

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex, and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

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
Equalities/HR Advisor:	Edward Ashcroft / Jim Pomeroy
Cabinet meeting date (if applicable):	1st March 2022
Director/Assistant Director	Jon Warlow, Director of Finance; Andy Briggs, AD Corporate and Customer Services

2. Executive summary

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.
- 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 an additional simplified summary of the scheme written in plain English.
- Stabilising entitlement for residents by simplifying what happens when a resident's income changes by a small amount during the financial year.

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. It is likely that these groups will continue to be impacted by ongoing financial challenges such as rising inflation and increases to energy prices.

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 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. The vast majority (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 add a simplified summary of the scheme in plain 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 it difficult to access the scheme, 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 our internal support service and 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 regard to developing its CTRS. The duties 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. 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. Consultation and engagement

Background

The council ran a public consultation from 2nd September to 11th November 2021 on the proposals to change the Local Council Tax Reduction scheme from April 2022. The volume of responses received to the public consultation was substantially higher than previous Local Council Tax Reduction scheme (LCTRS) consultations run by the council.

The consultation was predominantly online on the council's website. To create awareness, the Council ran a publicity campaign on social media and held pop events at libraries across the Borough where residents could ask officers any questions on the consultation and fill out a paper copy. Paper copies were also made available at various libraries throughout the Borough to provide access for those who were digitally excluded. To ensure awareness, all households within the borough were written to with an invitation to participate in the consultation along with advice on how to respond.

Responses

There was a total of 4,580 responses to the public consultation. Of these:

- Sex - 56% of respondents were Female and 41% Male. 3% preferred not to say.
- Age – 1% of respondents were under 25; 41% of respondents were 25-44; 40% of respondents were 45-64; and 18% of respondents were over 65.

1746 reported that they were currently receiving Council Tax reduction (38%). Given the characteristics of those in receipt of Council Tax Reduction, it is likely that a disproportionate number of these respondents had Protected Characteristics.

Findings – Quantitative

A summary of the consultation findings is included within the report to Cabinet. A summary of the equalities analysis is contained below. There was overwhelming support for these changes.

Of the total 4542 responses received:

	Supported (%)	Did not support (%)	Don't know or not sure (%)
Simplifying the claims process	77	8	14
Increasing the provision for backdating claims	81	9	9
Rewriting the scheme into plain English	89	4	7
Changes to Council Tax	76	7	17

Recalculations (stabilising entitlement)			
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Of the 1746 responses where the resident identified that they were in receipt of Council Tax Reduction:

	Supported (%)	Did not support (%)	Don't know or not sure (%)
Simplifying the claims process	73	9	19
Increasing the provision for backdating claims	82	11	7
Rewriting the scheme into plain English	87	3	9
Changes to Council Tax Recalculations (stabilising entitlement)	70	8	21

Findings – Qualitative

There was broad support for all the proposals.

Changes to Council Tax Recalculations

The lowest level of support (which was still a strong majority in favour) was 70% in favour of the proposed changes to Council Tax Recalculations – which would stabilise entitlement for residents by simplifying what happens when a resident's income changes by a small amount during the financial year.

Some of those in favour felt that the measure would support budgeting amongst the most vulnerable, noting that claimants often find it difficult to budget due to their claims being reassessed on a regular basis. For example:

Claimants find it difficult to budget due to their claims being reassessed on a monthly basis. So, this proposal is great.

As a single parent on a tight budget, I think this is a good idea. Others were concerned about the potential impact on those with low incomes should they receive a lower award.

Any little amount counts in a household like ours (one adult, four kids).

It is noted that some residents will be worse off under these proposed changes. Modelling shows that 5.5% of working-age households receiving Council Tax support would be worse off. The average loss would be £32/year, which is 61p per week.

However, the vast majority of residents will see no change in their entitlement, and, where residents do see some change in their entitlement, the number is likely to be low.

The potential specific impacts of these changes are examined throughout this EqIA. In summary the council is putting in place the following mitigations:

- To mitigate the impact, the preferred approach to stabilising entitlement has sought to minimise the number of people who will receive less financial support. The vast majority of residents will see no change in their entitlement, and, where residents do see some change, the number is likely to be very low.
- In addition, where residents are facing financial hardship, as is the council's usual practice, we will continue to use existing support mechanisms such as signposting to other sources of help including our internal support service and the CAB and voluntary groups for our customers and will seek to build upon these.

The potential negative impacts are considered to be proportionate to the overall benefit of this change to residents and the council.

Other comments

Some general points were also raised around the accessibility of the scheme. This included some concerns around access for those who face language barriers and/or who are digitally excluded.

It is noted that the proposed changes set out here do not remove any avenues to apply for Council Tax Reduction – instead, they add additional and simplified channels. Notably, those who are digitally excluded, or face language barriers are particularly likely to benefit from changes to the scheme which will see automatic applications for those on Universal Credit and stabilised entitlement.

