



Equality Impact Assessment

Name of Project	Council Tax Reduction Scheme for 2018/19	Cabinet meeting date <i>If applicable</i>	14 th November 2017
Service area responsible	Corporate Finance		
Name of completing officer	Oladapo Shonola	Date EqlA created	September 2017
Approved by Director / Assistant Director	Clive Heaphy	Date of approval	

The Equality Act 2010 places a '**General Duty**' on all public bodies to have '**due regard**' to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity between those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Haringey Council also has a '**Specific Duty**' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council's commitment to equality and the responsibilities outlined above, for more information about the Council's commitment to equality; please visit the Council's website.

Stage 1 – Names of those involved in preparing the EqIA		
1. Project Lead	Oladapo Shonola	5.
2. Equalities / HR	Paul Green	6.
3. Legal Advisor	Gina Clarke	7.
4. SSC	Rupinder Shergill / Helen Kent	8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups. Also carry out your preliminary screening (Use the questions in the Step by Step Guide (The screening process) and document your reasoning for deciding whether or not a full EqIA is required. If a full EqIA is required move on to Stage 3.

As per the information contained within the main report, the proposal to maintain the current Council Tax Reduction Scheme into 2018/19, will mean that all working-age non protected claimants will have to pay something towards their Council Tax bill. Pensioners and those in receipt of certain disability benefits will continue to be protected

As detailed in this EQIA, there is mitigation in place for those impacted by the changes, however it is recognised and understood that the reduction of Council Tax Support has had and will continue to have a negative impact on many vulnerable groups. As no change is proposed for 2018/19, it is expected that people will be similarly affected as at present, so we will continue to use existing support mechanisms for our residents, and will seek to build upon these. We will routinely check our progress with those residents who tell us they have difficulty in paying, to ensure that we can come up with the best solution to meet their needs. We note the cumulative impact that may arise alongside other welfare reform changes such as the benefit cap and Local Housing Allowance rate changes which are likely to put additional pressure on vulnerable groups.

The Government guidelines protect pensioners whose entitlement will be maintained at their current rates, hence they are excluded from this EqIA.

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 which the Council would have to have in regards to developing its Council tax Support scheme. These are described in that document as “Vulnerable people – key local authority duties” and 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**

This Equalities Impact Assessment reviews each of these areas in more detail and gives statistics where they are held. Although equalities data is routinely

asked for new applicants, this data is not mandatory and so the information we hold does not give a complete picture of claimants.

For this EqlA, we have used available equality data on claimants on the Council's Revenues and Benefits IT system: I-World. Our records shows that as at September 2017 there are a total of 26,000 households receiving Council Tax Support, of which 11,300 are not protected and as a result have an amount to pay.

Approximately 58% are pensioners or in receipt of certain disability premiums and as such will continue to receive the same level of support as they did previously. Approximately 25% of current claimants receive support for Council Tax payments capped at 80.2%. Families are particularly affected with almost 24% having at least one dependent under 16.

The table at Appendix A shows the available breakdown of claimants as at September 2017.

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 Revenues and Benefits IT system as they do not form part of the application criteria. Prior to the Equality Act 2010, these characteristics were not covered by public sector equality duty, hence there was no requirement to record them in the system and as a result, no historical data exists relating to them. This data is routinely asked for as part of the new application processes, however it is not mandatory.

Although the full extent of the impact of the proposed scheme on individuals with these characteristics is not able to be fully shown in this EqlA, we have been able to make estimates of impact and proposed mitigation.

Recorded unprotected characteristics

This EqlA also covers the impact on claimants with dependents, lone parents, economically inactive claimants and a comparison of impact between the east and the west of the borough.

