

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 protect 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	Review of Council Tax Reduction Scheme Administration for 2022/23
Service area	Revenues and Benefits, Finance
Officer completing assessment	David Graaff, Head of Service Delivery
Equalities/ HR Advisor	Edward Ashcroft, Policy and Equalities Officer

Cabinet meeting date (if applicable)	Cabinet, July 2021
Director/Assistant Director	Jon Warlow, Director of Finance; Andy Briggs, AD Corporate and Customer Services

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*

This is a working document which will be updated and informed by the public consultation ahead of a final decision by Full Cabinet in December 2021.

Background

In 2013, the government formerly abolished Council Tax Benefit (CTB) and replaced it with a locally defined Council Tax Reduction Scheme (CTRS). In 2012/13, the Council developed its own scheme. It reviewed and updated the scheme in 2019/20. No changes were made in 2020/21. Previous Equality Impact Assessments are available on the council website.

Following the transfer of Council Tax Benefit to Local Authority, the Haringey Council Tax Reduction Scheme has protected pensioners from any changes (as mandated by Central Government). This means pensioners can receive up to 100% support with their council tax. In addition, those in receipt of certain disability benefits and (since 2019/20) working age residents with children are also eligible to receive up to 100% support for their council tax bill. Working-age claimants who are not protected must make some contribution but can receive up to 80.2% support for their council tax bill. This requirement is in place due to funding cuts associated with the transfer of responsibility from Central to Local Government and to ensure the scheme remains financially sustainable for the council whilst protecting those who are most vulnerable.

Proposal

The proposals to amend the CTRS scheme for the financial year 2022/23 primarily relate to ways to simplify the administration of the scheme to maximise uptake amongst residents and minimise the administrative burden for the council. The council is not seeking

to reduce the generosity of the current scheme or to reduce the maximum entitlement awarded since 2019. This means that as per the current scheme, those in receipt of certain disability benefits and working age claimants with children will continue to be protected. All working-age non protected claimants will have to pay something towards their Council Tax bill. The proposed amendments to the scheme primarily relate to the following:

- Simplifying the claims process by adding a new channel for residents on Universal Credit to claim council tax support automatically.
- Stabilising entitlement for residents by simplifying what happens when a resident's income changes by a small amount during the financial year.
- Simplifying the scheme by changing the way that council tax support can be backdated to allow more time for residents to claim.
- Simplifying the scheme through improved transparency by publishing a revised statement of the scheme written in plain English.

Process

The Council is seeking agreement from the Cabinet to go out to public consultation on the options presented in the Cabinet Report. If the Cabinet agrees to the proposals, the Council will go out to public consultation. Following the public consultation, the Council will assess the findings and incorporate any changes, where appropriate, in the final proposal and EqIA. The matter will be taken to Full Council later in 2021. If the final proposal is approved, officers will prepare necessary administrative changes in time for the amendments to come into force on 1 April 2022.

Key Stakeholders

The proposals directly impact all current recipients of CTRS as well as those who are eligible but not claiming or who may become eligible as they relate to changes in the ways that the scheme is administered.

The current preferred option has the potential to impact on a wide range of protected groups. The specific proposed changes are likely to have a particular impact on the following groups, amongst whom there is likely to be a disproportionate number of residents with protected characteristics, based on available evidence:

- Those who are claiming Universal Credit, amongst whom there has been a sharp increase in the last year.
- Those who are in insecure work, including those in the 'gig' economy, and whose income therefore fluctuates regularly.
- Those who may struggle to access the support for example due to digital exclusion, language barriers, or lack of information.

Due to the impact of Covid-19, there has been an increase in the number of residents claiming CTR support. The council has estimated a 15% increase in claimants since the start of the pandemic (6% in 2020/21 and 9% in 2021/22). Given the unequal

financial impact of the pandemic, there is likely to be a disproportionate number of residents with protected characteristics within this cohort. Our Covid-19 Community Impact Assessment highlights that young people and women are more likely to have lost work due to the impact of Covid-19, whilst lower income earners (concentrated in the east of the borough where there is a disproportionate number of BAME residents) have also been acutely impacted by the economic fallout from the pandemic.

