

## 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

<b>Name of proposal:</b>	<b>Council Tax Reduction scheme changes 2024-25</b>
<b>Service Area:</b>	<b>Benefit Service</b>
<b>Officer Completing Assessment:</b>	<b>James Straw</b>
<b>Equalities Advisor:</b>	<b>Jim Pomeroy</b>
<b>Full council meeting date (if applicable):</b>	<b>04 March 2024</b>
<b>Director/Assistant Director</b>	<b>Barry Francis/Andy Briggs</b>

### 2. Executive summary

The Council Tax Reduction Scheme (CTRS) provides support to low-income households to reduce their Council Tax liability. The scheme is currently means tested and provides support to approximately 27,000 households within the borough.

Each year the Council can amend its Council Tax Reduction Scheme (CTRS) for working-age households. Pension-age households have their entitlement assessed under the national pension-age scheme, which the Council is not able to alter.

The pension-age scheme is updated by Central Government on an annual basis and the Council is proposing to update the working-age scheme with the following changes to match the pension-age scheme:

## 1) Introduce new capital disregards

The proposal would introduce new capital disregards for a variety of compensation and support payments. This change means that the following payments would not be counted as part of their savings and investments in the capital calculation:

- Windrush payments
- Historical child abuse payments
- Grenfell Tower support payments
- Child disability payments
- Payments made by the Child Migrant Trust
- Compensation payments for DWP errors
- We love Manchester emergency fund
- Payments made due to an error of law
- Scottish Infected Blood Support Scheme
- An approved blood scheme
- London Emergencies Trust
- Thalidomide payments
- Payments made under Section 49 of Children and Families Act 2014

## 2) Include Scottish and Welsh legislative

These proposed changes will simplify administration of Council Tax Reduction and will positively impact claimants moving into the borough from either Scotland or Wales. The changes will update the scheme with changes in Scottish and Welsh legislation to align with the pension-age scheme:

- Residents will be treated as disabled if they receive Adult Disability Payments, and these payments will be disregarded as income.
- Including Child Disability Payments as a qualifying condition for the enhanced disability premium.
- Scottish social security payments will be disregarded as capital.
- The childcare definition will be updated to include people employed by a domiciliary support service and charges referred to in the Fostering Panels (Establishment and Functions) (Wales) Regulations 2018.
- Care and Support payments made under the Social Services and Well-being (Wales) Act 2014 and the Children (Scotland) Act 1995 will be disregarded as income.
- Including references to Scottish taxpayers and Scottish basic rate of income tax when calculating earnings.

- Including a new category of part-time fire-fighter employed by the Scottish Fire and Rescue Service in the earned income disregard rules.
- Expand the definition of disability to include changes made in the Social Services and Well-being (Wales) Act 2014.
- Amend the scheme to reference Social Care (Self-directed Support) (Scotland) Act 2013 instead of The Social Work (Scotland) Act 1968.

3) Make administrative changes to match the pension-age and working-age schemes

- Including Statutory Parental Bereavement Pay as income.
- Update references to the personal allowance and personal reliefs from the Income Tax Act 2007.
- Including carers in receipt of the carer element of Universal Credit for the purposes of awarding a severe disability premium.
- Amend references to the family premium to 'a family including at least one child or young person'.
- Amend terminology due to change in social security legislation, regarding service user groups, national insurance contributions and exempt work.
- Include a new category of part-time fire-fighters, as defined in the Fire and Rescue Services Act 2004, for earnings disregards.
- Disregard payments made under the Care Act 2014.
- Expand the definition of disability to include severely sight-impaired residents included in registers kept under the Care Act 2014.
- Include references to paternity leave and shared parental leave.

The Council is not looking to looking to reduce the generosity of the scheme, and this analysis has not identified any negative impacts which need to be considered. Furthermore, some of the changes which have been proposed, such as the expansion of the definition of disability, and some of the support payments disregards, are likely to have positive impact on some groups.

