

Equality Impact Assessment (EIA)

Document control

Title of activity:	Proposal to amend the Council Tax Support Scheme 2019
Type of activity:	This is a scheme which provides assistance to people on low incomes to help them pay their Council Tax.
Lead officer:	Chris Henry, Head of Council Tax & Benefits, Exchequer & Transactional Services, oneSource
Approved by:	Sarah Bryant, Director of Exchequer & Transactional Services
Date completed:	November 2018
Scheduled date for review:	June 2019

Did you seek advice from the Corporate Policy & Diversity team?	Yes
Does the EIA contain any confidential or exempt information that would prevent you publishing it on the Council's website?	No

1. Equality Impact Assessment Checklist

The Equality Impact Assessment (EIA) is a tool to ensure that your activity meets the needs of individuals and groups that use your service. It also helps the Council to meet its legal obligation under the [Equality Act 2010 and the Public Sector Equality Duty](#).

Please complete the following checklist to determine whether or not you will need to complete an EIA. Please ensure you keep this section for your audit trail. If you have any questions, please contact the Corporate Policy and Diversity Team at diversity@havering.gov.uk

About your activity

1	Title of activity	Proposal to amend the Council Tax Support Scheme 2019
2	Type of activity	This is a scheme which provides assistance to people on low incomes to help them pay their Council Tax.
3	Scope of activity	<p>Many people on low incomes can get Council Tax Support to help them pay their Council Tax bills. The Council Tax Support Scheme is funded by Central and local Government.</p> <p>The Council needs to address a £37million budget gap that remains over the next four years which has arisen through reduced Government funding, increasing costs and a growing and ageing population. The Council is developing a range of proposals to close the budget gap for the next two years and a review of the CTS scheme forms part of these proposals.</p> <p>The proposed scheme will continue to protect pensioners by law who will get the same level of council tax support as they do now.</p> <p>The proposals for 2019/20 are to:</p> <ul style="list-style-type: none"> • Increase the current Council Tax Support reduction for non- vulnerable working age claimants from 15% to 25%. This means that every non- vulnerable working age household would have to pay a minimum charge of 25% of their Council Tax Bill. This is an additional £2.20 per week in Council Tax. • Increase the current Council Tax Support reduction for vulnerable working age claimants from 15% to 20%. This means that every vulnerable working age household would have to pay a minimum

		charge of 20% of their Council Tax Bill. This is an additional £1.15 per week in Council Tax.
4a	Is the activity new or changing?	Yes – changing
4b	Is the activity likely to have an impact on individuals or groups?	Yes
5	If you answered yes:	

Completed by:	Chris Henry, Head of Council Tax & Benefits
Date:	September 2018

2. Equality Impact Assessment

Background/context:

The Council proposes to amend the Council Tax Support (CTS) Scheme from April 2019. The scheme provides assistance to people on low incomes to help them pay their Council Tax.

The Council needs to make savings in order to balance its budget due to reductions in government grant, increasing costs and a growing and ageing population.

The CTS grant has been rolled into the Settlement Funding Allocation which has been reduced in 18/19 as part of the core funding reduction.

To balance the budget, the Council needs to **save** money by reducing running costs, and/or **raise** money by increasing income, most obviously through the Council Tax. The Council is developing a range of proposals to close the budget gap for the next two years and a review of the CTS scheme forms part of these proposals. .

The Council will consult on various options including which service to protect and which to reduce and whether residents think there any other realistic options available to manage the budget gap on the Council Tax Support Scheme that would produce a reasonable outcome, having regard to the needs of residents and the Council's budget position.

The proposed scheme will continue to protect pensioners who will get the same level of Council Tax Support as they do now.

The proposals for 2019/20 are to:

- Increase the current Council Tax Support reduction for working age claimants without disabilities from 15% to 25%. This means that every working age household without disabilities would have to pay a minimum charge of 25% of their Council Tax Bill.
- Increase the current Council Tax Support reduction for working age claimants with disabilities from 15% to 20%. This means that every working age household with disabilities would have to pay a minimum charge of 20% of their Council Tax Bill.

At any one time, approximately 9,000 working-age claimants are in receipt of Council Tax Support. Our proposals are based on reducing the amount of CTS received by working age people.

Working age disabled claimants are defined as people who have a disability income that

entitles them to one of the following premiums: disability, severe disability, enhanced disability, disabled child and/or carer when calculating their benefit.