Our analysis shows that of the claimants most likely to be impacted by the continuation of the scheme:

- 48% are in the 25-44 age group
- 42% are in the 45-59 age group
- 7% have 3 or more dependents
- 56% of claimants' have children aged 0-16
- 37% are lone parents
- 62% are women

53% of those with ethnicity recorded are non white and 47% white British and other white

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Identify the main sources of the evidence, both quantitative and qualitative, that supports your analysis. This could include for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of recent relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national.

Data Source (include link where published)	What does this data include?
This change relates to Haringey residents and not employees.	

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

This section to be completed where there is a change to the service provided

Data Source (include link where published)	What does this data include?
Northgate iWorld Council Tax Reduction Analysis tool. This data is shown in this document as Appendix A	Age, Disability, Gender, Ethnicity, responsibility for children

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex		More women (62%) will be affected than men.	4,194 Lone parents are impacted by the scheme, the majority of lone parents are women. Lone parents are likely to be disproportionately affected by any changes to the scheme as they are on a low income and may already be impacted by other welfare reform changes.	
Gender Reassignment				No data is available as this information is not collected as part of the CTRS application process.
Age	Pensioners will be protected.	Working age claimants will be affected, mostly within the age range		

		25-44 with 48%, followed by the age range 45 – 59, with 42%		
Disability	<p>Disabled people will continue to be protected from any proposed changes if they are in receipt of certain disability related benefits.</p> <p>26% of recipients of CTRS are in receipt of these disability related benefits</p>		There are no plans to change the protection for disabled people	
Race & Ethnicity		Of the information we hold, it appears that non white British would be most affected (53%)	Of the information we hold, 47% of CTR recipients are either white British or white (other)	The data does not reflect the complete picture as this information is not a mandatory part of the application process.
Sexual Orientation				No data is available as this information is not collected as part of the CTRS application process.
Religion or Belief (or No Belief)				No data is available as this information is not collected as part of the CTRS application process.
Pregnancy & Maternity			Although this data is not collected as part of the CTRS application process, we have used the information we hold to make an estimate of the likely impact. 1,016 claimants impacted by the scheme have a child under 1.	

Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))				No data is available as this information is not collected as part of the CTRS application process.
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**Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups:
Positive and negative impacts identified will need to form part of your action plan.**

	Positive	Negative	Details	None – why?
Sex				Employees not affected
Gender Reassignment				Employees not affected
Age				Employees not affected
Disability				Employees not affected
Race & Ethnicity				Employees not affected
Sexual Orientation				Employees not affected
Religion or Belief (or No Belief)				Employees not affected
Pregnancy & Maternity				Employees not affected
Marriage and Civil Partnership				Employees not affected

Stage 6 - Initial Impact analysis	Actions to mitigate, advance equality or fill gaps in information
Protected characteristic: Age	
<ul style="list-style-type: none"> 48% of claimants (excluding pensioners and those in receipt of certain disability premiums) are aged 25-44 42% of claimants (excluding pensioners and those in receipt of certain disability premiums) are aged 45-59 56% of people who will be affected by the continuation of the scheme have children under the age of 16. If unemployed or on low income their households would be exposed to additional financial pressures as a result to the changes. It could also impact adversely on child poverty 	<ul style="list-style-type: none"> Pensioners are protected from these changes so will not see any amendment in their current entitlement When calculating entitlement, all premiums, disregards and applicable amounts remain the same: <ul style="list-style-type: none"> ➤ Premiums are included in the Applicable Amount for all claimants where there are dependent children or qualifying young persons in the household. ➤ Capital belonging to a child or qualifying young person is fully disregarded ➤ Child Benefit and maintenance payments in respect of a child or qualifying young person are fully disregarded ➤ Child care costs are disregarded where appropriate ➤ More generous Applicable Amounts for 'non-passported', working-age and pensioner lone parents are given ➤ There is no change to the level of non-dependant deduction amounts. ➤ There is no change to the application of the deduction exemption for non-dependant students ➤ There is no change to Second Adult Rebate

