

## EQUALITY IMPACT ASSESSMENT

The Equality Act 2010 places a 'General Duty' on all public bodies to have 'due regard' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (Same Sex Couples) Act 2013.

### Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

### Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Changes to 2019/20 Council Tax Reduction Scheme
Service area	Shared Service Centre – Revenues & Benefits
Officer completing assessment	Luke Rigg (Policy & Equalities Officer)
Equalities/ HR Advisor	Luke Rigg (Policy & Equalities Officer)
Cabinet meeting date (if applicable)	Full Council, 31 January 2019
Director/Assistant Director	Jon Warlow (Director of Finance)

## 2. Summary of the proposal

*Please outline*

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

### **Background information**

In 2013, the government formerly abolished Council Tax Benefit (CTB) and replaced it with locally-defined Council Tax Reduction Schemes (CTRS).

The changes did not affect claimants of pensionable age as the government ensured that they would be given the same level of protection that they received under CTB.

In 2012/13, the Council developed its own CTRS and consulted on the following proposed local additions for working age claimants:

- Implement a minimum contribution of 19.8% of a person's Council Tax liability;
- Introduce a £1 minimum award per person;
- Introduce a £10,000 capital savings limit.

As a result of the 2012 public consultation, the Council decided to protect those working-age claimants on a prescribed disability-related benefit or disability premium by creating a 'Protected' category. Those working age claimants in the 'protected' category receive the same maximum level of Council Tax Reduction as those of pensionable age (100%).

Since 2013, the Council's CTRS has remained unchanged.

### **Proposal summary**

The Council is proposing to amend its 2019/20 CTRS. The Council has identified its preferred option, which is to:

- Extend the maximum level of support from 80.2% to 100% for working age non protected claimants with children.
- Update the scheme to align with some national welfare changes:
  - Increase the Allowances and Premiums for all Working Age Claimants.
  - Increase the Second Adult Reduction Income Bands.
  - Increase the Non-Dependant Deduction and Income Bands.

- Update the language used:
  - Abolish references to the Employment and Support Allowance Work Related Activity component and replace it with reference to a Work-Related Activity Group.
  - Include the Employment and Support Allowance Support component and Armed Forces Independence Payment in the list of prescribed disability-related benefits;
  - Replace 'bereavement payment' with 'Bereavement Support Payments' in the list of incomes that are taken into account.

Alongside the preferred option, the Council has consulted on alternative options, including:

- No change;
- Increase the maximum level of CTR to 100% for all working age claimants;
- Limit the amount of CTR received in higher value properties to the amount provided in a designated band;
- Alter the capital savings limit.

### **Process**

The Council is seeking agreement from Full Council to note the findings of the public consultation and to adopt the Council's preferred option.

If the Full Council agrees to the proposals, officers will prepare the necessary administrative changes to launch the new CTRS on 1 April 2019.

### **Key stakeholders**

The proposals directly impact all current recipients of CTRS as they pertain to changes to:

- The maximum level of financial support;
- The maximum support for specific groups;
- The changes to align with wider national welfare changes.

The proposed changes are also of relevance to wider Council Tax payers in the borough, because increasing the maximum level of Council Tax Reduction and funding it from the Council's General Fund would add to the financial pressure on the Council and could mean that service areas have to make additional savings.

Accordingly, in general, the current preferred option has the potential to impact upon a wide range of protected groups.

The Council used the consultation process to ensure that the key stakeholders identified above were engaged on the options presented in the Cabinet report.

### **Duty to vulnerable groups**

In 'Localising Support for Council Tax: Vulnerable People – key local authority duties', the government was clear that in addition to their public sector equality duty, there were additional duties of the Council in regards to developing its CTRS. The duties are described in the aforementioned document and include the following key areas:

- Duty under the Child Poverty Act 2010
- Public sector equality duty – disability
- Armed Forces Covenant – war pension and compensation payments
- Duty to prevent homelessness

The EqIA reviews each of these areas in more detail and provides data where they are held.

### **Unrecorded protected characteristics**

Although equality data is routinely requested in new applications, this data is not mandatory and so the information the Council holds does not provide a comprehensive overview of CTRS claimants.

The protected characteristics of gender reassignment, sexual orientation, marriage and civil partnership, religion and belief and pregnancy and maternity are not currently recorded in the Council's CTRS database as they do not form part of the application criteria. Prior to the Equality Act 2010, the aforementioned characteristics were not covered by the public sector equality duty, hence there was no requirement to record them in the system and as a result no historical data exists relating to them. The Council takes routine steps to request the data as part of new application processes.

The Council is currently reviewing its practice of recording equality data with a view to ensuring that comprehensive data is available for equality impact assessments.

The Council took a number of steps to ensure that the consultation was inclusive and did not discriminate based on any protected characteristics. The consultation questionnaire included open-ended questions, to allow respondents to provide information about equality issues if they had any concerns. The Council also provided a number of contact options available to residents, which included email and written address. Officers responded to any enquiries which came through those communications channels.