Regarding next steps, following agreement at Full Council, the new scheme will be implemented with effect from 01 April 2024. There will be a 6-month review of this assessment by 30 September 2024 to ensure that there are no unintended consequences which need to be addressed.

### **3. Consultation and engagement**

An 8-week full public consultation was undertaken between 06 December 2023 and 31 January 2024, with residents asked three questions regarding each of the three types of changes being proposed. Social media posts and advertising on the Council's website was used to promote the consultation.

50 responses were received, which were broadly supportive of the proposed changes. It is not possible to identify the residents who will be affected by these changes, meaning that it was not possible to directly engage with these groups.

## 4. Data and Impact Analysis

### 4a. Age

#### Data

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

- 71,660: 18-34 (34%)
- 63,930: 35-49 (31%)
- 46,516: 50-64 (22%)
- 27,706: 65+ (13%)

##### Target Population Profile

- 2,900: 18-34 (11%)
- 7,213: 35-49 (27%)
- 8,640: 50-64 (32%)
- 8,422: 65+ (30%)

#### The Council's CTRS database, January 2024; Census 2021

For the purposes of this assessment, the age group 0-17 has been removed from the data as residents can only be liable for Council Tax once they reach eighteen years old. The data shows that the age group 65+ is over-represented, and the age group 18-34 is under-represented, when compared with the overall Borough profile.

The pension-age scheme is prescribed nationally, and the proposed changes have already been included in this scheme previously. Therefore, members of the age group 65+ will not be disproportionately affected by these changes.

The changes will only impact CTRS recipients aged 18 to state pension age and the changes will match changes which have already been introduced in the national pension-age scheme. The changes will have a positive impact on these age groups, as it will match the support already provided to pension-age claimants. The Council is not reducing the generosity of the scheme and there are no negative impacts which need to be considered.

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<sup>1</sup> Census, 2021 – [Population and household estimates, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/population-and-household-estimates)

## 4b. Disability

### Data

#### Borough Profile

- Disabled under Equality Act – 13.7%<sup>2</sup>
  - Day to day activities limited a lot – 6.1%
  - Day to day activities limited a little – 7.5%
- 7.5% of residents people diagnosed with depression<sup>3</sup>
- 1.7% of residents diagnosed with a severe mental illness<sup>4</sup>
- 0.4% of people in Haringey have a learning disability<sup>5</sup>

#### Target Population Profile

The CTRS database does not provide detail on the specific conditions which resident's have been diagnosed with. However, the number of residents in receipt of a prescribed disability benefit or premium is detailed:

- Working-age in receipt of a disability benefit or premium – 8,219 (30.2%)
- Pension-age in receipt of a disability benefit or premium – 2,672 (9.8%)
- No disability benefit or premium in payment – 16,289 (60%)

#### The Council's CTRS database, January 2024; Census, 2021

Disabled residents continue to be heavily over-represented within the CTRS database when compared with the overall Borough profile. Several of the proposed changes are likely to have a positive impact on this group of residents.

- 1) Disabled applicants are more likely to be in receipt of some of the support payments which are proposed to be disregarded, for instance the infected blood schemes. Implementing this change will reduce the amount of capital these residents are deemed to hold, potentially increasing the CTRS award.
- 2) Amended the scheme to treat residents in receipt of Adult Disability Payment as disabled will mean any residents who move from Scotland and are in receipt of this benefit will be treated under the vulnerable scheme and entitled to up to 100% support, as opposed to 80.2%.
- 3) Expanding the definition of disability to include severely sight impaired residents will ensure that more residents within this group receive the highest level of support available under the scheme.

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<sup>2</sup> Census, 2021 – [Disability, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/disabilityandlongtermhealth/bulletins/disabilityinenglandandwales/2021)

<sup>3</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed depression among GP registered population age 18+](https://www.nhs.uk/quality-improvement/quality-outcomes-framework/prevalence-of-diagnosed-depression-among-gp-registered-population-age-18/)

<sup>4</sup> NHS Quality Outcomes Framework – [Prevalence of diagnosed mental health diagnosis among GP registered population age 18+](https://www.nhs.uk/quality-improvement/quality-outcomes-framework/prevalence-of-diagnosed-mental-health-diagnosis-among-gp-registered-population-age-18/)

<sup>5</sup> PHE Learning disability profiles – <https://fingertips.phe.org.uk/learning-disabilities#page/0/gid/1938132702/pat/6/par/E12000007/ati/102/are/E09000014>

Given these factors, and with consideration that the Council is not looking to reduce the generosity of the scheme, there are no negative impacts which need to be considered.