	<ul style="list-style-type: none"> It is recognised that certain people may find it difficult to find work due to their age; they will continue to be signposted to employment and re-skilling programmes that provide targeted support to find work. These include focused training provided by Haringey Adult Learning Services, CONEL and other Haringey based providers. Where people have been affected by multiple welfare reform changes, they will continue to receive individual assistance including one-to-one interviews with colleagues from Housing Services and JobCentrePlus and direct referrals to support providers such as Money Advice Service or the Quaker Social Action Group.
Protected characteristic: Sex (formerly gender)	
<ul style="list-style-type: none"> Both sexes will continue to be subject to the same rate of reduction in support and to the same rule changes. However the majority of claimants who will be affected are female. 	<p>Female claimants will continue to be signposted to the various appropriate women specific employment and skills development initiatives in the borough, in addition to generic programmes to help people into work e.g. Haringey Adult Learning Services (HALS) and the College of North East London (CONEL)</p> <p>Where appropriate there will continue to be targeted signposting in place for local groups offering support that is gender specific such as Supamums, Jan Trust and Skills and Training Network</p>
Protected characteristic: Disability (includes people in receipt of Disability Living Allowance, Personal Independence Payment, Severe Disablement Allowance and Higher Rate Incapacity Benefit and Chronically Sick Disabled Persons Act duty)	
<ul style="list-style-type: none"> 26% of claimants are receiving a disability related benefit. 	<p>During the consultation period for the 2013/14 scheme, respondents were asked if there was any group that they felt should be protected in addition to pensioners. The majority wanted disabled claimants to be protected and this was agreed by Full Council for the 2013/14 scheme and remained unchanged since. It is recommended that this protection continue for the 2018/19 scheme.</p> <p>Those in receipt of one or more of the following disability benefits will have their entitlement maintained at its current rate:</p> <ul style="list-style-type: none"> Attendance Allowance Constant Attendance Allowance DLA - Care component (lower or middle or higher rate) DLA – Mobility component PIP – Daily living component PIP – Mobility component Exceptionally Severe Disablement Allowance Long Term Rate Incapacity Benefit Mobility Allowance Mobility Supplement Severe Disablement Allowance WTC – Disability element

Protected characteristic: Race (formerly ethnicity)	
<ul style="list-style-type: none"> Of those who declared their ethnicity, 53% are Black and Minority Ethnic groups combined; 47% are White British and Other White category 	<p>Claimants will continue to be signposted to employment and skills training programmes to enhance employment opportunities, especially in the east of the Borough where there is a high concentration of BMEs and high levels of deprivation.</p> <p>Relationships have been built with local JobCentrePlus sites where claimants can receive information about opportunities relating to both employment and skills development. There is also access to budgeting loans to help with any work related costs (such as clothing or equipment). These will continue going forward.</p>
Protected characteristic: Pregnancy and maternity	
<p>We do not collect information about claimants' maternity status so the full impact on this characteristic is not known, however we have used the data we hold to make an estimate of the impact.</p> <p>Our records show that 1,016 claimants (9%) have children under one, as such we can assume this group of people will have been impacted by maternity leave.</p>	<ul style="list-style-type: none"> In support of the Government's initiative to promote working, provisions will continue to apply for 'non-passported' working-age claimants to delay/reduce the impact of stopping work as a result of pregnancy, maternity or paternity leave. Child care cost disregards will continue to apply where appropriate. The Government's "Healthy Start" scheme provides vouchers to pregnant women and those with children under four which can be exchanged for food, fruit and formula milk. Haringey has a number of Children Centres located across the borough bringing together a range of services such as childcare, family support, health and education and information on local services. Women who are pregnant or on maternity leave are unable to work for a set period of time and are likely to be in receipt of statutory maternity pay which may help to supplement their income. <p>Where appropriate there will continue to be targeted signposting in place for those needing support with children such as the Child Poverty Action Group (CPAG), Family Action Group and referrals to the Sure Start Maternity Grant department of the DWP.</p>
Protected characteristic: Marriage & Civil Partnership	
<p>We do not collect detailed information about claimants' marriage and civil partnership status so the full impact on this characteristic is not known, however we have used the data we hold to make an estimate of the impact.</p> <p>10% of claimants (excluding pensioners and those in receipt of certain disability premiums) have a partner</p>	<p>We will assist all customers who are facing difficulty in paying, by offering to try to alleviate any financial difficulties they may have. We hold drop-in sessions with people concerned about their ability to pay. We make extended arrangements to pay off the balance, extending into the following year if need be. We have utilised other methods of collection, such as payment direct from state benefits. We have signposted people to other sources of advice where impartial advice can be provided.</p>
Child poverty	
<ul style="list-style-type: none"> Approximately 36% of Haringey children are living in poverty (DWP 2014). High risk groups include children in workless families; children in families with 4 or more children; children in single parent families; children of teenage mothers and BME children (national data shows that poverty rates are 	<p>Child Poverty will be addressed through the Haringey 54,000 Programme with outcomes which include:</p> <ul style="list-style-type: none"> Ensuring all children in Haringey are safe and that they thrive and achieve. Ensuring families can access a high quality educational offer. Promoting resilient families by acting as a catalyst for a wide selection of high quality universal or targeted borough-based child and family activities.