**3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?**

*Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these*

*This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.*

<b>Protected group</b>	<b>Service users</b>	<b>Staff</b>
<b>Sex</b>	The Council's CTRS database; Census, 2011; Public Consultation	N/A
<b>Gender Reassignment</b>	No Council data recorded; EHRC national data; Public Consultation	N/A
<b>Age</b>	The Council's CTRS database; GLA Population Projection, 2015; Public Consultation	N/A
<b>Disability</b>	The Council's CTRS database; ONS Disability in England & Wales, 2011; Public Consultation;	N/A
<b>Race &amp; Ethnicity</b>	The Council's CTRS database; Census, 2011; Public Consultation	N/A
<b>Sexual Orientation</b>	No Council data recorded; ONS Sub-National Sexual Identity Data, 2013-15; Public Consultation	N/A
<b>Religion or Belief (or No Belief)</b>	No Council data recorded; Census, 2011; Public Consultation	N/A
<b>Pregnancy &amp; Maternity</b>	No Council data recorded; Census, 2011	N/A
<b>Marriage and Civil Partnership</b>	No Council data recorded Census, 2011; Public Consultation	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

*Explain how you will overcome this within the proposal.*

*Further information on how to do data analysis can be found in the guidance.*

As of May 2018, there were 26,487 claimants in receipt of Council Tax Reduction in Haringey. This total has fallen year on year since Council Tax Benefit was abolished in 2013. Table 1.0 summarises the breakdown of the Council's CTRS caseload.

**Table 1.0 – Total CTRS caseload (May 2018)**

May 2018 CTRS caseload	Pensionable	Vulnerable/ Protected	Working Age Employed	Working Age Other	Total CTR Claimants	Total Working Age (excluding pensioners & vulnerables)	% All CCTR Claimants	% Total Working Age (excluding pensioners & vulnerables)
	8429	7221	5353	5484	26487	10837	100%	40.9%

31.8% of the Council's CTRS caseload is of **pensionable age**. Those claimants in the pensionable category are assessed against a maximum 100% of their Council Tax liability, which mirrors all Local Authorities in England and Wales. When Council Tax Benefit was abolished, the government stipulated that pensioners would receive the same level of protection under the new CTRS. The Council is not proposing to change any aspect of the CTRS for claimants of pensionable age.

27.3% of the Council's CTRS caseload is of **working age but in receipt of a specific disability benefit**, and therefore the Council has 'protected'. Those claimants in the 'protected' category are also assessed against a maximum 100% of their Council Tax liability. The Council's preferred new scheme will impact the 'protected' group as it is proposing to update a number of welfare rules and entitlements for all working age claimants.

40.9% of the Council's CTRS caseload is of working age and not 'protected' under the scheme. This group is assessed against a maximum 80.2% of their Council Tax liability. The Council's preferred new scheme will impact this group as it is proposing to update a number of welfare rules and entitlements, which will affect both protected and unprotected working age claimants. The report is also proposing to increase the maximum level of support from 80.2% to 100% for non-protected working age claimants with children, which will impact the aforementioned group.

Data definitions:

- Protected = working age claimants who are in receipt of a prescribed disability related benefit or premium and therefore subject to up to a maximum 100% CTR
- Pensionable = pensionable age claimants – subject to up to a maximum 100% CTR
- Working Age Employed = working age claimants who are currently in employment
- Working Age Other = working age claimants who are currently not in employment

**Table 1.1 – Estimated Average financial implications of the Council's preferred option on affected CTRS claimants, 2019/20**

Caseload Category	Caseload	Total Financial Impact (£)	Average change to claimant's annual Council Tax bill (£)
Protected working age	7,084	4,132.36	-0.58
Households with children	6,134	1,620,196.66	-264.13
Non-protected working age	4,649	-1,825.24	0.39
<b>Total</b>	<b>17,867</b>	<b>1,622,503.78</b>	<b>-90.81</b>

The above table takes into account the projected decrease in caseload in 2019/20 and the extra day in 2019/20 (which is a leap year). Given those factors, if no changes to the CTRS were made for non-protected working age claimants without children, the estimated financial implication for that group for 2019/20 would be -£14,800.43 (i.e. a much larger saving). Therefore, the preferred option is to spend more on this group than would be spent if no changes were made to the CTRS.

## 1. Sex

Table 1.1 – Total CTRS caseload by Sex (May 2018)

Sex	Pensionable	Protected	Working Age Employed	Working Age Other	Total CTR Claimants	% All CCTR Claimants	Total Working Age (excluding pensioners & vulnerables)	% Total Working Age (excluding pensioners & vulnerables)	Haringey <sup>1</sup>	London <sup>2</sup>
<b>Female</b>	4718	3972	3161	3412	15263	57.6%	6573	60.7%	50.5%	50.9%
<b>Male</b>	3549	3071	2082	1886	10588	40%	3968	36.6%	49.5%	49.1%
<b>Unknown</b>	162	178	110	186	636	2.4%	296	2.7%	N/A	N/A
<b>Total</b>	8429	7221	5353	5484	26487	100%	10837	100%	100%	100%

There are disproportionately more women in receipt of CTR than the Haringey and London population as a whole. This is the case both for working age claimants (protected and non-protected) and all claimants. Therefore, the proposed changes will disproportionately impact women more than men.

## 2. Gender Reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery, and there is not national data collected for this protected characteristic. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK<sup>3</sup>.

