

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 individuals 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 treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	Discretionary Scheme Energy Rebate
Service Area:	Council Tax.
Officer Completing Assessment:	David Graaff.
Equalities Advisor:	Jim Pomeroy.
Cabinet meeting date (if applicable):	NA.
Director/Assistant Director	Andy Briggs.

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

- The policy proposal, its aims and objectives, the decision in consideration. Please focus on **the change** that will result from this decision.
- Results of the analysis: potential positive and negative equality impacts
- Mitigations that will be taken to minimise negative equality impacts (if relevant)

- Next steps (this may include: if/when the EQIA will be refreshed, planned consultation, future stages of the project).

Council Tax Energy Rebate

The council is already implementing the payment of £150 to each eligible household whose property falls with valuation bands A-D. This will mean a payment to around 90,000 homes in the borough.

Discretionary Scheme

The government funding available under this scheme is £1,464,750. This scheme is designed to support vulnerable people and individuals on low incomes who pay Council Tax for properties in Bands E to H, or who do not pay Council Tax. Payments will be made as one-off grants of up to £150 to households eligible under the criteria set out in this policy.

The discretionary fund also offers 'top-up' payments to the most vulnerable households in bands A - D (including those on Council Tax Support), and offers support in excess of £150 per household for people who are in properties in Bands E-H, or who do not pay Council Tax where they have an energy bill or meter in their name.

Allocations from the discretionary fund must be spent by 30 November 2022.

The discretionary scheme has three elements:

- 1. Direct Payments** where the council can identify that a person qualifies for the award as at 1/4/2022 without an application being completed
- 2. Application Payments** where the council cannot identify whether a person qualifies for the award without an application being completed
- 3. Top-ups** where there are unallocated funds remaining after all Direct and Application payments have been made. Top-ups will be made to CTRS claimants in bands A-H by means of a credit to their Council Tax Account or by another means of the council's choosing

Additional qualifying criteria:

1. The person is in receipt of CTRS
2. The person has been identified by the Council as having a "shortfall" in income using LIFT data
3. The person is a care leaver
4. The property is an exempt dwelling in the classes N (students), S (under 18), U (SMI), W (annex)
5. The property has a disability reduction (SI 1992/554)

Where the liable person meets all of the base criteria and at least one element of the additional criteria set out above, they will automatically be eligible for £150 Discretionary Energy Payment which will be paid by cash voucher with the alternative of a BACS payment. A credit will be made to their Council Tax account where voucher expires uncashed.

The guidance states that “Councils can determine locally how best to make use of this funding to support those suffering financial hardship as a result of the rising cost of living. This could include households living in property valued in bands E to H that are on income related benefits or those where the energy bills payers are not liable for council tax. Where councils consider it the best means of supporting those in financial difficulty, they can use the discretionary fund to offer carefully targeted ‘top-up’ payments to the most vulnerable households in bands A to D (for example, those on means tested benefits), or to offer discretionary support exceeding £150 per household. Occupants of class M (student halls) are unlikely to be eligible for discretionary support, unless they are exposed to rising energy prices in a similar way to other households. Discretionary support should not be offered to occupants of property in exemption class O, where the Ministry of Defence will provide cost of living support. Support from the Discretionary Fund does not have to be provided in relation to the position on 1 April 2022”.

The “no application” groups were chosen because they are likely to be suffering financial hardship as a result of the rising cost of living, and they are known to the Council through existing Council Tax and Benefits records.. These groups are all experiencing socioeconomic disadvantage: identified by being on CTRS or LIFT, students, disabled, severely mentally impaired, occupying annexes as part of extended households, care leavers or households where everyone is under 18.

The “application” groups were chosen because they meet the requirements of the discretionary scheme but are not known to the Council, so an application is required. These are people who are either those where the energy bills payers are not liable for council tax, or those who would otherwise have been eligible for the core scheme had their household been in existence on the 1st April 2022.