<p>higher for all BME groups than for white families)</p> <ul style="list-style-type: none"> • Our records show that 3,008 CTRS claimants (27%) have children under five 	<ul style="list-style-type: none"> • Providing high quality safeguarding. <p>It is recognised that there is a need to focus efforts on addressing child needs in a different way and Haringey departments are working on inclusive strategies that look to address this.</p>
Households with dependent children	
<ul style="list-style-type: none"> • Over 32% of households have at least one child. • 7% of claimants have 3 or more dependents • Approximately 37% of affected claimant households are lone parents, most of whom are female. 	<p>In addition to the Child Poverty mitigation set out above, when calculating entitlement, all premiums, disregards and applicable amounts remain the same:</p> <ul style="list-style-type: none"> ➤ Premiums are included in the Applicable Amount for all claimants where there are dependent children or qualifying young persons in the household. ➤ There will be no change to the applicable amount for 'non-passported' working-age (and pensioner) claimants which includes Premiums based on household composition as well as an additional Family Premium with more generous rates for lone parents and the disabled ➤ Capital belonging to a child or qualifying young person is fully disregarded ➤ Child Benefit and maintenance payments in respect of a child or qualifying young person are fully disregarded ➤ Child care costs are disregarded where appropriate ➤ More generous Applicable Amounts for 'non-passported', working-age and pensioner lone parents are given ➤ There is no change to the level of non-dependant deduction amounts. ➤ There is no change to the application of the deduction exemption for non-dependant students ➤ Protection from non-dependant deductions where Attendance Allowance and the Care Component of PIP are received by the claimant/partner(s) will continue. ➤ There is no change to Second Adult Rebate ➤ In support of the Government's initiative to promote working, provisions will continue to apply for 'non-passported' working-age claimants to delay/reduce the impact of stopping work as a result of pregnancy, maternity or paternity leave.
Unemployed (on maximum CTR entitlement)	
<p>The continuation of the scheme will impact more on claimants who are currently not in work and claim maximum CTRS, this constitutes approximately 60%.</p>	<p>We will work with unemployed and people on low income to try to alleviate any financial difficulties they may have. We hold drop-in sessions with people concerned about their ability to pay. We make extended arrangements to pay off the balance, extending into the current year if need be. We have utilised other methods of collection, such as payment direct from state benefits. We have signposted people to other sources of advice where impartial advice can be provided. We encourage customers through Council employment and regeneration strategies and plans. The Tottenham Regeneration Programme is one of the core focuses of the Corporate Plan. It has people as its main objective focusing on job creation and the skilling of local people to enable them take up job opportunities.</p> <p>Claimants will continue to be signposted to employment and skills training programmes to enhance their</p>