## 4c. Gender Reassignment

### Data

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

- Gender Identity different from sex registered at birth but no specific identity given – 0.5%
- Trans woman – 0.1%
- Trans man - 0.1%

### Target Population Profile

We do not hold data on the number of people who are seeking, receiving, or have received, gender reassignment surgery, who are also in receipt of CTRS in Haringey.

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

### Census, 2021

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 changes proposed will not have a disproportionate impact on this protected characteristic.

The changes proposed are as likely to impact this group as the rest of the working-age CTRS recipients. Therefore, the changes are expected to have a neutral impact on this group.

## 4d. Marriage and Civil Partnership

**Note:** Only the first part of the equality duty (“*Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act*”) applies to this protected characteristic.

### Data

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

- Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (9.9%)
- Married or registered civil partnership: (35.8%)

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<sup>6</sup> Census, 2021 – [Gender identity, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicityandnationality/bulletins/genderidentityinenglandandwales/2021)

<sup>7</sup> Census, 2021 – [Marriage and civil partnership status in England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/relationshipsandpartnerships/bulletins/marriageandcivilpartnershipstatusinenglandandwales/2021)

- Separated (but still legally married or still legally in a same-sex civil partnership): (2.9%%)
- Single (never married or never registered a same-sex civil partnership): (45.3%)
- Widowed or surviving partner from a same-sex civil partnership: (6.1%)

### **Target Population Profile**

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

### **Census, 2021**

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 proposed changes to the current scheme will not have a disproportionate impact on this protected characteristic.

The changes proposed are as likely to impact this group as the rest of the working-age CTRS recipients. Therefore, the changes are expected to have a neutral impact on this group.

The Council is not proposing to reduce the generosity of the scheme, meaning there are no negative impacts which need to be considered.

## **4e. Pregnancy and Maternity**

### **Data**

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

Live Births in Haringey 2021: 3,376

### **Target Population Profile**

The CTRS database does not hold any data on pregnant residents, and the data was not available on children under 26 weeks.

### **Births by borough, ONS**

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 proposed changes to the current scheme will not have a disproportionate impact on this protected characteristic.

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<sup>8</sup> Births by Borough (ONS)

The changes proposed are as likely to impact this group as the rest of the working-age CTRS recipients. Therefore, the changes are expected to have a neutral impact on this group.

The Council is not proposing to reduce the generosity of the scheme, meaning there are no negative impacts which need to be considered.

#### **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.<sup>9</sup>

##### **Data**

##### **Borough Profile <sup>10</sup>**

##### **Arab: 1.0%**

- Any other ethnic group: 8.7%

##### **Asian: 8.7%**

- Bangladeshi: 1.8%
- Chinese: 1.5%
- Indian: 2.2%
- Pakistani: 0.8%
- Other Asian: 2.4%

##### **Black: 17.6%**

- African: 9.4%
- Caribbean: 6.2%
- Other Black: 2.0%

##### **Mixed: 7.0%**

- White and Asian: 1.5%
- White and Black African: 1.0%
- White and Black Caribbean: 2.0%
- Other Mixed: 2.5%

##### **White: 57.0% in total**

- English/Welsh/Scottish/Norther Irish/British: 31.9%
- Irish: 2.2%
- Gypsy or Irish Traveller: 0.1%
- Roma: 0.8%
- Other White: 22.1%

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<sup>9</sup> [Race discrimination | Equality and Human Rights Commission \(equalityhumanrights.com\)](https://www.equalityhumanrights.com/en/our-work/anti-discrimination-law/race-discrimination)

