

DISABILITY OVERSIGHT PANEL

WEDNESDAY, 24 JULY 2019 AT 5.00 PM
THE COUNCIL CHAMBER, CROWDALE CENTRE, 218 EVERSHOLT STREET,
LONDON, NW1 1BD

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MEMBERS

Councillor Roger Robinson (Disability Champion) (Chair) (L)
Councillor Lorraine Revah (Carers and Learning Disabilities Champion)
(Vice-Chair) (L)
Councillor Simon Pearson, Deaf and hard of hearing Champion (L)
Councillor Nazma Rahman, Mental Health Champion (L)
Councillor Flick Rea, Visially Impaired Champion (LD)

L = Labour

Issued on: Date Not Specified

CROWNDALE CENTRE FIRE/EMERGENCY EVACUATION PROCEDURE

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**DISABILITY OVERSIGHT PANEL
24 JULY 2019**

THERE ARE NO PRIVATE REPORTS

PLEASE NOTE THAT PART OF THIS MEETING MAY NOT BE OPEN TO THE PUBLIC AND PRESS BECAUSE IT MAY INVOLVE THE CONSIDERATION OF EXEMPT INFORMATION WITHIN THE MEANING OF SCHEDULE 12A TO THE LOCAL GOVERNMENT ACT 1972, OR CONFIDENTIAL WITHIN THE MEANING OF SECTION 100(A)(2) OF THE ACT.

AGENDA

Wards

1. APOLOGIES

To consider any apologies for absence

2. DECLARATIONS BY MEMBERS OF PECUNIARY, NON-PECUNIARY AND ANY OTHER INTERESTS IN RESPECT OF ITEMS ON THIS AGENDA

3. ANNOUNCEMENTS

4. NOTIFICATION OF ANY ITEMS OF BUSINESS THAT THE CHAIR DECIDES TO TAKE AS URGENT

5. MINUTES

To consider the minutes of the meeting held on 27 February 2019. (Pages 7 - 8)

**6. COUNCIL TAX REDUCTION SCHEME 2020/2021 - All Wards
CONSULTATION ON RECOMMENDED OPTION**

Report of the Director for Customer Services.

(Pages 9 -
44)

This report considers the recommend option for a Council Tax Reduction Scheme for working age people for the year 2020/21.

The scheme supports the poorest households in Camden to pay Council Tax and enables a number of Camden 2025 outcomes to address poverty and debt, employment and supporting children and people with disabilities.

This report sets out the rationale for changing the scheme, the options

considered to date and the proposed scheme that is now out for consultation. The proposed scheme:

- sees no reduction in the total amount of financial support awarded – over £16m a year for working age and £9m for pensioners
- maintains our commitment to having no minimum payment for all – over 10,000 out of work and low income households will still get 100%
- delivers fairness, simplicity and affordability through a reduction in bureaucracy - enables £500,000 to be saved in staffing and other costs
- supports people's transition to Universal Credit
- supports young adults to stay with their families in Camden
- targets financial support at the poorest households
- provides additional support for families, disabled people and carers and disregards children and disability benefits in income calculations
- provides greater certainty and in work progression incentives for those in low pay

The consultation methods are set out in this report. It is anticipated that the results of any consultation will be considered in the Autumn with the Council needing to agree any scheme in January 2019 as any revision to or replacement scheme must by law be made no later than 11 March 2020.

7. CAMDEN TOWN HALL REFURBISHMENT - DESIGN FOR ACCESSIBILITY **All Wards**

Report of the Programme Manager Corporate Accommodation.

(Pages 45 - 50)

This report updated the Disability Oversight Panel on the current stage of design development on the refurbishment of Camden Town Hall as regards design for accessibility and seeks from the Panel on the access features of the developed designs which can be reflected in further stages of development. A short design for access presentation will be given at the meeting.

8. EVIDENCE BASE: OUTCOMES AND EXPERIENCES OF BAME DISABLED PEOPLE IN CAMDEN **All Wards**

Report of the Head of Strategy Corporate Services.

(Pages 51 - 58)

This report lays out what we know about Camden residents who have a disability and are also Black, Asian or from Minority Ethnicities (BAME). Both national and local data have been used to form this report as well as information from qualitative and quantitative sources. This research has been done in order to build a picture of what

Camden knows about the experiences and needs of BAME residents who have disabilities.

9. COMMISSIONERS' UPDATES AND ACTION TRACKER

All Wards

Report of Strategy and Change.

(Pages 59 -
72)

This report provides:

1) Updates from Commissioners in relation to:

- Learning Disabilities
- Children and young people
- Mental Health
- Special Educational and Inclusive Intervention Service

2) Updates, in the form of an action tracker, from previous Disability Oversight Panel meetings.

10. FUTURE MEETINGS

All Wards

To note the future dates of meetings of the Disability Oversight Panel:

- 23 October 2019
- 18 February 2020

AGENDA ENDS

The date of the next meeting will be Wednesday, 23 October 2019 at 5.00 pm in The Council Chamber, Crowndale Centre, 218 Eversholt Street, London, NW1 1BD.

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THE LONDON BOROUGH OF CAMDEN

At a meeting of **COMMITTEENAME** held on **MEETINGDATELEGAL** at MeetingTime in MeetingLocation

MEMBERS OF THE PANEL PRESENT

Councillors MembersPresentShortRolesList

MEMBERS OF THE PANEL ABSENT

Councillors MembersAbsentShortAttendCommentList

ALSO PRESENT

Councillors GuestInattendanceShortList

The minutes should be read in conjunction with the agenda for the meeting. They are subject to approval and signature at the next meeting of CommitteeName and any corrections approved at that meeting will be recorded in those minutes.

MINUTES

The meeting ended at MeetingActualFinishTime.

CHAIR

Contact Officer: MeetingContact

Telephone No: CommitteeTel

E-Mail: CommitteeEmail

MINUTES END

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LONDON BOROUGH OF CAMDEN	WARDS: All
<p>REPORT TITLE Council Tax Reduction Scheme 2020/2021 – Consultation on recommended option</p>	
<p>REPORT OF Director of Customer Services</p>	
<p>FOR SUBMISSION TO Disability Oversight Panel</p>	<p>DATE 24 July 2019</p>
<p>SUMMARY OF REPORT</p> <p>This report considers the recommend option for a Council Tax Reduction Scheme for working age people for the year 2020/21.</p> <p>The scheme supports the poorest households in Camden to pay Council Tax and enables a number of Camden 2025 outcomes to address poverty and debt, employment and supporting children and people with disabilities.</p> <p>This report sets out the rationale for changing the scheme, the options considered to date and the proposed scheme that is now out for consultation. The proposed scheme:</p> <ul style="list-style-type: none"> • sees no reduction in the total amount of financial support awarded – over £16m a year for working age and £9m for pensioners • maintains our commitment to having no minimum payment for all – over 10,000 out of work and low income households will still get 100% • delivers fairness, simplicity and affordability through a reduction in bureaucracy - enables £500,000 to be saved in staffing and other costs • supports people’s transition to Universal Credit • supports young adults to stay with their families in Camden • targets financial support at the poorest households • provides additional support for families, disabled people and carers and disregards children and disability benefits in income calculations • provides greater certainty and in work progression incentives for those in low pay <p>The consultation methods are set out in this report. It is anticipated that the results of any consultation will be considered in the Autumn with the Council needing to agree any scheme in January 2019 as any revision to or replacement scheme must by law be made no later than 11 March 2020.</p> <p>Local Government Act 1972 – Access to Information</p>	

No documents that require listing were used in the preparation of this report

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RECOMMENDATIONS

That the Disability Oversight Panel is asked to:

1. Consider the recommended scheme and it's impact on residents with a disability
2. Note that the final decision on a scheme will be taken by Council in January 2019

Signed:

Date:

1. CONTEXT AND BACKGROUND

- 1.1. Every year the Council must decide whether to keep the existing Council Tax Reduction Scheme or revise it. The decision to adopt a scheme must be taken by Full Council.
- 1.2 Any revision to the scheme or any replacement scheme must be made no later than 11 March 2020. If Full Council does not adopt a revised scheme by 11 March 2020, the existing scheme continues to apply for the following financial year.
- 1.3 This report does not discuss the scheme provisions for people of pension credit age as this is prescribed by law and cannot be changed. Nor does it propose to change the 21 statutory exemptions and discounts from Council Tax or the Council's policy to award a discount to foster carers and care leavers.
- 1.4 The Council Tax Reduction Scheme (CTRS) awards a reduction in Council Tax for residents receiving benefits or on a low income. Camden currently spends £25m a year on council tax reductions for 22,600 people, 15,000 of which are working age (at a cost of £16.8m). Of these 11,228 receive 100% support.
- 1.5 Most Council Tax Reduction awards are calculated using data from Housing Benefit claims. As claimants move to Universal Credit, fewer Council Tax Reduction claimants will also be claiming Housing Benefit. They will need to make a separate claim for a Council Tax Reduction.
- 1.6 The cost of processing Housing Benefit and Council Tax Reduction Scheme claims is funded by Government. This funding is expected to reduce by over £1m a year by 2023 leading to a budget pressure if the Council Tax Reduction Scheme remains the same.
- 1.7 When the Government localised council tax support, they cut the funding by 10%. Since then it has been rolled up into the revenue support grant and subject to further reductions. The Local Government Association concludes that Government funding for the scheme has reduced by a minimum of 28%. Camden's own analysis has identified that if the CTRS grant remained the same % of the revenue support grant as in 2013/14, the Council is now providing an additional £10m a year to sustain the scheme. This is likely to increase as the Government further reduces local government funding.
- 1.8 The Council is committed to sustaining the same investment in the scheme to ensure that the poorest continue to receive 100% support, with no reduction in the total level of financial support overall. However, the Council is considering redesigning the scheme to make it simpler to claim, sustain and administer, delivering fairness for those on Universal Credit and legacy benefits. As such the Council included a proposal, subject to consultation and consideration of equality impacts, to save £500,000 in the Medium Term Financial Strategy to reduce the cost of staffing and other costs (e.g. postage) from April 2020 associated with administering the CTRS.

1.9 Universal Credit (UC) is being fully rolled out with over 100 claims a week transferring to the new benefit. The migration of existing claimants is expected to start in 2020 with the process being completed by December 2023.

1.10 There are a number of concerns about the Council's current Council Tax Reduction Scheme:

- The Council's current scheme results in Universal Credit claimants in work receiving an average of 9% less support than if they stayed on legacy benefits due to the way income is treated. This will increasingly impact on working households in Camden as the roll-out of UC continues, potentially impacting 5000 in work claimants. Redesigning the scheme can ensure greater fairness and parity between working households on Universal Credit and those that remain on legacy benefits.
- The Council's current scheme only allows claims to be backdated for one calendar month. Most people on legacy benefits would have made a single claim for both Housing Benefit and Council Tax Reduction and the claims would have been assessed at the same time. However, under UC, claimants need to make a separate claim for a Council Tax reduction and for many there is a delay before claiming. In that time, they become liable for Council Tax which would not be covered by the one month CTRS claim backdate and they would struggle to pay the difference.
- The current scheme is very complex with little transparency and understanding on entitlement, using 50 different criteria to determine eligibility. Every household has an applicable amount which is the amount they can earn before their entitlement reduces. This amount varies considerably (from £75 to £700 a week) depending on the household circumstances. After this amount, financial support is reduced by 20p for every £1 earned. Each change in income results in a full reassessment and potentially a new bill. The Council currently does 1000 reassessments a week which could double under UC. All this means that claimants have to provide a wealth of information to claim, it is very difficult for earners to understand their entitlement or plan future budgeting and sustaining a claim can be a significant burden if income changes regularly. This all leads to a very poor resident experience with few in work progression incentives built into the scheme.
- There are 5,700 Council Tax reduction claims with non-dependents living at home that are subject to a further deduction. Deductions are based on the circumstances of the non-dependent. It is estimated that up to a quarter of correspondence dealt with by the Benefit Service relates to non-dependents. Simplifying the arrangements for non-dependents will reduce the amount carried out by the Benefit Service reducing both staffing and administration costs and gives the potential to support those that stay at home until 25.