Key impacts of proposed changes:

- **Simplifying the claims process to include an automated way for those on Universal Credit to apply for CTRS is likely to have a positive equalities impact.** It will simplify access to the scheme for many residents, including those who may be digitally excluded, face language barriers, or lack access to information and therefore be unable to claim the support to which they are entitled. There are likely to be a disproportionate number of residents with protected characteristics amongst these groups, including disabled people with disabilities, elderly residents, and historically marginalised groups.
- **Stabilising entitlement for residents by simplifying what happens when a resident's income changes by a small amount during the financial year is also likely to have a positive overall equalities impact.** Many residents experience multiple changes in income throughout the year, including those in insecure work or the 'gig economy', amongst whom there are likely to be a disproportionate number of residents with protected characteristics or low socioeconomic status. Reducing the number of bills issued will support with household budgeting and therefore help to minimise debt. It should be noted that under these proposed changes, there are likely to be a small percentage of claimants who will be worse off financially. Specifically, modelling shows that 5.5% of working-age households receiving Council Tax support would receive an average loss of £32/year. By comparison, 6.4% of working-age households receiving Council Tax support would be better off at an average of £36/year. 88% would receive the same award as now. This EqIA explains in more detail the anticipated impact on specific groups with protected characteristics. These impacts are considered to be proportionate to the overall benefit of this change to residents and the council. The preferred approach to stabilising entitlement has sought to minimise the number of people who will receive less financial support.
- **Simplifying the scheme by changing the way that council tax support can be backdated to allow more time for residents to claim and to simplify the language in the policy is also likely to have an overall positive equalities impact.** This is because simplifying the scheme and allowing more time to backdate claims will support those residents who may find access the scheme difficult, including due to access to information or language barriers. There are likely to be a

disproportionate number of residents with protected characteristics amongst these groups, including disabled people , elderly residents, and historically marginalised groups.

Key impact of decision to maintain current levels of protections:

- The Council is proposing to maintain the current level of generosity of the scheme. This means that as per the current scheme, those in receipt of certain disability benefits and working age claimants with children will continue to be protected. All working-age non protected claimants will continue to have to pay something towards their Council Tax bill. Maintaining the same level of support as now can be expected to have a positive overall equalities impact given the ongoing financial impact of the pandemic and the increase in recipients of council tax support.

Other mitigations

It is recognised that cuts to council tax support introduced by welfare reforms will continue to have a significant impact on those who are vulnerable. Where residents are facing financial hardship, we will continue to use existing support mechanisms such as signposting to other sources of help including the CAB and voluntary groups for our customers and will seek to build upon these. We will routinely check our progress with those customers who tell us they have difficulty in paying, to ensure that we can come up with the best solution to meet their needs.

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 include the following key areas:

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

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

Unrecorded protected characteristics

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, and no historical data exists relating to them. The Council takes routine steps to request the data as part of new application processes. As below, data available to the Council has been used in considering the effect of the proposal on the protected groups.

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.

Protected group	Service users	Staff
Sex	The Council's CTRS database; Census, 2011;	N/A
Gender Reassignment	No Council data recorded; EHRC national data;	N/A
Age	The Council's CTRS database; GLA Population Projection, 2015;	N/A
Disability	The Council's CTRS database; ONS Disability in England & Wales, 2011;	N/A
Race & Ethnicity	The Council's CTRS database; GLA Ethnic Group Population Projection	N/A
Sexual Orientation	No Council data recorded; ONS Sub-National Sexual Identity Data, 2013- 15;	N/A
Religion or Belief (or No Belief)	No Council data recorded;	N/A

	Census, 2011;	
Pregnancy & Maternity	The Council's CTRS database; Census, 2011	N/A
Marriage and Civil Partnership	No Council data recorded Census, 2011;	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.

Note on data – the summary data used in this Equalities Impact Assessment is drawn from the June 2021 caseload. The data used to examine the impact of changes to stabilise entitlement is drawn from the April 2020 caseload.