To contextualise the changes, all working age claimants without disabilities (approx. 5,500) will be affected by increasing the 15% reduction to 25%.

All working age claimants with disabilities (approx. 3,400) will be affected by increasing the 15% reduction to 20%.

The proposed changes will have a disproportionate impact on low income working age households because Council Tax Support is designed for low income working age households.

The proposals to change the current CTS Scheme to help bridge the funding gap was subject to a nine week consultation, and have been part of a wider package of proposals.

All 9,000 working-age CTS claimants will be contacted and invited to share their views, along with the wider public by commenting on the Council's proposals via an online survey.

<u>Council Tax Support Case Group Descriptions</u>	<u>Count</u>
Elderly - Non-Passported - Carer	138
Elderly - Non-Passported - Child Under 5	0
Elderly - Non-Passported - Enhanced Disability	0
Elderly - Non-Passported - Family Premium	2
Elderly - Non-Passported - Family Premium - 1 Child	6
Elderly - Non-Passported - Family Premium - 2 Child	1
Elderly - Non-Passported - Family Premium - 4 Child	1
Elderly - Non-Passported - Non Dependant	335
Elderly - Non-Passported - Other	1692
Elderly - Non-Passported - Severe Disability	396
Elderly - Non-Passported - War Pensioners	15
Elderly - Non-Passported - Working	84
Elderly - Passported - Carer	164
Elderly - Passported - Child Under 5	1
Elderly - Passported - Enhanced Disability	0
Elderly - Passported - Family Premium	5
Elderly - Passported - Family Premium - 1 Child	14
Elderly - Passported - Family Premium - 2 Child	4
Elderly - Passported - Family Premium - 3 Child	1
Elderly - Passported - Family Premium - 4 Child	0
Elderly - Passported - Non Dependant	435
Elderly - Passported - Other	2085
Elderly - Passported - Severe Disability	835
Elderly - Passported - Working	18

TOTAL (Elderly) = 6232 (41%)	
Working Age - Non-Passported - Carer	121
Working Age - Non-Passported - Child Under 5	351
Working Age - Non-Passported - Disability	96
Working Age - Non-Passported - Disabled Child Premium	39
Working Age - Non-Passported - Enhanced Disability	229
Working Age - Non-Passported - Family Premium	90
Working Age - Non-Passported - Family Premium - 1 Child	627
Working Age - Non-Passported - Family Premium - 2 Child	465
Working Age - Non-Passported - Family Premium - 3 Child	183
Working Age - Non-Passported - Family Premium - 4 Child	52
Working Age - Non-Passported - Family Premium - 5 and above	5
Working Age - Non-Passported - Lone Parent Child Under 5	432
Working Age - Non-Passported - Non Dependant	39
Working Age - Non-Passported - Other	165
Working Age - Non-Passported - Severe Disability	153
Working Age - Non-Passported - War Pensioners	3
Working Age - Non-Passported - Working	382
Working Age - Passported - Carer	475
Working Age - Passported - Child Under 5	73
Working Age - Passported - Disability	159
Working Age - Passported - Disabled Child Premium	21
Working Age - Passported - Enhanced Disability	1195
Working Age - Passported - Family Premium	66
Working Age - Passported - Family Premium - 1 Child	376
Working Age - Passported - Family Premium - 2 Child	181
Working Age - Passported - Family Premium - 3 Child	49
Working Age - Passported - Family Premium - 4 Child	13
Working Age - Passported - Family Premium - 5 and Above	2
Working Age - Passported - Lone Parent Child Under 5	815
Working Age - Passported - Non Dependant	239
Working Age - Passported - Other	836
Working Age - Passported - Severe Disability	935
Working Age - Passported - Working	44
TOTAL (Working Age) = 8,911 (59%)	
Grand Total Working Age & Elderly)	15143

Age: Consider the full range of age groups	
<i>Please tick (✓) the relevant box:</i>	
Positive	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input checked="" type="checkbox"/>
Overall impact:	
The proposed changes will impact negatively on working age Council Tax Support claimants. However, based on the findings from other London authorities who have implemented the same or higher reductions, we do not anticipate the impact to be significant.	
This proposal would mean working age claimants without disabilities	

	<p>would have an estimated additional £2.20 per week to pay in Council Tax. Working age claimants with disabilities would have an estimated additional £1.15 per week to pay in Council Tax.</p> <p>However, within the scope of the 2019 scheme, there is a Council Tax Discretionary policy to enable the Council to consider cases of hardship which will help mitigate any negative impacts.</p> <p>Pension age claimants (currently men and women aged 62½ and over) will not be affected by the change.</p>
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Evidence:

At present approximately 59% of Council Tax Support claimants are working age and 41% are pension age.