- 1.11 A report by the Institute of Fiscal Studies, “The impact of Localised Council Tax Support Schemes (2019)” has evaluated the impact of different council tax support schemes across the country. It noted that the majority of councils had implemented a ‘minimum payment’ of varying amounts. The analysis concludes that arrears are most likely to be in households that previously received 100% support and did not receive a bill. The size of the new bill did not make a material difference in likelihood to pay for these groups. Whereas those who were already receiving partial support did not see a large spike in arrears.
- 1.12 The Council’s is committed to sustaining investment in the scheme to ensure that the poorest continue to receive 100% support, with no reduction in the total level of financial support, whilst redesigning the scheme to make it simpler to claim, sustain and administer, delivering fairness for those on Universal Credit and legacy benefits.
- 1.13 The Council has been modelling different options for scheme design with the aim of mitigating impacts on those that need the financial support the most. Despite the commitment to keep the total funding for the scheme the same, every scheme design results in different households gaining and losing support.

2. PROPOSED SCHEME

- 2.1 Through Camden 2025, Camden has made clear its commitment to tackling poverty and supporting those most in need. In so doing it has provided extra support for foster carers and those leaving care as well as invested in retaining 100% support for council tax for the poorest households.
- 2.2 It is proposed that Council continue to invest in maintaining the same level of financial support with Council Tax for Camden’s poorest households and consult on a new Council Tax Support Scheme to address the loss of entitlement for working UC claimants and reduction in administration funding. The aim is to design a scheme for working age households that is **simpler** to claim and sustain, delivers **fairness** for those on UC and legacy benefits, **affordable** in the context of the Council’s Medium Term Financial Strategy and **reduces unnecessary bureaucracy**.
- 2.6 The Council has worked with independent expertise and analysis from Policy in Practice to consider a range of options set out in section 3 below.
- 2.7 A roundtable discussion with local advice providers, One Housing, Zacchaeus 2000 and the Child Poverty Action Group took place to develop draft principles that should guide the future design. The organisations welcomed the opportunity to discuss the need for change and a follow-up will be held when the consultation on the recommended option for a scheme is launched. These sessions and other discussions with those leading on the Council’s employment support concluded with the following key principles:

- Focus of our investment should be supporting people in poverty rather than administration
- No minimum payment for all irrespective of circumstance
- Easy to work out entitlement, claim and sustain
- Providing stability and certainty for claimants to enable better budgeting
- Support for the poorest and least able to pay - retaining 100% for those out of work
- Based on people's real earnings (no minimum income floor for self-employed people)
- Continuing flexible/sensitive approach to debt recovery with a hardship fund
- Maintaining employment and in work progression incentives
- Responsive to changes/avoiding overpayments
- Fair to those on UC and legacy benefits
- Supporting households through the transition to UC
- Supporting young adults into employment
- Supporting households with children (especially lone parents)
- Supporting households with a disability or carer
- Support for single adults with health needs with the lowest ability to pay

2.8 The Council agreed to consult on a hybrid income and circumstance model summarised below and in Appendix A, as this provides the best opportunity to reflect the costs of children and disability alongside income bands.

	No Children	Children	Disabled or Carer *
Not Working or earning less than £84.40pw (8 x London Living Wage (LLW))	100%	100%	100%
Earning between £84.40 to £168.80pw (16 hours x LLW)	55%	65%	85%
Earning between £168.81 to £379.80 (36 hours x LLW)	35%	45%	55%
Earning between £379.81 to £417.78 (36 hours x LLW+10%)	0%	30%	45%
Earning between £417.79 to £474.75 (36 hours x LLW+25%)	0%	15%	30%

*To qualify for a Disabled Award the applicant or their partner have to be receiving Disabled Living Allowance (DLA), Personal Independence Payments (PiP) or Carers Allowance.

2.9 The recommended option for consultation will also:

- Stop making deductions for non-dependents under the age of 25 to support young people entering employment and non-dependents (of any age) in receipt of DLA/PiP or students

- Exempt childcare expenditure in the income calculation up to the level set out in the Government's default regulations, currently up to £300 a week
- Not implement the minimum income floor for self-employed workers
- Allow backdating of a claim for CTRS from 1/4/2020 or start of Universal Credit Claim or Passport Benefit claim if after this date – this will help those claiming UC who don't realise they have to make a separate claim
- Retain £16,000 capital limit
- Income thresholds are based on the published London Living Wage (LLW) and will update automatically with announcements
- Introduce a set non-dependent rate of 30% council tax liability for those in work aged 25 and over earning over £84.40/week.
- Change the name of the scheme document to Council Tax Support to address the current confusion with discounts
- Cease the use of Enforcement Agents for Council Tax debts for those in receipt of Council Tax Support
- Extend the use of the hardship fund to support those households facing genuine hardship as a result of the change
- Reassess existing claims at the launch of the scheme without people having to make a claim

2.10 The recommended option for consultation delivers a number of the principles set out in 2.7 above.

- sees no reduction in the total amount of financial support awarded – over £16m a year for working age and £9m for pensioners
- maintains our commitment to having no minimum payment for all – over 10,000 out of work and low income households will still get 100%
- delivers fairness, simplicity and affordability through a reduction in bureaucracy - enables £500,000 to be saved in staffing and other costs
- supports people's transition to Universal Credit
- supports young adults to stay with their families in Camden
- targets financial support at the poorest households
- provides additional support for families, disabled people and carers and disregards children and disability benefits in income calculations
- provides greater certainty and in work progression incentives for those in low pay
- provides a sensitive approach to debt collection with a hardship fund for those facing hardship

2.11 The draft scheme is now subject to a consultation with recipients, council tax payers and local advice agencies/voluntary organisations. An initial Equality Impact Assessment is set out in Appendix B. This will be updated as consultation progresses to incorporate any relevant feedback before a final decision is taken.

2.12 If, subject to consultation, an amended scheme is approved by Cabinet and full Council in December 2019/January 2020 in line with the current proposed option, then it is anticipated that the Benefit Service would undergo a restructure to save £500k for the 2020/21 financial year.

3. IMPACT ON CLAIMANTS WITH A DISABILITY

- 3.1 There are 596 Council Tax Reduction claimants who are receiving either Disabled Living Allowance or Personal Independence Payments. There are a further 210 claimants who receive Carer's Allowance due to the disability of a family member.
- 3.2 Claimants with a disability who receive Income Support, Employment Support Allowance, Job Seekers Allowance or are earning less than £84.40 per week will receive full benefit and will not have to pay any Council Tax, less any Non-Dependent Deduction.
- 3.3 The recommended option recognises the additional expenditure faced by claimants with a disability and those supporting a disabled family member. Claimants with these circumstances in employment will receive a higher award than those not disabled with similar earnings.
- 3.4 The recommended option is proposing to make changes to Non-Dependent Deductions. These are deductions made from a Council Tax Reduction Award for each adult living with the claimant (that is not a spouse or partner). Currently if the main claimant or their partner is on DLA/PIP, their non-dependents are not required to pay towards council tax, even though they may be high earners. However, in the current scheme, if the main claimant does not have a disability, but their adult children do, there is a non-dependent deduction for non-dependents with disability. A list of the current deductions is shown below: -

	Weekly deduction
Student	Nil
On Benefits (JSA,IS,ESA, UC No Earnings)	Nil
Nil Income	£ 4.00
Earning £0 - £207.70	£ 4.00
Earning £207.71 - £360.10	£ 8.10
Earning £360.11 - £447.40	£ 10.20
Earning more than £447.40	£ 12.20

Under the recommended option there will be no non-dependent deduction where the non-dependent is receiving Disabled Living Allowance or Personal Independence Payments.

- 3.5 Non-dependent deductions create a significant amount of administration as the Council is constantly adjusting the status of young adults living at home and chasing families for evidence of student status. Therefore it is proposed that the non-dependent deductions are changed to mean that all non-dependents under the age of 25 are exempt from a deduction. There would be a set

deduction of 30% of Council Tax liability for any non-dependent aged 25 and over in work and earning over 8 hours x LLW a week.

- 3.6. **Backdating** – Claimant can currently have their claim for Council Tax Reduction backdated for one calendar month. In order to bring the backdating of working age claim in line with pensioners it was considered that the scheme could be changed to backdate a working age claim to the start of a Universal Credit claim. This would reduce the administration costs of recovering small debts from people in receipt of welfare benefits and help disabled claimants who may struggle with the transition to Universal Credit.

4. **WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?**

- 4.1 The award of a Council Tax Reduction reduces financial pressures on the poorest residents by reducing their liability for Council Tax. If we are to change the scheme, we must design a Council Tax support scheme that is simple to claim as possible and targets support for those that need it most. Equally it is important that Camden fully understands the impact of any proposed scheme on its residents.

- 2.2 An independent organisation, Policy in Practice has been commissioned to undertake a more detailed evaluation of the impact of the proposed hybrid model compared to if the current scheme was retained in 2020/21. This has fed into an Equality Impact Assessment (Appendix B). These impacts, listed below, have been fully considered in determining the Council's recommended scheme for consultation.

- 12,383 (81%) would receive the same or more financial support
 - 7,309 (48%) households retain the same level of support as now
 - 5,074 (33%) households would gain financial support (at least £1 a week). These are predominately single adults, lone parents plus some couples with children across out of work, in work and self-employed groups. Average gain is £5.23/week
- 10,343 (68%) would continue to receive 100% support
- 2,992 (19%) households lose financial support (at least £1 a week). These are all in work households and generally couples with children with higher household incomes. Average loss is £9/week.
- 1,282 (8%) would move from 100% entitlement now to having something to pay – these are all in work or self-employed.
- 59 households currently receiving partial support would lose all entitlement due to high earnings.
- Generally, Council Tax bands ABC see an increase and EFGH see a reduction
- There is no statistical difference according to tenure

- 2.3 In determining the recommended scheme for consultation the Council has modelled a number of different options and tried to find a fair balance between

those losing and gaining support. Seeking to protect some groups from significant change would then result in bigger impacts on other groups. Therefore the Council has chosen to prioritise those with the lowest household incomes and therefore least able to pay. The equalities impact assessment identifies the potential impact on larger working families, which may result in impacting specific ethnicities as the scheme does not give more support according to the number of children or whether the claimant is single or in a couple. However as the scheme disregards child benefit, working tax credit, child tax credit and the children element of Universal Credit, these households have greater total household income than other households.

- 2.4 On broader risks, it is impossible to quantify who is not currently claiming that would under a new, more transparent scheme. Nor can we forecast who will transfer to Universal Credit and when or the impact of Brexit on employment. Therefore a risk remains that the numbers claiming and the numbers eligible for 100% can vary, resulting in changes to the total cost of the scheme. As such the scheme will need to be reviewed each year.
- 4.5 There is a risk that the software needed to administer any new scheme would not be in place by April 2020. Initial meetings with Civica, our benefits software supplier, have confirmed they are already working with other local authorities to provide software for schemes similar to the recommended scheme for consultation in this report. Some of these will went live in April 2019.