Summary – CTRS caseload

The council has estimated a 15% increase in claimants since the start of the pandemic (6% in 2020/21 and 9% in 2021/22). It is likely that amongst these groups, there will a disproportionate number of residents with protected characteristics. Our Covid-19 Community Impact Assessment highlights that young people and women are more likely to have lost work, whilst lower income earners (concentrated in the east of the borough where there is a disproportionate number of BAME residents) have also been acutely impacted by the economic fallout from the pandemic.

In June 2021, there were 27956 residents in receipt of Council Tax Reduction support in Haringey. This total had been declining year on year since Council Tax Benefit was abolished in 2013 but has increased due to the pandemic. Table 1.0 summarises the breakdown of the Council's CTRS caseload in comparison to September 2019. For reference, the total resident population in Haringey is 271,222 of which 185,872 are of working age (18-64).

Table 1.0 – Total CTRS caseload (June 2021 compared to September 2019)

	Pensionable	Protected / disability-related	Protected / child in household	Non-protected/ other Working Age	Total CTR Claimants
June 2021	7688	7599	6770	5899	27956
Sept 2019	8101	7396	5667	4107	25278

27% 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 therefore this protection will continue. This is a caseload decrease from September 2019.

27% of the Council's CTRS caseload is of **working age but in receipt of a specific disability benefit**, and who the Council has therefore 'protected'. Those claimants in the 'protected' category are also assessed against a maximum 100% of their Council Tax liability. The Council is not proposing to change any aspect of the CTRS therefore this protection will continue. This is a small decrease on September 2019.

24% of the Council's CTRS caseload is of **working age with children**, 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 is not proposing to change any aspect of the CTRS therefore this protection will continue. This is a small increase on September 2019.

21% 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. This percentage has increased from 16.25% in September 2019.

Data definitions:

- Protected = working age claimants who are in receipt of a prescribed disability related benefit or premium or working age claimants with children 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

Summary – those impacted by proposed administrative changes

The proposed changes to simplifying the claims process to include an automated way for those on Universal Credit to apply for council tax support will impact those on Universal Credit. There has been a sharp increase in the number of residents claiming this benefit during the pandemic. In February 2020, 7.7% of people aged 16-65 in Haringey were claiming Universal Credit. This rate reached a record 22.4% in May 2021, which represents 42,296 people or almost 3 times the number before the pandemic. Claimants are concentrated in the east of the borough.

The proposed change to simplify entitlement when residents' income changes could impact all current and potential recipients of the scheme by reducing the number of bills the council issues which will help to simplify the scheme for residents and the council. Modelling shows that 6.4% of working-age claimants would be better off (at an average of £36/year), 5.5% worse off (at an average of £32/year) and 88% unchanged.

The proposed changes to simplify the scheme by changing the backdating rules and produce a version of the policy written in simple English will benefit all current and potential recipients of the scheme.

Data by protected characteristic

1. Sex

Table 1.1 – Total CTRS caseload by Sex (June 2021 and September 2019)

June 2021								
Sex	Pensionable	Protected / disability	Protected/child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants	Haringey ¹	London ²
Female	4387	4267	5059	2919	16632	59.5%	50.5%	50.9%

¹ 2011 Census

² 2011 Census

Male	3145	3152	1576	2905	10778	38.6%	49.5%	49.1%
Unknown	156	189	135	75	546	2.0%	N/A	N/A
Total	7688	7599	5667	5899	27956	100%	100%	100%

September 2019								
Sex	Pensionable	Protected/disability	Protected/child in household	Non-protected/other Working Age	Total CTR Claimants	% All CCTR Claimants	Haringey ³	London ⁴
Female	4556	4139	4157	1904	14756	58.47%	50.5%	50.9%
Male	3390	3074	1365	2123	9952	39.4%	49.5%	49.1%
Unknown	162	183	145	80	570	2.3%	N/A	N/A
Total	8108	7396	5667	4107	25278	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. Maintaining the generosity of the current CTRS into 2021/22 will continue to disproportionately impact women more than men.

Proposed administrative changes

³ 2011 Census

⁴ 2011 Census

Given there are a larger number of women claiming CTRS, women are likely to be disproportionately positively impacted by the overall steps to simplify the scheme and improve its accessibility.

Under the proposed change to simplify entitlement when residents' income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. Given that more women are in receipt of CTR than the wider Haringey population, women are likely to be slightly more impacted by this change. The modelling breakdown is set in Table 1.2.