Application support for the digitally excluded will also continue to be available through our services such as Connected Communities and our Customer Services. The Council has also delivered take-up campaigns to help ensure that residents can learn about the scheme and access the support that they need (including through targeted outreach).

4. Data and Impact Analysis

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. These are also some of the groups who are likely to be most impacted by ongoing challenges such as rising energy costs and inflation.

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 percentage 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 March 2020, there were around 15,135 people on Universal Credit. In November 2021, there were 39,669. 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 summary version of the policy written in simple English will benefit all current and potential recipients of the scheme.

4a. Age

Data

Borough Profile¹

56,718: 0-17 (21%)

72,807: 18-34 (27%)

68,257: 35-49 (25%)

44,807: 50-64 (17%)

28,632: 65+ (11%)

Target Population Profile

Table 1.1 – 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

¹ Source: State of the Borough

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%

Impacts

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.

Older people

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.

There is a disproportionate number of +65-year-old residents in this category who will continue to be positively impacted by the decision to maintain the current generosity of the scheme into 2022/23.

Children

Working age claimants with children will continue to be 'protected' under the scheme and receive up to 100% maximum Council Tax Reduction.

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 decisions here will have a positive impact for children.

Working age residents

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.

Non-protected working age claimants are predominantly aged between 25 and 59 and must pay some contribution towards their council tax. There are no proposals to change this in 2022/23 but there will be no increases to the amount for which they will be liable.

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 1.2.

Although there are some variations amongst age groups this does not suggest this protected characteristic will be disproportionately negatively impacted by these changes.

Table 1.2 – 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

4b. Disability²

Data

Borough Profile ³

4,500 people have a serious physical disability in Haringey.

19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.

1,090 people living with a learning disability in Haringey.

4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

There were 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.

Impacts

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 continue to benefit from the decision to maintain the current generosity of the CTRS in 2022/23.

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.

² In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

³ Source: 2011 Census

4c. Gender Reassignment⁴

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.⁵

Target Population Profile

We do not hold data on gender reassignment in Haringey's CTR caseload. 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.

Impacts

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.

⁴ Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to one's preferred gender. This is because changing one's physiological or other gender attributes is a personal process rather than a medical one.

⁵ Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

4d. Marriage and Civil Partnership

Data

Borough Profile ⁶

Divorced or formerly in a same-sex civil partnership which is now legally dissolved:
(8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership):
(4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

We do not hold data on marriage and civil partnership among Haringey's CTR caseload. 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.

Impact

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.

⁶ Source: 2011 Census

4e. Pregnancy and Maternity

Data

Borough Profile ⁷

Live Births in Haringey 2019: 3646

Target Population Profile

We do not hold detailed data about maternity in the CTRS dataset. However, in the June 2021 dataset, there were 6770 working age residents eligible for 100% council tax support with children, 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. Therefore, those with children will continue to benefit from the decision to maintain the current level of generosity in 2022/23.

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 1.3. Although there are some variations amongst age groups this does not suggest this protected characteristic will be disproportionately negatively impacted by these changes.

Table 1.3 – 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

⁷ Births by Borough (ONS)

Lone Parents with dependents (27%)	8.9%	£34	7.8%	£30
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4f. Race

Data

Borough Profile ⁸

Arab: 0.9%

Any other ethnic group: 3.9%

Asian: 9.5%

Bangladeshi: 1.7%

Chinese: 1.5%

Indian: 2.3%

Pakistani: 0.8%

Other Asian: 3.2%

Black: 18.7%

African: 9.0%

Caribbean: 7.1%

Other Black: 2.6%

Mixed: 6.5%

White and Asian: 1.5%

White and Black African: 1.0%

White and Black Caribbean: 1.9%

Other Mixed: 2.1%

White: 60.5% in total

English/Welsh/Scottish/Norther Irish/British: 34.7%

Irish: 2.7%

Gypsy or Irish Traveller: 0.1%

Other White: 23%

Target Population Profile

Table 1.4 – Total CTRS caseload by Ethnicity (June 2021 compared to September 2019)

⁸ Source: 2011 Census

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%

September 2019						
Ethnicity	Pensionable	Protected/disability	Protected/child in household	Non-protected/other Working Age	Total CTR Claimants	% All CCTR 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%

Race and ethnicity data was not historically recorded as part of the CTRS application process. Therefore, the data provided in table 1.4 does not give a complete overview of the current caseload.

For those CTRS claimants who provided an ethnicity (see Table 1.4), 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.