5. LINKS TO OUR CAMDEN PLAN

- 5.1 A Council Tax Reduction is awarded to claimants on low pay and therefore assists those furthest from the labour market move into employment. It also provides vital financial support for the poorest households in the borough and as such contributes to reducing debt and poverty.
- 5.2 The Council is also committed to designing services around the needs of citizens so this provides Camden with an opportunity to understand what matters to local people and design a new scheme that delivers priority outcomes.

6. CONSULTATION/ENGAGEMENT

- 6.1 The change to the scheme is being fully publicised with a wide ranging engagement strategy to ensure everyone can have their say. The consultation started on the 17th June 2019 and closes on the 15th September 2019 with a supporting communications strategy. See www.camden.gov.uk/CTRS
- 6.2 Details of the scheme have been sent to organisations supporting residents with disabilities. Their views will be sought at the regular Camden Advice Partnership meetings and throughout the engagement process. We will be able to have more detailed discussion with organisations and support groups, if requested.

- 6.3 Whilst designing a new scheme is complex, the consultation and details of the proposed scheme are as simple as possible to understand, distilling complex information into plain English. The consultation breaks down information and questions to support people to submit informed responses. An information pack that uses infographics and scenario-based examples to help people understand the implications, and include both top-level information and the full details of the scheme for transparency and to engage people with ranging levels of understanding and interest. We will provide questions and answers in the information pack for key queries that are likely to come up.
- 6.4 The consultation is available to complete online and on paper to make sure that people who are not digitally active can participate, and will also be available in different formats such as large print and translation on request. The consultation runs over three months to make sure that people who are away over the summer can still participate, and communications and engagement will be sustained across this period.
- 6.5 The consultation and engagement will target both council taxpayers and existing recipients of Council Tax Reduction.
- 6.6 We are directly contacting residents, holding focus groups, place targeted content on relevant parts of the website using user cookies and more universal communications to ensure everyone has a chance to give their views on the proposals. At the centre of this will be a short animated video that visually and in plain English explains the recommended CTRS and why changes are needed, which we will encourage our partners to share.
- 6.7 We will utilise other organisations' channels to promote the consultation, including TRAs and DMCs, GPs and leisure centres. We will promote the consultation internally to encourage staff to share with residents and to take part if they are among the 20% of staff who live in Camden.
- 6.8 Communications will sit alongside a wide-reaching programme of engagement, including:
- A presence within Contact Camden at 5PS, both publicising the proposals and the opportunity to feedback thoughts, as well as helping navigate residents through how the changes would impact them.
 - A series of drop in sessions across the borough's nine libraries, providing opportunities to come and speak to officers directly to understand how the system works and what the proposal may mean for them.
 - Officers taking part in summer events, working with housing, leisure and children's service colleagues to ensure physical presence at events, especially focussed where a high proportion of impacted residents will be present.
 - A follow-up meeting with organisations working to reduce poverty (Citizens Advice Camden, Child Poverty Action, Zacchaeus 2000 Trust) has already taken place.

7. LEGAL IMPLICATIONS

7.1 There is a statutory obligation on the Council to have a scheme specifying the reductions that apply to amounts of council tax payable by (a) persons whom the authority considers to be in financial need; or (b) persons in classes consisting of persons who the authority considers to be, in general, in financial need. A scheme must state the classes of persons who are entitled to a reduction under the scheme and the Local Government Finance Act 2012 states that classes may be determined by reference to, in particular:

- (a) the income of any person liable to pay council tax to the authority in respect of a dwelling;
- (b) the capital of any such person;
- (c) the income and capital of any other person who is a resident of the dwelling;
- (d) the number of dependants of any person within paragraph (a) or (c);
- (e) whether the person has made an application for the reduction.

7.2 For each financial year, the Council must consider whether to revise or replace its scheme and any revision or replacement must be made by 11 March in the preceding financial year to that which it is to take effect. The statutory requirement to consult applies to the Council when revising or replacing the scheme. These require that the authority must (in the following order):

- (a) consult any major precepting authority which has power to issue a precept to it;
- (b) publish a draft scheme in such manner as it thinks fit; and
- (c) consult such other persons as it considers are likely to have an interest in the operation of the scheme.

7.3 In addition, wherever there is a duty to consult, it is a duty to engage in lawful (and therefore fair) consultation. When looking at the precise circumstances of a case, however, the court will have in mind certain guiding principles that must be followed if consultation is to be fair, frequently referred to as "the *Gunning* principles":

- The consultation must be at a time when proposals are still at a formative stage.
- The proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response. Those consulted should be aware of the criteria that will be applied when considering proposals and which factors will be considered decisive or of substantial importance at the end of the problem, see [R \(Robin Murray & Co\) v The Lord Chancellor \[2011\] EWHC 1528 \(Admin\) \(16 June 2011\)](#).
- Adequate time must be given for consideration and response.
- The product of consultation must be conscientiously taken into account in finalising any statutory proposals.

The Supreme Court has held that the demands of fairness are likely to be somewhat higher when an authority contemplates depriving someone of an

existing benefit or advantage than when the claimant is a bare applicant for a future benefit

7.4 The DCLG guidance “Localising Support for Council Tax: Vulnerable people-key local authority duties”(February 2014) outlines the duties local authorities need to consider in relation to vulnerable groups in designing their schemes (other than those of state credit pension age who receive statutory protection). The duties have changed since the guidance was written and the summary below takes account of these amendments:

a) the public sector Equality Duty (The Equality Act 2010). The need for the local authorities to consciously consider this duty as an integral part of the decision making process and ensure it has sufficient information to do so is reiterated as is the need to take into account disabled peoples disabilities when making decisions about policies or services and the impact of their schemes on disabled people. This is a continuing duty.

b) the duty to mitigate effects of child poverty (The Child Poverty Act 2010). The relevant provisions were repealed by the Welfare Reform and Work Act 2016 in May 2016 and the Act renamed the Life Chances Act 2010 and replaced with a new duty on the Secretary of State to report levels of educational attainment and worklessness. However it is noted the guidance also referred to the fact that authorities may wish to use their scheme to help encourage separated parents to make child maintenance arrangements and maximising the money reaching children for example by fully disregarding child maintenance when assessing eligibility.

c) The duty to prevent homelessness (The Housing Act 1996). Authorities will want to consider how information about their scheme is made available to homeless households once they are secured accommodation and when taking into the equality duty, have regard to vulnerable individuals for whom it secures accommodation, or who are at risk of becoming homeless- for example, young people or individuals suffering from mental illness.

7.5 The public sector equality duty is a continuing duty and Cabinet Members must take into account in coming to any decision the Councils equality duties. In summary these legal obligations require the Council, when exercising its functions, to have ‘due regard’ to the need to 1. Eliminate discrimination, harassment, victimisation, and other conduct prohibited under the Act; 2 to advance equality of opportunity between people who share a relevant protected characteristic and those who do not; 3. Foster good relations between people who share a relevant protected characteristic and those who do not (which involves tackling prejudice and promoting understanding). Under the Duty the relevant protected characteristics are Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation. In respect of the first aim only i.e. reducing discrimination, etc the protected characteristic of marriage and civil partnership is also relevant. In this case, for this decision, at present, the attached EIA concludes that there is no potential for discrimination and all appropriate opportunities to advance equality and foster

good relations have been taken and the EIA will be kept under review as the consultation progresses.

8. RESOURCE IMPLICATIONS

- 8.1 Funding of £150,000 will be required to change the Council Tax Reduction Scheme. This will cover the independent evaluation of any proposed schemes, any public consultation costs and any software changes.
- 8.2 The restructuring of the Benefit Service will lead the deletion of up to ten posts in 2020/21 and further reduction in later years. As any redundancies would be a direct result of the roll out of Universal Credit redundancy costs will be met by the Department for Work and Pensions.(see Universal Credit Local Authority Bulletin UC1/2017 <https://www.gov.uk/government/publications/universal-credit-local-authority-bulletins-2017>)

9. TIMETABLE FOR IMPLEMENTATION

- 9.1 At present, it is planned that the consultation will run from June to September 2019. The results will be analysed with recommendations for a final scheme likely to go to Cabinet in December 2019 and Council in January 2020. Subject to the outcome of the consultation and any subsequent decision on a scheme , it is currently anticipated that any required restructure will begin alongside changes to the software to enable the changes to go live in April 2020 and be reflected in the Council Tax bills issued in March 2020.

10. APPENDICES

- A – Proposed option for Council Tax Reduction Scheme for consultation
- B – Equalities Impact Assessment

REPORT ENDS

Appendix A

Recommended changes to the Council Tax Reduction Scheme for consultation

For working age households only - Income based scheme based on household composition

	No Children	Children	Disabled or Carer
Not Working or earning less than £84.40pw (8 hours x London Living Wage)	100%	100%	100%
Earning between £84.40 to £168.80pw (16 hours x LLW)	55%	65%	85%
Earning between £168.81 to £379.80 (36 hours x LLW)	35%	45%	55%
Earning between £379.81 to £417.78 (36 hours x LLW+10%)	0%	30%	45%
Earning between £417.79 to £474.75 (36 hours x LLW+25%)	0%	15%	30%

- Earnings based on London Living Wage and uplifted in line with announcements
- Disabled or Carer awards are made where the claimants or partner are in receipt of either Disabled Living Allowance, Personal Independence Payments or Carers Allowance
- Capital Limit - £16,000
- Maximum Income £474.75 per week
- Self-Employed – Actual Figures based on last tax return
- Non-Dependent Deductions – nil for all under 25, students and those in receipt of DLA/PIP. 30% of council tax liability for all household members aged 25 and over in employment earning over 8hours x LLW a week
- Backdating to 1/4/2020 or start of Universal Credit Claim or Passport Benefit claim if after this date.
- Childcare costs are disregarded in accordance with the MHCLG default regulations currently £175/week for one child and £300/week for two or more where lone parent or both parents work at least 16 hours/week
- Disregard income from child benefit, child tax credit, working tax credit, disability benefits and the disability and child elements of Universal Credit

The detailed scheme is available to view at www.camden.gov.uk/benefits

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Equalities Impact Assessment

Camden Council

What is an Equality Impact Assessment?

An Equality Impact Assessment (“EIA”) is a way of analysing a proposed organisational policy or decision to assess its effect on people with protected characteristics covered by the Equality Act 2010*. To meet the Council’s statutory duty the EIA should also address issues of advancing opportunities and fostering good relations between different groups in the community.

It is essential that you start to think about the EIA process before you develop any new activity or make changes to an existing activity. This is because the EIA needs to be integral to service improvement rather than an ‘add-on’. If equality analysis is done at the end of a process it will often be too late for changes to be made.

The courts place significant weight on the existence of some form of documentary evidence of compliance with the Public Sector Equality Duty* when determining judicial review cases. Having an EIA as part of the report which goes to the decision makers and making reference to the EIA within that report helps to demonstrate that we have considered our public sector equality duty and given “due regard” to the effects the decision will have on different groups.

The EIA must be considered at an early stage of the formation of a policy/decision and inform its development, rather than being added on at the end of the process. The EIA form should be completed and updated as the policy / decision progresses and reviewed after the policy or change has been implemented.

If a staff restructure or organisational change is identified as necessary following the review of an activity then an EIA needs to be completed for both stages of the process, i.e. one when the activity is reviewed and one when the restructure or organisational change is undertaken.

Please note all sections must be completed. However the obligation is to have due regard and it may be that while an issue requires the completion of an EIA, the matters at hand may not lend themselves to some of the obligations, for example fostering good relations. As long as this has been properly considered it is legitimate to conclude that this cannot be applied in a particular case.