Table 1.2 – Modelled working-age CTRS caseload under stabilised entitlement changes by gender (April 2020)

Working-age households (% of households in dataset) - gender of lead claimant	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
Female (62%)	6.8%	£35	5.9%	£31
Male (38%)	5.9%	£39	5.0%	£34

Working-age households (% of households in dataset) - gender including partners	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
Female only (53%)	5.9%	£34	5.3%	£32
Male only (25%)	3.0%	£35	3.3%	£38
Mixed household (21%)	11.8%	£39	8.7%	£30

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 UK⁵.

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 be in receipt of CTRS. Therefore, it is anticipated that the continuation of the current scheme alongside the proposed administrative changes will not have a disproportionate impact on this protected characteristic.

⁵ <https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review>

3. Age

Table 1.3 – Total CTRS caseload by Age (June 2021 compared to September 2019)

June 2021						
Age	Pensionable	Protected / disability	Protected / child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants
18-24	0	45	203	182	430	2%
25-44	<10	1735	4428	1764	7930	28%
45-59	29	4090	2033	2847	8999	32%
60-64	47	1325	89	913	2374	8%
65+	7609	330	12	192	8143	29%
Not provided	0	74	<10	<10	80	0%
Total	7688	7599	6770	5899	27956	100%
September 2019						

Age	Pensionable	Protected/disability	Protected/child in household	Non-protected/other Working Age	Total CTR Claimants	% All CCTR Claimants
18-24	0	57	202	85	344	1.36%
25-44	<10	1822	3779	985	6590	26.07%
45-59	48	4176	1623	2312	8159	32.28%
60-64	77	1152	59	662	1950	7.71%
65+	7979	145	<10	63	8191	32.40%
Not provided	0	44	0	0	44	0.17%
Total	8108	7396	5667	4107	25278	100%

40.12% of the Council's CTRS caseload is aged 60 or over, which is higher than the Haringey and London averages.

Table 1.4 – Age breakdown in Haringey and London⁶

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

Haringey is a relatively young borough with around 25% of residents under the age of 20. The highest proportion of residents under 18 are found in the east and northwest of the borough.

⁶ GLA population projection, 2015

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.

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

Non-protected working age claimants are predominantly aged between 25 and 44 and must pay some contribution towards their council tax. There are no proposals to change this in 2022/23. 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.

Proposed administrative changes

All residents in receipt or eligible for CTR stand to benefit from steps to simplify the scheme and improve its accessibility. Residents who may have otherwise faced barriers to claim the support to which they are entitled stand to notably benefit.

Under the proposed change to simplify entitlement when residents’ income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. There will be some variation within age groups as set out in Table 1.5.

Table 1.5 – Modelled working-age CTRS caseload under stabilised entitlement changes by age (April 2020)

Working-age households (% of households in dataset)	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
16-17 (0%)	1.9%	£2	0%	£0
18-21 (0%)	6%	£24	3.6%	£58
22-24 (1%)	4.5%	£41	2.3%	£25
25-29 (5%)	5.8%	£35	6.9%	£33
30-34 (8%)	6.0%	£37	7.1%	£31
35-39 (11%)	10%	£34	6.0%	£34
40-44 (13%)	9.9%	£36	8.4%	£29
45-49 (15%)	8.3%	£40	6.7%	£33

50-54 (17%)	5.8%	£36	4.9%	£31
55-59 (17%)	3.9%	£34	4.1%	£32
60-64 (13%)	2.6%	£33	2.6%	£33

4. Disability

There are 7599 people in the June 2021 caseload who were eligible for 100% council tax support due to being in receipt of certain disability benefits. This represents 27% of the overall caseload.

Table 1.6 – 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%

Working age CTRS claimants in receipt of a prescribed disability related benefit or premium will continue to receive up to a maximum 100% CTR under the existing CTRS. Therefore, this protected characteristic will not be disproportionately impacted by maintaining the current generosity of the CTRS in 2021/22.