	employment opportunities.
Claimants by area of residence (east/west of the borough)	
<ul style="list-style-type: none"> Census records show 67% of affected claimants reside in the east of the borough. The high levels of claimants in the east correlate strongly with areas of multiple deprivation, most acute in the north-east of the borough. 	Assistance for the unemployed and people on low income will continue to be addressed through various employment and regeneration strategies and plans. The Tottenham Regeneration Programme is one of the core focuses of the Haringey Corporate Plan. It has people as its main objective, focusing on job creation and the skilling of local people to enable them take up job opportunities. Through these strategies and plans the Council aims to tackle unemployment and worklessness especially in the more deprived east of the borough.
Homelessness	
<p>Of those accepted as being unintentionally homeless and being in priority housing need in 2013/14:</p> <ul style="list-style-type: none"> 40% were young people aged 16 – 30; 43% were Black or Black British; Just over 63% were lone female parents <p>Source: Haringey Council P1E returns</p>	<p>The requirement to pay Council Tax and therefore the ability to be eligible for Council Tax support is less prominent with this vulnerable group. However, it is recognised that this group will be disadvantaged by the other Welfare Reform changes.</p> <p>Haringey's Corporate Plan has the reduction and prevention of homelessness as a key priority objective with targets set against temporary accommodation placements and homelessness acceptances.</p> <p>Where appropriate there will continue to be targeted signposting in place for those presenting as homeless including organisations such as Crisis, No Second Night Out, Centrepoin, Alone in London, Causeway and CARIS (Christian Action and Response in Society). There has also been close working with the local Foodbanks in terms of physical support (assisting with shifts / managing donations) and claimant referrals, this will continue going forward.</p>
Armed Forces Covenant - war pension and Armed Forces Compensation payment	
<ul style="list-style-type: none"> 14 people in Haringey are in receipt of war disablement pension and are protected under the scheme. 	Income received from a war pension will continue to be disregarded when calculating entitlement
Welfare Reform Issues	
<p>Many claimants of Council Tax Support are reliant on state benefits. The future of many benefits is under threat from the Governments stated requirement to cut £12 billion from the national welfare bill.</p> <p>Starting in 2016, there are plans to reduce Tax Credit thresholds, thus reducing the amount of Tax Credit due to claimants.</p> <p>Other changes will begin to take effect from April 2017 and later.</p>	<p>It is recognised and understood that the Government's intent is to lift the poorest off benefits by supporting them into work and various initiative and incentives are in place to move towards this. However the barriers in place relating to unemployment, deprivation, disability and homelessness prevent this move to self reliance and self support.</p> <p>It is not anticipated that these barriers would be immediately removed and claimants achieve self reliance as a result of this scheme. Their removal will form part of longer term plans and programmes aimed at assisting claimants so they become less reliant on benefit support.</p> <p>It is recognised and understood that these changes will have a detrimental affect on individuals and where possible signposting and targeted support will be offered to those in need.</p>

	<p>Although the government has proposed to reduce the level of Tax Credits paid from April 2016, we do not propose to change our scheme to say that these customers now need less money to live on. This means that no one will have to pay more than the existing 19.8% contribution towards their Council Tax. However, customers may have more difficulty in paying the 19.8% contribution, as they will have less family income to live on. We shall continue to support all customers who tell us that they will have difficulty in paying, by offering longer payment periods, and signposting to services which can help them find a way out of poverty.</p>
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Stage 7 - Consultation and follow up data from actions set above	
Data Source (include link where published)	What does this data include?
	<p>Prior to the scheme being approved by Full Council in January 2013, public consultation took place between 22 August and 19 November 2012, the outcomes of which were fed into the final scheme.</p> <p>As the scheme is not changing for 2018/19 there is no requirement to re-consult.</p> <p>Claimants will be informed with their annual Council Tax bill, that the scheme is continuing without change. The bill will also include information about the different ways to pay and advice about what to do if they think they will have difficulty paying.</p> <p>All Revenues, Benefits and Customer Services staff who deal with claimants either face to face, on the phone or in the Back Office when processing applications have been trained in assisting claimants who tell us they will have difficulty paying. Scripts and IT systems have been appropriately updated.</p> <p>Refresher briefings will be given and will incorporate any other appropriate Welfare Reform updates.</p> <p>All data connected to the Council Tax Reduction Scheme, including collection levels, is reviewed and monitored on a regular basis.</p> <p>The Scheme has to be reviewed each year and monitoring data will always be used to assess whether it should be amended or not.</p>