Explanatory Notes

What is our Public Sector Equality Duty (PSED)

Under section 149 of the Equality Act 2010 (the Act/ EqA 2010) all public authorities must, in the exercise of their functions, have 'due regard' to the need to:

1. Eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act (s149(1)(a));
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not (s149(1)(b)); This involves having due regard to the need to:
 - o remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
 - o take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it (section 149(4)); and
 - o encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.
(Section 149(3), EqA 2010.)
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (section 149(1)(c)). This involves having due regard, in particular, to the need to tackle prejudice and promote understanding (section 149(5), EqA 2010).

Section 149(6) makes it clear that compliance with the duties in section 149(1) may involve treating some people more favourably than others, but that is not to be taken as permitting conduct that would otherwise be prohibited by or under the Act (this includes breach of an equality clause or rule or breach of a non-discrimination rule (section 149(8))).

Section 146(4) states that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take into account of disabled persons' disabilities.

Under the Duty the relevant protected characteristics are: Age, Disability, Gender reassignment, Pregnancy and maternity, Race, Religion or belief, Sex, Sexual orientation.

- In respect of the first aim only i.e. reducing discrimination, etc. the protected characteristic of marriage and civil partnership is also relevant.

- In meeting the needs of disabled people we have a duty to take account of their disability and make reasonable adjustments to our services and policies where appropriate. Under s26 of the Act a person (a "service-provider") concerned with the provision of a service to the public or a section of the public (for payment or not) must not discriminate against a person requiring the service by not providing the person with the service. In addition, a person must not, in the exercise of a public function that it not the provision of a service to the public or section of the public, do anything that constitutes discrimination, harassment or victimisation.
- We must be able to demonstrate that we have considered and had due regard to all three parts of this duty. We must also look for anything that directly or indirectly discriminates.

What do we mean by “due regard”?

- This is not a question of ticking boxes, but should at the heart of the decision-making process.
- decision-makers must be made aware of their duty to have due regard – so understand the legal requirements on them;
- There should be an analysis of the data – who is this going to affect and how will it put against the legal requirements
- We need to have thought about these duties both before and during consideration of a particular policy and we need to be able to demonstrate that we have done so
- The Duty is “non-delegable” so it is for the decision maker themselves to consider with assistance from the report and officer analysis. What matters is what he or she took into account and what he or she knew so it is important to have the relevant papers accompanying the report. The report should make explicit reference to the EIA. the duty is continuing so while this guide is aimed at the point of decision we should at appropriate points review our duties against the decision/policy
- The decision maker must assess the risk and extent of any adverse impact and the ways in which such risk may be mitigated before the adoption of a proposed policy or decision has been taken
- Officers reporting to or advising decision makers must not merely tell the decision maker what he/she wants to hear but need to be “rigorous in both enquiring and reporting to them”
- The duty should be reconsidered if new information comes to light

“

What is due regard? In my view, it is the regard that is appropriate in all the circumstances. These include on the one hand the importance of the areas of life of the members of the disadvantaged ... group that are affected by the inequality of opportunity and the extent of the inequality; and on the other hand, such countervailing factors as are relevant to the function which the decision-maker is performing”

Lord Justice Dyson

”

We need to take a sensible and proportionate approach to this based on the nature of the decision or policy being reviewed

STAGE ONE - WHAT IS BEING ANALYSED?

Question 1

What is changing and why?

If the issue is going for decision, e.g. at Cabinet meeting, what are the decision makers being asked to

decide? If you are reviewing a policy what are its main aims? How will these changes affect people?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

The Council is being asked to approve a Council Tax Reduction scheme for the financial year 2020/21.

Council Tax Reduction awards have been completed using the same data as Housing Benefit awards. There will be fewer Housing Benefit claims as new claimants now claim Universal Credit. This will lead to a reduction of Government funding for processing benefit claims from £1.8m to £500k.

The aim of the proposed Council Tax Reduction Scheme is to have a scheme that is simpler to administer but is still fair to claimants.

The Council will maintain current levels of award but significantly reduce administrative costs.

Changes to the Council Tax Reduction Scheme will affect working-age residents with no or very low incomes.

There will be no changes to Council Tax Reduction awards to pensioners.

Notes to Question 1

- Summarise briefly and precisely just what the decision is about. In particular what changes will happen if this decision is agreed and put into effect? What happens now and what will happen in the future? What will be different?
- **Do not cut and paste the report or policy** but concisely restate it, considering equalities issues directly against the facts
- **Focus on the impacts on people** e.g. the users of any facility or service.

Question 2

STAGE 2 – PLANNING YOUR EQUALITY ANALYSIS

Read the notes to Question 2

Gather relevant equality data and information to show who will be affected by this decision and how. Set this out below. Include the results of any consultation or engagement. If you have identified any information gaps set out what these are.

In particular do those from protected groups benefit or will they experience specific and disproportionate impacts? Will there be any direct or indirect discrimination?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

Consider each protected group:

- Age
- Disability
- Gender Reassignment
- Marriage and Civil Partnership
- Pregnancy and maternity
- Race
- Religion or Belief
- Sex
- Sexual orientation

Consultation and Engagement

Age

The groups below were contacted during the consultation:

Say what the groups said.

Say what the individuals said.

Any key themes?

Disability

The groups below were contacted during the consultation:

Say what the groups said.

Say what the individuals said.

Any key themes?

Gender reassignment

The groups below were contacted during the consultation:

Say what the groups said.

Say what the individuals said.

Any key themes?

Pregnancy and maternity

The groups below were contacted during the consultation:

Say what the groups said.

Say what the individuals said.

Any key themes?

Race

The groups below were contacted during the consultation:

Say what the groups said.

Say what the individuals said.

Any key themes?

Religion or belief

The groups below were contacted during the consultation:
 Say what the groups said.
 Say what the individuals said.
 Any key themes?

Sex/gender

The groups below were contacted during the consultation:
 Say what the groups said.
 Say what the individuals said.
 Any key themes?

Sexual orientation

The groups below were contacted during the consultation:
 Say what the groups said.
 Say what the individuals said.
 Any key themes?

The majority of households are liable to pay Council Tax. Of these approximately one quarter are awarded a reduction as they have no income or a very low income.

Sex

Claimants	Total	Single	Parents	Couple	Parents
Male	5,686	4,233	170	1,453	1,121
Female	9,233	7,710	3,728	1,523	1,238
Not Known	33		11		
Total	14,952	11,944	3,909	2,977	2,359

Age

Age	Claimants
16-24	228
25 – 34	1,825
35 – 44	3,778
45 – 54	4,787
55 – 67	4,334
Total	14,952

Commented [RA1]: I assume this will be removed before it's published?

Ethnicity

From Census Figures for Camden

White	White British	44%
	White Irish	3%
	Gypsy/Irish Traveller	0%
	White Other	19%
Mixed	White and Black Caribbean	1%
	White and Black African	1%
	White and Asian	2%
	Other Mixed	2%
Asian	Indian	3%
	Pakistani	1%
	Bangladeshi	6%
	Chinese	3%
	Other Asian	4%
Black	Caribbean	5%
	African	2%
	Other Black	2%
Other	Arab	2%
	Any Other Ethnic Group	2%

Dependent Children

Children	Claimants
0	8,689
1	2,479
2	2,005
3	1,098
4	461
5	159
6	43
7	14
8	4
Total	14,952

Disabled Claimants

	Claimants
Disabled Living Allowance	145
Personal Independence Payment	451
Carers' Allowance for family member	210
Total	806

Sexual Orientation

There are 15 same-sex couples claiming Council Tax Reduction

Impact

The majority of Council Tax Reduction claimants will not be affected by the proposed changes, as the proposed scheme will award a 100% discount to all claimants earning less than £84.40 per week.

Only claimants with an income in excess of £84.40 will not receive a 100% award.

Across each income band, generally those in the top half of the band will get a higher award and those in the bottom half will get a lower award. The scheme provides for a higher award to disabled claimants, so the impact will not be as great.

The current Council Tax Reduction Scheme awards a higher amount to couples, including same-sex partners and larger families. Under the proposed scheme a much higher percentage of claimants from this group will receive a lower award.

There are a large number of single parents, the majority of whom are women. For this group of claimants, a far higher proportion would receive a higher award under the proposed scheme.

Whilst there is limited information on ethnic origin, there is evidence that there is a higher proportion of claimants from BAME within Camden..

Notes to Question 2

- Here use data to show who could be affected by the decision. Consider who uses the service now and might use it in the future. Think about the social mix of the borough and of our workforce.
- If available use profile of service users and potential users / staff by protected groups: (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation). You could consider the following:
 - Take up of services, by protected group if available;
 - Recommendations from previous inspections or audits;
 - Comparisons with similar activities in other departments, councils or public bodies;
 - Results of any consultation and engagement activities broken down by protected groups (if available) - sources could include, complaints, mystery shopping, survey results, focus groups, meetings with residents;
 - Potential barriers to participation for the different protected groups;
 - National, regional and local sources of research or data – including statutory consultations;
 - Workforce equality data will be provided by your HR change adviser for organisational change / restructure EIAs and
 - For organisational change / restructure EIAs include the results of any consultation or meetings with staff or trade unions.
- **Do not simply repeat borough wide or general service equality data** – be as precise and to the point as possible.
- If there are gaps in equality information for some protected groups identify these in this section of the form and outline any steps you plan to take to fill these gaps. Consider:
 - Any relevant groups who have not yet been consulted or engaged;
 - Whether it is possible to breakdown existing data or consultation results by different protected groups;
 - If you are conducting an organisational change / restructure EIA and there are data gaps consider asking affected staff to update their details on Oracle.
- We are under a legal duty to be properly informed before making a decision. If the relevant data is not available we are under a duty to obtain it and this will often mean some consultation with appropriate groups is required.
- Is there a particular impact on one or more of the protected groups? Who are the groups and what is the impact?
- Consider indirect discrimination (which is a practice, policy or rule which applies to everyone in the same way, but has a worse effect on some groups and causes disadvantage) - for example not allowing part-time work will disadvantage some groups or making people produce a driver's licence for ID purposes.

Question 3

STAGE 3- ANALYSING YOUR EQUALITY INFORMATION AND ASSESSING THE IMPACT

Analysing the evidence outlined above, does the proposed decision have an impact (positive or adverse) on our duty to eliminate discrimination/harassment and victimisation, advance equality of opportunity or foster good relations between different groups in the community (those that share characteristics and those that do not)?

The proposed scheme will have a greater impact on larger families, whose earnings are greater than £84.40 per week. However, the impact is mitigated as larger families will have a greater entitlement to Tax Credits, Child Benefit and the family element of Universal Credit.

Couples earning more than £84.40 per week will see a greater reduction in entitlement than a single person with a similar income.

The new scheme will assist young adults aged under 26 years old, as there will be no non-dependent deductions for this age group. This will encourage young adults to obtain employment without a financial loss to their parents or the Council Tax-charge payer for the property they are living in.

Equality impact summary

Please use this grid to summarise the impacts outlined above.

Protected group	Summarise any possible negative impacts that have been identified for each protected group and the impact of this for the development of the activity	Summarise any positive impacts or potential opportunities to advance equality or foster good relations for each protected group
Age	A proportion of in-work claimants will receive a lower award across all age groups	A proportion of in-work claimants will receive a higher award across all age groups. Claimants earning less than £84.40 will receive a 100% award.
Disability	A proportion of disabled In work claimants will receive a lower award	The scheme make a higher award to claimants in receipt of disability benefits or caring for disabled family members.
Gender reassignment	No impact	
Marriage and Civil Partnership	A higher proportion of couples, especially those with larger families, will receive a lower award	
Pregnancy and maternity		Maternity benefits will not be counted as income.
Race	A proportion of in-work claimants will receive a lower award across all age groups.	A proportion of in-work claimants will receive a higher award across all age groups. Claimants earning less than £84.40 will receive a 100% award.
Religion or belief	No impact.	
Sex	A proportion of in-work claimants will receive a lower award across all age groups.	A proportion of in-work claimants will receive a lower award across all age groups.
Sexual orientation	There are a small number of same-sex couples who may receive a lower award.	