At this stage, we do not have any data to suggest that this group would be any more or less likely than the rest of the population to have children or be affected by the proposed changes to update the scheme in line with some national welfare changes. Therefore, it is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic.

<sup>1</sup> 2011 Census

<sup>2</sup> 2011 Census

<sup>3</sup> <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>



### 3. Age

Table 1.2 – Total CTRS caseload by Age

Age	Pensionable	Protected Working Agee	Working Age Employed	Working Age Other	Total CTR Claimants	Total Working Age (excluding pensioners & vulnerables)	% All CCTR Claimants	% Total Working Age (excluding pensioners & vulnerables)
18-24	<10	70	112	300	482	412	1.8%	3.8%
25-44	<10	1829	3023	2331	7186	5354	27.1%	49.4%
45-59	60	4065	2011	2342	8478	4353	32.0%	40.2%
60-64	208	1076	206	495	1985	701	7.5%	6.5%
65+	8158	44	<10	16	8219	17	31.0%	0.2%
Not provided	<10	137	<10	<10	137	<10	0.5%	0.0%
<b>Total</b>	<b>8429</b>	<b>7221</b>	<b>5353</b>	<b>5484</b>	<b>26487</b>	<b>10837</b>	<b>100%</b>	<b>100%</b>

38.5% of the Council's CTRS caseload is aged 60 or over, which is higher than the Haringey and London averages.

Table 1.3 – Age breakdown in Haringey and London<sup>4</sup>

Age	Haringey	London
0-15	19.4%	20%
16-64	71.6%	68.6%
65+	9%	11.4%

The percentage of particular age brackets of the population in Haringey broadly match that of the wider London population.

For households where a claimant or their partner is of state pensionable age, the claimant is categorised as 'pensionable' and receives up to 100% Council Tax Reduction under the scheme. The proposed changes to the scheme will not impact on this group.

Working age claimants in receipt of a prescribed disability benefit or premium will continue to be 'protected' under the scheme and receive up to 100% maximum Council Tax Reduction.

Therefore, the only impact will be on non-protected working age claimants. This group is predominantly aged between 25 and 44. However, this group is unlikely to be disproportionately impacted as a whole because it appears to be under-represented in the CTRS caseload when compared to the wider Haringey and London populations.

<sup>4</sup> GLA population projection, 2015

The preferred option includes increasing the maximum entitlement to Council Tax Reduction for working age claimants with children. Therefore, it is also likely to disproportionately impact on children (i.e. those under 16, or young persons aged between 16 and 19 for whom child benefit is payable).

#### 4. Disability

Table 1.4 – Total CTRS caseload by Disability

In receipt of a prescribed disability benefit?	Pensionable	Vulnerable	Working Age Employed	Working Age Other	Total CTR Claimants	% All CTR Claimants
Yes	1546	7221	<10	<10	8767	33.1%
No	6883	N/A	5353	5484	17720	66.9%

Table 1.5 – Disability data in Haringey, London and England & Wales

	Haringey	London	England & Wales
Day-to-day activity limited a lot	6.8%	6.7%	8.3%
Day-to-day activity limited a little	7.2%	7.4%	9.3%
Day-to-day activity not limited	86.0%	85.8%	82.4%
Day-to-day activity limited a lot: Age 16-64	3.8%	3.4%	3.6%
Day-to-day activity limited a little: Age 16-64	4.6%	4.2%	4.6%
Day-to-day activity not limited: Age 16-64	62.4%	61.5%	56.5%

The proposed changes to bring the CTRS in line with some national welfare changes will affect all working age CTRS claimants. 33.1% of the Council's working age CTRS claimants are protected, i.e. currently in receipt of a prescribed disability related benefit or premium. This percentage is higher than the Haringey, London and national averages. Therefore, it is likely that the proposal to bring the CTRS in line with some national welfare changes will disproportionately impact on this protected characteristic.

In respect of the proposal to increase the maximum level of CTR for working age claimants with children to 100%, protected working age CTRS claimants (i.e. those currently in receipt of a prescribed disability related benefit or premium) already receive up to a maximum 100% CTR under the existing CTRS. Therefore, this proposal will not affect protected working age claimants. Consequently, it is not considered likely that this proposal will disproportionately impact on this protected characteristic.

It is theoretically possible that there are working age claimants with a disability who are not classed as protected working age claimants, for example because they have not successfully claimed a prescribed disability benefit or premium. This could include, for example, a pensioner who is already entitled to a maximum 100% CTR discount and so does not fall into the category of protected working age CTRS claimants. However, we are unable to ascertain this from the available data. Therefore, there is presently no data to suggest that either:

- a) This would alter the likelihood that this protected characteristic would be disproportionately impacted by the changes to bring the CTRS in line with national welfare changes;

or

- b) That such a group would be any more or less likely than the rest of the population to have children. Therefore, it is not presently considered that this protected characteristic is likely to be disproportionately affected by the proposal to increase the maximum CTRS for working age claimants with children to 100%.