Activity to promote inclusivity and remove barriers to applications

We have identified that the following groups may be disadvantaged, the reason why and our mitigations

Disadvantaged Groups	Why they are disadvantaged	Our mitigation
Charedi community	Don't go online, so may not find out about the scheme, or be able to apply online for a discretionary payment	Covered by direct payments if on CTRS Applications and top ups Engage with Jewish community groups, to ensure our comms is understood by the local community Outreach sessions in the Stamford Hill area to assist people to make claims where needed
English is second language	Our comms is primarily in English	Covered by direct payments if on CTRS Applications and top ups

		<p>Include important information about energy bills in letters in top 5 languages spoken</p> <p>Offer assisted service via telephone or in person to make applications</p>
Disability - learning disabilities and mental health	May not find out about the scheme or be able to make applications	<p>Covered by direct payments if on CTRS or disability reduction on CTAX liability</p> <p>Applications and top ups Link in with Social Care Outreach at day centres</p>
Care leavers	May not find out about the scheme	<p>Covered by direct payments if on CTRS</p> <p>Applications and top ups Care Leavers Network Digital comms via channels that Gen Z use</p>
Older people	May not find out about the scheme or go online to make applications	<p>Covered by direct payments if on CTRS</p> <p>Applications and top ups Engage with Age concern, Social Care and agents to complete forms on older person's behalf</p>

3. Consultation and engagement

3a. 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? Detail how your approach will facilitate the inclusion of protected groups likely to be impacted by the decision.

There is limited time to carry out any consultation or engagement as the Energy Rebate Scheme was only announced in February 2022 and guidance on the discretionary scheme was only published in March 2022. The Council must start to deliver the scheme in April 2022 and make all payments by end November 2022. The Council's primary aim is to get extra money to residents on low incomes as quickly as possible to help with rising energy costs

We have engaged with a range of internal and external partners via the Council's Partnership Board to ensure we can engage with groups we have identified where barriers to engagement exist.

3b. 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

No formal consultation as time constraints do not allow, but engagement across disadvantaged groups will continue throughout the life of the scheme and this EQIA updated accordingly.

Our approach to payments means no-one who is eligible will lose out because they will either get a voucher, a BACS payment or credit to their council tax account.

4. Data and Impact Analysis

Note: officers may want to complement their analysis with data from the State of the Borough and ward profiles, found here: <https://www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough>.

Please consider how the proposed change will affect people with protected characteristics.

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

0-17 (XX%)
18-34 (XX%)
35-49 (XX%)
50-64 (XX%)
65+ (XX%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Borough demographics

¹ Source: State of the Borough

As above (quantitative and qualitative)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal as a result of a need related to their protected characteristic?

Older people have been identified as a target cohort for messaging about the applications/top-up aspect of the scheme as they may have less information about the scheme and less access to the internet. The Council will engage with VCS groups such as Age Concern and through Adult Social Care to ensure older people are able to access the scheme.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

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

As above.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

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

As above (quantitative and qualitative)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Disabled people have been identified as a target cohort for messaging about the applications/top-up aspect of the scheme as they may have less information about the scheme and face additional challenges to completing applications. The Council will engage through Adult Social Care and outreach at day centres to ensure disabled people are able to access the scheme.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

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 2,000 Haringey residents are Trans.⁵

Target Population Profile

As above.

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.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

None available

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic

No and No.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

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

As above .

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

⁶ Source: 2011 Census

As above (quantitative and qualitative)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

No and No.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

4e. Pregnancy and Maternity

Data

Borough Profile ⁷

Live Births in Haringey 2019: 3,646

Target Population Profile

As above.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

As above

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

⁷ Births by Borough (ONS)

No and No.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral .

4f. Race

In the Equality Act 2010, race can mean ethnic or national origins, which may or may not be the same as a person's current nationality.⁸

Data

Borough Profile ⁹

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%

⁸ [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/race-discrimination)

⁹ Source: 2011 Census

Target Population Profile

As above .

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

As above

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

No and No.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

4g. Religion or belief

Data

Borough Profile ¹⁰

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

As above.