Notes to Question 3

- Here, think about how the proposals may impact (positive and or negative) upon those wider duties and aspirations?
- What might say a reduction in the hours of a facility that mainly serves a particular group have on our wider duties?
- Examples of eliminating discrimination: Taking action to ensure that services are open to all groups – e.g. targeting help at particular deprived sections of the community or funding services who work to prevent discrimination
- Does take up of the activity differ between people from different protected groups?
- Have the outcomes of your consultation and engagement results identified potentially negative or positive impacts?
- Are some groups less satisfied than others with the activity as it currently stands?
- Is there a greater impact on one protected group, is this consistent with the aims of the activity?
- For organisational change / restructures analyse the outcomes of consultation with staff and trade unions and analyse the staff data provided by your change adviser
- If you have identified negative impacts include details of who these findings have been discussed with (e.g. Legal, HR) and their views
- Are there any further changes that could be made to deliver service improvements or make the activity more responsive?

Question 4

STAGE 4-PLANNING FOR IMPROVEMENT

If there is an adverse impact, can it be avoided?

If it can't be avoided, what are we doing to mitigate the impact?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

The Council will liaise with voluntary sectors groups campaigning on poverty-related issues and groups representing the disabled and ethnic minorities.

The Council will work with the voluntary sector to provide employment and training advice for parents and couples on how to increase their earnings.

The Council will provide advice on how to access registered child care. The cost of registered child care can be offset against the claimant's earnings.

The Council will establish a hardship fund for claimants adversely impacted by the proposed changes.

The Council Tax recovery process will take in to account the additional hardship faced by claimants on low income and take steps to reduce the recovery action taken against these groups.

The new scheme will assist young adults aged under 26 years old, as there will be no non-dependent deductions for this age group. This will encourage young adults to obtain employment without a financial loss to their parents or the Council Tax-charge payer for the property they are living in.

Notes to Question 4

- Assuming there is an impact, what are we going to do about it? We need to make sure the **decision makers understand the impacts**
- All our policies and decisions should be designed to eliminate discrimination and contribute to our other obligations such as promoting good relations.
- If it can't be avoided can it be mitigated in some other way?
- There might be decisions elsewhere or perhaps additional spending on other services which could reduce the impact. Beware of simply saying that we will direct service users to other services or resources without considering the feasibility of doing so or the knock-on effect for those services
- We don't have to completely eliminate a negative impact, but we must identify it and try to mitigate it and the **decision makers must be in a position to fully understand the implications of their decision and balance off the competing interests** – e.g. the impact against the need to make savings and balance our budget

Question 5

Could any part of the proposed activity discriminate unlawfully?
Can we advance equality of opportunity via this decision/policy?
Can we foster good relations via this decision/policy?

[You can use this space to capture your reader's attention with a quote from the document or to emphasise a key point.]

No part of the proposed Council Tax Reduction scheme discriminates unlawfully.

The decision to abolish non-dependent deductions for young adults ages under 26 years old will encourage this group to take up paid employment.

Notes to Question 5

- **There may be decisions or policies where this is not going to be applicable. Explain this briefly in the box above. The important point is that it is carefully considered.**
- Suggest positive steps that can be achieved towards our statutory obligations to remove or minimise disadvantages suffered because of protected characteristics, e.g. taking steps to meet the needs of people from the different backgrounds when they are different to the needs of others, encouraging participation from groups when participation is disproportionately low
- Advancing equality of opportunity - (NB this does not apply to marriage and civil partnership). **This is a “positive duty”** which requires public authorities to consider taking proactive steps to root out discrimination and harassment and advance equality of opportunity in relation to their functions—from the design and delivery of policies and services to their capacity as employers. The duties require us to give consideration to taking positive steps to dismantle barriers. Advancing equality of opportunity might require treating some groups differently e.g. targeting training at disabled people to stand as councillors.
- **The legislation requires when we have due regard in terms of advancing equality of opportunity to:**
 - a. **Remove/minimises disadvantage suffered by those who share a characteristic and is connected to it**
 - b. **Take steps to meet the different needs of those who share a characteristic**
 - c. **Encourage those who share a characteristic to participate in public life or any other activity when participation is disproportionately low.**
- Advancing opportunity includes the fact that the steps needed to meet the needs of disabled persons take into account the disabled persons' disabilities
- We are required to have “due regard” to the need to foster good relations between people who share a relevant protected characteristic and people who do not share it. This involves having due regard, in particular, to the need to tackle prejudice, and promote understanding.

Examples

- An employer to provide staff with education and guidance, with the aim of fostering good relations between its trans staff and its non-trans staff.
- A school to review its anti-bullying strategy to ensure that it addresses the issue of homophobic bullying, with the aim of fostering good relations, and in particular tackling prejudice against gay and lesbian people.
- Local authority (Not Camden) to introduce measures to facilitate understanding and conciliation between Sunni and Shi'a Muslims living in a particular area, with the aim of fostering relations between people of different religious beliefs.
- Our work to encourage Bangladeshi tenants involvement in TA's.

STAGE 5- OUTCOME OF THE EIA

Use this stage to record the outcome of the EIA. An EIA has four possible outcomes.

Outcome of analysis	Description	Select as applicable
Continue the activity	The EIA shows no potential for discrimination and all appropriate opportunities to advance equality and foster good relations have been taken.	X
Change the activity	The EIA identified the need to make changes to the activity to ensure it does not discriminate and/ or that all appropriate opportunities to advance equality and /or foster good relations have been taken. These changes are included in the planning for improvement section of this form.	
Justify and continue the activity without changes	The EIA has identified discrimination and / or missed opportunities to advance equality and / or foster good relations but it is still reasonable to continue the activity. Outline the reasons for this and the information used to reach this decision in the box below.	
Stop the activity	The EIA shows unlawful discrimination.	

STAGE 6 –CHECK AND SIGN OFF

EIA prepared by: Alan Porter

Date: _____

EIA checked by: _____

Date:

EIA approved by:

Date:

(Relevant Director Sponsor)

What to do upon approval

For organizational change: If your EIA relates to internal staff, please send to your HR Business Adviser.

For all other EIAs: Please upload onto Sharepoint via this link:

LONDON BOROUGH OF CAMDEN	WARDS: King's Cross
REPORT TITLE Camden Town Hall refurbishment – Design for Accessibility	
REPORT OF Programme Manager Corporate Accommodation	
FOR SUBMISSION TO Disability Oversight Panel	DATE 24 th July 2019
<p>SUMMARY OF REPORT</p> <p>This report updated the Disability Oversight Panel on the current stage of design development on the refurbishment of Camden Town Hall as regards design for accessibility and seeks from the Panel on the access features of the developed designs which can be reflected in further stages of development. A short design for access presentation will be given at the meeting.</p> <p>Local Government Act 1972 – Access to Information</p> <p>No documents which require listing were used in the preparation of the report.</p> <p>Contact Officer: Ian Patterson Programme Manager Corporate Accommodation Development – Supporting Communities 3rd Floor, 5 Pancras Square London N1C 4AG E-mail: ian.patterson@camden.gov.uk Telephone: 020 7974 8635</p>	
<p>WHAT DECISIONS ARE BEING ASKED FOR?</p> <p style="text-align: center;">The Panel is asked to review and comment upon the current stage of Town Hall design as regards disability access improvements.</p>	

Signed: Neil Vokes, Director of Development

Date: 9th July 2019

1. WHAT IS THIS REPORT ABOUT?

- 1.1 This report reviews the refurbishment proposals for Camden Town Hall with specific focus on design to improve disability access.

2. WHY IS THIS REPORT NECESSARY?

- 2.1 The Disability Oversight Panel received a presentation on Town Hall access in the earlier stages of design in mid-2018. Since that time more detailed design development has taken place and a planning application has been submitted. This report seeks views from the Panel on the access features of the developed designs which can be reflected in further stages of development.

3. OPTIONS

- 3.1 The business case for the refurbishment of Camden Town Hall approved by the Cabinet includes:
- Modernised spaces for civic and democratic functions and public services to improve and enhance public access to services and the democratic process
 - In line with the Council's digital strategy, enhanced use of technology and a wider digital offer for increased effectiveness, transparency and public access
 - Space for business to occupy the 2nd and 3rd floors of the Town Hall.
 - Space for small and medium enterprises (SMEs) in the basement.
 - A major investment in building infrastructure to ensure the long term future of the Town Hall as the Council's main democratic and civic space.
 - Long term income to support the initial investment including lease income from a commercial operator of the Camden Centre
- 3.2 Improving disability access has been an important part of the design development for the Town Hall refurbishment project. This is challenging in the context of a Grade II listed building with significant heritage features. A planning application for the Town Hall refurbishment project has been submitted which include a Design and Access Statement. The relevant section 'Design for Accessibility' is attached as an extract at Appendix A.
- 3.3 Further detailed review and design development is taking place prior to the start of works in early 2020. This report and the associated design presentation to be given at the meeting invites the Panel to comment on the proposals and options which can be reflected in the next stages of design.
- ## **4. WHAT ARE THE REASONS FOR THE RECOMMENDED DECISIONS?**
- 4.1 To obtain the views of the Disability Oversight Panel on accessible design proposals to be included within the proposals for the Town Hall.

5. WHAT ARE THE KEY IMPACTS / RISKS? HOW WILL THEY BE ADDRESSED?

- 5.1 The design proposals will increase access to the Town Hall. However the fact that the Town Hall is a Grade II listed building presents both a challenge and a risk to achieving enhanced access. Design development has taken place with input from specialist heritage and disability access advisers to ensure that the best solution possible in the context of the Town Hall is achieved.

6. WHAT ACTIONS WILL BE TAKEN AND WHEN FOLLOWING THE DECISION AND HOW WILL THIS BE MONITORED?

- 6.1 Views from the Panel will be included in later stages of design development. Progress will be reported to the Executive Director Corporate Services, the Cabinet Member for Finance and Transformation and subsequent meetings of the Town Hall Councillors Steering Group and the Disability Oversight Panel.

7. LINKS TO THE CAMDEN PLAN OBJECTIVES

- 7.1 The proposals will support delivery of the overall Camden Town Hall project which in turn supports several Camden Plan objectives:

Camden 2025

Call to action two: In 2025, growth in Camden should be strong and inclusive – everyone should be able to access the work that is right for them.

We need to make Camden the best place in London to do business, with the infrastructure that business needs to grow.

Our Camden Plan

Strong growth and access to jobs

We will help to make Camden the best place in London to do business and to work, working with the business community to deliver genuinely inclusive growth that benefits everyone.

We will create the conditions for jobs in the life sciences and the digital, data and creative sectors to grow, and ensure clear pathways into these for local people.

We will increase the number of affordable workspaces in the borough, supporting small businesses to gain a foothold here and to grow. We will use all our levers as a planning authority, and through our Community Investment Programme, to deliver high-quality flexible workspaces that can respond to our growth sectors and changing patterns of employment.

8.0 LEGAL IMPLICATIONS (comments from the Borough Solicitor)

8.1 The Borough Solicitor has been consulted on this report and has no further comments.

9. FINANCIAL IMPLICATIONS (comments from the Executive Director Corporate Services)

9.1 Accessible design improvements form an integral part of the approved capital budget for the Camden Town Hall refurbishment. The cost plan will be refined further as the design proposals are developed.