Proposed administrative changes

All residents in receipt or eligible for CTR stand to benefit from steps to simplify the scheme and improve its accessibility. Residents who may have otherwise faced barriers to claim the support, amongst whom there is likely to have been a disproportionate number of disabled residents, stand to notably benefit.

Under the proposed change to the scheme to simplify entitlement when residents' income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. Within this group, our modelling suggests that 1.4% of those in receipt of DLA or ESA equivalent will be worse off (at an average loss of £38) and 1.3% better off (at an average gain of £34). This is a particularly low variation and does not suggest that there will be a disproportionate impact on these residents compared to the larger caseload.

5. Race & Ethnicity

Table 1.7 – Total CTRS caseload by Ethnicity (June 2021 compared to September 2019)

June 2021						
Ethnicity	Pensionable	Protected / disability	Protected / child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants
White British	280	503	493	706	1982	7%
White Other	249	415	724	596	1984	7%
Non White	475	817	1404	1106	3802	14%
Unknown	6684	5864	4149	3419	20188	72%

Total	7688	7599	6770	5899	27956	100%
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September 2019						
Ethnicity	Pensionable	Protected/disability	Protected/care held in household	Non-protected/other Working Age	Total CTR Claimants	% All CTR Claimants
White British	232	393	335	283	1243	4.92%
White Other	228	366	425	190	1209	4.78%
Non White	408	697	832	637	2574	10.18%
Unknown	7240	5940	4075	2997	20252	80.12%
Total	8108	7396	5667	4107	25278	100%

Haringey has an ethnically diverse population. 67.1% of the population are from a BME group (40.5%) of White Other (26.6%) ethnic group. This compares to 60.7% in London.

Race and ethnicity data was not historically recorded as part of the CTRS application process. Therefore, the data provided in table 1.7 does not give a complete overview of the current caseload.

For those CTRS claimants who provided an ethnicity (see Table 1.8), 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 current proposals.

Proposed administrative changes

All residents in receipt or eligible for CTR stand to benefit from steps to simplify the scheme and improve its accessibility. Residents who may have otherwise faced barriers to claim the support stand to notably benefit.

Under the proposed change to the scheme to simplify entitlement when residents' income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. Data is not currently available by ethnicity for the modelling but there is no reason to expect that this protected characteristic will be particularly impacted by these changes.

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 15th largest LGB community in the country⁷.

Parliament estimates that in the UK there are around 20,000 dependent children living in same-sex couple families⁸. It is unclear what the figure would be for same-sex single parents.

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 be in receipt of CTRS. Therefore, it is anticipated that the continuation of the current scheme alongside the proposed administrative changes will not have a disproportionate impact on this protected characteristic.

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%

⁷ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

⁸ <http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN03372#fullreport>

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. Two out of three residents in Haringey are practicing a religion with Christians (45%) and Muslims (14%) being the largest resident groups.

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 be in receipt of CTRS. Therefore, it is anticipated that the continuation of the current scheme alongside the proposed administrative changes will not have a disproportionate impact on this protected characteristic.

8. Pregnancy & Maternity

Table 1.9 – Proportion of 0-4 year olds in Haringey and London

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

In the June 2021 dataset, there were 6770 residents with children in receipt of council tax support, which equates to 24% of the total. The scheme will continue to protect working-age claimants with children and there are no proposed changes to this protection.

Proposed administrative changes

All residents in receipt or eligible for CTR stand to benefit from steps to simplify the scheme and improve its accessibility. Residents who may have otherwise faced barriers to claim the support stand to notably benefit.

Under the proposed change to the scheme to simplify entitlement when residents' income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. Within this group, working-age households with dependents are likely to be impacted as set out in Table 2.1.

Table 2.0 – Modelled working-age CTRS caseload under stabilised entitlement changes by dependents (April 2020)

Working-age households (% of households in dataset)	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
Households with dependents aged 1 and under (2%)	7.4%	£37	8.1%	£18
Households with dependents aged 5 and under (14%)	9.1%	£37	7.3%	£32
Households with dependents aged 16 and under (39%)	10.8%	£36	8.6%	£30
Households with 3 or more dependents (12%)	11.7%	£39	8.7%	£32
Lone Parents with dependents (27%)	8.9%	£34	7.8%	£30

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 any data to suggest that this group would be any more or less likely than the rest of the population to be in receipt of CTRS. Therefore, it is anticipated that the continuation of the current scheme alongside the proposed administrative changes will not have a disproportionate impact on this protected characteristic.