## 5. Race & Ethnicity

Table 1.6 – Total CTRS caseload by Ethnicity

Ethnicity	Pensionable	Vulnerable	Working Age Employed	Working Age Other	Total CTR Claimants	Total Working Age (excluding pensioners & vulnerables)	% All CTR Claimants	% Total Working Age (excluding pensioners & vulnerables)
<b>White British</b>	231	340	179	338	1088	517	4.1%	4.8%
<b>White Other</b>	270	382	487	210	1349	697	5.1%	6.4%
<b>Non White</b>	337	603	574	782	2296	1356	8.7%	12.5%
<b>Unknown</b>	7591	5896	4113	4154	21754	8267	82.1%	76.3%
<b>Total</b>	<b>15650</b>	<b>7221</b>	<b>5353</b>	<b>5484</b>	<b>26487</b>	<b>10837</b>	<b>100%</b>	<b>100%</b>

**Table 1.7 – Ethnicity in Haringey and London<sup>5</sup>**

Area	Black and Minority Ethnic
Haringey	39.5%
London	40.2%

Race and ethnicity data was not historically recorded as part of the CTRS application process. Therefore, the data provided in table 1.6 does not give a complete overview of the current caseload.

The data in Table 1.7 shows that the Black and Minority Ethnic population in Haringey is approximately the same as for London as a whole.

For those CTRS claimants who provided an ethnicity (see Table 1.6), the majority of working age non-protected claimants and all claimants were 'White Other' and 'Non White'. Therefore, it is likely that the Black and Minority Ethnic population will be disproportionately impacted by any changes to the CTRS, including the preferred option.

## **6. Sexual Orientation**

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15<sup>th</sup> largest LGB community in the country<sup>6</sup>.

Parliament estimates that in the UK there are around 20,000 dependent children living in same-sex couple families<sup>7</sup>. It is unclear what the figure would be for same-sex single parents.

Therefore, at this stage, it we do not have sufficient data to suggest that people of any particular sexual orientation would be any more or less likely than the rest of the population to have children or be affected by the proposed changes to update the scheme in line with some national welfare changes. Therefore, it is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic.

<sup>5</sup> 2011 Census

<sup>6</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

<sup>7</sup> <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN03372#fullreport>

## 7. Religion or Belief (or No Belief)

We do not hold data on religion or belief among Haringey's CTR caseload. However, the borough and region's data can be summarised as the following:

Table 1.8 – Religion in Haringey and London

Religion/Belief	Haringey	London
Christian	45.0%	48.9%
Buddhist	1.1%	1.0%
Hindu	1.8%	5.0%
Jewish	3.0%	1.8%
Muslim	14.2%	12.4%
Sikh	0.3%	1.5%
Other religion	0.5%	0.6%
No religion	25.2%	20.7%
Religion not stated	8.9%	8.5%

The distribution of religions in Haringey broadly tallies with London. There is a slightly higher proportion of residents with no religion than in London.

Therefore, at this stage, we do not have sufficient data to suggest that people of any particular religion or belief would be any more or less likely than the rest of the population to have children or be affected by the proposed changes to update the scheme in line with some national welfare changes.

Therefore, it does not appear likely that the proposed changes to the CTRS will have a disproportionate impact on this protected characteristic.

## 8. Pregnancy & Maternity

Table 1.9 – CTRS caseload by Dependant Category

Dependents Categories	Pensionable	Vulnerable	Working Age Employed	Working Age Other	Total CTR Claimants	Total Working Age (excluding pensioners & vulnerables)	% Total CTR Claimants	% Total Working Age (excluding pensioners & vulnerables)
Those with dependants aged 1 and under	<10	120	479	432	1032	911	3%	8%
Those with dependants aged 5 and under	<10	446	1585	1238	3275	2823	11%	26%
Those with dependants aged 16 and under	69	1516	3511	2165	7261	5676	27%	52%
Those with more than 3 dependants	<10	149	415	105	669	520	3%	5%
Count of All Lone Parents with dependants	38	1107	1807	2065	5017	3872	15%	36%

Table 2.0 – Proportion of 0-4 year olds in Haringey and London

	Haringey	London
Proportion of 0-4 year olds	7.1%	7.2%

Table 1.9 provides statistics on a number of scenarios regarding dependants. It should be noted that there will be considerable overlap between the different scenarios (for example, the number of claimants with dependants aged 1 and under is accumulated in the number of claimants with dependants aged 5 and under, etc).

The data shows that the 27% of claimants have a dependant aged 16 and under. Of this, a majority (52%) of non-protected working age claimants have a dependant aged 16 and under. This is higher than the borough and regional averages.

A significant proportion of households on CTR are single-parent households. This proportion increases among non-protected working age claimants, who are currently subject to the 80.2% maximum level of support.

The preferred option includes increasing the maximum entitlement to Council Tax Reduction for working age claimants with children.

Therefore we can infer that the preferred option is likely to disproportionately impact on the group with this protected characteristic.

## 9. Marriage and Civil Partnership

We do not hold data on marriage and civil partnership among Haringey's CTR caseload. However, the borough and region's data can be summarised as follows:

**Table 2.1 – Marital and civil partnership status in Haringey and London**

Marital and civil partnership status	Haringey	London
Married (heterosexual couples)	32.2%	40%
Civil Partnership	0.6%	0.4%

At this stage, we do not have data to suggest that people who are married or in a civil partnership would be any more or less likely than the rest of the population to have children or be affected by the proposed changes to update the scheme in line with some national welfare changes.