REPORT ENDS

APPENDIX A – Extract from Camden Town Hall Design and Access Statement

6.3 DESIGN FOR ACCESSIBILITY

In essence the project aims to bring Camden Town Hall's facilities up to modern standards and optimise use of parts of the building, where council departments have been relocated elsewhere. Currently the building does have ramped and stepped entrances; but to reach the upper floor levels there are two inadequate lifts within the Council areas, which require upgrading to improve accessibility. There is no lift access to the upper levels in the Camden Centre. Other facilities, such as the existing wheelchair accessible WC cubicles do not meet current access guidelines.

The proposals will clearly divide the Town Hall into three zones, each with their own upgraded accessible entrances and circulation cores. These three zones are LBC Civic and Democratic Services at the west end; lettable office accommodation for start-up and more established businesses at basement, second and third floor levels; and the former Camden Centre operated as a prestigious events venue at the east end.

The entrances will be fully accessible, either level, via ramps or platform lifts, and via steps, taking account of the Grade II listed status of the building. Each zone will have at least one lift and the building will be organised in a logical way, making use of existing circulation and augmenting facilities, such as WCs, where required. These will be better distributed on all floor levels so that the building users will not need to negotiate stairs and lifts to reach them.

Access improvements to the LBC areas will include improvements to the main entrance ramp and refurbishment of the two existing lifts. There will be level access to the reorganised Wedding Suites and Registrar's interview rooms, and the Council Chamber, Committee and Members' Rooms on the first floor will be refurbished. Provision has been made to improve accessible seating areas in the Council Chamber.

There will be a new level entrance into the SME and office reception area, and the offices at basement, second and third floor levels will be accessible by new two passenger lifts. One of these will be equipped as an evacuation lift, to furnish easy means of escape for disabled people. The offices themselves will have fully flexible layouts, served by wheelchair accessible WCs and breakout facilities. On the third floor, a smaller office area will be on a raised platform, reached up a short flight of steps or via a platform lift.

The Camden Centre will have an improved entrance from Bidborough Street, with new steps and ramps designed to current access standards. A new main entrance from Tonbridge Walk will have a platform lift adjacent to the new entrance steps. Internally there will be a new lift up to the first floor gallery and an updated unisex wheelchair accessible WC.

At this detailed design stage the stairs, lifts, WCs, doors and door furniture are being continually reviewed in terms of their accessibility. The design of the visual

environment will make sure that there is sufficient contrast between walls, floors, doors, ironmongery and sanitary fittings. The lighting scheme will ensure adequate illumination, particularly on circulation routes and will minimise glare and reflections. Reception facilities and new Wedding Suites will have induction loops and there will be audio enhancement (fixed induction loops and portable audio-assistance systems) in LBC rooms and meeting rooms. People with dementia and learning disabilities will appreciate the more logical circulation and the improved visual and audio environment.

Once complete the proposals for Camden Town Hall will considerably enhance access for people with a range of disabilities, and all building users.

<p>LONDON BOROUGH OF CAMDEN</p>	<p>WARDS: All</p>
<p>REPORT TITLE Evidence base: Outcomes and experiences of BAME Disabled people in Camden</p>	
<p>REPORT OF Head of Strategy Corporate Services</p>	
<p>FOR SUBMISSION TO The Disability Oversight Panel</p>	<p>DATE 03/07/2019</p>
<p>SUMMARY OF REPORT This report lays out what we know about Camden residents who have a disability and are also Black, Asian or from Minority Ethnicities (BAME). Both national and local data have been used to form this report as well as information from qualitative and quantitative sources. This research has been done in order to build a picture of what Camden knows about the experiences and needs of BAME residents who have disabilities.</p> <p>Local Government Act 1972 – Access to Information</p> <p>The following documents have been used in the preparation of this report: No documents that require listing have been used in the preparation of this report</p> <p>Contact Officer: Rosie Clewlow Graduate Trainee Strategy & Change, Floor 5, 5 Pancras Square, Kings Cross, N1C 4AG Rosie.clewlow@camden.gov.uk</p>	
<p>RECOMMENDATIONS</p> <p>This report has highlighted the importance of considering the intersectionality of people’s lives and therefore collect data that cuts across different characteristics. Data on disability is rarely cross-tabulated by ethnicity and this is true nationally and locally in Camden.</p> <p>Further guidance to be provided on completing Equality Impact Assessments to consider the impact of proposals on people with multiple protected characteristics.</p>	

1. Purpose of Report

- 1.1. This report lays out what we know about Camden residents who have a disability and are also Black, Asian or from Minority Ethnicities (BAME). For the purpose of this report disabilities include both physical and mental/emotional disabilities, learning disabilities and long-term health problems. Both national and local data have been used to form this report as well as information from qualitative and quantitative sources.
- 1.2. This research has been done in order to build a picture of what Camden knows about the experiences and needs of BAME residents who have disabilities. By forming this analysis gaps in what we know can be revealed, areas where service delivery could be improved are highlighted, and the unique needs and experiences of BAME disabled people better understood. Therefore future policy and practice can be tailored to suit these citizens' needs and requirements to the fullest.
- 1.3. This report finds that BAME disabled people face multiple barriers and challenges due to the intersectionality of being BAME and disabled. This leads to multiple disadvantages in terms of opportunity and access to resources.
- 1.4. Experiences vary between people but common barriers are access to services due to lack of language and cultural appropriateness and access to employment due to discrimination (nationally disabled people are twice as likely to be unemployed compared to non-disabled people¹).
- 1.5. A consideration of this research is that data on BAME disabled residents in Camden is limited and in some cases does not exist. For example there is no register of people with physical disabilities in Camden and it is noted anecdotally that disabled people are unlikely to share their lived experience due to fear of persecution or stigma. Additionally, where data is available on disability it is unlikely to be broken down by ethnicity.
- 1.6. This report is the start of a series of evidence bases created for the London Borough of Camden that focus on equality and cohesion and will help build a better picture of what we know about our residents.

2. National Context

- 2.2. National data states that outcomes for BAME disabled people are worse than that of the general population. This population are effected by the systemic barriers against both BAME and disabled people. Access to services, employment market, and society can be reduced if you are BAME and further if you are disabled.

¹ Disability Facts and Figures, Scope, 2018: <https://www.scope.org.uk/media/disability-facts-figures/>

- 2.3. Research from the LSE found that there are at least one million BAME disabled people living in the UK. As BAME Disabled people can face multiple disadvantages and barriers their research advises that policy-makers, advocates and service providers should consider carefully how such overlapping identities can affect, and be affected by, policy decisions². BME disabled people's needs and views have often fallen between the two areas of disability and race equality policy.
- 2.4. According to Scope, a disabled people charity, 1 in 3 disabled people feel that three is a lot of discrimination in the UK towards disability³ and research by Carers UK ⁴ found that there are multiple additional difficulties and barriers for BAME carers such as struggling with language barriers, accessing culturally appropriate services and stereotyping around caring. This puts them at greater risk of ill health, poverty, loss of employment and social isolation.
- 2.5. Scope and the Equalities National Council – a user-led BME disabled people's organisation – carried out research to identify how BME (alternative term used in the UK to describe BAME people⁵) people feel about the services available to them⁶. They found that: nearly half of all minority ethnic disabled people live in household poverty, compared with 1 in 5 of the population as a whole; individual incomes for BME disabled people are 30% lower than for the general population; and less than 4 in 10 BME disabled people of working age are in employment. Experiences reported in the research were difficulties in communication and heightened levels of stigma (which is particularly acute within some ethnic minority communities).

3. Camden Context

- 3.1. At the time of the last census, in 2011, 34% of Camden's residents were from black and minority ethnic groups (BAME) making up 74,283 residents⁷ and there was 35,037 BAME residents living with a long-term health problem or disability in Camden. This makes up just over 1/3 of all residents living with a long-term health problem or disability in Camden (107,885) therefore this rate is fairly proportional⁸.

² 'The already disadvantaged and little understood BME disabled community will suffer greatly under austerity measures', LSE, 2012: <https://blogs.lse.ac.uk/politicsandpolicy/bme-disability-scope-trotter>

³ 'The disability perception gap', Scope, 2018: <https://www.scope.org.uk/campaigns/disability-perception-gap/>

⁴ 'Half a Million Voices: Improving support for BAME carers', Carers UK 2011: <https://www.carersuk.org/for-professionals/policy/policy-library/half-a-million-voices-improving-support-for-bame-carers>

⁵ Definitions, Institute of Race Relations: <http://www.irr.org.uk/research/statistics/definitions/>

⁶ 'Over-looked Communities, Over-due Change: how services can better support BME disabled people', Scope & Equalities National Council, 2012:

https://www.supportsolutions.co.uk/blog/client_groups/disability/issues_for_bme_disabled_people.html

⁷ Census population data, Open data Camden, 2011, <https://opendata.camden.gov.uk/w/c6rq-u7nw/7xcc-ae6v>

⁸ Census population data, Open data Camden, 2011, <https://opendata.camden.gov.uk/w/c6rq-u7nw/7xcc-ae6v>

- 3.2. In the census 2,096 (5.9%) BAME residents recorded that their health problem or disability limits their day-to-day activities 'a lot' and 2,051 (5.8%) said it limited their day-to-day activities 'a little'. This is a similar rate compared to white residents where 7.1% record that their health problem or disability limits their day-to-day activities 'a lot' and 7.2% said it limited their day-to-day activities 'a little'⁹.
- 3.3. Considerations to this data should be that it is relatively out of date (by 8 years) and that understandings of disability vary between different ethnic groups.
- 3.4. Camden and Islington NHS Foundation Trust has more up to date data on Camden's population by health conditions and ethnicity. In 2015 research with Camden's GP practices found that Camden's healthy population is dominated by women, the least deprived, and people from white ethnic groups. Among people with greater health needs¹⁰;
- Men, and people from Black and Asian ethnic groups, are overrepresented in the learning disabilities population segment. This data was support by Camden's Learning Disability Service (CDLS)¹¹.
 - The serious mental illness segment shows a similar pattern; Black and Asian ethnic groups and the most deprived are overrepresented, along with working age men and older women
- 3.5. Camden Public Health GP dataset in 2012¹² suggests that BME communities have poorer health outcomes than other groups. For example members of Camden's Bangladeshi community, the largest minority ethnic group in the Borough, have a 69% higher risk of a long term limiting illness: their risk of diabetes is four times higher than for the general population, they are twice as likely to suffer from heart disease, stroke and high blood pressure and 22% more likely to suffer from serious mental illness.
- 3.6. According to a TUC report in 2015¹³ disabled people consistently fare worse in employment than non-disabled people and are twice as likely to be unemployed that able bodied people.
- 3.7. DWP published data shows that 2,890 BAME residents claimed ESA in August 2018 in Camden compared to 3,840 white residents. This shows that,

⁹ Census population data, Open data Camden, 2011, <https://opendata.camden.gov.uk/w/c6rq-u7nw/7xcc-ae6v>

¹⁰ Camden Demographics Population Segment, 2015: <https://opendata.camden.gov.uk/Health/Camden-Demographics-Population-Segmentation-2015/v6fr-wght>

¹¹ Camden Profile Public Health Intelligence, 2013, Camden Learning Disability Service: <https://opendata.camden.gov.uk/Health/Camden-Learning-Disabilities-Profile/95wp-jeffr/data>

¹² Camden Population Segment by Ward, 2012: <https://data.gov.uk/dataset/308bf656-6efe-45ae-8fb7-8803e463389e/camden-population-segmentation-by-ward-2012>

¹³ 'Disability and Employment Report', Department of Work and Pensions, 2015: <https://www.tuc.org.uk/sites/default/files/DisabilityandEmploymentReport.pdf>

proportionally to their population size, a greater percentage of BAME residents claim ESA compared to white residents. *(Note, this comparison should be treated with some caution as there was a high number of residents (3,050) who did not give their ethnicity).*

- 3.8. Camden's Strategic Needs Assessment¹⁴ recognises the need to understand the effect of being BAME on resident's health outcomes, especially as the ethnic diversity in Camden continues to change and grow. Services need to be culturally sensitive and appropriate to the different communities within the BAME population.
- 3.9. Certain BAME groups, such as the Bangladeshi and black African communities, have a higher risk of developing mental illness, certain chronic conditions such as heart disease and hypertension. Some behavioural risks, such as smoking, are also more common in certain BAME groups. Those groups disproportionately affected by long term sickness or disability and unable to work include older residents aged 55-59 and Black or Black British residents.
- 3.10. Camden has the third highest prevalence (1.3%) of recorded serious mental illness (schizophrenia, bipolar disorder and other psychoses) in London and has a crude prevalence significantly higher than London and England. Locally, black men have the highest rates of diagnosed serious mental disorder, at 4.8% higher compared to the borough average. Camden has significant numbers of people suffering from depression (over 28,000 people), the 7th highest rate in London.