10. Socioeconomic status

Council Tax Support is means tested across low income socio-economic groups.

All claimants will be in a lower socio-economic category.

Due to the increase in financial hardship created by Covid-19, maintaining the generosity of the current scheme can be expected to have an overall positive equalities impact.

Proposed administrative changes

All residents in receipt or eligible for CTR stand to benefit from steps to simplify the scheme and improve its accessibility. Residents who may have otherwise faced barriers to claim the support stand to notably benefit.

Under the proposed change to the scheme to simplify entitlement when residents' income changes, 6.4% of working-age residents will be better off (at an average of £36/year) and 5.5% will be worse off (at an average of £32/year) with 88% unchanged. There will be a particular impact on those who are more likely to see fluctuations in their incomes, including those who are employed and self-employed as set out in Table 2.2.

Table 2.2 – Modelled working-age CTRS caseload under stabilised entitlement changes by economic status (April 2020)

Working-age households (% of households in dataset)	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
Employed (28%)	18%	£38	12.7%	£32
Self-employed (5%)	12.8%	£30	18.5%	£30
Not in work – career (5%)	1.1%	£26	5.3%	£16
Not in work – disable (39%)	0.6%	£34	0.9%	£39
Not in work – lone parent (9%)	2.3%	£26	1.8%	£37
Not in work – other (14%)	1.8%	£26	1.9%	£42

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

Public consultation exercises took place in 2012 and 2018 to shape the current CTRS. The consultation aimed to be inclusive and not discriminate on the basis of any protected characteristics and included open ended questions and free text boxes to allow respondents to provide information about equalities issues if they had any concerns.

Overall, the equality data sources from consultation in 2018, did not suggest that individuals or groups who share a protected characteristic would be negatively impacted on by changes to the CTRS.

The 2018 consultation also showed that residents were broadly in support of the changes to the CTRS, details on how to access the full results of the consultation can be found <https://www.haringey.gov.uk/council-tax-and-benefits/council-tax/council-tax-reductions/proposed-changes-201920-council-tax-reduction-scheme>

For 2022/23 the changes primarily relate to administrative changes. If approved by cabinet, the council will consult upon these changes and ensure that, through the consultation process, the key stakeholders identified above are informed and engaged on the options presented in the Cabinet report. Moreover, the consultation process will allow residents' input to feed into the final proposal.

We will routinely check our progress with those customers who tell us they have difficulty in paying, to ensure that we can come up with the best solution to meet their needs.

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?

To be completed after the consultation.

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 positively affected by the continuation of the generosity of the scheme and from proposed changes to improve how the scheme is administered.

It seems likely from the data that most single parents in the Haringey CTRS caseload are women, as women are overrepresented in the caseload. Maintaining the generosity of the scheme as is means 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.

Some women may be slightly worse off financially under the proposed changes to stabilise entitlement when residents income changes by a small amount.

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment

Overall, maintaining the scheme as is would leave most affected claimants financially better off.

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 be in receipt of CTRS. Therefore, it is anticipated that continuing the generosity of the current scheme and the proposed administrative changes will not have a disproportionate impact on this protected characteristic.

Positive		Negative		Neutral impact	X	Unknown Impact	
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3. Age

Maintaining the generosity of the scheme as is will have a positive impact on pensioners, working age claimants in receipt of certain disability premiums, working age claimants with children and children themselves. Administrative changes are likely to improve uptake of and accessibility to the scheme.

Children

Child poverty is a significant issue in the borough and maintaining the generosity of the scheme as is will continue to 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

There may be some individuals in this group who do not qualify for up to 100% maximum CTR as a result of not being entitled to certain disability benefits or having children.

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

Changes to stabilise entitlement are not likely to have a disproportionate negative impact on this protected characteristic, although a small number of residents may be slightly worse off financially.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability

Maintaining the generosity of scheme as is will have a positive impact on working age claimants in receipt of certain disability premiums, as they will continue to be protected.