For comparison, the working age population (18 – 64 years) in Havering is 76% and the pension age population (65 and over) is 24%.

The proposed changes mean that all working age Council Tax Support claimants not considered disabled for the purposes of the scheme will have to pay at least 25% towards their Council Tax and all working age Council Tax Support claimants considered disabled for the purposes of the scheme will have to pay at least 20% towards their Council Tax.

Sources used:

Council Tax Support caseload data
Demographic, Diversity and Socio-economic Profile of Havering’s Population March 2017
Havering Data Intelligence Hub
Office of National Statistics (ONS)

Disability: Consider the full range of disabilities; including physical mental, sensory and progressive conditions	
<i>Please tick (✓) the relevant box:</i>	
Positive	<p>Overall impact:</p> <p>If the proposals are approved, disabled people who are of working age will also be negatively affected. This is because they are disproportionately represented amongst working age claimants who receive a reduction in Council Tax support.</p> <p>However, disabled claimants are partially protected by less of an increase, 5%, extra to pay compared to working age claimants who are not considered disabled for the purposes of the CTS scheme and who will have to pay and extra 10%.</p>
Neutral	
Negative	
	✓

	<p>This takes into account that disabled people are less likely to have the same opportunities and access to work and employment that would improve their financial situation.</p> <p>Support is also in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.</p> <p>Pension age Council Tax Support claimants are not affected by these proposals.</p>
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Evidence:

In terms of Council Tax Support, disabled claimants are defined as people who have a disability income that entitles them to one of the following premiums: disability, severe disability, enhanced disability, disabled child and/or carer when calculating their benefit.

Approximately 23% of working age Council Tax Support claimants meet the above definition compared with 21% of the working age population of Havering.

The Council recognizes the barriers disabled people face and seek to assist address them by disregarding Disability Living Allowance and Attendance Allowance in the calculation of Council Tax Support. This often increases the amount of Council Tax Support a disabled person is entitled to. Havering has also chosen to disregard all Armed Forces compensation income from Veterans and Members of the Armed Forces.

In addition to the above, the Council seeks to maximize Council Tax Support for disabled people by increasing the applicable amount for them through premiums. Currently, there are premiums for severe disability, enhanced disability and a disabled child rate. Such premiums are granted when Council Tax Support applicants receive a relevant disability related benefit granted and administered by the Department of Work & Pensions.

Disabled people are historically disadvantaged and face greater barriers when accessing (information about) services and therefore disabled households are considered to be more vulnerable than other households. Disabled people who are unable to work receive higher levels of state benefits and while based on the proposals they will be subject to the 20% liability reduction, disabled working age claimants are likely to have a higher income than other unemployed, working age claimants whose council tax support will also be reduced.

Sources used:

Council Tax Support caseload data
Demographic, Diversity and Socio-economic Profile of Havering’s Population March 2017
Havering Data Intelligence Hub
Office of National Statistics (ONS)