Therefore, it is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

*Please outline which groups you may target and how you will have targeted them*

Further information on consultation is contained within accompanying EqIA guidance

The Council used the public consultation to understand the views of current recipients of CTRS in Haringey and wider Council Tax payers. The consultation findings provide the opportunity to further assess the impact of the proposed changes on groups who share protected characteristics.

The consultation targeted:

- Existing recipients of CTRS
- Wider Council Tax payers

The consultation comprised of:

- Drop-in sessions at public sites (including libraries)
- Physical copies of the consultation in all of the borough's libraries and two Customer Service Centres
- Online consultation form via the Council's website
- Targeted social media campaign
- Use of physical advertisements across the borough

The consultation aimed to be inclusive and not discriminate on the basis of any protected characteristics. It included open ended questions and free text boxes, to allow respondents to provide information about equalities issues if they had any concerns.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

*Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?*

### Headline Findings

The Council consulted on the preferred option, alternative options and the proposed funding of the changes. Summary tables have been provided which outline the breakdown of consultation responses by protected characteristic.

The consultation findings identified that 52% of respondents were in favour of element 'a' of the preferred option and 57% of respondents were in favour of element 'b' of the preferred option.



Overall, the equality data sourced from the consultation did not suggest that individuals or groups who share a protected characteristic would be negatively impacted by the preferred option and therefore do not suggest that changes should be made to the proposal.

**Table 2.2 – Breakdown of Consultation Responses by Sex**

Male	Female	Prefer not to say	No reply	Total
109	176	32	25	342
32%	51%	9%	7%	100%

Table 2.2 identifies that 32% of respondents identified as male, as opposed to 51% of respondents who identified as female. This compares to 40% of existing CTR claimants who identified as male and 58% who identified as female claimants. Therefore, it can be inferred that the proportion of respondents who identify as female and male was broadly representative of the proportion of existing CTR caseload who identify as such.

Overall, it is considered that the consultation findings do not suggest the preferred option will disproportionately negatively impact this protected characteristic.

**Table 2.3 – Breakdown of Consultation Responses by Gender Reassignment**

Yes	No	Prefer not to say	No reply	Total
<10	243	39	54	342
<3%	71%	11%	16%	100%

Table 2.3 identifies that 2% of respondents have undergone gender reassignment, which is slightly higher than national projections (of less than 1% of the UK population<sup>8</sup>). It is not considered that this represents a significant deviation from what the Council would expect to be the case.

Overall, it is considered that the consultation findings do not suggest the preferred option will disproportionately negatively impact this protected characteristic.

<sup>8</sup> <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>

**Table 2.4 – Breakdown of Consultation Responses by Age**

Under 20	21-24	25-29	30-44	45-59	60-64	65-74	75-84	85-89	90 and over	No reply	Total
<10	<10	28	130	90	25	39	12	-	-	11	342
<3%	<3%	8%	38%	26%	7%	11%	4%	-	-	3%	100%

Table 2.4 identifies that a majority (64%) of respondents were between the ages of 30-59. Working age CTR claimant are the individuals who would be affected by the proposed changes to the CTRS. Therefore, this indicates that a significant majority of respondents were those who would actually be affected by the proposed changes.

Overall, it is considered that the consultation findings do not suggest the preferred option will disproportionately negatively impact this protected characteristic.

**Table 2.5 – Breakdown of Consultation Responses by Disability**

Deafness or partial loss of hearing	Development disorder	Physical disability	Blindness or partial loss of sight	Mental ill health	Other disabilities	Learning disability	Long term illness or condition	No disabilities	Prefer not to say	Other	No reply	Total
15	<10	22	<10	17	<10	<10	36	161	44	<10	56	342
4%	<3%	6%	<3%	5%	<3%	<3%	11%	47%	13%	<3%	16%	100%

Of the respondents who submitted a response to this question, 30% identified as having a disability. This is higher than the local, regional and national averages, but is representative of the Council's existing CTRS claimant caseload, where over 33% have a disability.

Overall, it is considered that the consultation findings do not suggest the preferred option will disproportionately negatively impact this protected characteristic.

**Table 2.6 – Breakdown of Consultation Responses by Race and Ethnicity**

White			White Other						Mixed				Black or Black British		
British	Irish	Greek/ Greek Cypriot	Turkish/ Cypriot	Turkish	Kurdish	Gypsy/ Roma	Irish Traveller	Other	White and Black African	White and Black Caribbean	White and Asian	Other	African	Caribbean	Other
174	10	<10	<10	<10	<10	<10	<10	52	<10	<10	<10	<10	16	19	<10
51 %	3 %	<3 %	<3 %	<3 %	<3 %	<3 %	<3 %	15 %	<3 %	<3 %	<3 %	<3 %	4 %	6 %	<3 %

Asian or Asian British					Chinese or other Ethnic Group		Total
Indian	Bangladeshi	Pakistani	East African Asian	Other	Chinese	Any other Ethnic Background	
<10	<10	<10	<10	<10	<10	<10	342
<3%	<3%	<3%	<3%	<3%	<3%	<3%	100%

Table 2.6 identifies that 51% of respondents identified as White British. The Council holds limited data on the race and ethnicity of its existing CTRS claimants, therefore the Council must rely on comparisons with data for the borough. The representation of White British respondents was higher than the proportion of White British residents in Haringey. Similarly, the next highest proportions of other ethnicities in the responses to the consultation are lower than that of the proportions of residents in the borough. Therefore, it may be the case that the consultation is less useful in assessing the impact on this protected characteristic.