<sup>10</sup> Census 2021 - [Ethnic group, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/peoplepopulationandcommunity/ethnicity/bulletins/census2021)

## Target Population Profile

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

Unknown: 16,433 (60.5%)

### Arab:

- Arab: 92 (0.01%)
- Kurdish: 136 (0.01%)

### Asian:

- Bangladeshi: 234 (0.01%)
- Chinese: 73 (0.01%)
- Indian: 154 (0.01%)
- Pakistani: 75 (0.01%)
- Other Asian: 202 (0.01%)

### Black:

- African: 1,726 (6.4%)
- Caribbean: 1,225 (4.5%)
- Other Black background: 183 (0.01%)

### Mixed:

- White and Asian: 56 (0.01%)
- White and Black African: 75 (0.01%)
- White and Black Caribbean: 183 (0.01%)
- Mixed other: 227 (0.08%)

### White:

- English/Welsh/Scottish/Norther Irish/British: 2,094 (7.7%)
- White Irish: 331 (0.01%)
- Gypsy Traveller: 2 (0.01%)
- Other White: 2,621 (9.6%)

Other ethnic group: 820 (3.0%)

## **Council's CTRS database, January 2024; Census, 2021**

The ethnicity data within the CTRS database has significant gaps in ethnicity data, meaning it is difficult to state that this is representative of the overall CTRS caseload. However, based on the 40% of ethnicity data held, less than 30% identified as part of the White group. Therefore, it is reasonable to intimate that a significant proportion of the caseload have non-white ethnicity.

The Council is not looking to reduce the generosity of the scheme, and there are no negative impacts from the proposed changes which need to be considered. Furthermore, some of the changes proposed are likely to have a disproportionately positive impact on certain ethnic groups. For instance, the Windrush support payments are highly likely to only impact Black-Caribbean residents, meaning their payments will be disregarded and they will potentially receive a higher level of CTRS.

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

#### **Data**

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

- Christian: 39%
- Buddhist: 0.9%
- Hindu: 1.3%
- Jewish: 3.6%
- Muslim: 12.6%
- No religion: 31.6%
- Other religion: 2.3%
- Religion not stated: 8.0%
- Sikh: 0.3%

#### **Target Population Profile**

We do not hold data on religion or belief in the Haringey CTRS caseload,

#### **Census, 2021**

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 not anticipated that this change will have a disproportional impact on this protected characteristic.

### **4h. Sex**

#### **Data**

##### **Borough profile <sup>12</sup>**

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<sup>11</sup> Census, 2021 – [Religion, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

<sup>12</sup> Census 2021 – [Gender identity: age and sex, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

- Females: (51.8%)
- Males: (48.2%)

### **Target Population Profile**

- Females: 16,506 (60.7%)
- Males: 10,124 (39.3%)

### **The Council's CTRS database, January 2024; Census, 2021**

There are disproportionately more women in receipt of CTRS than the overall Borough profile and they continue to be an overrepresented group when considering changes to the working-age scheme.

None of the changes proposed are expected to have any specific impacts on this group which need to be considered. Overall, the changes are expected to have a neutral impact on this group.

## **4i. Sexual Orientation**

### **Data**

#### **Borough profile <sup>13</sup>**

- Straight or heterosexual: 83.4%
- Gay or Lesbian: 2.7%
- Bisexual: 2.1%
- All other sexual orientations: 0.8%
- Not answered: 11.0%

### **Target Population Profile**

The CTRS database does not hold data on resident's sexual orientation.

### **Census, 2021**

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 not anticipated that this change will have a disproportional impact on this protected characteristic.

