

## 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:

- 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

<b>Name of proposal:</b>	Review of Council Tax Reduction Scheme Administration for 2023/24
<b>Service Area:</b>	Revenues and Benefits, Finance
<b>Officer Completing Assessment:</b>	David Graaff
<b>Equalities/HR Advisor:</b>	Jim Pomeroy
<b>Full Council meeting date (if applicable):</b>	<b>02.03. 2023</b>
<b>Director/Assistant Director</b>	Jon Warlow, Director of Finance; Andy Briggs, AD Resident Experience

## 2. Executive summary

### Background

In 2013, the government formally 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 and 2022/2023. 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 a 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.

### The 2022/2023 changes

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

### Proposal

- No changes to the scheme are proposed in 2023/2024

### Key Stakeholders

The option not to amend the scheme directly impacts all current recipients of CTRS, as well as those who are eligible but not claiming or who may become eligible. As there are no proposals to make the scheme more generous, the effect of this is neutral. No one is better off or worse off. Council Tax Reduction recipients are likely to have a disproportionate number of residents with protected characteristics, based on available evidence, as people with protected characteristics tend to have lower incomes. This includes

- Those who are claiming Universal Credit, or legacy benefits
- Those who are in insecure work, including those on zero-hours contracts, and those 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.

Lower income earners (concentrated in the east of the borough where there is a higher proportion of BAME residents) have also been acutely impacted by the economic situation. 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:

No changes are proposed this year

#### 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 can be expected to have a positive equalities impact given the ongoing financial impact of the pandemic, the cost-of-living issues, 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 produce 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 stated that there were additional duties of the Council in 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 it is 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.

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

No consultation has been necessary as there are no proposed changes to the scheme

## 4. Data and Impact Analysis

### Summary – CTRS caseload

The council has seen a 9% increase in Council Tax Reduction claimants since April 2020 and a 2% increase since April 2022. It is likely that amongst these groups, there will a disproportionate number of residents with protected characteristics. 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 February 2023, there were 27,266 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 since the Covid-19 pandemic and cost of living issues. Table 1.0 summarises the breakdown of the Council’s CTRS caseload in comparison to April 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 April 2019)**

	Pensionable	Protected / disability-related	Protected / child household	Non-protected/ other Working Age	Total CTR Claimants
Feb 23	7767	7973	6417	5109	27266
April 2019	8172	7238	5650	4210	25270

28% 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 April 2019.

29% 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 caseload increase on April 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 1% caseload increase on April 2019.

19% 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 16.6% in April 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 last year's administrative changes

The simplification of the claims process to include an automated way for those on Universal Credit to apply for council tax support impacted those on Universal Credit. There has been a sharp increase in the number of working age residents claiming this benefit since the pandemic. In March 2020, there were around 15,135 people on Universal Credit. In October 2022, there were 36,617. Universal Credit claimants are more concentrated in the east of the borough.

The change to simplify entitlement when residents' income changes affect all current and potential recipients of the scheme by reducing the number of bills the council issues. Modelling showed 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 changes to simplify the scheme by changing the backdating rules and produce a summary version of the policy written in simple English has benefited all current claimants. New claimants to the scheme have been able to have their claims backdated further than previously, where necessary.

## 4a. Age

### Data

#### Borough Profile<sup>1</sup>

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 (January 2023)**

January 2023						
Age	Pensionable	Protected / disability	Protected / child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants
18-24	0	36	192	151	379	1%
25-44	<10	1788	4261	1318	7367	27%
45-59	20	4122	1871	2158	8171	30%
60-64	35	1630	79	936	2680	10%
65+	7726	402	17	193	8338	31%
<b>Total</b>	<b>7781</b>	<b>7978</b>	<b>6420</b>	<b>4756</b>	<b>26935</b>	<b>100%</b>

### Impacts

Haringey is a 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.

<sup>1</sup> Source: State 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 2023/24

### *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 decision to maintain the scheme, 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 2023/24 but there will be no increases to the amount for which they will be liable.

Although there are some variations amongst age groups, the maintenance of the existing scheme suggests that there will be a neutral impact on this protected characteristic.

## **4b. Disability<sup>2</sup>**

### **Data**

#### **Borough Profile <sup>3</sup>**

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.

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<sup>2</sup> 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.

<sup>3</sup> Source: 2011 Census



## Target Population Profile

There were 7973 people in the February 2023 caseload who were eligible for 100% council tax support due to being in receipt of certain disability benefits. This represents 29% 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 2023/24.

### *Proposal to maintain the current scheme*

All residents in receipt or eligible for CTR have benefitted from the 2022/2023 changes 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, have benefitted.

The maintenance of the existing scheme suggests that there will be a neutral impact on this protected characteristic.

## 4c. Gender Reassignment<sup>4</sup>

### Data

#### Borough Profile

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

## 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

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<sup>4</sup> 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.

<sup>5</sup> 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.



It is anticipated that the continuation of the current scheme will not have a disproportionate impact on this protected characteristic.

## 4d. Marriage and Civil Partnership

### Data

#### Borough Profile <sup>6</sup>

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 will not have a disproportionate impact on this protected characteristic.