Overall, it is considered that the consultation findings do not suggest the preferred option will disproportionately negatively impact this protected characteristic.

**Table 2.7 – Breakdown of Consultation Responses by Sexual Orientation**

Heterosexual	Gay	Lesbian	Bisexual	Prefer not to say	No reply	Total
193	14	<10	<10	67	55	342
56%	4%	<3%	<3%	20%	16%	100%

Table 2.7 identifies that 56% of respondents identified as heterosexual.

A greater proportion (8%) of respondents identified as Lesbian, Gay or Bisexual (LGB) than the estimated proportion of LGB residents in Haringey (3.7%). Although this indicates this group were over-represented amongst respondents, the proportion is not materially different and the ONS Sub-National Sexual Identity Data may be an underestimate. Therefore, it may be the case that the consultation is less useful in assessing the impact on this protected characteristic.

**Table 2.8 – Breakdown of Consultation Responses by Religion or Belief**

Christian	Hindu	Muslim	Sikh	Jewish	Rastafarian	Buddhist	No Religion	Prefer not to say	Other	No reply	Total
79	<10	13	<10	<10	<10	<10	139	51	10	41	342
23%	<3%	4%	<3%	<3%	<3%	<3%	41%	15%	3%	12%	100%

Table 2.8 identifies that the highest proportion of respondents identified as having no religion (41%), which is higher than the borough average. The proportion of respondents who identified as Christian (23%) is lower than that of the borough. However, the borough data is based on 2011 and wider national projections suggest that the proportion of individuals identifying as Christian continues to fall. Therefore, it may be the case that the consultation is less useful in assessing the impact on this protected characteristic.

### **Pregnancy and Maternity**

The consultation did not explicitly ask respondents about their pregnancy and maternity circumstances. However, the Council holds age-related data on the current CTRS caseload, which identifies the proportion of younger children. The analysis of this data is included in section three of the Equality Impact Assessment.

## Marriage and Civil Partnership

**Table 2.9 – Breakdown of Consultation Responses by Marriage and Civil Partnership Status**

Single	Married	Separated	Divorced	In a same sex civil partnership	Co-habiting	Widowed	Prefer not to say	No reply	Total
92	107	<10	12	<10	21	<10	55	38	342
27%	31%	<3%	4%	<3%	6%	<3%	16%	11%	100%

Table 2.9 identifies that 31% of respondents were married, which tallies with the proportion of married individuals in Haringey (32%).

The proportion of respondents who were in a same sex civil partnership (1%) is higher than the proportion of residents in same sex civil partnerships in Haringey (0.2%), however, it is considered that this does not represent a significant deviation from what the Council would expect to be the case.

### 5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

*Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.*

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

#### 1. Sex

Women are overrepresented in the current CTRS caseload and so are likely to be disproportionately affected by the proposed changes.

It seems likely from the data that most single parents in the Haringey CTRS caseload are women, as women are overrepresented in the caseload. The Council's preferred option would provide additional financial support to households with children for non-protected working age claimants.

There may be some women who do not qualify for up to 100% maximum CTR as a result of not being pensioners, entitled to certain disability benefits or having children. The proposal to align with national welfare changes is likely to generally have a positive financial impact on CTRS claimants. Some of this cohort may financially lose out as a result of the changes to non-dependant income bands and deductions. However, the

number of people affected is likely to be comparatively small once the other proposed changes are taken into account (including increases to allowances and premiums) and the maximum financial loss would be a maximum of 95p per week.

Therefore, on balance it is considered that the overall impact on this protected characteristic would be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
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## 2. Gender reassignment

Overall, the preferred option would leave most affected claimants financially better off than under the existing scheme.

It is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic as the data available does not suggest that this characteristic is overrepresented. Therefore, it is considered that the impact is likely to be neutral.

Positive		Negative		Neutral impact	X	Unknown Impact	
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## 3. Age

The preferred option is considered likely to have a disproportionate impact on both children. Claimants of pensionable age will not be affected by the proposed changes.

### *Children*

Overall, the proposed changes are likely to have a positive impact on children because it is proposed to increase the maximum CTR for working age claimants to 100%. This aims to provide additional financial assistance to a group in particular need. For example, working age claimants with children who currently receive the maximum 80.2% Council Tax Reduction would no longer pay any Council Tax.

Even once the proposed changes to align with some national welfare changes are taken into account, the net result is likely to mean non-protected working age claimants with children will be financially better off.

Child poverty is a significant issue in the borough and the proposed changes will reduce the financial contribution that working households with children are required to pay towards their Council Tax.

Therefore, it is considered likely that the preferred option will have a positive impact for children.

*Adults aged between 25 and 44*

Generally, the preferred option is likely to have a positive financial impact on most adults within this group. This is because more adults are likely to gain from the proposed changes than to not.