4. Lived experience and anecdotal evidence in Camden

- 4.1. In 2016 Healthwatch Camden published a report on access to and experience of GP services in Camden for BAME residents¹⁵. The findings of the report were:
 - There are cases where satisfaction with health care was lower in BAME communities due to not receiving enough information, support or assessments relating to disability or health impairment.
 - A frequent complaint from all communities is the lack of respect they feel they receive from GP receptionists, who were said to be 'rude' (by many), 'unfriendly', 'uncooperative' and 'patronising', particularly if English is not your first language. *'Receptionists are very rude; they want to know why you want to see the doctor before you make an appointment. This is not good if you want to talk about something*

¹⁴ 'Camden's Joint Strategic Needs Assessment', 2014-2014: camden.gov.uk/jsna

¹⁵ 'Access to GP services for BME Communities', Healthwatch Camden, 2016:

<https://healthwatchcamden.co.uk/resources/access-gp-services-camden-experience-bme-communities>

private, personal.’ (Bangladeshi woman)

- Communication was a big barrier to good service for many BAME residents, *‘I always struggle to communicate with my GP due to language barrier ... they don’t give me time to express myself because English is not my first language and I find it hard to understand the medical terminologies or know the right name for parts of the body.’ (South Sudanese woman)*
- All the groups that discussed mental health reported that participants were reluctant to do so at first, partly because of a lack of knowledge but also because of the cultural stigma attached to this.

4.2. Colloquial evidence from Camden’s strategic partners in the VCS:

- Transport is a major issue for some people with disabilities. Often residents are reliant on informal carers to support their travel.
- Lack of independence is a barrier to wellbeing as it can lead to isolation and potential exploitation.
- BAME Disabled people find it difficult to navigate the services available for them. One woman stays with a relative and rarely leaves the house because she doesn’t know where to go to access any services.
- One woman said she feels she can’t articulate or express herself when speaking to the professionals for example her GP and she feels misunderstood. Translation and interpretation would help. Her grandchildren who help her have to go to school, she has to wait for them after school or during the holidays.
- Poverty – contributes to causing ill health-most of the service users.

5. What is Camden doing for this group?

- 5.1. In 2019 The London Borough of Camden commissioned Mind in Camden to deliver a service to engage underrepresented groups (Bangladeshi, African, Chinese, Black and Irish). The project is coproduced and co-facilitated with ethnic groups. Those BAME people who are part of the programme have expressed that they have felt embarrassment before and that language and cultural differences are barriers to accessing services and achieving good mental health.
- 5.2. This Mind service is the only commission services specifically for BAME residents with disabilities in Camden.

- 5.3. However there is an expectation that Camden services will deliver for all people and Camden's Centre for Independent Living will provide support to all residents.

6. Recommendations

- 6.1. Further guidance to be provided on completing Equality Impact Assessments to consider the impact of proposals on people with multiple protected characteristics.

7. Finance Comments of the Executive Director Corporate Services

This report does not recommend any new resource implications for the council. It is a data review and can be delivered within existing resources.

8. Legal Comments of the Borough Solicitor

- 8.1. The Public Sector Equality Duty under section 149 of the Equality Act 2010, which the Council is subject to, covers age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. In summary, those subject to the general equality duty must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- 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.

- 8.2. These are sometimes referred to as the three aims of the general equality duty. The Act explains that having due regard for advancing equality 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.

- 8.3. The Act states that meeting different needs involves taking steps to take account of disabled people's disabilities. It describes fostering good relations

as tackling prejudice and promoting understanding between people from different groups. It states that compliance with the equality duty may involve treating some people more favourably than others.

REPORT ENDS

LONDON BOROUGH OF CAMDEN	WARDS: ALL
<p>REPORT TITLE</p> <p>Commissioners' updates and action tracker</p>	
<p>REPORT OF Strategy and Change</p>	
<p>FOR SUBMISSION TO</p> <p>Disability Oversight Panel</p>	<p>DATE</p> <p>24 July 2019</p>
<p>SUMMARY OF REPORT</p> <p>This report provides:</p> <ol style="list-style-type: none"> 1) Updates from Commissioners in relation to: <ul style="list-style-type: none"> • Learning Disabilities • Children and young people • Mental Health • Special Educational and Inclusive Intervention Service 2) Updates, in the form of an action tracker, from previous Disability Oversight Panel meetings. <p>Local Government Act 1972 – Access to Information</p> <p>No documents that require listing have been used in the preparation of this report.</p> <p>Contact Officer:</p> <p>Alex Evans Senior Policy and Project Officer Strategy and Change 5th Floor, 5 Pancras Square London N1C 4AG 020 7974 2794 alex.evans@camden.gov.uk</p>	
<p>RECOMMENDATIONS</p> <p>That the Disability Oversight Panel note the contents of the updates, and provide feedback on the format.</p>	

Updates from Commissioners

Learning Disabilities (LD)

The London Borough of Camden and Camden Clinical Commissioning Group (CCG) strongly believe that all people with a learning disability have the right to the same opportunities as anyone else. Through integrated commissioning activity, the Council and the CCG are seeking to improve local services so that they empower and support more people with a learning disability of all ages to live fuller and more rewarding lives, to be valued for their strengths and contributions as citizens, and to live as independently and healthily as possible in their community.

This will mean that people with a learning disability will have the 'chance to succeed and no-one gets left behind', helping to realise the Our Camden Plan vision of the borough as a place "...where everyone can lead happy, healthy and fulfilling lives."

Commissioned services for people with a learning disability include:

- Camden Learning Disabilities Service (CLDS), providing specialist social work, social care and NHS care including
 - Learning disability nursing
 - physiotherapy
 - psychiatry
 - clinical psychology
 - speech and language therapy
 - occupational therapy
- The Children and Young People with Disabilities Service (CYPDS), a 0-25 Social Worker led service for Children and Young people with disabilities
- The MOSAIC children with disabilities health team (co-located with CYPDS)
- Acute mental health provision via St Pancras Hospital and the Crisis House (NHS Services)
- Residential and nursing care, mostly out of borough
- Supported Living in Camden and in neighbouring boroughs
- Day time opportunities for people with complex needs both at the Greenwood Centre (in house service) and with the Camden Society
- Breakaway short breaks service to provide support to carers and for short term stays to avoid placing people out of borough in an emergency (in house service)
- Floating Support services
- The community inclusion project hosted by Camden Disability Action
- Statutory and non-statutory advocacy
- Self-advocacy and user involvement, such as the Synergy Experts by Experience project hosted by Camden Disability Action
- Employment support, including
 - development work with local employers
 - supported internships with the Council
 - the partnership with the Camden Society to open a training café at the Greenwood Centre
- Spot purchase of a range of interventions, including via Continuing Health Care funding.

Current key priorities include:

- Remodelling and building new supported living accommodation that will provide homes that are fit for the future, cost effective and promote independence and wellbeing. New services are expected to start to come on stream by 2020
- Recommissioning contracts for up to 10 years for care and support in supported living properties, on a locality model and taking a strengths-based approach, proposed to commence on 1st July 2020.
- Mobilising new floating support contracts on a locality model and taking a strengths-based approach, to commence on 1st July 2019
- Piloting new approaches through the Community Inclusion Project, to support people to use mainstream services and be more independent alongside our floating support offer
- Mobilising an in-house shared lives service, with the first placements to be made from April 2020.
- Building on the success of the Alexandra Centre through a collaboration agreement with Westminster Kingsway College from September 2019.
- Moving the Breakaway short breaks service to a newly adapted specialist site on the Alexandra Centre campus.
- Improving take up of Annual Health Checks with GPs by March 2020. We have increased the numbers of people on the GP registers from 788 to 1016
- Mainstreaming our employment support offer as part of Central London Works
- Liaising with Supporting Communities in response to campaigners and the recently launched government consultation to amend Building Regulations to include a requirement to install Changing Places in new build large public buildings. A briefing note will go to cabinet members shortly.

Key partners in developing effective support for people with LD include:

- Internal Council teams, including SEIIS, CLDS, CYPDS, Adult Social Care, ASC Provider Services, SENDIASS, Community Partnerships, Camden Learning, Economic Development, Procurement, Legal, Finance
- The wider health economy, including Camden CCG, GPs and the local acute and provider Trusts
- Providers, including Creative Support, The Westminster Society, Outward, One Housing Group, The Camden Society, Centre 404, CamdenAbility, Westminster Kingsway College, The National Development Team for Inclusion (NDTi) and POhWER
- Voluntary sector partners, including Camden Disability Action, Camden People First, and People's Centre for Change

Children and young people (CYP)

The London Borough of Camden and the Camden Clinical Commissioning Group (CCG) are committed to delivering the best possible outcomes for CYP with disabilities, using our joint resources to best effect. Our vision is to work together with children, young people and their families to commission high quality services that are co-ordinated, proactive, accessible and safe.

Camden recently received very positive feedback from an Ofsted/CQC inspection of services for children with Special Educational Needs and Disabilities (SEND). We received a subsequent letter from the Parliamentary Under-Secretary of State for Children and Families noting the strengths of our local provision and asking us to share our innovative practice with others. Strengths highlighted included strong local leadership, effective joint commissioning and a wealth of high quality provision. Areas for improvement included developing our Local Offer to make it easier for parents/carers to use, improving the consistency of input by different agencies across Education, Health and Care plans, reducing permanent exclusions for children and young people with SEND and strengthening the identification and management of needs at secondary level.