Sex/gender: Consider both men and women																
<i>Please tick (✓) the relevant box:</i>																
Positive	<p>Overall impact:</p> <p>Due to the fact that only one claim is submitted per household, it is difficult to fully consider the implications the proposals will have on this protected characteristic.</p> <p>However, equalities monitoring indicates that the majority of claims (63%) are made by females (married and single titles) compared with males. We also know that lone parents, part-time workers and carers are more likely to be women.</p> <p>The proposals are therefore considered to have a disproportionate impact on women.</p> <p>Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.</p> <p>The Council has considered the indirect discrimination and the legitimate aim of balancing the budget in the context of significant savings required. We also consider it is proportionate because the Council's budget situation is such that there are no feasible alternatives. Since 2013, Government grant for Council Tax Support was withdrawn and the scheme has been funded by the Council from its own resources.</p> <p>Changes to the Council Tax Support scheme have not been made since 2015. However, since 2015, the Council has increased the Council Tax by more than 1.96% each year.</p>															
Neutral																
Negative ✓																
Evidence:																
Council Tax Support caseload data July 2018:																
<table border="1"> <thead> <tr> <th>Title on claim</th> <th>No.</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Mr Count</td> <td>4,810</td> <td>32%</td> </tr> <tr> <td>Mrs Count</td> <td>4,958</td> <td>33%</td> </tr> <tr> <td>Ms/Miss Count</td> <td>5,224</td> <td>35%</td> </tr> <tr> <td>Other</td> <td>59</td> <td>0%</td> </tr> </tbody> </table>		Title on claim	No.	Percentage	Mr Count	4,810	32%	Mrs Count	4,958	33%	Ms/Miss Count	5,224	35%	Other	59	0%
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Mr Count	4,810	32%														
Mrs Count	4,958	33%														
Ms/Miss Count	5,224	35%														
Other	59	0%														
From the above table it is seen that in total 63% of the household claims are made by women.																

Sources used:

Council Tax Support caseload data
 Demographic, Diversity and Socio-economic Profile of Havering's Population March 2017
 Havering Data Intelligence Hub
 Office of National Statistics (ONS)

Ethnicity/race: Consider the impact on different ethnic groups and nationalities

Please tick (✓)
 the relevant box:

		Overall impact:
Positive		Our data shows that BME claimants are slightly over-represented amongst working age claimants receiving Council Tax Support.
Neutral		There could be a negative impact of the proposals on people from Black and Minority Ethnic (BME) groups. This could imply that BME groups experience more difficulty in finding employment.
Negative	✓	Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.

Evidence:

The tables below show the projected figures for the breakdown of Havering by ethnicity/race and for Benefits claimants where they have supplied this information. The data is difficult to compare due to the different classifications of ethnicity used.

2017 (Havering general population projection)	Number	Percentage of population (%)
All ethnicities	253,478	100.00
White	211,814	83.6
Black Caribbean	3,696	1.5
Black African	10,405	4.1
Black Other	1,510	0.6
Indian	7,405	2.9
Pakistani	2,400	0.9
Bangladeshi	1,883	0.7
Chinese	1,567	0.6
Other Asian	3,652	1.4
Mixed	7,498	3.0
Other	1,648	0.7
<i>BAME¹ Total</i>	<i>41,664</i>	<i>16.4</i>

¹ The GLA define BAME differently to the ONS. The GLA does not include a 'White Other' Group. Instead they have one category 'White' that includes 'White British' and 'White Other'.

Council Tax Support & Housing Benefit Claimants where Equalities information provided

Claimant Population	Number	Percentage of claimants who provided information
White/British	8689	65%
White/Irish	164	1.2%
White/Other	1175	8.7%
White & Black Caribbean	197	1.5%
White & Black African	95	0.7%
White & Asian	56	0.4%
Mixed/Other	110	0.8%
Asian/Asian British Indian	192	1.4%
Asian/Asian British Pakistan	238	1.8%
Asian/Asian British Bangladesh	214	1.6%
Asian/Asian British: Any Other	135	1%
Asian/Other	14	0.1%
Arab	44	0.3%
Black/Black British Caribbean	412	3.1%
Black/Black British African	1160	8.7%
Black/Black British Other	157	1.2%
Chinese	28	0.2%
Gypsy/Traveller	11	0.1%
Other Ethnic Group	228	1.7%
Declined	65	0.5%
Total	13384	100%

From the data provided above, it would appear that there is a disproportionate impact on BME claimants. 83.6% of Havering's population are defined as White, compared to 74.9% of benefit claimants who define themselves as White (including 'White: Other').

Sources used:

Council Tax Support caseload data
 Demographic, Diversity and Socio-economic Profile of Havering's Population March 2017
 Havering Data Intelligence Hub
 Office of National Statistics (ONS)

*

Religion/faith: Consider people from different religions or beliefs including those with no religion or belief

Please tick (✓) the relevant box:

Overall impact:

Positive	<input type="checkbox"/>
Neutral	<input type="checkbox"/>
Negative	<input type="checkbox"/>

Not known

There is no information available to make an assessment on the impact of the proposals on this protected characteristic.