Administrative changes are likely to improve overall uptake and ease of access to council tax support, including for those who may otherwise have struggled to access the support to which they are entitled.

Changes to stabilise entitlement are not likely to have a disproportionate negative impact on this protected characteristic, although a small number of residents may be slightly worse off financially.

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

The borough profile data suggests that the Black and Minority Ethnic population is overrepresented.

Generally, maintaining the scheme as-is whilst making some administrative changes so the scheme is easier to access 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, however, the number of people affected is likely to be comparatively small.

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

Administrative changes are likely to improve overall uptake and ease of access to council tax support, including for those who may otherwise have struggled to access the support to which they are entitled. Changes to stabilise entitlement are not likely to have a disproportionate negative impact on this protected characteristic, although a small number of residents may be slightly worse off financially.

Positive	X	Negative		Neutral impact		Unknown Impact	
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6. Sexual orientation

Overall, maintaining the generosity of the scheme as is would leave most affected claimants financially better off. Changes to the administration of the scheme are likely to improve the overall uptake and ease of access to support for residents, although a small number of working-age residents will be slightly worse off.

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 be in receipt of CTRS. Therefore, it is anticipated that the proposals will not have a disproportionate impact on this protected characteristic.

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

Overall, maintaining the generosity of the scheme as is would leave most affected claimants financially better off. Changes to the administration of the scheme are likely to improve the overall uptake and ease of access to support for residents, although a small number of working-age residents will be slightly worse off.

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 be in receipt of CTRS. Therefore, it is anticipated that the proposals will not have a disproportionate impact on this protected characteristic.

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

Overall, maintaining the generosity of the scheme as is will have a positive impact on working age claimants with children. Changes to the administration of the scheme are likely to improve the overall uptake and ease of access to support for residents, although a small number of working-age residents will be slightly worse off.

Child poverty is a significant issue in the borough and maintaining the generosity of the scheme as proposed here will continue to 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 this group.

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

Overall, maintaining the generosity of the scheme as is would leave most affected claimants financially better off. Changes to the administration of the scheme are likely to improve the overall uptake and ease of access to support for residents, although a small number of working-age residents will be slightly worse off.

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 be in receipt of CTRS. Therefore, it is anticipated that the proposals will not have a disproportionate impact on this protected characteristic.

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;
- Socioeconomic status;

The data suggests that female-headed single parents and BAME women are more likely to be disproportionately positively impacted by maintaining the generosity of the scheme and improving accessibility, as the equality strands are overrepresented in the CTRS caseload. Likewise, all residents in receipt of council tax support are on low incomes and therefore improvements to the scheme are likely to have a disproportionate positive impact on those with low socioeconomic status. As highlighted above, those who are in employment or self-employed are disproportionately likely to gain or lose from the changes to how entitlement is calculated when income goes up or down.

Overall, the preferred option would leave most affected claimants financially better off.

Positive	X	Negative		Neutral impact		Unknown Impact	
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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 changes that are being proposed primarily relate to simplifying the administration of the scheme in order to maximise uptake for residents. The council is not seeking to reduce the generosity of the current scheme or to reduce the maximum entitlement awarded since 2019. This could be expected to have a positive impact on the groups that share protected characteristics:

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

Changes to the administration of the scheme are likely to improve the overall uptake and ease of access to support for residents, although a small number of working-age residents will be slightly worse off financially.

Duties to particular groups

As above, continuing the generosity of the scheme whilst simplifying how it is administered 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 continuing the generosity of the scheme 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 complete Council Tax exemption for residents who are "Severely Mentally Impaired".

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.

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 EqIA guidance

Outcome	Y/N
No major change to the proposal: the EqIA 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>	Tbc
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>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	Tbc
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	Tbc

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
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.			
-			
6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:			
<p>The Council will continue to provide support to Council Tax payers where vulnerabilities are identified and respond appropriately. This includes:</p> <ul style="list-style-type: none"> • 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 			

7. Authorisation	
EqlA approved by: Andy Briggs, Assistant Director Corporate and Customer Services	Date

8. Publication
<i>Please ensure the completed EqlA is published in accordance with the Council's policy.</i>
This EQIA will be published along with all papers relating to the report

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