 2.3% who identified as gay or lesbian 1.6% who identified as bisexual. 0.6% with other sexual orientations 1.1% of the population (2,400 people) identified as a gender different from their sex assigned at birth. The likelihood of an adult identifying as LGBT decreased with age. In 2021, 4.5% of adults aged 16 to 24 identified as LGB+, which decreased to 0.1% of adults aged 65 and over. (Source: Census 2021).

Will the proposed change to service/policy have a differential impact [negative] on people with a particular sexual orientation? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on people with a particular sexual orientation. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted.

Highlight any positive benefits the proposed change will have on people who identify as heterosexual, bisexual, lesbian or asexual.

Pregnancy and maternity

In 2022, a total of 4,040 children were born in Waltham Forest. The General Fertility Rate (number of live births per 1,000 women aged 15-44) in the borough is 60.3) compared to the London average of 50.7. In 2021, the borough also had the 4th highest teenage (under 18) conception rates of London Boroughs (13.8 compared to the London average of 9.5 per 1,000 female population aged 15 to 17). In 2021, there were 63 teenage conceptions with a 54% abortion rate among 15-17 year olds in Waltham Forest (62% across London) (Source: Office for National Statistics).

Will the proposed change to service/policy have a differential impact [negative] on pregnancy and maternity? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed change will impact all residents and does not have an intended impact on pregnancy and maternity. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted. Households with a child aged 5 and under will be eligible to receive up to 85% support as one of our protected groups, provided they meet the remaining qualifying criteria (household composition, level of income and capital).

Highlight any positive benefits the proposed change will have on people who are pregnant/expecting a baby.

Gender reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

According to a [2020 landmark Employment Tribunal ruling](#), people who identify as gender fluid and non-binary or transitioning are protected under this section of the Equality Act and should therefore be considered as part of your assessment.

Will the proposed change to service/policy have a differential impact [negative] on transgender people? If so, explain why this group may be affected and what mitigating action will be taken.

We do not currently hold information on gender reassignment however the proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on transgender people. The Council Tax support (CTS) scheme is in place to support residents and in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted.

Highlight any positive benefits the proposed change will have on people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex.

Marriage and civil partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the UK both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will the proposed change to service/policy have a differential impact [negative] on people in a marriage or civil partnership? If so, explain why this group may be affected and what mitigating action will be taken.

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on people in a marriage or civil partnership. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted

Highlight any positive benefits the proposed change will have on people in a marriage or civil partnership.**Care Leavers****Will the proposed change to service/policy have a differential impact [negative] on people who are Care Leavers? If so, explain why this group may be affected and what mitigating action will be taken.**

The proposed change will impact all residents liable to pay Council Tax and does not have an intended impact on care leavers. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted. Care Leavers under 25 will continue to be eligible for discretionary council tax hardship support payments to cover their full council tax up until their 25th birthday.

Highlight any positive benefits the proposal will have on people who are Care Leavers.**Other structurally disadvantaged groups****Will the proposed change to service/policy have a differential impact [negative] on other structurally disadvantaged groups?**

The proposed change will impact all residents and does not have an intended impact on other structurally disadvantaged groups. The Council Tax support (CTS) scheme is in place to support residents, in addition the Council has a discretionary fund of £750,000 available to help households most adversely impacted

Highlight any positive benefits the proposal will have on groups experiencing structural disadvantage.**Section 4: Monitoring and reviewing**

The effects of the change will be felt by all residents liable to pay Council tax. The Council tax support scheme is in place to support residents as well as a discretionary fund of £750,000. Wider support is also available to help residents through advice and guidance to maximise their income. Use of the both the main CTS and discretionary schemes are monitored as well as the collection of council tax and support can be put in place to help residents to pay their council tax through instalment plans.

Section 5: Conclusion**Set out your conclusions from the analysis of the proposal or policy.**

The increase in Council tax will impact all residents liable to pay Council Tax and is not intended to adversely impact residents with protected characteristics. The increase is necessary to protect front line services and support will continue to be provided via the Council Tax support scheme and the discretionary hardship fund. The Council will also keep this Equality Impact Analysis under review as part of its compliance with its' Public Sector Equality Duty. Up to £750,000 will continue to be made available under the continuation of a Discretionary Council Tax Hardship Fund to offer extra support to the most vulnerable residents. This fund is administered alongside other discretionary funds such as Discretionary Housing Payment (now part of the Crisis Resilience Fund) which provides additional support with rent and other housing costs to help maintain or secure tenancies and the Council's Local Welfare Allowance scheme which provides much needed support for families in crisis to obtain food, essential furniture and white goods as well as meeting fuel costs.

The outcome following analysis of the impact indicates the impact to be outcome 3.

Outcome of Equality Impact Assessment *check one that applies*

- **Outcome 1:** No major change required when the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.
- **Outcome 2:** Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments would remove the barriers identified?
- **Outcome 3:** Continue despite having identified some potential for adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should be in line with the duty to have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.
- **Outcome 4:** Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Section 6: Signatures

Signed off by Corporate Director for the proposal or policy/project:

Name:

Ursula Gamble

Date:

Click here to enter text.

Section 7: Version control

Status	Version	Author	Date	Changes made
Draft	1			