Evidence:
Sources used:

Sexual orientation: Consider people who are heterosexual, lesbian, gay or bisexual	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	Not known
Neutral	There is no information available to make an assessment on the impact of the proposals on this protected characteristic.
Negative	
Evidence:	
Sources used:	

Gender reassignment: Consider people who are seeking, undergoing or have received gender reassignment surgery, as well as people whose gender identity is different from their gender at birth	
<i>Please tick (✓) the relevant box:</i>	Overall impact:
Positive	Not known
Neutral	There is no information available to make an assessment on the impact of the proposals on this protected characteristic.
Negative	
Evidence:	
.	

Sources used:

Marriage/civil partnership: Consider people in a marriage or civil partnership

<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive	<input type="checkbox"/>	Not known
Neutral	<input type="checkbox"/>	There is insufficient information available to make an assessment on the impact of the proposals on this protected characteristic.
Negative	<input type="checkbox"/>	

Evidence:

Sources used:

Pregnancy, maternity and paternity: Consider those who are pregnant and those who are undertaking maternity or paternity leave

<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive	<input type="checkbox"/>	Working mothers on maternity leave and women with caring responsibilities tend to have less income and/or reduced access to the labour market. However, there is insufficient information available to make an assessment on the impact of the proposals on this protected characteristic.
Neutral	<input type="checkbox"/>	
Negative	<input checked="" type="checkbox"/>	It is perceived that there may also be equality implications for parents with young children and babies, particularly lone parents who may experience a negative impact. Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.

Evidence:
Sources used:

Socio-economic status: Consider those who are from low income or financially excluded backgrounds

<i>Please tick (✓) the relevant box:</i>		Overall impact:
Positive		Council Tax Support is a means tested scheme available to households on low incomes. Therefore all recipients would be considered to be at a socio-economic disadvantage, particularly lone parents (most likely to be women), part-time workers (most likely to be women), working-age couples on low income, large households (more likely to be from BME backgrounds) and carers (most likely to be women).
Neutral		
Negative	✓	
		Support is in place through the Council Tax Discretionary policy for those who suffer hardship as a result of these proposals in order to mitigate any negative impacts.
		Pension age Council Tax Support claimants will not be affected and will continue to receive similar levels of support with their council tax bills as they do at present.

Evidence:

Please refer to breakdowns of Council Tax Support claimants available above.

Sources used:

Council Tax Support caseload data
 Demographic, Diversity and Socio-economic Profile of Havering's Population March 2017
 Havering Data Intelligence Hub
 Office of National Statistics (ONS)

Action Plan

In this section you should list the specific actions that set out how you will address any negative equality impacts you have identified in this assessment.

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
All	✓	Consultation on the proposed changes to take place in August & September 2018 and will report the results to Cabinet in January 2019	Individual households will have access to formal appeal and review arrangements should they have complaints or concerns about the assessment criteria and method used to identify the Council Tax Support they need.	January 2019	Chris Henry
All	✓	Monitor implication of change in Council Tax Support.	We will monitor the impact of the changes and take-up of hardship funds as part of our performance and quality checking systems. The performance data collated, including satisfaction surveys and community profile monitoring will form part of regular reporting arrangements to senior management and	February 2019	Debbie Wheatley

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
			members. Citizens' Advice Bureau commissioned to assist provides debt counselling and advice.		
All	✓	The Council Tax Discretionary Policy	The policy is available on the Internet for any claimant struggling to pay their Council Tax. Five applications were received in 2017/18, 2 were awarded a discretionary payment, two were assisted by other welfare benefits and the remaining claimant failed to provide information on request however, did remit the balance of the Council Tax due for 2017/18.		
All	✓	All affected CTS applicants to be contacted in advance to advise of change if agreed prior to annual billing	Customers will have time to adjust and make appropriate payment arrangements. The Council Tax Service will consider more lenient payment plans that allow CTS claimants additional time to pay.	April 2019	Rav Nizzer

Protected characteristic	Identified negative impact	Action taken to mitigate impact*	Outcomes and monitoring**	Timescale	Lead officer
Disability	✓	“Removing the Barrier”	<p>This is a practical event planned for International Day of the Disabled Person to engage with and advance the rights and wellbeing of persons with disabilities.</p> <p>The agenda will include public Speakers, open forum discussions and opportunities to develop and contribute local policy.</p>	December 2018	Vernal Scott

Review

The EIA will be reviewed at bi-annual intervals.