There may be some in this group who do not qualify for up to 100% maximum CTR. This cohort may financially lose out as a result of the changes to non-dependant income bands and deductions. However, the number of people affected is likely to be comparatively small once the other proposed changes are taken into account (including increases to allowances and premiums) and the maximum financial loss would be a maximum of 95p per week.

Therefore, on balance it is considered that the overall impact on this protected characteristic would be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
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**4. Disability**

It is considered unlikely that persons with a disability would be disproportionately affected by the proposal to increase the maximum CTR to 100% for working age claimants with children because protected working age CTRS claimants are already entitled to a maximum 100% CTR.

It is considered likely that persons with a disability would be disproportionately impacted only by the proposed changes to align the CTRS with some national welfare changes as they are overrepresented in the CTRS caseload.

Generally, the preferred option is likely to have a positive financial impact on most CTRS claimants. There may be some persons with a disability who financially lose out as a result of the proposed changes to align the CTRS with some national welfare changes non dependant income bands and deductions. However, the maximum financial loss would be a maximum of 95p per week and the number of people affected is likely to be comparatively small once the other proposed changes are taken into account (including increases to allowances and premiums).

Therefore, on balance it is considered that the overall impact on this protected characteristic would be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
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### 5. Race and ethnicity

It is considered likely that the Black and Minority Ethnic population will be disproportionately impacted by the preferred option, as the borough profile data suggests that this protected characteristic is overrepresented.

Generally, the preferred option is likely to have a positive financial impact on most CTRS claimants. There may be some who do not qualify for up to 100% maximum CTR who financially lose out as a result of the changes to non-dependant income bands and deductions. However, the number of people affected is likely to be comparatively small once the other proposed changes are taken into account (including increases to allowances and premiums) and the maximum financial loss would be a maximum of 95p per week.

Therefore, it is thought likely that it would also have an overall positive impact on the Black and Minority Ethnic CTRS claimants.

Positive	X	Negative		Neutral impact		Unknown Impact	
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### 6. Sexual orientation

Overall, the preferred option would leave most affected claimants financially better off than under the existing scheme.

It is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic as the data available does not suggest that this characteristic is overrepresented. Therefore, it is considered that the impact is likely to be neutral.

Positive		Negative		Neutral impact	X	Unknown Impact	
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### 7. Religion or belief (or no belief)

Overall, the preferred option would leave most affected claimants financially better off than under the existing scheme.

It is anticipated that the proposed changes to the CTRS will not have a disproportionate impact on this protected characteristic as there is no data that suggests this protected characteristic would be disproportionately impacted. Therefore, it is considered that the impact is likely to be neutral.

Positive		Negative		Neutral impact	X	Unknown Impact	
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## 8. Pregnancy and maternity

The proposed changes are expected to have a positive impact on groups who share this protected characteristic because the proposal will increase the maximum level of CTR from 80.2% to 100% for working age households with children.

Those households with children who fall into the existing pensionable category will not be affected by the proposed changes as their maximum level of CTR and other rules/entitlements remain unchanged and have been defined separately.

Those households with children who fall into the protected working age group will continue to receive up to 100% CTR.

Even once the proposed changes to align with some national welfare changes are taken into account, the net result is likely to mean non-protected working age claimants with children will be financially better off.

Child poverty is a significant issue in the borough and the proposed changes will reduce the financial contribution that working households with children are required to pay towards their Council Tax.

The proposed changes will positively impact this group because for those claimants with children who are not already 'protected' (by falling into the pensionable or protected categories) the maximum level of support will increase from 80.2% to 100%. Moreover, the proposed changes will support single-parent households, who make up a significant proportion of the CTRS caseload. This will have a positive financial impact on those non-protected working age claimants with children, as they will have less or nothing to pay towards their Council Tax liability.

Therefore, the impact on this protected characteristic is considered likely to be positive.

Positive	X	Negative		Neutral impact		Unknown Impact	
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## 9. Marriage and Civil Partnership

Overall, the preferred option would leave most affected claimants financially better off than under the existing scheme.

It is anticipated that the proposed changes to the CTRS will have a disproportionate positive impact on this protected characteristic as the proposed changes will provide additional financial support to households with young children.

Positive		Negative		Neutral impact	X	Unknown Impact	
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## 10. Groups that cross two or more equality strands e.g. young black women

- Female-headed single parents;
- BAME women;

The data suggests that female-headed single parents and BAME women are more likely to be disproportionately positively impacted by the preferred option as the equality strands are overrepresented in the CTRS caseload.

There is nothing to suggest that these groups will be negatively impacted by the preferred option.

Overall, the preferred option would leave most affected claimants financially better off than under the existing scheme.

### Outline the overall impact of the policy for the Public Sector Equality Duty:

- Could the proposal result in any direct/indirect discrimination for any group that shares the relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not?

This includes:

- a) Remove or minimise disadvantage suffered by persons protected under the Equality Act
  - b) Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups
  - c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The preferred option will not affect claimants of pensionable age. Pensioners follow a national scheme and their level of entitlement to Council Tax Reduction will not change.