## **4j. Socioeconomic Status**

### **Data**

#### **Borough profile**

#### **Income**

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<sup>13</sup> Census, 2021 – [Sexual orientation, England and Wales - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk)

- 6.9% of the population of Haringey were claiming unemployment benefit as of April 2023<sup>14</sup>
- 19.6% of residents were claiming Universal Credit as of March 2023<sup>15</sup>
- 29.3% of jobs in Haringey are paid below the London Living Wage<sup>16</sup>

### **Educational Attainment**

- Haringey ranks 25<sup>th</sup> out of 32 in London for GCSE attainment (% of pupils achieving strong 9-5 pass in English and Maths)<sup>17</sup>
- 3.7% of Haringey's working age population had no qualifications as of 2021<sup>18</sup>
- 5.0% were qualified to level one only<sup>19</sup>

### **Area Deprivation**

Haringey is the 4<sup>th</sup> 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.<sup>20</sup>

### **Target Population Profile**

Receiving Universal Credit – 11,273 (41.9%)

### **The Council's CTRS database, January 2024; ONS**

The CTRS scheme is means-tested support, meaning that all households in receipt of CTRS are on a low-income. Additionally, nearly 42% of recipients are in receipt of Universal Credit, meaning this group is heavily over-represented when compared with the overall Borough profile. The CTRS database does not hold any data on resident's educational qualifications.

The Council is not seeking to reduce the generosity of the scheme, meaning that there are no negative impacts which need to be considered. However several of the changes, including the income and capital disregards, will increase resident's entitlement, meaning that there this group will be positively impacted by the proposed changes.

## **5. Key Impacts Summary**

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

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<sup>14</sup> ONS – [ONS Claimant Count](#)

<sup>15</sup> DWP, StatXplore – [Universal Credit statistics, 29 April 2013 to 9 March 2023 - GOV.UK \(www.gov.uk\)](#)

<sup>16</sup> ONS – [Annual Survey of Hours and Earnings \(ASHE\) - Estimates of the number and proportion of employee jobs with hourly pay below the living wage, by work geography, local authority and parliamentary constituency, UK, April 2017 and April 2018 - Office for National Statistics](#)

<sup>17</sup> DfE – [GCSE attainment and progress 8 scores](#)

<sup>18</sup> LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

<sup>19</sup> LG Inform – [Data and reports | LG Inform \(local.gov.uk\)](#)

<sup>20</sup> IMD 2019 – [English indices of deprivation 2019 - GOV.UK \(www.gov.uk\)](#)

The analysis above highlights that there are no negative impacts which need to be considered or mitigated, as the Council is not looking to reduce the generosity of the scheme.

Furthermore, several of the changes, outlined below, are likely to have a positive impact on specific groups:

- 1) Some of the support payments which are proposed to be disregarded are more likely to impact onto specific groups, such as the Windrush payments, and will result in an increase in CTRS entitlement.
- 2) The expansion of the disability definition, alongside the disregard of Adult Disability Payments, will have a positive impact on the disabled group, who will potentially see an increase in their CTRS entitlement.

### **5b. Intersectionality**

It is not considered that intersectionality will have any negative impacts on any groups, and overall the proposals are only likely to have a positive or neutral impact on resident's CTRS entitlement.

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

The proposed changes will not result in any direct/indirect discrimination for any groups with protected characteristics. The proposals will match changes already made within the national pension-age scheme, meaning that they will support the working-age residents to gain equivalent support in these areas as pension-age residents.

As mentioned previously, some of the changes will provide positive impacts on groups with protected characteristics, which will support the advancement of opportunity for residents affected by these changes. The majority of changes will impact both protected and non-protected groups.

## **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 **Y**

This assessment highlights that there is no potential for adverse impacts and that the proposals are likely to have a positive or neutral impacts on specific groups. The

changes have already been implementing in the pension-age scheme, and this proposal will match the schemes in these areas.

## **7. Ongoing monitoring**

The policy will be monitored by the Benefits Service and will be monitored through the existing CTRS extract, which has been used to inform this assessment. The number of residents affected by this proposal is expected to be low but will be identifiable through the dataset.

The Council is only able to adjust the working-age CTRS scheme once per year, via a full council decision. Therefore, any revisions will need to be considered in consultation with members, a full public consultation and through full council.

### **Date of EQIA monitoring review:**

**30 September 2024**

## **8. Authorisation**

EQIA approved by (Assistant Director/ Director)

Andy Briggs

Date

14 February 2024

## **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.