Table 1.5 shows the modelled impact on different ethnicities of proposed changes to stabilise entitlement (based off limited data). Although some groups will have a slightly higher level of variance (percentage seeing higher or lower awards), this data does not suggest that there will be a disproportionate impact on this protected characteristic

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

Working-age households	% with higher awards	average gain if higher CTS award (£)	% with lower award	average loss if lower CTS award (£)
Asian	8%	£36	7%	£39
Black	5%	£32	5%	£32
Mixed	3.4%	£24	5.6%	£31
White British	4.5%	£35	4.2%	£33
White Other	9.3%	£39	7.8%	£32
Other	7.5%	£36	6%	£33

4g. Religion or belief

Data

Borough Profile ⁹

Christian: 45%

Buddhist: 1.1%

Hindu: 1.9%

Jewish: 3%

Muslim: 14.2%

No religion: 25.2%

Other religion: 0.5%

Religion not stated: 8.9%

Sikh: 0.3%

Target Population Profile

We do not hold data on religion or belief among Haringey's CTR caseload. 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.

Impact

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.

⁹ Source: 2011 Census

4h. Sex

Data

Borough profile ¹⁰

Females: (50.5%)

Males: (49.5%)

Target Population Profile

Table 1.6 – 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
Female	4387	4267	5059	2919	16632	59.5%
Male	3145	3152	1576	2905	10778	38.6%
Unknown	156	189	135	75	546	2.0%
Total	7688	7599	5667	5899	27956	100%

September 2019						
Sex	Pensionable	Protected/disability	Protected/child in household	Non-protected/other Working Age	Total CTR Claimants	% All CCTR Claimants
Female	4556	4139	4157	1904	14756	58.47%
Male	3390	3074	1365	2123	9952	39.4%
Unknown	162	183	145	80	570	2.3%
Total	8108	7396	5667	4107	25278	100%

¹⁰ Source: 2011 Census

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 2022/23 will continue to disproportionately positively impact women more than men.

Proposed administrative changes

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 1.7.

Although there is some variation in the percentage seeing higher or lower awards, this data does not suggest that there will be a disproportionate impact on this protected characteristic

Table 1.7 – 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

4i. Sexual Orientation

Data

Borough profile ¹¹

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

We do not hold data for this protected characteristic in the CTRS caseload. 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.

Impacts

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.

¹¹ Source: ONS Integrated Household Survey

4j. Socioeconomic Status (local)

Data

Borough profile

Income¹²

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage. The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

Educational Attainment¹³

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

Target Population Profile

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

All claimants will therefore 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. This will continue to have a positive benefit due to the ongoing impact of increases to the cost of living, including inflation and energy prices.

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.

¹² Source: Annual Survey of Hours and Earnings, ONS, 2019

¹³ Source: Annual Population Survey 2019 (via nomis)

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 1.8.

Although there are some significant variations, including for those who are self-employed, this does not suggest that there will be a disproportionate negative impact on this protected characteristic.

It should be noted that reducing the number of bills issued will be of particular benefit to those who see regular changes in their incomes in order to support with household budgeting and therefore minimise debt.

Table 1.8 – 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 – carer (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

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

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 of the changes proposed here, including those to maximise uptake of the scheme, would have a positive impact on this age group.

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.

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

Gender reassignment

Overall, maintaining the generosity of 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.

Marriage and civil partnerships

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.

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.

Race

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.

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

Religion or 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.

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.

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

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.

Socioeconomic status

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.

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 – but it is not anticipated that there will be a disproportionate negative impact on this protected characteristic. In addition, reducing the number of bills issued will be of particular benefit to those who see regular changes in their incomes by supporting with household budgeting and therefore minimising debt.

5b. Intersectionality

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.

Other residents who face multiple barriers to accessing support – for example, those who might face language barriers and be digitally excluded – are also disproportionately likely to benefit from proposed administrative changes which are designed to simplify the scheme and improve its accessibility.

5c. Data Gaps

The council ran a public consultation from 2nd September to 11th November 2021 on the proposals to change the Local Council Tax Reduction scheme from April 2022. This received 4542 responses, including 1746 from those in receipt of Council Tax Reduction.

The data in this EqlA has been drawn from the council CTRS caseload, including modelled analysis of the potential impact of changes to the scheme. Where there are gaps, these have been explained.

6. Overall impact of the policy for the Public Sector Equality Duty

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.

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.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

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. 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

Yes

Adjust the proposal: the EQIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below 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

No

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. **Y/N**

No

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Actions to mitigate potential negative impacts will be taken as detailed throughout this EqIA.

Please outline any areas you have identified where negative impacts will happen because of the proposal, but it is not possible to mitigate them.

N/A

Please provide a complete and honest justification on why it is not possible to mitigate the:

N/A

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision
- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

Date of EQIA monitoring review:

The Council Tax Reduction Scheme will continue to be monitored on a regular basis, reviewed annually and proposed changes will continue to be subject to equalities analysis.

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Andy Briggs.

Date

16th February 2022

9. Publication

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

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