Stage 8 - Final impact analysis
<p>We recommend that the Council Tax Reduction Scheme continues unchanged for 2018/19. In addition to protection for pensioners, it is recommended that the scheme continues to protect claimants in receipt of specified disability benefits.</p>

We cannot afford to further protect any other claimants.

Around 42% of Council Tax Reduction claimants will be expected to pay towards their Council Tax – an average of £8.71 per claimant per week. The Council is under severe financial pressure and unable to further fund changes to the Council Tax Reduction Scheme.

Actions are in place to reduce possible hardship to working age claimants and families with dependents. We will make arrangements to extend the payment period, and reduce payment amounts where possible. We will signpost affected customers to services which can best assist them to help themselves out of financial difficulty. We also plan to undertake significant analysis of the effect of welfare reform and debt on our community, which will in future enable us to better support our residents. This is consistent with government intentions that people dependent on state benefits are assisted towards work, and making work pay.

We will continue to monitor the impact of the scheme in terms of individual hardship and collection rates, and where necessary make arrangements which meet the needs of the individuals yet achieve collection objectives.

These actions will be owned by the Head of Revenues and the Assistant Director, Shared Services and will be reviewed regularly

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council's policy.

Appendix A

Category	All Council Tax Reduction Scheme claimants	Impacted by Scheme (excluding pensioners and those in receipt of certain disability premiums)	% All Council Tax Reduction Scheme claimants	% Impacted by Scheme (excluding pensioners and those in receipt of certain disability premiums)	Borough of Haringey (where applicable)
Households	26,927	11,290	100%	42%	116,900
Claimant Age					Mid-yr estimate 2016
18-24	410	359	2%	3%	9%
25-44	7,177	5,431	27%	48%	38%
45-59	8,739	4,752	32%	42%	18%
60-64	2,016	731	7%	6%	4%
65+	8,583	17	32%	0%	9%
Dependents Age					Mid-yr estimate 2016
Those with dependants aged 1 and under	1,442	1,016	5%	9%	
Those with dependants aged 5 and under	3,463	3,008	13%	27%	
Those with dependants aged under 16	8,014	6,268	30%	56%	21%
Those with more than 3 dependants	951	747	3%	7%	
Count of all lone parents with dependants	5,318	4,194	20%	37%	10% (Census 2001)
Disability (based on modelling tool which counts claimants who had been awarded a disability premium as at September 2017)					Nomis (Feb 2014)
No	20,002	11,290	74%	100%	97%
Yes	6,925		26%		3%
Gender					Mid-yr estimate 2016
Male	10,629	3,988	39%	35%	50%
Female	15,658	6,986	58%	62%	50%
Unknown	640	316	Excluded (2%)	Excluded (3%)	
Ethnicity	(12,000 records had an ethnicity recorded in the 2011 Census)				Census 2011
White British	990	455	4%	4%	35%
Other White	1,285	667	5%	6%	23%
Non White	2,160	1,288	8%	11%	42%
Unknown	22,492	8,879	Excluded (83%)	Excluded (79%)	

* Source: i-World (Revenue and Benefits IT system) September 2017