¹⁰ Source: 2011 Census

What data will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

As above

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Residents from the Charedi community have been identified as a target cohort for messaging about the applications/top-up aspect of the scheme as they may have less information about the scheme and lack of access to information online. The Council will engage by engaging with Jewish community groups to develop effective communications and outreach sessions in Stamford Hill to assist with claims were needed.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral .

4h. Sex

Data

Borough profile ¹¹

Females: (50.5%)

Males: (49.5%)

Target Population Profile

As above.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

¹¹ Source: 2011 Census

As above (quantitative and qualitative)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

No and No .

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

4i. Sexual Orientation

Data

Borough profile ¹²

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

As above.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

As above (quantitative and qualitative)

Detail the findings of the data. a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?

b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

¹² Source: ONS Integrated Household Survey

No and No.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Neutral.

4j. Socioeconomic Status (local)

Data

Borough profile

Income

8.3% of the population in Haringey were claiming unemployment benefit on 9 December 2021.¹³

20.8% of the population in Haringey were claiming Universal Credit on 9 December 2021.¹⁴

29% of employee jobs in the borough are paid less than the London Living Wage.¹⁵

Educational Attainment

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it is below the London average.¹⁶

4.4% of Haringey's working age populations had no qualifications in 2020.¹⁷ 4.8% were qualified to level one only.¹⁸

Area Deprivation

Haringey is the 4th most deprived in London as measured by the IMD score 2019. The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough where more than half of the LSOAs fall into the 20% most deprived in the country.¹⁹

Target Population Profile

¹³ [ONS Claimant Count](#)

¹⁴ [LG Inform](#)

¹⁵ ONS

¹⁶ Source: Annual Population Survey 2019 (via nomis)

¹⁷ [LG Inform - qualifications](#)

¹⁸ [LG Inform – level one](#)

¹⁹ [State of the Borough](#) (p.21)

The discretionary scheme is designed to benefit those who are experiencing socioeconomic disadvantage.

The barriers people experiencing socioeconomic disadvantage face to accessing the scheme may include lack of access to the internet and/or information about the scheme.

As with other groups, we will engage through VCS, and Citizens Advice, to ensure people on low incomes are supported to apply.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

As above (quantitative and qualitative)

Detail the findings of the data.

- a) Might members of this group be disproportionately affected by the proposal due to overrepresentation? How does this compare with the wider demographic profile of the Borough?
- b) Might members of this group be disproportionately affected by this proposal by dint of a need related to their protected characteristic?

Positive.

Potential Impacts

- Consider whether the proposed policy/decision will have positive, neutral, or negative impacts (including but not limited to health impacts).

Those on Council Tax Reduction in Bands E-H will automatically receive £150 .

5. Key Impacts Summary

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

Recognising inequalities of access, activity will be undertaken to ensure the scheme is promoted widely, in an inclusive and accessible way. Activity will be undertaken through direct outreach and with the VCS to ensure residents have support to apply, where required.

Officers will keep under review access to the scheme and engage with the community and, where additional action is required, seek to tailor activity appropriately.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.
- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

This EQIA has identified different groups who will require additional support. The Council's combination of outreach and VCS activity will seek to overcome intersectional challenges posed by lack of access to combinations of financial resource (digitally excluded), language barriers and lack of access to information.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

N/A

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

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- 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?
- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The discretionary scheme will have a positive impact on those who are eligible for additional funding, who are deemed to be more vulnerable to financial

hardship. Activity will be undertaken to ensure these groups are able to apply to the scheme. This will help to foster equality of opportunity between groups.

7. Amendments and mitigations

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

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

Please delete Y/N as applicable

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 **Y/N**

None.

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 **Y/N**

None.

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**

N/A

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?

Action:

N/A

Lead officer:

Timescale:

Please outline any areas you have identified where negative impacts will happen because 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 the:

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?

Given the limited funding, the limited property-based criteria and short delivery timescales it is not proposed to undertake further monitoring.

Date of EQIA monitoring review:

There is no review proposed to be undertaken.

8. Authorisation

EQIA approved by (Assistant Director/ Director)

Andy Briggs

Date

11/4/2022

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.