## 4e. Pregnancy and Maternity

### Data

#### Borough Profile <sup>7</sup>

Live Births in Haringey 2019: 3646

### Target Population Profile

We do not hold detailed data about maternity in the CTRS dataset. However, in the February 2023 dataset, there were 6,417 working age residents eligible for up to 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.

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<sup>6</sup> Source: 2011 Census

<sup>7</sup> Births by Borough (ONS)

### *Proposal to maintain the current scheme*

All residents in receipt or eligible for CTR have benefitted from steps to simplify the scheme and improve its accessibility in 2022/2023. Residents who may have otherwise faced barriers to claim the support have benefitted.

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

## **4f. Race**

### **Data**

#### **Borough Profile <sup>8</sup>**

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**

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<sup>8</sup> Source: 2011 Census

**Table 1.2 – Total CTRS caseload by Ethnicity (January 2023)**

January 2023						
Ethnicity	Pensionable	Protected / disability	Protected / child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants
<b>White British</b>	394	669	511	486	2060	8%
<b>White Other</b>	866	896	760	508	3030	11%
<b>Non-White</b>	1148	1394	1468	1187	5197	19%
<b>Unknown</b>	5374	5019	3682	2937	17012	62%
<b>Total</b>	<b>7782</b>	<b>7978</b>	<b>6421</b>	<b>5118</b>	<b>27299</b>	<b>100%</b>

Race and ethnicity data was not historically recorded as part of the CTRS application process. Therefore, the data provided in table 1.2 does not give a complete overview of the current caseload.

For those CTRS claimants who provided an ethnicity (see Table 1.2), 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 would be disproportionately impacted by any changes to the CTRS.

#### *Proposal to maintain the current scheme*

All residents in receipt or eligible for CTR have benefitted from steps to simplify the scheme and improve its accessibility in 2022/2023. Residents who may have otherwise faced barriers to claim the support have benefitted.

The maintenance of the existing scheme will have a neutral impact on this protected characteristic.

## **4g. Religion or belief**

### **Data**

#### **Borough Profile <sup>9</sup>**

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<sup>9</sup> Source: 2011 Census

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 will not have a disproportionate impact on this protected characteristic.

## 4h. Sex

### Data

#### Borough profile <sup>10</sup>

Females: (50.5%)

Males: (49.5%)

### Target Population Profile

Table 1.3 – Total CTRS caseload by Sex (January 2023)

January 2023						
Sex	Pensionable	Protected disability	Protected/child in household	Non-protected / other Working Age	Total CTR Claimants	% All CCTR Claimants
Female	4468	4555	4932	2535	16490	60.41%
Male	3143	3230	1383	2515	10271	37.62%

<sup>10</sup> Source: 2011 Census

<b>Unknown</b>	171	193	106	68	538	1.97%
<b>Total</b>	7782	7978	6421	5118	27299	100%

There are disproportionately more women as the main claimant 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 current CTRS into 2022/23 will continue to disproportionately impact women more than men positively.

#### *Proposal to maintain the current scheme*

Given there are a larger number of women claiming CTRS, women are likely to have been disproportionately positively impacted by the overall steps to simplify the scheme and improve its accessibility in 2022/2023.

The maintenance of the existing scheme suggests that there will be a neutral impact on this protected characteristic.

## **4i. Sexual Orientation**

Data

### **Borough profile <sup>11</sup>**

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 will not have a disproportionate impact on this protected characteristic.

## **4j. Socioeconomic Status (local)**

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<sup>11</sup> Source: ONS Integrated Household Survey

## Data

### Borough profile

#### Income<sup>12</sup>

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 Attainment<sup>13</sup>

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 a means-test benefit for 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 have benefited from steps to simplify the scheme and improve its accessibility in 2022/2023. Residents who may have otherwise faced barriers to claim the support have benefitted.

The maintenance of the existing scheme suggests that there will be a neutral impact on this protected characteristic.

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

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<sup>12</sup> Source: Annual Survey of Hours and Earnings, ONS, 2019

<sup>13</sup> Source: Annual Population Survey 2019 (via nomis)

## 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.

#### *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 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.

Changes made last year, to maximise uptake of the scheme, have had a positive impact on this age group, and the maintenance of the scheme will have a neutral effect.

#### 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 last year have improved 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.

#### 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 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.

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 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.

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.

## **Race**

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

Generally, maintaining the scheme as-is is likely to have a neutral 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 have improved 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.

## **Religion or belief**

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 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.

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.

Maintaining the generosity of the scheme as-is is not likely to have a disproportionate negative impact on this protected characteristic.

## **Sexual Orientation**

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 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 maintaining the generosity of the scheme as-is is likely to have a disproportionate positive impact on those with low socioeconomic status.

### **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, 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 have benefitted from last year's administrative changes which were designed to simplify the scheme and improve its accessibility.

### **5c. Data Gaps**

No specific data gaps have been identified.

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

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.

### Duties to particular groups:

As above, continuing the generosity of the scheme 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?

No potential negative impacts have been identified 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

**14<sup>th</sup> February 2023**

## 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.