Our strategic priorities for commissioning services are:

- early intervention and prevention and promoting resilience
- improving access to support
- care for the most vulnerable

Commissioned services for CYP, including for disabled children and young people, include:

Mental Health

- Minding the Gap transitions services for 16 to 25 year olds with mental health needs
- Child and adolescent mental health services
- Parental mental health, creative therapies, equine therapy and psychotherapy
- Camden Kaleidoscope – supported living as step down from Tier 4
- Youth justice, eating disorders and perinatal mental health
- Mental Health in Schools, peer support and education
- Community mental health services and crisis services

Universal and Targeted Health and Wellbeing services for all children and young people, including disabled children

- School nursing and health visiting
- Play services and services for young carers
- Sexual health network and substance misuse services

Children's Integrated Care Service (child development services, OT, SLT, Physiotherapy, community paediatrics, special school nursing, dietetics, bladder and bowel)

- Children's community audiology
- Delivery of CCG and council SEND strategy and Autism Plan

- Transforming Care – support for children and young people with autism, learning disability and/or mental health or challenging behaviour
- Short breaks provision
- Spot purchasing of ‘complex needs’ placements for children and young people needing a residential placement and/or independent educational provision

III Health and Long Term Conditions

- Continuing care specialist nursing for those children with the highest level of health needs and community nursing

Current key priorities include:

- Refresh of the SEND Strategy
- Develop a 10 year commissioning strategy for CYP with complex and additional needs. This multi-agency strategy will focus on developing local provision to ensure that children with the most complex needs remain in or close to Camden wherever possible.
- Review existing short breaks provision to inform the next commissioning and procurement strategy for April 2020 onwards.
- Redesign the Local Offer website for children with SEND and their parents to make it easier for families to find information about local services, co-designing with families
- Minding the Gap - Manage continued delivery in response to a reduction in funding. Manage the transition of the Royal Free Hospital School from the hospital to the Hive.
- CAMHS – roll out the Mental Health in Schools and 4 week wait Trailblazer schemes, funded by NHS England. Maintain a strong focus on mental health in schools and community settings, including parental education, training and peer support; increasing/improving the digital offer.
- Keep waiting times for autism assessment to within 12 weeks
- Continue to develop paediatric specialisms in primary care

Key partners in developing effective support for CYP:

- Internal Council teams, including children and young people’s disability team, looked after child team, special educational needs team, procurement, legal and finance
- Schools
- The wider health economy and stakeholders including the CCG, GPs, the local acute and community trusts
- Our network of voluntary sector, NHS and other providers

Mental health commissioning update for Disability Oversight Panel

The London Borough of Camden and the Camden Clinical Commissioning Group (CCG) have an integrated commissioning team for mental health and learning disabilities, working across health and social care to commission joined up support that better enables people to live fulfilling lives and stay well in their local community.

Commissioned services for people with mental health needs include:

- Secondary mental health care services from Camden and Islington NHS Foundation Trust (C&I) and the Tavistock and Portman, which includes community mental health teams, crisis services, acute inpatient services and a range of rehabilitation services
- Primary care mental health services, such as Improving Access to Psychological Therapies (IAPT) and a series of multidisciplinary teams organised on a GP neighbourhood level, co-located in Practices
- A range of social care support services, such as residential care, nursing care and care in someone's home
- Supported Living services
- Floating support for people to maintain their tenancy and connect with their local community
- Reablement and intensive support
- A diverse range of voluntary sector services working in partnership as Camden's Resilience Network, supporting people in their community to achieve the key resilience outcomes. These are to ensure that people are better able to address and manage mental health needs themselves, can access the right support at the right time and take part in community life. The Network offers include:
 - Employment support that follows the evidence based Individual Placement Support (IPS) model
 - Healthy Minds – a collection of services including a community activity programme, social prescribing and a volunteer academy
 - A Cultural Advocacy Project, which works alongside different BAME communities to raise awareness of mental health and wellbeing and to develop peer support groups
 - Peer Mentoring
 - Mental Health training
 - Mental Health website, which has information about local mental health and wellbeing support services in Camden
 - A day opportunities community support programme
 - An Expert by Experience service, which supports people with lived experience to become involved in shaping services and input into decision making

Current key priorities include:

- A review of the Crisis Pathway is underway with an aim to improve services across the borough. This includes:

- Development of a service development improvement plan to optimise performance in the Crisis Resolution and Home Treat Teams, ensuring that they meet targets, provide quality care to service users in their own homes and support discharge planning on acute wards.
- The possible recommissioning of Crisis Houses on a single site to deliver efficiencies. The intention is to retain current bed numbers and access arrangements maintaining strong link with clinical services
- Exploring the development of a “Crisis Café”, which would provide an out of hours service for people in mental health crisis who would otherwise require intervention from the Crisis Resolution Teams or attend A & E. The aim is to divert as much activity as possible away from A & E, London Ambulance Service and inpatient settings by responding to service users' immediate needs and linking them with appropriate support
- A review a recommissioning strategy for services in the mental health supported accommodation pathway, including alternatives to supported accommodation e.g. Housing First and potentially Shared Lives.
- Continued work on the Transforming Care Programme to address the needs of people with a learning disability or autistic spectrum disorder as well as mental health problems. The focus is on keeping them well in a community setting and ensuring that there are appropriate plans in place to mitigate the need for admission to hospital.
- A pilot to develop a Personal Health Budget offer for people with mental illness.

Key partners for mental health commissioners include:

- Wider teams, such as procurement and finance, within the Council and CCG
- Residents of Camden borough, both people who use services or their carers
- Adult Social Care, particularly the social work functions delegated to C&I via a Section 75 agreement
- North Central London Partners, the sustainability and transformation partnership (STP) footprint containing Barnet, Enfield, Haringey, Islington and Camden boroughs
- C&I as the main mental health service provider
- The wider health economy, including GPs, local acute trusts and the Tavistock and Portman
- Voluntary sector partners, such as Mind in Camden, Hillside Clubhouse and VoiceAbility

Special educational and Inclusive Intervention Service (SEIIS)

This team is responsible for funding and placing children and young people with Special Educational Needs and Disabilities (SEND). It commissions specialist places for children and young people with the most complex needs at:

- Woodlands Autism Base
- Primrose Hill Autism Base
- Kentish Town Autism Base
- Torriano language base
- Regents High and Kentish Town also have bases for children with physical disabilities
- Swiss cottage Special school
- Frank Barnes primary special school for deaf children
- Re integration programs for children at risk of exclusions (Rhyl for primary aged children and Haverstock for KS 3 secondary (KS3) pupils. This is for children at risk of exclusion and is intended to reduce exclusions
- Robson House primary PRU to support children with Social, emotional and mental health (SEMH) difficulties
- Camden Centre for Learning for secondary aged pupils with SEMH
- Acland Burghley Autistic Spectrum Disorder base for secondary aged pupils
- The Alexandra centre for young adults with profound and complex difficulties
- Royal Free Hospital School
- AC Arts Alternative Provision Provider
- 8 London Borough Camden Supported Internship opportunities

The Inclusive Intervention team, offers specialist teaching support to nurseries and nursery aged children.

The Sensory Impairment team offers specialist teaching support for children with physical difficulties and those with visual impairment, hearing impairment or multi-sensory impairment.

Special Education and Inclusive Intervention Services (SEIIS) Educational Psychology support includes:

- Bright Minds, bright moods (a Cognitive Behaviour Therapy group based intervention)
- Training to schools for supporting children with emotional and behavioural needs, including those with attachment needs
- Video Interaction Guidance (using video to reflect attuning in a given relationship (e.g. parent /child or teacher/ child).
- Video enhanced reflective practice for practitioners to enable them to
- Allocated support to schools, Virtual school and youth justice as well as critical incident response from the Educational Psychology team (SEIIS)
- Parent/Carer counselling service
- TIPS – Trauma Informed Practice in Schools (Pilot project based on recommendations from Youth Safety Task Force) involving multi agency input and common framework of shared language This takes a preventative and public health approach rather than a crime and disorder approach and involves partners working together across education, Child and Adolescent Mental Health Service (CAMHS), police and youth work. Educational

psychologists work with CAMHS professionals to deliver training to whole school staff groups (including safer schools police, youth workers, health therapists working in that school) and also to provide regular consultation support to the school over a period of a year to embed the approach at an organisational level.

- Transport for children and young people with SEND
- Independent Travel Training for children and young people with SEND commissioned via HCT Group

Disability Oversight Panel action tracker June 2019

Meeting	Item/Theme	Action	Action By	Status
February 2018	Business meeting http://democracy.camden.gov.uk/document/s/g7574/Printed%20minutes%2001st-Feb-2018%2018.30%20Disability%20Oversight%20Panel.pdf?T=1	The June meeting should cover the issue of Communication and Accessibility/Town Hall Refurbishment	S&C	Items included in the June 2018 meeting
	Work Programme	Officers to produce Work Programme	S&C	Work Programme discussed at the June 2018 meeting
	Scrutiny	The Chair and the Vice-Chair to meet with officers to identify issues to be included in the report to the Joint Chairs of Scrutiny Committee	Cllrs and S&C	Paper taken to Scrutiny in March 2018
	Housing Allocations	Officers send round the link to the new BLS video on the housing allocation system, which had been created for Camden's d/Deaf and hard of hearing residents.	Committee Services	Link sent to DOP Champions in February 2018

June 2018	Business meeting http://democracy.camden.gov.uk/ieListDocuments.aspx?CId=737&MId=7803	Agreed terms of reference		
	Town Hall refurbishment	DOP to be provided with updates	Corporate Accommodation	Update to be taken to the July 2019 DOP
	New website	Officers would work with visually impaired service users to find out how they got to know what was available through the Council's website, and how they found their way through to access what they wanted.	Customer Services	We held user trials in conjunction with the Royal National Institute of Blind People (RNIB).
		Officers would also consider how the work of the Champions could be promoted through the website.	Committee Services	DOP is promoted on Cindex http://cindex.camden.gov.uk/kb5/camden/cd/service.page?id=hsUSmac1qWI http://cindex.camden.gov.uk/kb5/camden/cd/service.page?id=AYyOrekNWpA
	Accessibility	Hold a public engagement meeting on Accessibility	S&C	Event took place in November 2018

November 2018	Business meeting http://democracy.camden.gov.uk/ieListDocuments.aspx?CId=737&MId=7804&Ver=4	None		
	Accessibility	Feedback from workshop to be included in the Accessibility Strategy	S&C	Feedback has been included in the draft strategy
February 2019	Business meeting http://democracy.camden.gov.uk/ieListDocuments.aspx?CId=737&MId=7805&Ver=4	Take report to Joint Chairs of Scrutiny Committee Priorities for the year ahead agreed	Cllrs and S&C Cllrs and S&C	Complete
	Healthy and active lives	DOP to have a separate meeting arranged by Sport and Physical activity to shape the procurement of the new leisure contract	Cllrs and Sport and Physical activity	Event taking place on 29 May 2019
	Employment	Circulate collated workshop comments to Cllrs and DOP distribution list Include residents' feedback in development of employment support	S&C Economic Development	Comments circulated We have taken the feedback on board, and will be incorporating this into a long-term piece of work that will allow us to develop the four ideas for improving and building on current employment support. This will take place over the next 9-12 months. We will return to the DOP during this piece of work to once again test ideas and gather insights with residents

				<p>as we look to move towards delivery. The four ideas are:</p> <ul style="list-style-type: none"> • Integrating our current employment offer to make sure it is working as effectively as it can together • Taking a neighbourhood approach to delivering employment support • Supporting 3 way conversations between employers, employees and providers • Creating a digital platform to make it easier for residents to identify support <p>We are also at the early stages of developing some ideas that respond to systemic barriers to unemployment that go beyond the four work streams outlined above.</p>
March 2019	Scrutiny	Chairs, in consultation with officers, should look to devise a key set of questions in relation to disability that should be addressed in scrutiny committee reports.	Cllrs and S&C	Proposed set of questions provided for May 2019 DOP Champions for consideration and support.
May 2019	Healthy and active lives	<p>Circulate collated workshop comments to Cllrs and DOP distribution list</p> <p>Include residents' feedback in the Leisure contract specification</p>	<p>Sport and Physical activity</p> <p>Sport and Physical activity</p>	<p>In progress. Update to be provided at future meeting.</p> <p>In progress. Update to be provided at future meeting.</p>

REPORT ENDS