The preferred option will affect working age claimants. The assessment has identified that, where we have data, overall the proposed changes to the existing Council Tax Reduction Scheme would have a positive impact on the groups that share protected characteristics:

- Sex
- Age
- Disability
- Race and Ethnicity
- Pregnancy and Maternity

**Proposed changes to maximum level of CTR for non-protected working age claimants in households with children:**

- An increase of the maximum level of CTR from 80.2% to 100% will have a positive impact on those households with children who are currently not 'protected' or fall into the pensionable category of the existing scheme. This will either reduce or eliminate any Council Tax liability for households with children, which will have a positive impact on those families, whom the Council deems vulnerable and in particularly difficult financial circumstances.
- The change would play a clear role in fostering equality of opportunity for working age claimants in households with children, but also in fostering equality of opportunity for the children in those households. The preferred option provides support and reduces financial burdens on households, promoting equality of opportunity.

**Proposed changes to update the scheme to align with national welfare changes:**

Generally, the preferred option is likely to have a positive financial impact on most CTRS claimants. There may be some who do not qualify for up to 100% maximum CTR who financially lose out as a result of the changes to non-dependant income bands and deductions. However, the number of people affected is likely to be comparatively small once the other proposed changes are taken into account (including increases to allowances and premiums) and the maximum financial loss would be a maximum of 95p per week.

In many cases, the overall financial impact on affected claimants is likely to be offset by the increases to allowances and premiums. For working age households with children, any financial loss is likely to be significantly mitigated by the increase to the maximum level of CTR that can be awarded.

**Duties to particular groups**

As above, the preferred option is considered likely to have a positive impact on child poverty and persons with a disability. As most CTRS claimants are considered likely to financially benefit from the preferred option it is thought likely that this would reduce the risk of homelessness by reducing the financial burden on groups in particular need.

Since 2013, the Council's CTRS has reflected armed forces benefits.

Outside the CTRS, the Council holds a range of Council Tax Discounts, Exemptions and Disregards. These powers include support complete Council Tax exemption for residents who are "Severely Mentally Impaired".

### **Additional benefits of the proposed potential changes**

- Some claimants will no longer have any remaining Council Tax liability to pay to the Council. The groups most likely to fall into this category are those with children.
- We know that some of the households with children who currently receive up to a maximum of 80.2% Council Tax Reduction are unable to pay their remaining liability and are taken to court (and in some cases referred to Enforcement Agents). By removing the liability, the Council will avoid using enforcement action with some households with children. In 2017/18, 21.8% of all non-protected working age claimants receiving the current maximum 80.2% CTR were summonsed. Moreover, 11.7% of all non-protected working age claimants with children receiving CTR were summonsed. The proposals are likely to reduce the number of cases being summonsed in 2019/20.

### **Additional powers to support vulnerable residents:**

- The Council has the discretionary power, under S13A(1)(c) of the Local Government Finance Act, to eliminate the Council Tax liability for residents in extenuating circumstances.

### **Funding the proposed changes:**

Should the Cabinet approve the proposed new CTRS, the Council is proposing to fund it through its General Fund. Therefore, the proposals in this report would exacerbate the financial pressures for the wider organisation. As with other cost pressures, the Council will have to explore savings proposals from other services as well as options to generate additional income to pay for the additional costs associated with the proposed 2019/20 CTRS.

At this stage in the development of the Council's next medium term financial strategy it is impossible to identify where those savings might originate. Moreover, the Council does not connect individual savings with individual cost pressures in its budget. Therefore, it is difficult to identify whether certain groups who share protected characteristics would be disproportionately affected by the preferred option to change the CTRS.

The General Fund is used to deliver the Council's Corporate Plan. An outcome of the Corporate Plan is 'A Fair and Equal Borough'. Individuals and groups protected under the Equality Act are most likely to benefit from the delivery of the outcome.

Therefore, the Council can infer that individuals and groups protected under the Equality Act may be disadvantaged and may stand to lose out as a result of the proposed changes. However, the identity of those groups that would financially lose out cannot be predicted with certainty. The financial impact is not considered significant, particularly when weighed against the overall additional financial support arising from the preferred changes to the CTRS.

**6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?**

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
<p><b>No major change to the proposal:</b> the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u></p>	Yes
<p><b>Adjust the proposal:</b> the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. <u>Clearly set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below.</p>	No
<p><b>Stop and remove the proposal:</b> the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.</p>	No

**6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty**

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
N/A	N/A	N/A	N/A
<p>Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.</p>			
N/A			

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

Regardless of the decision in relation to proposed CTRS changes for 2019/20, the Council will continue to provide support to Council Tax payers where vulnerabilities are identified and respond appropriately. This includes:

- Supportive and flexible payment arrangements
- Promotion of wider support available in the Council and with our Voluntary and Community Sector partners across the borough
- Signposting to Citizens Advice Haringey

The Council is currently reviewing its practice of recording equality data with a view to ensuring that comprehensive data is available for equality impact assessments.

#### 7. Authorisation

EqlA approved by  Jon Warlow, Director of Finance	Date 7/1/19
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#### 8. Publication

*Please ensure the completed EqlA is published in accordance with the Council's policy.*

Please contact the Policy & Strategy Team for any feedback on the EqlA process.